

# ICMI Transportation Verification Protocol (Revision June 2021)

Summary Audit Report

## Alaska West Express

2023 Re-Certification Audit



Submitted to:

The International Cyanide Management Institute  
1400 I Street, NW – Suite 550  
Washington, DC 20005  
USA

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## Operation General Information

<b>Name and Location of Operation Audited:</b>	Alaska West Express Inc. Fairbanks Terminal 1095 Sanduri St Fairbanks AK 99701  Tacoma Terminal 2902 Taylor Way Tacoma WA 98421
<b>Audit Scope:</b>	Sodium cyanide truck transportation and interim storage in Fairbanks, Alaska and truck transportation dispatched from Tacoma, Washington.
<b>Names and contact information for this facility:</b>	Tyler Bones Director of HSSE <a href="mailto:tbones@awe.lynden.com">tbones@awe.lynden.com</a> (907) 328-4332 office

## Location detail and description of operation

Alaska West Express (AWE) was established by Lynden in 1978 to haul bulk commodities and is still part of the Lynden family of companies. AWE provides truckload transportation throughout the United States and Canada, specializing in shipments to and from Alaska, especially the transport of liquid- and dry-bulk products, hazardous and non-hazardous chemicals, and petroleum products.

AWE has operations in Anchorage, Fairbanks, and Prudhoe Bay, Alaska, as well as Tacoma, Washington. The AWE Fairbanks and Tacoma Terminals are the only AWE terminals that manage cyanide and were therefore the only two terminals included in the scope of this re-certification audit.

AWE became a Signatory to the International Cyanide Management Institute (ICMI) Cyanide Code in 2012. AWE has been continuously audited and found to be compliant to the Cyanide Code since its original audit as part of a supply chain certification in 2010.

The Fairbanks Terminal is specialized in transporting commodities and equipment to mining customers in the region. The terminal receives intermodal containers, which are shipped from points in the U.S. to the Port of Whittier, Alaska. The intermodal containers are delivered directly into the AWE Terminal on a rail spur. AWE offloads the intermodal containers, stores them in a secure yard, and transports the containers to mining customers when requested to do so.

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The Tacoma Terminal provides dray services to and from rail yards in Seattle, Washington to the port in Seattle. There is no storage of any cargo at the Tacoma Terminal.

The Health, Safety, Security, and Environmental (HSSE) program and maintenance programs are centrally managed at AWE. The company maintains extensive procedures, plans, and computerized systems to ensure that operations at all locations conform to the same HSSE and equipment maintenance standards. The HSSE Manager and Maintenance Manager have responsibility, accountability, and authority over all HSSE and equipment maintenance aspects of operations at all AWE locations.

## Audit Implementation

The audit was conducted according to the current ICMI Cyanide Transportation Protocol (June 2021). The audit was performed by an independent third-party auditor who was pre-approved by the ICMI as a Lead Auditor for all types of International Cyanide Management Code (Cyanide Code) audits and as a technical expert for Cyanide Code audits of cyanide transportation and production operations.

AWE cyanide transportation management practices were evaluated against the Cyanide Code requirements, as documented in the ICMI Cyanide Transportation Verification Protocol. AWE internal policies, procedures, and practices were reviewed. The audit was conducted through discussions and interviews with AWE personnel at the Fairbanks and Tacoma Terminals. Transportation equipment and operations at each terminal were observed during the audit.

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## Auditor's Finding

Alaska West Express Fairbanks and Tacoma-based cyanide transportation practices were evaluated for Cyanide Code compliance using the 2021 version of the *ICMI Cyanide Transportation Verification Protocol*. Alaska West Express internal standards, policies, practices, and procedures regarding the management of the cyanide transportation operations were reviewed.

The auditor found that the overall level of preparedness and understanding of ICMI Cyanide Code requirements was very good. Management systems upon which the operation is based are mature, and requested records were readily available for review.

The results of this re-certification audit demonstrated that Alaska West Express cyanide-related transportation activities are in **FULL COMPLIANCE** with International Cyanide Management Code requirements.

## Compliance Statement

This operation has not experienced any compliance issues, cyanide exposure, or cyanide spill incidents during the re-certification period.

## Auditor Information

<b>Audit Company:</b>	CN Auditing Group <a href="http://www.cnauditing.com">www.cnauditing.com</a>
<b>Lead / Technical Auditor:</b>	Ralf Jurczyk E-mail: <a href="mailto:rj@cnauditing.com">rj@cnauditing.com</a>
<b>Dates of Audit:</b>	1/16-1/18/2023

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### Auditor Attestation

I attest that I meet the criteria for knowledge, experience, and conflict of interest for a Cyanide Code Certification Lead Auditor, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Certification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the re-certification audit. I further attest that the re-certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code *Cyanide Transportation Verification Protocol* and using standard and accepted practices for health, safety, and environmental audits.

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## Principles and Standards of Practice - Cyanide Transportation Verification Protocol

### Principle 1 | TRANSPORT

Transport cyanide in a manner that minimizes the potential for accidents and releases.

#### Transport Practice 1.1

##### Select cyanide transport routes to minimize the potential for accidents and releases.

Alaska West Express (AWE) maintains a documented procedure for the evaluation of routes used to transport cyanide. The procedure is entitled "Procedure for Establishing a New Route for Sodium Cyanide". The procedure applies to the route planning at both the Fairbanks and Tacoma Terminals. The Director Health, Safety, Security, and Environment (HSSE) performs the route planning and leads the evaluation of risk process to minimize the potential for and potential impacts of accidents and releases. Periodic reviews of the route plans are performed as the drivers give feedback about route conditions.

The procedure also calls for a review with the driver who tested the route and a re-review of the route at least every three years, or as necessary. The procedure and the resulting risk evaluation records for both terminals were evaluated during the audit and were found to be acceptable.

According to interviews and review of route evaluation records, all cyanide delivery routes for both terminals have been evaluated or re-evaluated during the re-certification period to determine if comparable routes would be available that would reduce the risks associated with proximity to high population densities, poor road infrastructure (sharp turns), pitch & grade, alternative roads, proximity to water bodies, and prevalence and likelihood of poor weather and resulting poor driving conditions. Routing considerations were found to be consistent with those required by the Code.

The risks associated with each of the routes (grade, traffic patterns, proximity to water, etc.) were evaluated and are detailed in the "Procedure for Establishing a New Route for Sodium Cyanide" where there is a section entitled Special Considerations to include alternate routes. The necessary risk mitigation measures for each route are also detailed in the procedure.

Section 4 of the "Procedure for Establishing a New Route for Sodium Cyanide" calls for a review to be held between the dispatcher and drivers who are returning from a cyanide delivery. The procedure also calls for each route to be re-evaluated at least every three years. Records were available to demonstrate that both Tacoma-area and Fairfax-area routes were re-evaluated during the recertification period.

Interviews confirmed that drivers report any problems with the routes, such as road construction, to their dispatcher. The routes currently in use call for a dray move in Tacoma that is less than 10 miles, a mine delivery that is 24 miles away from the Fairbanks Terminal, and an approximately 140-mile move to another mine outside of Fairbanks. There have been no significant changes in

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the routes for either of the terminals during the recertification period.

The route planning procedure and the need for driver feedback was well understood by personnel at both terminals. AWE also has a documented process for holding regularly scheduled safety meetings each week at which drivers are invited to share safety-related feedback regarding operations and the routes.

The risks associated with each of the routes (grade, traffic patterns, proximity to water, etc.) and all special considerations for a specific route are detailed in the individual route plans that are established for each route. The necessary risk mitigation measures for each route are also detailed in these route plans. All drivers are trained on the procedure. Risk mitigation measures such as special training, call-in procedures every 5 miles to the mine security team, and specific poor-weather emergency equipment are detailed in the mine and AWE procedures for this route.

Tacoma - Route plans and risk evaluations were available for the Seattle Union Pacific (UP) rail head to Seattle Port routes. The primary risk is highly populated and congested areas. There is also one bridge crossing that cannot be avoided. Drivers are trained in defensive driving skills; deliveries are made during daylight hours (the hours of operation at the port) using roadways that are approved by the United States (U.S.) Government for the transportation of hazardous materials.

AWE seeks input from the community through their involvement in local emergency response organizations. For Fairbanks, local emergency response agencies are invited to all training provided by AWE throughout the state of Alaska. Records were available to show engagement with local governments, communities, and emergency responders in 2021 and 2022. The AWE Director HSSE is a member of several emergency response organizations including the Fairbanks Local Emergency Planning Committee (LEPC) and the Borough-wide HazMat Response Team.

For Tacoma, there are no restrictions in the port area where the routes are located. Lynden Corporate Safety Director participates in emergency response planning for the Port of Seattle and would inform AWE in the event there are any community concerns. AWE is a member of the local chamber of commerce and LEPC where emergency response planning information is exchanged and there is an opportunity to seek input.

There were no special safety concerns identified in the routes that require convoys, escorts or other additional safety or security measures for either terminal. AWE does not subcontract any portion of their cyanide transportation operations and tractors are owned by AWE.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 1.1
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> Not in compliance with	

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### Transport Practice 1.2

**Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.**

The *AWE Industrial Health and Safety Manual*, Section 2.7 “Driver Qualifications” details that all drivers must have commercial driver’s licenses with hazmat endorsements. Records and licenses were checked during the audit at both terminals and confirmation was made that all drivers have the necessary credentials, endorsements, and qualifications. The HR policies, procedures, and computer tracking program used to maintain training and driving credential records are centralized at AWE. A recall system is used to ensure that drivers who are due for training or license renewal are notified of the need for action. The system emails a notification nightly about upcoming expiration dates and expired license and/or hazmat endorsements. An Alaska driver’s license is valid for eight years, a Washington license is valid for five years, and the hazardous materials endorsement expires after five years in both states. Testing and fingerprinting are required every five years and a physical exam is conducted at least every two years. Medical cards were on file and records and qualification documentation for the re-certification period were well organized and readily retrievable in a scanned in format via a centralized computer network system used by both terminals.

AWE requires all drivers in both locations to have training in Hazardous Materials (HazMat), Defensive driving, Safety Requirements and On Duty Time. AWE has a Fit for Work policy, driver’s handbooks, performs random drug tests to drivers. AWE uses software which allows management to track hours of service compliance, perform instant audits, identify potential compliance gaps, and receive email notifications when compliance areas require attention. Records were reviewed and found to be complete.

Instructor-led and online training is given on a regular basis. Instructor-led training for cyanide is refreshed at least once every three years and includes emergency response training annually. New hire training is done with the Cyanco video. Instructors also talk about the hazards, transportation expectations, paperwork, routes, Safety Data Sheet (SDS) review. The Spill Contingency Plan is kept in each truck, insurance and permits are maintained in a book and updated every 6 months. Drivers also receive the HazMat HM-126 training and the Security Awareness Training (HM-232) training every 3 years. Load securement training is also given upon hire. Training records for both terminals were reviewed and were complete. Interviews showed good awareness.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 1.2
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### Transport Practice 1.3

#### Ensure that transport equipment is suitable for the cyanide shipment.

AWE maintains a documented and very well-organized computer-based Equipment Maintenance Program that is administered in Fairbanks and applied to all AWE transportation and handling equipment at each Terminal. Equipment specifications and the design of the tractors, flatbed trailers, and chasses versus the weight of the loaded intermodal containers were confirmed at both locations.

Fairbanks: Confirmation was made that equipment has loading capacities that greatly exceed the weight of the cyanide shipments. The chassis can carry 88,000 pounds and the intermodal containers generally weigh less than 50,000 pounds when fully loaded.

Tacoma: The chassis data plates were checked and indicated a capacity up to 88,000 lbs. The loads transported are standard loads that don't exceed approximately 47,500 lbs. loaded. The Tacoma terminal uses tractors and triple-axle and spread-axle chasses are used for cyanide shipments at this location.

AWE transports intermodal containers that are consistently packed with the same amount of cyanide each time. The equipment at each terminal is inspected prior to each delivery to ensure that it can safely transport the load. Trailers and chassis are inspected every 1200 miles. In addition, if a deficiency is found in a pre- or post-trip inspection, the trailer or chassis undergoes the same checklist inspection at that time. Tractors are inspected pre and post trip in addition to the Department of Transportation (DOT) required annual inspection. If any deficiencies are found, the equipment is repaired prior to transport. Maintenance and pre-/post-trip inspection records at each location were reviewed and were found to be acceptable.

The AWE *Industrial Health and Safety Manual* describes the loading tolerances for equipment. The Fairbanks terminal has one forklift with a 36-ton capacity and another with an 80-ton capacity. Both forklifts can be used to move the 20 ft intermodal containers used to transport cyanide.

At Fairbanks, the straps and chains used to secure the sea container to the flat bed trailers are marked with their working load capacity. Instructions for the securement of loads are taken from the JJ Keller "Cargo Securement Handbook". Drivers ensure that the working load capacity of the straps and chains is at least 50% of the load, as required by DOT regulations. This was confirmed during the audit through interview and observations.

The Tacoma Terminal only provides dray services to its customers, there is no interim storage at the AWE truck yard. As such, containers are lifted onto the chassis at the rail head by the railroad lifting equipment and lifted off the trucks by the receiving entity, either SEA PAC interim storage or the Seattle Port at Harbor Island.

AWE transports intermodal containers that are consistently packed with the same amount of cyanide each time. AWE does not open intermodal containers. Shipping papers are checked for

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weights and the equipment is inspected prior to each delivery to ensure that it can safely transport the load.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 1.3
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### Transport Practice 1.4

#### Develop and implement a safety program for transport of cyanide.

AWE does not open intermodal containers. AWE stores the containers in a secure yard at the Fairbanks Terminal and has installed security cameras throughout the terminal to prevent intruders and/or tampering with the containers.

Containers being transported to mine customers are loaded onto flatbed trailers just prior to shipment, cargo is secured with chains to the trailers and is delivered directly to the customer. The procedure "Cargo Securement Via Highway" describes the procedures for ensuring that the cyanide is transported in a safe manner. Drivers receive the training "Loads and Cargo Securement". AWE maintains a documented procedure for cargo load securement. According to the procedure, the load must be secured according to the North American Load Securement Standard 49 Code of Federal Regulations (CFR) part 393.126 subpart i.; cargo is chained, and strapping is done every 10-feet. This type of trailer is used to accommodate the delivery situation at the mine sites. The mine sites do not have the lifting equipment necessary for picking the intermodal containers off a chassis. The cyanide is therefore being unloaded from the intermodal containers by mine personnel immediately upon delivery to the mine sites.

The Tacoma Terminal uses tri-axle and spread-axle chassis with locking pin mechanisms used to secure the loads. The intermodal containers are packed by the shipper and are not opened and remain locked during transportation activities in Tacoma. There is no storage activity at this location.

Appropriate placards are displayed on all four sides of the transport vehicles. Drivers visually inspect containers prior to each delivery. This practice was confirmed through interviews and observations at the Tacoma and Fairbanks Terminals. A check of proper placarding (all four sides with United Nation (UN) number and 2 sides with Marine Pollutant) is called for by the pre-trip inspection process and is taught during orientation training.

Records for the re-certification period showing that pre-trip inspections are conducted on a regular basis were used to confirm that pre-trip inspections are conducted prior to each departure. Both Fairbanks and Tacoma drivers record the pre-trip inspections. Records were sampled at both locations and were found to be acceptable.

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AWE uses a maintenance preventive maintenance (PM) software for all equipment at both locations. Maintenance frequencies for all tasks (oil changes, brake inspections, tire inspections, etc.) are detailed in the computer program and in procedures maintained in Fairbanks. Annual Department of Transportation (DOT) inspections for the recertification period were completed for all equipment sampled. Fairbanks and Tacoma preventive maintenance records were available for review in Fairbanks and were found to be complete.

Driver hours are limited in the *AWE Industrial Health and Safety Manual* to meet U.S. Federal Motor Carrier Safety Regulations (FMCSR) at each location. AWE does not have any extended routes; drivers are typically making multiple shorter trips in a single day with little to no opportunity to exceed Federal and State driver hour limitations. Drivers are informed of legal requirements and are encouraged to stop driving if they become too tired (empowerment).

Cyanide intermodal containers are packaged by the shipper. AWE drivers confirm that the load has been properly secured after the cargo has been lifted onto the flatbed trailer or chassis. Chains are used for securement to flatbed trailers and the intermodal containers are attached to chasses with lock pins.

AWE carefully monitors driving conditions and is linked into several alert systems that would be used to inform AWE if driving conditions are unsafe. Drivers and dispatchers were very aware of procedures for suspending deliveries if conditions such as severe weather or civil unrest are encountered. The *AWE Industrial Health and Safety Manual* states that drivers are empowered to stop if they feel fatigued. Drivers are also empowered to stop a shipment and/or change routing if conditions are unsafe. Acceptable alternative routes are listed in the Route Plans.

A drug abuse prevention program has been implemented at both locations and was reviewed in the *AWE Industrial Health and Safety Manual*, last updated in 2022. Every employee is tested upon hire and randomly thereafter as regulated by DOT and for reasonable suspicion and post-accident situations. AWE has a zero-tolerance policy for drugs and alcohol.

Records for the re-certification period were available to demonstrate that AWE has a comprehensive and effective safety program.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 1.4
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	<input type="checkbox"/> Not in compliance with	

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### Transport Practice 1.5

#### Follow international standards for transportation of cyanide by sea.

AWE does not ship cyanide by sea or by air. This section of the Cyanide Code does not apply to this operation.

The operation is:                       In full compliance with                      Standard of Practice 1.5  
     In substantial compliance with  
     Not in compliance with

### Transport Practice 1.6

#### Track cyanide shipments to prevent losses during transport.

Each route plan for cyanide routes requires that drivers always have communication equipment in the truck. Drivers have cell phones and the specific route plan for deliveries to a specific mine requires that a radio be available as the mine requires the driver to check in every 5 miles. Trucks dispatched out of the Fairbanks Terminal have VHF radios and GPS satellite tracking with 2-way communications. There is only one mine road where cellular service is unavailable, this is why radios are used. No other blackouts exist for cyanide transport on the AWE routes.

Tacoma drivers must always have cell phones with them during all deliveries. Interviews confirmed this practice. The Tacoma Terminal only provides dray services in urban conditions between the railhead, interim storage, and port. All parts of the short routes have good cell phone coverage. Tacoma trucks also have Global Positioning System (GPS) tracking.

The satellite tracking systems and the radios in the trucks at each location are part of the regularly scheduled preventive maintenance program. Interviews with the Maintenance Manager and a review of maintenance records for the re-certification period confirmed this practice. Additionally, drivers at both locations reported that they confirm the proper functioning of their communications equipment as part of the pre-trip inspection process.

AWE transports many commodities to the mines and dispatches multiple trucks to each mine each day and they remain in close contact with trucks throughout each day. Although blackout areas exist for cell phones on some parts of the mine roads, there are no blackout areas for the satellite tracking systems.

For Tacoma there are no blackout areas on the routes traveled. Cell phones are the normal method of communication as routes are all in the city area.

AWE transports many commodities to the mines and dispatches multiple trucks to each mine each day and they remain in close contact with trucks throughout each day. Route Plans for each cyanide route require drivers to communicate with the dispatcher upon delivery of the cyanide.

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Interviews with AWE personnel at both locations confirmed that Dispatcher tracks each load until it is delivered. Procedures for both terminals indicate that the Driver is to contact the Dispatcher when loading and unloading the truck.

Shipments can be tracked through an online system with GPS. During the recertification period cameras were installed in all trucks and the online system is used to advise AWE of high speed and hard braking.

When AWE receives the intermodal containers from the rail they are sealed. In Fairbanks during interim storage, containers are stored with doors facing each other to prevent tampering. AWE maintains inventory controls on all containers stored in the yard. AWE does not open the containers. Customers sign the shipping papers upon delivery of the cyanide. Records of this process were available for review and were found to be complete. Tacoma does not provide interim storage services.

Shipping records were sampled from the re-certification period. The shipping papers show all necessary information including: U.N. 1689 designation, shipper, shipping destination, emergency contact telephone numbers, quantity, receipt information, driver name, trailer number, tractor number. Information was found to be complete.

AWE's DOT Hazardous Materials Security Plan is addressed in the *Industrial Health and Safety Manual*.

Shipping records for the re-certification period were sampled and were found to be complete at both terminals. The amount of cyanide is noted on the paperwork. The Safety Data Sheet (SDS) is attached to the shipping paperwork upon dispatch of the load. This practice was confirmed at each location.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 1.6
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	<input type="checkbox"/> Not in compliance with	

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## Principle 2 | INTERIM STORAGE

Design, construct and operate cyanide interim storage sites to prevent releases and exposures.

### Transport Practice 2.1

**Store cyanide in a manner that minimizes the potential for accidental releases.**

The Fairbanks Terminal has interim storage, the Tacoma Terminal does not. Intermodal containers are stored in an open, but secure storage yard at the Fairfax AWE Terminal. The intermodal containers have DOT placards affixed. Due to security concerns, there are no signs (beyond placarding of the intermodal containers) indicating that cyanide is stored in the area. The *Industrial Health and Safety Manual* prohibits eating, drinking, smoking, and open flames within 30 feet of the cyanide storage area.

Personal protective equipment includes a hard hat, safety vest, and eye protection. All employees who have contact with containers are cyanide trained. The intermodal containers are never opened while at AWE. AWE’s approach to the storage of the intermodal containers was found to be acceptable.

The outdoor truck yard / cyanide interim storage area is protected against unauthorized access. The storage area is fenced, and access is controlled. The gates are locked at night and cameras are used to monitor the yard.

The *Industrial Health and Safety Manual* states that the cyanide is to be stored away from acids, oxidizers, and explosives. No incompatible materials are stored near the cyanide. The only material temporarily stored in the cyanide storage part of the truck yard is solid cyanide briquettes in multiple layers of packaging within sealed intermodal containers. These storage practices were found to be suitable for the operation and were confirmed through field observations during the audit.

The cyanide is stored in the same containers it is shipped, which provides protection from the rain and harsh weather conditions. The area where the containers are stored is at a higher point in the truck yard and is not susceptible to flooding or water gathering. The containers are not opened or stored inside which virtually eliminates the risk of human exposure to hydrogen cyanide gas or dust.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 2.1
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	<input type="checkbox"/> Not in compliance with	

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## Principle 3 | EMERGENCY RESPONSE

Protect communities and the environment through the development of emergency response strategies and capabilities.

### Transport Practice 3.1

#### Prepare detailed emergency response plans for potential cyanide releases.

AWE has two primary emergency response plans: the Emergency Response Plan and the Spill Contingency Plan, both last updated in 2022. The emergency plan is updated at least every 2 years. The spill contingency plan is updated annually. This was confirmed during the audit. The plans were available for review and were found to be comprehensive and appropriate for the operations.

The Tacoma Terminal maintains emergency procedures in the Route Plan, including alternate routes. The Spill Contingency Plan is always in the trucks and the January 2023 copy of this document is on file in the office.

The AWE Emergency Response Plan (ERP) applies to all emergencies at both terminals and was found to be appropriate for the transportation and interim storage operations. The ERP is a comprehensive document that has detailed instructions on what needs to be done to respond to different emergency scenarios, including transportation and interim storage scenarios, and what notifications need to be made. In addition to the ERP, each route has a "Route Plan" established for it that details the primary route to be taken, special considerations (risk mitigation measures), alternate approved routes, and emergency procedures.

Section 10.12 of the ERP is specific for "Incidents involving Cyanide emergency response". The section detailed initial actions, a description of what cyanide looks like and the dangers of cyanide, signs and symptoms of cyanide exposure, and detailed actions regarding decontamination of a victim.

The emergency procedures in the Route Plan detail specific information about the need to keep the sodium cyanide from getting wet with a tarp, the dangers of hydrogen cyanide gas generation, the need to keep runoff from getting into ditches and surface water, and the prohibition of using sodium hypochlorite, ferrous sulfate, or hydrogen peroxide for treating a cyanide spill into surface water. This information is maintained in the trucks during all deliveries and was found to be appropriate for the transport infrastructure and solid sodium cyanide truck transport, the only type of cyanide and method of transport involved in this operation.

The product is stored and transported in standard design 20 ft intermodal containers that are either strapped and chained to flatbed trailers (Fairbanks) or mounted on chasses (Tacoma). The plans adequately address the emergency planning needs associated with an incident from the use of this type of equipment.

The emergency procedures detail specific information about the need to keep the sodium cyanide from getting wet with a tarp, the dangers of hydrogen cyanide gas generation, the need to keep

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runoff from getting into ditches and surface water by building up a berm, and the prohibition of using sodium hypochlorite, ferrous sulfate, or hydrogen peroxide for treating a cyanide spill into surface water. This information was found to be appropriate for the operation.

The Spill Contingency Plan, the Route Plan for Cyanide, and the ERP, give contact information for external response organizations in the Fairbanks and Tacoma areas and detail the roles of others outside of AWE, including the roles of remediation response companies.

The AWE Director Health, Safety, Security, and Environmental (HSSE) is also the Chief of the Fairbanks North Star Borough Hazmat Team, the entity that would respond to any incident. AWE has robust emergency response capabilities, and, in many situations, AWE may be the only responder. AWE personnel are also very involved with the Local Emergency Planning Committee (LEPC) (meet quarterly) and the roles and responsibilities have been clarified during those meetings as well as during actual emergency response incidents. None of the incidents involved cyanide deliveries. AWE has also been in contact with Tacoma-based Fire Department and has contact with LEPC personnel to discuss emergency planning. AWE advises external responders of their roles in an emergency through the LEPC engagement and the running of emergency drills with external responders.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 3.1
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### Transport Practice 3.2

#### Designate appropriate response personnel and commit necessary resources for emergency response.

AWE Fairbanks Terminal personnel are given full hazardous materials responder training in accordance with U.S. Regulations – 29 CFR (HAZWOPER Training). Emergency 40-hour initial training and refresher training is done for the emergency response team. AWE provides emergency response training to its own personnel and external responders who may participate in the response effort. Training records for the recertification period were checked and were found to be complete.

Tacoma personnel do not respond to spills. All AWE personnel are trained on the AWE emergency response plans and on cyanide-specific response through initial instructor-led sessions, then annually using computer-based training modules.

Very specific response actions are detailed for administrative staff and field responders in the ERP. Drivers also have the emergency procedures in the Route Plans that are quite detailed.

The roles and responsibilities of relevant internal and external personnel are also clearly described

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in the Spill Contingency Plan for both terminals. These emergency plans are maintained in the trucks at both locations.

The ERP details the emergency response equipment that is maintained at each location and on the trucks. The ERP requires that emergency equipment is checked on at least a quarterly basis or after the response kits are used. There are separate emergency equipment checklists for Fairbanks trucks, Tacoma trucks, Fairbanks Terminal, and the Emergency Response Unit (45-foot emergency response van in Fairbanks).

Records were available to show that emergency equipment on trucks and at each location was inspected, as required during the recertification period.

During the pre-trip inspection process drivers confirm that the required emergency equipment is present. Observations during the audit also confirmed that emergency equipment is available during transport.

In Fairbanks, the emergency equipment includes a spill kit that is mounted on the tractor. Maintenance also does a visual check of the spill kits as a defined task during its regular preventive maintenance activities on the truck. In Tacoma, the drivers are responsible for checking their emergency equipment quarterly. The kits in both locations are replaced annually.

Confirmation of emergency response equipment availability on the trucks is part of the pre-trip inspection process. AWE does not subcontract any part of its operations.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 3.2
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### Transport Practice 3.3

#### Develop procedures for internal and external emergency notification and reporting.

The ERP includes telephone numbers for senior leadership, all Fairbanks and Tacoma personnel, and hospitals and medivac services in Fairbanks, Tacoma, and destination cities. The list of contact numbers is extensive and includes government agency numbers, weather stations, and points of contact information for all key customers and mines.

The contact information and the procedures for roles, responsibilities, and notification actions are detailed in the ERP. This information is also in the ERP "Core Plan" and the Route Plan emergency procedures carried by all drivers during transport.

The telephone numbers are updated with changes and phone numbers are confirmed annually. The Spill Contingency Plan is re-issued in its entirety every year.

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There were no cyanide exposures or incidents during the recertification period. The ERP was updated with the requirement that ICMI be notified of any significant cyanide-related incidents within 24 hours of the incident. This was found to be acceptable by the auditor.

The operation is:  In full compliance with  In substantial compliance with  Not in compliance with Standard of Practice 3.3

**Transport Practice 3.4**

**Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.**

AWE’s environmental consulting firm is based in Anchorage, Alaska and will manage any remediation project as required by regulatory agencies in consultation with AWE as necessary.

This consulting firm would be involved in coordinating the response to accidents in Alaska and in Washington. The roles and responsibilities of the consulting firm are defined in the plan.

The use of sodium hypochlorite, ferrous sulfate and hydrogen peroxide is prohibited in the ERP. The Route Plan for each route also prohibits the use of sodium hypochlorite, ferrous sulfate, and hydrogen peroxide. Drivers are cyanide trained and are only permitted to do containment until emergency response and remediation experts arrive. AWE has confirmed with its emergency remediation responders that they understand the prohibition on the use of cyanide destruction chemicals in surface water and that documentation has been updated, as necessary.

The operation is:  In full compliance with  In substantial compliance with  Not in compliance with Standard of Practice 3.4

**Transport Practice 3.5**

**Periodically evaluate response procedures and capabilities and revise them as needed.**

The ERP is reviewed and evaluated for adequacy annually. The ERP and associated emergency procedures were found to be current and were most recently updated in 2022.

The ERP calls for annual drills or emergency response exercises to be run at each facility on an annual basis. AWE uses a combination of tabletop exercises, hands-on drills, and full-scale emergency response exercises with external responders to review the adequacy of the emergency response procedures, training, and emergency response readiness.

Records were available for the recertification period. Hands-on drills were held in 2019, 2020, and

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2022. Due to COVID, a hands-on drill was not conducted in 2021. This was accepted by the auditor.

The ERP addresses the evaluation of the plan's performance after an emergency. Meetings are held after emergencies and/or drills to evaluate what parts of the plans could or should be improved. The incident investigation process also has similar requirements to evaluate the plan's performance following an actual emergency. Evidence was available to show that plans were updated as necessary following emergency response drills.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 3.5
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> Not in compliance with	

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