



**ICMI International Cyanide Management Code  
Summary Audit Report**

**QC Carriers  
Re-Certification Audit**

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

*2020 Audit Cycle*



## QC Carriers

### Company Names & Contact Information

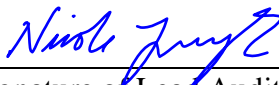
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| <b>Name and address of Headquarters:</b>             | QC Carriers Inc.<br>1208 East Kennedy Blvd.<br>Suite 132<br>Tampa, FL 33602  |
| <b>Address of Channelview Terminal (Texas, USA)</b>  | QC Carriers Inc.<br>Channelview Terminal<br>1910 Sheldon Rd.<br>Channelview, TX 77530  |
| <b>Address of Anjou Office (Quebec, Canada)</b>      | QC Carriers Inc.<br>7887 Grenache, suite # 101<br>Anjou, Quebec, Canada<br>H1J 1C4<br>(Shipments dispatched out of Cyanco Cadillac Terminal)   |
| <b>Name and contact information for QC Carriers:</b> | Cynthia Harvey, CSP, CHMM<br>QC Carriers Inc.<br>Director of Safety/Responsible Care Coordinator<br><a href="mailto:charvey@qualitydistribution.com">charvey@qualitydistribution.com</a> |

### Operational Overview

QC Carriers (QC) is a member of the Quality Distribution family of companies. Quality Distribution is made up of a network of more than 100 company-owned and affiliate terminals and facilities in locations throughout the U.S., Canada, and Mexico. QC has operated in the US since 1932.

QC headquarters is in Tampa, Florida. HQ operations include the central management of all documentation, records, training, driver qualification, equipment management, and emergency response planning. These operations and activities were included in the recertification audit.

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At the time of the audit, cyanide shipments were being dispatched from the Channelview, Texas Terminal, directly from the Cyanco Cadillac Terminal, and from the Carlin, Nevada terminal. The Carlin Terminal was most recently recertified under a separate recertification audit effort in 2019 and was not included in the scope of this re-certification activity. Headquarter operations and shipments made from the Channelview and Cadillac locations were within the scope of this re-certification audit. At the time of the audit, Channelview-based shipments were of containerized loads (intermodal / sea containers) of solid sodium cyanide packaged in a bag-in-box configuration and solid sodium cyanide briquettes transported in ISO tanks. Canadian shipments from the Cyanco Cadillac Terminal in Canada are of sodium cyanide solution delivered in tank trailers.

QC is an American Chemistry Council (ACC) Responsible Care Partner® and maintains a formal environmental, health, safety, and security management system that is Responsible Care Management System (RCMS®)certified. QC leverages its standard policies and procedures to ensure that cyanide is transported safely. Cyanide Code-specific processes have been integrated into the overall management system, as necessary.

QC provides services for two Cyanide Code-certified cyanide producers. The tank trailers used in the Canada operation are owned by the cyanide producer. Although tank trailers are inspected and maintained by the cyanide producer, QC ensures that all equipment that it uses is safe and suitable for transportation activities.

QC is responsible for route determination, shipment scheduling and tracking, inventory control, truck inspections, preventive maintenance for its equipment, training, safety program management, and emergency response planning.

## Audit Implementation

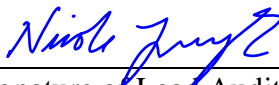
This report contains information regarding the International Cyanide Management Code (Cyanide Code) re-certification audit of the QC Carriers Headquarters and Terminal operations in Channelview and Canada.

Interviews were conducted with QC Management, Staff, Dispatchers, and Drivers from HQ, Channelview, and Canadian operations. Policies and procedures were reviewed, and records were evaluated from all three locations. Loading operations and equipment were observed and maintenance records were reviewed. Records from the re-certification period (2018-2020) were evaluated.

The audit was conducted according to the International Cyanide Management Institute (ICMI) Cyanide Transportation Verification Protocol. The audit was performed by an independent third-party audit team that fulfills all ICMI auditor requirements including Lead Auditor and Transportation Technical Auditor requirements for Cyanide Code audits.

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### Auditor's Finding and Attestation

Cyanide management practices for QC Carriers were evaluated for Cyanide Code compliance using the *ICMI Cyanide Transportation Verification Protocol*. QC internal policies, standards, and procedures, regarding the management of the Cyanide Transportation were reviewed. Records from the re-certification period were also evaluated and found to be acceptable during this audit.

QC Carriers has not had any cyanide-related spill, compliance, or exposure events.

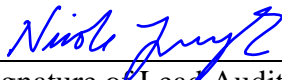
The audit was conducted through discussions and interviews with QC personnel. Equipment was physically evaluated. Records regarding shipment tracking, security measures, shipping documentation, community involvement, operational procedures, training, maintenance, and emergency response records were randomly sampled during the audit and were also found to be acceptable. All personnel were very well prepared for the audit. The audit team found that the overall level of preparedness and understanding of Cyanide Code requirements was excellent.


The QC Carriers sodium cyanide transportation operations were found to be in FULL COMPLIANCE with the ICMI International Cyanide Management Code requirements.

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|---------------------------|--|
| Audit Company:            | MSS Code Certification Service<br><a href="http://www.mss-team.com">www.mss-team.com</a>       |
| Lead / Technical Auditor: | Nicole Jurczyk<br>E-mail: <a href="mailto:CodeAudits@mss-team.com">CodeAudits@mss-team.com</a> |
| Auditor:                  | Nancy Sims   |
| Date(s) of Audit:         | September 15, October 15 and 26, 2020  |

I attest that I meet the criteria for knowledge, experience, and conflict of interest for Code Certification Audit Team Leader, 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 the Audit Reports accurately describe 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 Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety, and environmental audits.

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**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.

The operation is       in full compliance with  
     in substantial compliance with      Transport Practice 1.1  
     not in compliance with

*Summarize the basis for this Finding:*

Quality Carrier's (QC's) management system has extensive and established documentation. The Route Risk Assessment procedure and examples of route risk assessments were reviewed. The Corporate Director of Security and teams local to each terminal review the routes as necessary due to route changes or changing conditions, and at least every three years. No significant changes to routing during the re-certification period were made.

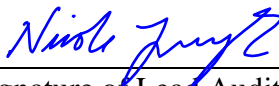
The documented route selection procedure considers population density, infrastructure, pitch & grade, proximity to water bodies, and prevalence and likelihood of poor weather and resulting poor driving conditions.

The records were found to be very complete for all documented routes. A risk assessment methodology is used to determine the best truck route. In many situations there is only one truck route possible. The risk assessment is done with input from drivers, road information available through the internet and personal knowledge of the routes. When options exist, the route with a lower risk is chosen to minimize the potential for accidents and/or releases.

QC Carriers seeks input from communities near its operations in the selection of routes and development of risk management measures. QC is a Responsible Care certified company, and as such it maintains formal communication processes with external stakeholders and communities. The route planning procedure shows what community and government considerations are made when planning a route.

A route risk assessment is done for all destinations. Designated routes were available for all destinations and available for review. Many of the destinations to which QC needs to deliver cyanide have limited options for which roadways can be used. Risk mitigation measures focus primarily on the avoidance of high traffic times of day and the avoidance of roads that are

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dangerous in poor weather conditions. In Canada, improvements were made to communication equipment as a risk countermeasure. Risk mitigation measures were found to be suitable for the routes driven.

Routes are reviewed with driver input at least every three years, or as necessary if there is an event or changes to the roads or infrastructure. All routes within the scope of this recertification audit were reevaluated in 2020. Routes are assessed for adequacy and for any changes in conditions that would result in a modified risk ranking. Based on interviews and the review of the risk assessments, there are no security concerns that require special security measures at this time.

This information was confirmed through interviews with the QC personnel, including several Drivers. QC's Cyanide Security Plan addresses measures to be taken for route risk mitigation. Risk mitigation actions were found to be appropriate for the routes driven.

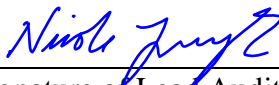
The route planning procedure shows what considerations are made when planning a route. A web site showing restricted routes is used to confirm that there are no route restrictions through which the trucks are traveling. Additional interaction occurs with the cyanide producers and stakeholders near terminal operations. QC incorporates government regulations and restrictions into its route planning. The Safety Director showed a high level of awareness of the U.S. Department of Transportation (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) regulations regarding the safe shipping and transportation standards for hazardous materials (49CFR106.50-106.130).

QC also participated in an emergency drill with Cyanco, QC's emergency response service provider, and Chemtrec during the recertification period to ensure that each entity understands its roles if there is a spill or accident. Additionally, confirmation was made that the shipper (Cyanco) continues to participate in outreach activities with external responders and medical facilities in the areas near their Alvin, Texas Plant and their Cadillac Terminal in Rouyn-Noranda, Quebec.

QC does not subcontract any portion of their cyanide transportation operations. They do have owner operators, but QC maintains all trucks (company owned and owner-operator trucks). Owner-operators are subject to all QC requirements and must follow all policies and procedures. Records were available for all drivers and all trucks to demonstrate full compliance with all Cyanide Code requirements. Full compliance was confirmed for all activities, including those involving owner operators.

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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 operation is                       in full compliance with  
     in substantial compliance with      Transport Practice 1.2  
     not in compliance with

Summarize the basis for this Finding:

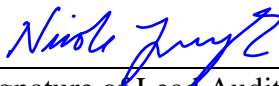
QC has developed an extensive driver training program. QC Distribution (QC's Parent Company) has several training schools across North America. All cyanide drivers must have a U.S. DOT Class A Commercial Driver's License (CDL) or Canadian Class 1 Driver's License (Canada) with a Hazardous Materials / Tanker endorsement (in the U.S.) or experience with Dangerous Goods in Canada, meet the minimum age requirement and have at least one year of Class A (or Class 1 in Canada) driving experience. Records were readily available and were found to be complete for all cyanide drivers. Drivers were interviewed and were found to have an appropriate level of knowledge and safety awareness.

All drivers complete an in-person training program at one of the company's schools and then receive additional training at the terminal. Compliance with this requirement is managed on-line. The driver in Canada received additional operational training on written unloading procedures from Cyanco, the owner of the tank trailers. The cyanide producer also provides computer-based cyanide safety training on an annual basis for all drivers. Training records were reviewed for the re-certification period and were found to be complete.

The driver in Canada who delivers cyanide solution receives additional operational training on written unloading procedures from Cyanco, the owner of the tank trailers. Records were found to be complete and driver awareness of requirements, risks, and procedures was confirmed through interview.

QC does not subcontract any portion of their cyanide transportation operations. They do have owner operators, but QC maintains all trucks (company owned and owner-operator trucks). Owner-operators are subject to all QC requirements and must follow all policies and procedures. Training and qualification records were readily available for all drivers, including owner-operators.

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Transport Practice 1.3:        Ensure that transport equipment is suitable for the cyanide shipment.

The operation is         in full compliance with  
                                   in substantial compliance with        Transport Practice 1.3  
                                   not in compliance with

*Summarize the basis for this Finding:*

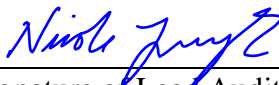
Equipment is designed by US manufacturer engineers to meet U.S. DOT weight rating standards. Gross Vehicle Weight Rating (GVWR) is certified by the manufacturer and documented on each vehicle with an equipment plate. All QC tractors and trailers have been checked and all are rated for weights that exceed maximum loaded weights. Truck inspections and preventive maintenance actions are performed regularly to ensure that the equipment is safe to operate and that it can continue to carry the loads for which is it designated. The records reviewed during the audit demonstrated that all preventive maintenance activities, repair activities, and inspection activities performed on the trucks and/or trailers over time were performed on time and in accordance with procedure for U.S. and Canadian operations.

QC drives trailers over third-party scales and Cyanco scales in both locations to ensure that the trailers are not overloaded. Loads are standard configurations and weights. ISO tanks are maintained by the shipper and loaded with standard amounts of solid sodium cyanide briquettes that are under the weight limits for the equipment and the road allowances. Records were available for review during the audit and confirmation was made that loads have not exceeded regulatory weight limitations or equipment loading capacities. The loads being hauled are standard loads that do not vary greatly in weight. Records were checked against weight capacities and weight limit regulatory information. Drivers reported that they take personal responsibility for ensuring weights are checked and that they are appropriate and safe.

QC does not subcontract any portion of their cyanide transportation operations. QC does use owner operators, but all equipment (company owned and owner-operator) is maintained by QC. Records were sampled for owner-operator tractors and was found to be complete.

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Transport Practice 1.4:      Develop and implement a safety program for transport of cyanide.

The operation is       in full compliance with  
                                   in substantial compliance with      Transport Practice 1.4  
                                   not in compliance with

*Summarize the basis for this Finding:*

In Texas, the driver picks up the sea container or empty ISO tank at the port. The container is inspected at the port and is then brought to the cyanide producer's plant. In Canada, Cyanco loaded tank trailers are picked up from the Cadillac plant. Cyanco is responsible for loading tank trailers in Cadillac and for bracing and blocking solid sodium cyanide bag-in-box sea container loads in Houston. Cyanco and drivers both ensure that loads are properly loaded, placarded, and secured in the U.S. and Canada, as required by hazardous material shipping laws in both countries.

All sea containers are secured with four corner lock pins. Tank trailers openings / connection points are secured with seals. This information was confirmed during the audit and was found to be appropriate.

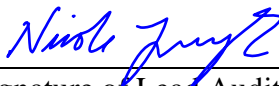
Appropriate placards showing either UN 1689 (solid sodium cyanide) or UN 3414 (cyanide solution) are displayed on all four sides of the transport vehicles. This was confirmed during the audit. Additionally, International Maritime Organization (IMO) required marine pollutant placards were on all containers headed for ports. A sampling of vehicles was reviewed. Drivers visually inspect the trailers prior to each movement. This was observed and confirmed through interviews with drivers. Equipment markings were found to be adequate and conformant.

Drivers conduct a pre-trip inspection prior to departure and a post-trip inspection upon return to the terminal. Mechanical defects are called to the attention of the on-site mechanic. Issues that would affect safety and/or legal compliance are resolved prior to movement off-site. Records showing that pre-trip inspections are performed were reviewed and found to be acceptable.

QC maintains a centralized formal preventive maintenance program for all equipment as part of its certified RCMS management system. Records were complete and demonstrated that planned maintenance activities are occurring for both the Texas, USA and Quebec, Canada locations.

The Safety Program includes limitations on drivers' hours in accordance with Federal Motor Carrier Safety Regulations (FMCSR). Driver's hours are recorded and tracked electronically. The electronic logging system enables QC dispatchers, safety and compliance personnel to stay

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informed at all times. Cyanide producers are responsible for bracing and blocking solid sodium cyanide loads. ISO tanks and tank trailers are also loaded, placarded, and secured by the cyanide producer.

Formal policies and procedures detail how drivers are empowered and directed to pull over whenever weather, fatigue, or other conditions (such as civil unrest) make it unsafe to continue a trip. QC's formal drug and alcohol policy is a zero-tolerance policy. QC randomly selects drivers from its driver pool for testing each month. An independent certified service provider is used to perform laboratory testing and chain of custody processing for samples.

Records for the re-certification period were available and were reviewed to confirm that the requirements of each of the abovementioned sections had been fulfilled for both locations. QC does not subcontract any portion of their cyanide transportation operations. QC does use owner operators, but QC policies, procedures, and requirements apply to all drivers, regardless of employee/owner-operator status.

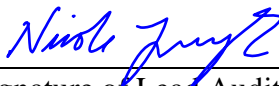
Transport Practice 1.5: Follow international standards for transportation of cyanide by sea and air.

The operation is  in full compliance with  
 in substantial compliance with Transport Practice 1.5  
 not in compliance with

*Summarize the basis for this Finding:*

QC activities in Texas include the transport of sea containers and ISO tanks to ports. At the time of the audit, this operation was only being done for Cyanco. Cyanco maintains a certified Ocean Supply Chain and ships cyanide by sea in compliance with the Dangerous Goods Code of the International Maritime Organization. All International Maritime Dangerous Goods (IMDG) Code compliance requirements were audited and found to be in compliance during the Cyanco re-certification audit (see report posted on [www.cyanidecode.org](http://www.cyanidecode.org)). Packaging and sea containers were reviewed during this audit and all IMDG Code requirements for labeling of packages and placarding of containers were found to be in compliance. QC does not ship cyanide by air.

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Transport Practice 1.6: Track cyanide shipments to prevent losses during transport.

The operation is  in full compliance with  
 in substantial compliance with Transport Practice 1.6  
 not in compliance with

Summarize the basis for this Finding:

QC has installed and implemented a satellite-based communication and tracking system on all its transport vehicles. This system provides real-time tracking and communication of information between drivers and the terminals. All drivers have been trained to use the on-board messaging and locator system. Drivers also have cell phones for communication with the terminal, the mine and/or emergency responders.

Additional communication equipment was provided to the driver in Canada who needs to travel on northern Canada roads that would otherwise present a risk of communication black out areas. There are no black out areas for communications in Texas.

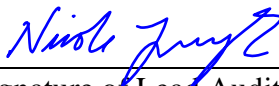
The functionality of the communication equipment is confirmed during the pre-trip inspections. This was found to be acceptable by the auditor. Dispatchers use the onboard computer communication / tracking system to regularly check on the current location / progress of the cyanide shipment. Interviews and observations confirmed this during the audit.

Chain of custody documentation is maintained. If the product is delivered to a mine customer, the Bill of Lading (BOL) is signed by the receiving party. If the product is dropped off at the port, the in-gate paperwork serves as the evidence that the cyanide was safely delivered to its destination. Records were available for review and were found to be acceptable. The BOL shows the gross, tare, and net weights of the shipment. The weight of the product is clearly noted, as is the type of packaging. In the case of bag-in-box shipments, the number of boxes is also noted. Safety Data Sheets for solid sodium cyanide and cyanide solution are maintained by the drivers in the trucks. This was confirmed through interviews with drivers.

QC does not subcontract any portion of their cyanide transportation operations. QC does use owner operators, but all drivers are subject to QC policies and procedures, regardless of type of employment or contract.

**2. INTERIM STORAGE: Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.**

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Transport Practice 2.1: Store cyanide in a manner that minimizes the potential for accidental releases.

The operation is  in full compliance with  
 in substantial compliance with Transport Practice 2.1  
 not in compliance with

*Summarize the basis for this Finding:*

QC does not provide interim storage within the scope of this re-certification audit. All loaded trailers are stored by the shipper, are dropped off at a port for loading onto a ship, or are brought to a designated interim storage location that is part of the shipper's certified supply chain.

QC only provides interim storage at the Carlin terminal. That location was most recently audited and found to be in Cyanide Code compliance in 2019.

**3. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities**

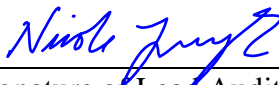
Transport Practice 3.1: Prepare detailed emergency response plans for potential cyanide releases.

The operation is  in full compliance with  
 in substantial compliance with Transport Practice 3.1  
 not in compliance with

*Summarize the basis for this Finding:*

QC maintains emergency response procedures at part of its certified Responsible Care Management System. The plans were deemed appropriate for the defined routes. Drivers were interviewed and driver awareness of the Emergency Response Plan (ERP) details was confirmed. The ERP mentions the physical forms of the cyanide. The cyanide-specific ERP was last updated in 2020. The more detailed information regarding the chemical and physical forms, however, is on safety data sheets (SDSs) that are kept in the truck at all times. In Canada, there is an additional Emergency Response Assistance Plan (ERAP) required by Canadian law. This document was also reviewed during the audit and was found to be up-to-date.

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QC Carriers relies on the national network of trained emergency responders from the communities through which they travel to assist in the event of an emergency.

The only mode of transportation is truck. The ERPs were found to be suitable for the method of transportation. The differences in infrastructure for the defined routes are addressed in the risk assessments and the ERP. As there are not multiple modes of transportation, the different road types such as highway, public, private, and rugged mine site were considered.

The ERP considers the design of the transport vehicle. The design of the transport equipment is most relevant for the sodium cyanide solution transport in Canada. Emergency shut off procedures are included in the operational procedures used to deliver product with the tank trailers.

The ERP includes a description of response actions if there is an emergency situation. The roles and responsibilities of the driver, the dispatcher, mine personnel, QC personnel, QC's emergency service provider, and the local response authorities are described in the ERP. The primary responsibilities of the driver are to secure the scene and make notifications. QC maintains an emergency response management team at Headquarters. This group, called SkyTank, coordinates emergency response actions and notifications for the entire company.

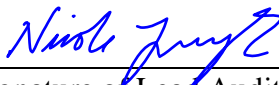
Transport Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response.

The operation is  in full compliance with  
 in substantial compliance with Transport Practice 3.2  
 not in compliance with  
*Summarize the basis for this Finding:*

Training on the emergency response plan was given to all terminal personnel, including drivers, at orientation and is then refreshed every three years. Records from the re-certification period were available and reviewed for all drivers. Drivers were interviewed and awareness of emergency procedures and reference documentation was confirmed. The roles and responsibilities of the driver, the dispatcher, mine personnel, QC personnel, QC's emergency service provider, and the local response authorities are described in the ERP.

The emergency response equipment carried on trucks in the Houston area is limited because drivers transporting solid sodium cyanide and are expected to have a notification role only, in the event of an emergency. A fire extinguisher is included in the pre- and post-trip checklist. Drivers also have personal protective equipment (PPE) such as steel toed shoes, hard hat, and gloves with them at all times.

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In Canada, where the sodium cyanide solution is delivered, the driver also has the following PPE at all times: Goggles, face shield, chemical suit, gloves, and boots. This list of required equipment is included in the operational procedures for the unloading of the product at the mines. The confirmation that this equipment is in good working condition and onboard at all times is part of the pre-trip inspection process.

Records, auditor observations, and driver interviews were used to confirm that emergency equipment (fire extinguisher) and required PPE are available in the trucks during transport. Emergency response training is given to all drivers at orientation and then again every three years. Training is also given during safety meetings through drills and “what-if” scenario reviews. Records from computer based training sessions on emergency response were reviewed for the drivers for the re-certification period. Drivers were interviewed and awareness of emergency procedures was verified.

The pre-trip inspection process includes a confirmation that the emergency equipment and PPE are in the truck. Records of the pre-trip inspections are maintained electronically. In addition to the pre-trip inspections, a review of emergency response equipment is done during vehicle maintenance. Interviews with drivers confirmed this practice.

QC does not subcontract any portion of their cyanide transportation operations. QC does use owner operators, but all drivers, regardless of employment status, are trained on emergency response procedures and are held accountable to follow the same policies and procedures.

Transport Practice 3.3:      Develop procedures for internal and external emergency notification and reporting.

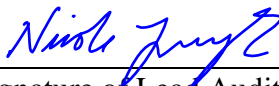
The operation is       in full compliance with      Transport Practice 3.3  
     in substantial compliance with  
     not in compliance with

*Summarize the basis for this Finding:*

Notification procedures are described in detail within the Emergency Response Plan (ERP). SKYTANK (a QC corporate function) makes all necessary notifications. Notification procedures for the SKYTANK team were reviewed during the audit. Confirmation was made that telephone numbers and instructions are in place for the notification of the shipper, regulatory agencies, outside response providers, medical facilities, and potentially affected communities. Records were available to show telephone numbers were last checked in 2020.

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Procedures for notification of appropriate parties in the event of a cyanide release or exposure during transport are carried in the transport vehicles. Emergency notification information contained in the ERP is checked routinely for accuracy.

Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

The operation is  in full compliance with  
 in substantial compliance with Transport Practice 3.4  
 not in compliance with

*Summarize the basis for this Finding:*

In the event of a spill, QC follows its defined emergency response procedures and would coordinate with the cyanide producer (Cyanco) and their designated emergency response service provider to ensure appropriate clean up and remediation of contaminated solids or soils.

QC Drivers will immediately notify QC's emergency response and notification system SKYTANK to ensure appropriate clean up and remediation of contaminated solids or soils. Once the transport truck driver calls SKYTANK, SKYTANK ensures that all necessary parties are notified and that Cyanco's Global Transportation Emergency Response Plan (GTERP) is properly activated.

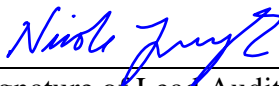
Confirmation was made with the shipper that this is the process.

Remediation of soils is not addressed specifically in the QC documentation, but this was found to be acceptable by the auditor due to the fact that QC would work directly with the shipper and the shipper's remediation expert to address the need for remediation and the disposal of clean-up debris.

As noted above, QC would not be directly involved in the remediation of a cyanide spill. The ERP, does however, address the requirement that none of the chemicals such as sodium hypochlorite, ferrous sulfate, or hydrogen peroxide be used to treat a release to surface water.

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Transport Practice 3.5: Periodically evaluate response procedures and capabilities and revise them as needed.

The operation is  in full compliance with  
 in substantial compliance with Transport Practice 3.5  
 not in compliance with

*Summarize the basis for this Finding:*

The Emergency Response Plans (ERP) notification call lists are reviewed at least annually. A hands-on drill must occur at least once every three years, during each recertification period. Drills were conducted in Houston and Canada in 2020. Drill critique records were available and reviewed and were found to be acceptable. Minor actions noted as necessary during the Canada drill related to calling internationally between the U.S. and Canada were identified, tracked to closure, and confirmed to be effectively resolved. Additionally, “What-if” tabletop discussions were held during safety meetings each year during the re-certification period. Records of the drill and the notifications done in response were available for review and were acceptable. The ERP was updated appropriately following this drill.

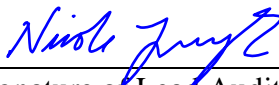
Training on emergency procedures is given upon hire and a refresher is given every three years to all cyanide drivers. Additionally, the ERP is reviewed annually with mock scenario notification drills. The telephone numbers on the call list were reviewed and checked for accuracy during the audit. Records were reviewed and accepted.

A combination of hands-on emergency response practice drills, classroom training, and table top “What If” discussions during Safety Meetings are used to train personnel and confirm that emergency plans are appropriate and up-to-date.

The QC Emergency Response Plan calls for a review of performance after actual emergencies and after the annual drill. Changes are to be made to the plan, as needed. There were no actual cyanide emergencies during this recertification period. Drill critique records were available for the 2020 drills. The emergency drill scenarios involved transport-related exposures and releases. Minor actions noted as necessary during the Canada drill related to calling internationally between the U.S. and Canada were identified, tracked to closure, and confirmed to be effectively resolved. The emergency procedures were updated appropriately following this drill and SKYTANK personnel were informed of the updates. This information was confirmed through a review of emergency procedures and interviews with SKYTANK personnel.

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