

# ICMI Transportation Verification Protocol (Revision June 2021)

Summary Audit Report

## Transwood. Inc. Winnemucca Terminal

Sodium Cyanide Solution Transportation Operations

2022 Re-Certification Audit



Submitted to:

The International Cyanide Management Institute  
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Washington, DC 20005  
USA

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## Operation General Information

<b>Name and Location of Operation Audited:</b>	TransWood, Inc. – Winnemucca Terminal 3109 Desert Gem Rd. Winnemucca, NV 89445
<b>Audit Scope:</b>	Bulk transportation of sodium cyanide in Nevada and the Western U.S.
<b>Names and contact information for this facility:</b>	Shelley Meckley - Terminal Manager P.O. Box 2213 Winnemucca, NV 89445 Email: <a href="mailto:smeckley@transwood.com">smeckley@transwood.com</a>

## Location detail and description of operation

TransWood Inc. (TransWood) has been in the bulk transportation business since 1928. The company provides services to many different industries delivering dedicated carriage, hazardous materials knowledge, logistics partnering, quality management and other specialized services.

The TransWood Winnemucca Terminal transports primarily sodium cyanide solution in bulk tankers and a small amount of solid sodium cyanide in ISO tanks from the Cyanco production facility in Winnemucca, Nevada, to gold mines in Nevada and the Western USA. Transporting solid cyanide in addition to solution is a change for the operation this recertification period. Cyanco starting shipping solid sodium cyanide briquettes in 2021. Cyanide is only shipped in bulk quantities from this location.

The TransWood terminal is located 1.5 miles west of Winnemucca on Jungo Road. The terminal is one of 40 TransWood terminals serving the USA. The carrier transports dry and liquid bulk loads and is headquartered in Omaha, Nebraska.

TransWood maintains a formal environmental, health, safety, and security (EHSS) management system that is certified by a third-party auditing firm to the American Chemistry Council's Responsible Care Management System (RCMS®) technical specification. The Winnemucca Terminal is included in the overall TransWood RCMS management system. The RCMS processes are applied to all operations and are used to ensure compliance to all legal and voluntary EHSS requirements, including the International Cyanide Management Code (Cyanide Code).

This TransWood terminal is dedicated exclusively to the maintenance and dispatch of bulk cyanide

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loads for Cyanco. The terminal has a full-service maintenance shop and all equipment is maintained on-site. TransWood is responsible for all maintenance related to the tractors, chassis, and underside (wheels and tires, etc.) of the tankers. Cyanco maintains the ISO tanks and the upper part of the tanker (tank, hoses, loading/unloading equipment). Cyanco has responsibility for performing the regular Department of Transportation (DOT) inspections of the ISO tanks and tank part of the tankers. The Cyanco re-certification audit, which is the subject of a separate report, confirmed that Cyanco is performing its agreed-upon duties regarding transportation equipment inspections and maintenance.

The terminal is approximately 5 miles away from Cyanco. No cyanide is stored at this location. Empty trucks may be staged for maintenance or inspection activities, but loaded trucks are kept within a secure perimeter at Cyanco.

Cyanide Code compliance is achieved in close collaboration with Cyanco. Trucks are loaded by Cyanco operators, driven by TransWood drivers, and monitored throughout transit by Cyanco and TransWood. TransWood also works very closely with Cyanco to ensure that all Cyanide Code requirements are fulfilled. Compliance with cyanide training, community outreach, emergency response, and route determination are all jointly managed. TransWood is also a part of the Cyanco certified North American Rail and Truck Supply Chain.

This operation is in FULL COMPLIANCE with the International Cyanide Management Code.

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A handwritten signature in dark ink, appearing to read 'Raymond J. [unclear]', is written over a horizontal line.

Signature of Lead Auditor

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## Auditor's Finding

TransWood cyanide transportation practices were evaluated for Cyanide Code compliance using the 2021 version of the *ICMI Cyanide Transportation Verification Protocol*. Transwood 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 Transwood cyanide-related transportation activities are in **FULL COMPLIANCE** with International Cyanide Management Code requirements.

## Compliance Statement

This operation has not experienced any compliance issues during the re-certification period.

There was one driver exposure incident in February 2022 that met the ICMI definition of "Significant Cyanide Incident". The driver received immediate assistance and was not injured. TransWood notified ICMI, as required. A full incident investigation was performed with corrective actions to prevent recurrence. The mine where the incident occurred reported the exposure to the Mine Safety and Health Administration (MSHA).

## 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>	7/20/2022 – 7/21/2022

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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.

TransWood has developed and implemented a procedure for selecting transport routes that minimizes the potential for accidents and releases or the potential impact of accidents and/or releases. TransWood uses a documented route selection process that takes into account population density, infrastructure, pitch & grade, proximity to water bodies, and the prevalence and likelihood of poor weather and resulting poor driving conditions.

Cyanco and TransWood work together with customers to determine the safest and best route for transport. Records of completed forms “Cyanide Transportation Delivery Route Evaluation Forms” were found to be acceptable for all documented routes. In many situations there is only one truck route possible.

The auditor reviewed records from the recertification period of route re-evaluations from TransWood’s Winnemucca Terminal to mining clients. Interviews indicated that none of the 15 approved routes changed during the recertification period.

The Terminal Manager performs the risk ranking with input from truck drivers, road information available through the internet and personal knowledge of the routes. When options exist, the route with the lowest risk is chosen to minimize the potential for accidents and/or releases. Interviews confirmed that drivers adhere to designated routes and request authorization prior to deviating from the established routes. In some cases, the pitch and grade of the roads are significant and transit through cities is lower risk.

Stakeholder input (Cyanco, mine customers, and local authorities) is considered when routes are determined. Appropriate risk mitigation measures are used. Weather conditions are constantly monitored, and deliveries are postponed if a route is deemed unsafe.

Risk assessment records were reviewed for all routes and were found to be acceptable. The routes were re-approved during the recertification period. Confirmation was made through a review of shipping records that all mines serviced were included in the route risk evaluation process.

TransWood periodically reevaluates routes used for cyanide deliveries and gets feedback on route condition from the drivers. The routes are evaluated prior to first delivery and again formally every three years thereafter. The Terminal Manager has a process of gathering feedback from drivers

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when they come back to the terminal to re-fuel after deliveries are made. Through this process, drivers have regular access to the Terminal Manager and provide feedback about driving conditions, any road construction, and as needed.

Special conditions reported by customers or drivers during deliveries are communicated to all drivers assigned to the route. The routes driven by TransWood vary in length. Drivers can often complete more than one trip in a day, although a small number of routes are long distance trips.

TransWood documents the measures taken to address risks identified with the selected routes. Risk mitigation measures are noted on the route documentation, where applicable. The dispatch orders indicate the routes. Risk mitigation measures focus primarily on the avoidance of high traffic times of day and the avoidance of roads that are dangerous in poor weather conditions. Drivers were interviewed and showed good awareness of risk mitigation measures necessary for driving through populated areas and parking overnight on route to a customer site, if necessary.

The route planning procedure shows what considerations are made when planning a route. Interviews demonstrated that communities and other stakeholders are involved in the selection of routes and the implementation of risk mitigation measures. Extensive interaction occurs between TransWood, Cyanco, and the mine customers. Drivers were interviewed and showed good awareness of the need to stay in close contact with the Terminal Manager and Dispatcher regarding route issues such as road condition or weather-related issues. Only hazmat approved roads are used in the route planning process. Cyanco is very involved in the community and with the Local Emergency Planning Committee. Community concerns or issues are either brought directly to TransWood's attention or brought up by Cyanco following community interactions. The auditor concluded that the level of stakeholder input into route planning was appropriate.

Where routes present special safety or security concerns, TransWood use additional safety measures to address these concerns. Interviews demonstrated that stakeholders are involved in the selection of routes and the implementation of risk mitigation measures. If there is a problem with the route or with weather the drivers are empowered to refuse the delivery.

Most routes are short in length and security concerns are minimal. TransWood has a robust QUALCOM communication and GPS tracking system. Drivers have pre-set codes that are typed in at 5 points along the trip to the customer site to notify the control room operator and the dispatcher that different steps in the transport have occurred. For example: left Cyanco, on-route to customer, at customer, leaving customer, arrived back at Cyanco. If a driver fails to send the pre-set number of QUALCOM messages, the TransWood Dispatcher and the Cyanco Control Room Operator immediately start calling the driver to see what may be wrong.

TransWood does not subcontract any portion of their cyanide transportation operations and tractors are owned by TransWood, Inc.

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 1.1
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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 transport company uses only trained, qualified and licensed operators to operate its transport vehicles. TransWood's procedure for hiring drivers requires a minimum age of 24 years, 2 years of commercial driving experience, security clearance certificate and driving records.

There is a zero tolerance for speeding and reckless driving. A road test is part of the qualification process. A CDL is required with hazmat and tanker endorsement at the time of hire. All drivers have a U.S. DOT Class A Commercial Driver's License (CDL) with a Hazardous Materials / Tanker endorsement. The records were reviewed and found to be acceptable. Interviews indicated that drivers are thoroughly trained, tested, and observed prior to delivering a load alone. New hires drive only in the daytime and go out with an experienced driver for about 5 weeks. They also go through a skills evaluation process prior to delivering each type of shipment and prior to driving a route for the first time.

All personnel operating cyanide handling and transport equipment have been trained to perform their jobs in a manner that minimizes the potential for cyanide releases and exposures. Operational training is given upon hire and there is a skills evaluation process to ensure that drivers are competent to perform their job and to drive the designated route prior to the first delivery alone. Cyanco conducts cyanide safety training on an annual basis for all drivers. Safety-related training is given at defined intervals to ensure that all personnel operating cyanide transportation equipment can perform their jobs in a manner that minimizes the potential for cyanide releases and exposures. The training is carried out using videos, computer-based training, and classroom sessions. Training records were reviewed and found to be acceptable.

Specific training records reviewed included: hazardous materials, mine safety and health administration, CN safety training, three points of contact, loading procedure, offloading procedure and mine training, cargo tank driver-rollover, fire extinguisher training, fall protection training and driving in extreme weather conditions, among others.

TransWood does not subcontract any portion of their cyanide transportation operations.

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

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### Transport Practice 1.3

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

The transport company only uses equipment designed and maintained to operate within the loads it will be handling. 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 a label. Equipment labels were reviewed during the audit. All tractors and trailers have been checked and all are rated for weights that exceed maximum loaded weights.

Tractors have automatic transmissions. Modifications are made to all standard trucks to make them more suitable for the mine roads and the loads hauled, they are "custom made". Most tractors have 4 axles and liftable, steerable tags (tires that can be lowered when more support is required). Trailers have reinforced double frames to meet stress in bumpy roads. Improvements in trailers include the use of double frames and longer frame rails.

There are procedures to verify the adequacy of the equipment for the load it must bear. 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. Equipment specifications are done by the company owner or the vice-president. The maintenance program is very well organized, spare parts inventory is maintained at a high level, and maintenance personnel are highly qualified.

Defined checklists showing all necessary maintenance activities are used and records were available to demonstrate that equipment is typically checked every 5,000 miles or at least every 60 days. Cyanco maintains the tank equipment and TransWood maintains the tractors and the trailers from the chassis down to the tires. Cyanco was also audited during this audit cycle and confirmation was made that tankers and ISO tanks are appropriately maintained. Regulatory-required inspections are scheduled, tracked, and documented. The tractor, trailer, and ISO tank files show all preventive maintenance activities, repair activities, and inspection activities that were performed on the tractor, trailer, and/or over time.

There are procedures in place to prevent overloading of the trucks used when handling cyanide. Loading is done by Cyanco operators using scales to confirm that equipment is not being overloaded. The loads being hauled are standard loads that do not vary greatly in weight, but the tractors and trailers are weighed prior to loading and after loading for each delivery. Records were checked against weight capacities and weight limit regulatory information.

The equipment is capable of transporting loads in excess of the maximum loads shipped. The regulatory limits on truck weight are typically the limiting factor that dictates the maximum amount of cyanide that can be transported. Office personnel and drivers all showed excellent awareness of weight capacities and regulatory requirements pertaining to maximum truck weight allowed in each state.

TransWood does not subcontract any portion of their cyanide transportation operations.

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The operation is:

- In full compliance with
- In substantial compliance with
- Not in compliance with

Standard of Practice 1.3

### Transport Practice 1.4

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

TransWood has procedures for loading and offloading to ensure that the cyanide is transported in a manner that maintains the integrity of the producer’s packaging. TransWood transports sodium cyanide solution in tanker trucks and solid sodium cyanide briquettes in ISO tanks. Because shipments are only made in bulk quantities, there is no “packaging” other than the truck itself. Normal safe driving procedures and unloading procedures ensure that the truck and the trailer are not damaged during transit. To reduce the risk of turn-over, TransWood has the policy of delivering only full loads and limiting any transport of partially full tankers. Baffles are used in the longer 53-foot tankers to reduce the risk of product movement and increase control over the vehicle. To make the cargo more stable against rollovers, tankers have a wider axis and a low platform to lower the center of gravity. The tanks travel almost full to avoid balance issues that could occur.

TransWood uses placards and signage to identify the shipment as cyanide, as required by local regulations or international standards. Appropriate placards showing UN 3414 (cyanide solution) or 1689 (solid cyanide) are displayed on all four sides of the transport vehicles. Drivers visually inspect the tractor and tanker trailer prior to each movement. Maintenance personnel review test markings on cargo tanks and perform required tests at prescribed intervals. Equipment markings were found to be adequate and conformant.

Transportation equipment was evaluated and was found to have placards on four sides in all cases. Company practice is to only remove the placards from a tanker or ISO tank if it was being taken out of service and has been triple-rinsed.

Drivers conduct a pre-trip inspection prior to departure. Mechanical defects are called to the attention of the on-site mechanics. Issues that would affect safety and/or legal compliance are resolved prior to movement off-site. Drivers were interviewed and they demonstrated a pre-trip inspection. Pre-trip inspection checklists were reviewed and found to be acceptable.

Drivers perform a driver vehicle inspection at the end of each day of operation. Completed checklists are submitted into the office at the end of each day. Pre- and post-trip inspection records were sampled for the recertification period and were found to be filled out and signed.

TransWood employs several full-time mechanics who perform preventive maintenance on all transportation equipment at regular intervals. The maintenance frequency is typically done every 5,000 miles. Records indicate that the maintenance is being conducted approximately every 60

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days. Equipment such as brakes and tires are changed out long before equipment failure would occur. Pre-defined checklists showing the required maintenance tasks are used to record actions. The incoming and outgoing condition of the equipment is recorded on the checklists and associated repair orders. Records were sampled for tractors and trailers for the recertification period and were found to be acceptable.

The Safety Program includes a limitation on drivers' hours in accordance with Federal Motor Carrier Safety Regulations (FMCSR). Drivers are informed of legal requirements regarding limits on driving hours, are encouraged to stop driving if they become too tired (empowerment), are provided with fatigue training, and are monitored monthly for adherence to driving hour limitations through spot checks performed at the terminal and monthly audits performed by headquarters. Drivers were interviewed about these requirements and policies. Awareness and understanding of the requirements was excellent. Electronic logs with alert notifications are used to ensure compliance.

The auditor reviewed the documents "TransWood Carriers Inc. Hours of Service Policy", as well as the procedure "Driver's Guide to Hours of Service" (DC-10). An out of service violation can be a cause for termination.

TransWood has a process of shipping only full tankers or moving empty tankers. This is done to reduce the risk of roll-over and the risk of an accident. The tankers and ISO tanks are generally shipped full.

Drivers are empowered and directed to pull over whenever weather, fatigue or other conditions are unsafe to continue a trip. In such instances the driver is to call into the office. The Stop Work Policy was reviewed and confirmed through driver interview during this audit.

There is a written drug abuse prevention program. TransWood participates in random drug and alcohol testing and maintains a strict zero-tolerance policy. Policy number DC-4 Drug & Alcohol Policy was reviewed. Drug testing is done randomly, as part of the pre-employment process, post-accident testing, at the mine site and if there is suspicion of a problem. The auditor reviewed several drugs tests registers for the re-certification audit period.

Records were available to demonstrate that the Cyanide Code requirements had been fulfilled.

TransWood does not subcontract any portion of their cyanide transportation 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 1.4
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**Transport Practice 1.5**

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

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

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 1.5
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**Transport Practice 1.6**

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

The trucks have the means to communicate with the transport company, the mining operation and the cyanide producer and emergency responders. Cyanide shipments are tracked using the Omnitricks Qualcomm/GPS tracking system that is maintained and monitored from Cyanco’s Control Room.

Shipments are tracked by both Cyanco and TransWood personnel. The Cyanco control load operator is responsible for updating the Transport via the Qualcomm satellite system to the control room. Every half hour the Qualcomm system updates the data on the control board. During daytime business hours TransWood also tracks the shipment with the Omni Tracks system. TransWood drivers also have cell phones as a back-up means of communication.

The communication equipment is periodically tested to ensure it functions properly. The communication and tracking equipment is properly maintained and is used daily. Checking the communication system is part of the pre-trip inspections. The communication equipment is maintained as part of the formal preventive maintenance program for each tractor. If necessary, Omni Tracks customer service will evaluate and fix the communication and tracking equipment. Cyanco continuously monitors the signal that appears on the Control Board.

Each truck is tracked by GPS. A demonstration of real-time tracking capability was observed during the audit. The system is used each day and correct operation of the system is confirmed at that time.

There are no blackout areas for the Qualcomm system along the designated routes. New trucks at TransWood have satellite antennas that improve the signal. Every half hour a position report is sent via the satellite.

TransWood has systems to track the progress of cyanide shipments. The company uses a QUALCOM communication and GPS tracking system. Drivers have pre-set codes that are typed

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in upon dispatch, upon arrival at the customer sites, and after unloading is complete. If a driver fails to send the pre-set number of QUALCOM messages, the TransWood Dispatcher and the Cyanco Control Room Operator start calling the driver to see what may be wrong.

Personnel responsible for tracking shipment status from both Cyanco and TransWood were interviewed, the GPS system was demonstrated, and logs showing that shipment status was being recorded were reviewed and were found to be complete.

The transporter has inventory control and chain of custody documentation to prevent loss of cyanide during shipment. Cyanco and TransWood work together to manage a unique inventory management system in which they monitor customer tank levels and dispatch shipments automatically after querying the customer's computer systems. TransWood ships full loads. Cyanco's dispatch system fills the tank with a telemetry system for level control and a scaled system. Drivers and Dispatchers were interviewed regarding this process of filling customer tanks, monitoring amounts delivered, and maintaining control over the shipment.

Bill of Lading paperwork shows the amount of cyanide delivered. This paperwork is used to document the chain of custody and is signed upon delivery of the product to the customer. The amount of cyanide delivered is carefully monitored by the driver and remotely through the TransWood dispatch office. Trucks are weighed when dispatched and when they return to ensure proper chain of custody for all cyanide shipped.

Shipping records indicate the amount of cyanide in transit and the Safety Data Sheet is available during transport. The receiving mine signs the Bill of Lading and this record is maintained by TransWood. The records were reviewed; signatures indicating receipt of the material were available for all deliveries reviewed. All necessary permits, SDS information, and emergency contact information is kept in the trucks at all times.

TransWood does not subcontract any portion of their cyanide transportation operations.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 1.6
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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.**

TransWood does not have any interim storage responsibilities. Additionally, no trucks containing cyanide are allowed to be stored at the terminal. If a delivery is interrupted, loaded cyanide tankers would be brought to Cyanco to be stored in a secure location.

There is no storage of cyanide within a building. Therefore, there is no possibility for buildup of hydrogen cyanide gas within a structure. Cargo tanks have vent valves. This was deemed to be sufficient.

Transportation equipment is designed to securely contain its contents. Loading of equipment is done at the packaging facility where secondary containment is used. The cabinet at the top of the tankers provides secondary containment around the dome. Procedures and check off sheets from the packaging facility were reviewed to confirm that the drain tubes leading from the top cabinet are plugged and checked as part of the loading process.

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 2.1
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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.**

TransWood has an Emergency Response Plan for its own operations, and it uses the documented Cyanco Winnemucca Emergency Response Plan (ERP) and the Cyanco Global Transportation Emergency Response Plan (GTERP) that address all of the Code requirements for the transportation of cyanide. The TransWood ERP is appropriate for the selected transportation routes. The ERP was reviewed and was found to be acceptable. TransWood drivers only have a notification role in emergency response. Emergency response is then directed and carried out by Cyanco employees, emergency responders, and mine personnel if the emergency happens at a

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mine site.

Drivers have hazardous materials training and security training, and they keep a copy of the Emergency Response Guide (ERG) with them at all times during transport. TransWood only transports cyanide via truck and all scenarios considered in the ERP were related to truck accidents. Liquid and solid sodium cyanide, tanker versus ISO tank, roadway infrastructure differences, and the roles of the different emergency responders are discussed in the ERPs.

- a) There have been no changes to the routes driven during the re-certification period. The combined ERPs for TransWood and Cyanco are appropriate for the selected transportation routes. Emergency procedures in the TransWood ERP are described in general, and more detailed response descriptions are in the Cyanco Winnemucca ERP and GTERP documents. TransWood drivers only have a notification role in emergency response.
- b) The ERPs consider the physical and chemical form of the cyanide. Both solution and solid forms of cyanide are shipped from the Winnemucca Plant. Both Safety Data Sheets (SDSs) are included in the ERPs.
- c) The ERPs consider the method of transport. The only mode of transportation is truck, which is addressed by the ERPs and the Cyanco GTERP.
- d) The ERPs consider all aspects of the transport infrastructure such as conditions of the road. The differences in infrastructure for the defined routes are addressed in the ERPs. As there are not multiple modes of transportation, the different road types such as highway, public, private, and rugged mine site were considered. Drivers showed good awareness of the need to use different routes depending on weather conditions.
- e) The Cyanco Winnemucca ERP and GTERP specifically mention the design of the transport vehicle. The emergency response actions outlined in the TransWood ERP are primarily notification actions. The Cyanco ERP shows diagrams of transportation equipment and how to transload material, if necessary. The Cyanco GTERP includes the detailed cyanide emergency procedures from the transportation emergency responder, Garner Environmental Services.

The ERPs and the GTERP include descriptions of response actions, as appropriate for the anticipated emergency. The role of the driver is described in the emergency procedures. The driver is responsible for securing the scene and making the necessary notifications. Cyanco, as owner of the material, is responsible for directing emergency responders. The role of this external partner is clearly stated in the ERPs. A representative of Cyanco confirmed this statement.

The ERPs identify the roles of outside responders, namely the Cyanco emergency response team, police, fire, medical responders, and hospitals. If an offsite emergency requires Cyanco's personnel expertise, those personnel will be made available in a support/liaison role pursuant to their level of training. Cyanco also contracts with Garner Environmental Services, Inc. to respond to transportation emergencies. Garner's roles is described in contractual agreements and in the Garner emergency procedures in the Cyanco GTERP.

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Cyanco emergency plans state that local emergency response agencies are to be called upon in an emergency onsite. The site is in a 911 emergency response area. Since these agencies have specialized training in fire, medical response transportation and law enforcement, they will be utilized to respond according to their training.

Emergencies occurring during transport may require the involvement of outside agencies and response personnel such as fire, police, and medical responders.

Combined emergency response drills are held with mine sites, local emergency responders, and Cyanco personnel to ensure that all parties understand their roles and responsibilities in the event of an incident or accident.

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.

TransWood provides emergency response training of appropriate personnel. Training on the Emergency Response Plans was given to all relevant employees. Records were available for review. Training is refreshed every year. Drivers were interviewed and awareness of emergency procedures and documentation was confirmed. Training records from the recertification period were reviewed and were found to be acceptable.

There are descriptions of the specific emergency response duties and responsibilities of personnel. The roles and responsibilities of personnel are described in the Cyanco Winnemucca ERP and GTERP. The only role described for TransWood is that of the driver to call the emergency response company for help by radio or phone, isolate the area and wait until help arrives.

There is a list of all emergency response equipment that should be available during transport or along the transportation route. Each truck has a designated emergency equipment bag that has several safety items including extra PPE. The contents of the emergency equipment bag are listed out on a checklist. The bags and contents of the bags are spot checked as part of the tractor preventive maintenance program. Although equipment is available for protecting the driver, the ERP does not call for the driver to try and stop a cyanide release, only to mark the area, keep people away, and make notifications. There is therefore no spill response equipment maintained in the trucks.

TransWood has the necessary emergency response and health and safety equipment, including personal protective equipment, available during transport. Each truck has a designated

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emergency equipment bag that has two sets of safety items including extra PPE as backup. Among the contents of the emergency equipment bag there are rubber boats, rubber gloves, rubber rain suits, hard hats, face shields and goggles, all these listed out on a checklist. The bags and contents of the bags were observed during the audit and are checked during the pre-trip inspections.

There are procedures to inspect emergency response equipment and ensure its availability when required. The Emergency Response Plan defines what equipment must be available in each truck and extra personal protective equipment is available in each bag. Equipment is checked during the pre-trip inspection process.

TransWood does not subcontract any portion of their cyanide transportation 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.

There are procedures and current contact information for notifying the shipper, the receiver, regulatory agencies, outside response providers, medical facilities and potentially affected communities of an emergency. The notification procedures are described in the Emergency Response Plan (ERP). The notification call list is checked for accuracy once per year when the ERP is reviewed and tested. Additional phone numbers and detailed information are in the Cyanco Winnemucca ERP and GTERP.

Systems are in place to ensure that internal and external emergency notification and reporting procedures are kept current. The Cyanco Winnemucca ERP and GTERP are reviewed and tested (by means of a drill and/or tabletop exercise) periodically. During the audit, the phone numbers were checked for accuracy. Information was found to be up to date.

Any significant cyanide incident in the supply chain is reported by TransWood to Cyanco, Cyanco's emergency response partners, and to ICMI. The TransWood ERP includes a written procedure that details the procedure for notifying ICMI within 24 hours if there is a significant cyanide incident. TransWood notified ICMI of the one exposure incident during the recertification period that met the criteria for significance.

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 3.3
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**Transport Practice 3.4**

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

There are procedures for remediation, such as decontamination of soil or other contaminated media and management and/or disposal of spill clean-up debris. The Cyanco Winnemucca ERP includes text that addresses the remediation and neutralization of cyanide solutions and solids. Garner Environmental Services, the Cyanco emergency response contractor for transportation incidents, also has detailed information regarding cleanup and decontamination in the GTERP.

The Cyanco Winnemucca ERP discusses the steps to be taken in the event of a cyanide release to ground or water. Neutralization of soil is discussed in the Garner emergency procedures in the GTERP. The hazards experienced with a cyanide release to water are also discussed in the plan.

General information is given, and the hazards associated with using cyanide treatment chemicals are recognized. Neutralization chemicals are not allowed to be used in or near surface water bodies.

The Cyanco Winnemucca ERP and the GTERP prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water. TransWood would not be directly involved in the remediation of a cyanide spill.

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 3.4
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TransWood Inc, Winnemucca  
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Signature of Lead Auditor

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### Transport Practice 3.5

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

There are provisions for periodically reviewing and evaluating the ERP adequacy and they have been implemented. The ERP states that the TransWood emergency procedures will be reviewed annually, and that drills are to be conducted at least annually. The auditor reviewed records from the recertification period to show that Emergency Response Plan had been reviewed. Interviews and written procedures confirmed that the ERP would also be reviewed after any deployment. Changes would be made, as necessary.

There are provisions for periodically conducting mock emergency drills and they have been implemented. Emergency drills were held annually during the recertification period. The mock drills conducted simulated transport-related cyanide release and exposure incidents. The drills dates were August 27, 2019, February 20, 2020, August 10, 2021, and May 21, 2022. Several of the drills included collaboration with mines and with Cyanco. Records were complete.

Mines regularly request that TransWood participate in their emergency drills. The operation conducts mock emergency drills, holds a drill critique, and evaluates the need for further training or adjustment to the emergency procedures.

There is a procedure for the ERP to be evaluated after its implementation and revised as needed. The Emergency Response Plan's performance is reviewed after actual emergencies and after the annual drill. Changes are made to the ERP, as needed. Drill critiques were reviewed for drills performed during this recertification period. Evidence was available to show that emergency plans were evaluated following drills and after the one significant cyanide incident during the recertification period. Identified actions, such as the updating of the contact list to capture recent names changes, were appropriately processed.

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 3.5
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