

SUMMARY AUDIT REPORT

INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE



For The International Cyanide Management Code and ALPA Servicios Logísticos – Lurin – Lima – Peru Cyanide Production Summary Audit Report

www.cyanidecode.org

LIMA, PERU



RIO DE JANEIRO, BRASIL



Name of Facility – ALPA Servicios Logísticos

Date – February 2014

Signature of Lead Auditor

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INTRODUCTION

Information of the Operation Audit

Name of Cyanide Transportation Facility: ALMACENERA EL PACIFICO SAC

Name of Facility Owner: ALMACENERA EL PACIFICO SAC

Name of Facility Operator: ALMACENERA EL PACIFICO SAC

Name of Responsible Manager: Ronald Escajadillo Villacorta

Address: Carretera Antigua Panamericana Sur Km 29.5 State/Province: Country: Lurin/Lima / Perú

Telephone: (511) 295-7023 Fax: (511) - E-Mail: rescajadillo@alpa.com.pe

Location Detail and Description of Operation:

Almacenera el Pacifico SAC (hereinafter ALPA) was created in 2006, with the aim of providing logistics services to businesses of mining services, but due to market needs services expanded to other areas at the national level for which significantly increased storage areas and services that the company provides solutions achieving logistics offer comprehensive warehousing, distribution, transportation.

The company has an area of 93,000 m2 where has a variety of different modular storage areas that meet the needs of its customers, including warehouses for storage of sodium cyanide which has an area of approximately 10,000 m2.

In 2010 were audited under the International Management Code Cyanide (hereinafter the Code) for the certification of the MERCANTILE SA Company and in 2013 were audited for recertification of the same company, because ALPA is the operator logistics of COMMERCIAL SA.

ALPA stores sodium cyanide in wooden presentation boxes and cylinders by 1TM 50Kg and 100Kg. Operation of ALPA includes management control of Customs Transport (Puerto - Warehouse Lurín) Warehousing Distribution (Downloading cyanide packaging containers, packaging storage and loading cyanide packaging to containers) and control in the management of Transport distribution (Warehouse Lurin - Customer). These activities are carried out 10 years ago with ZERO (00) accidents



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SUMMARY AUDIT REPORT FOR CYANIDE TRANSPORTATION OPERATIONS

Instructions

1. The basis for the finding and/or statement of deficiencies for each Transport Practice should be summarized in this Summary Audit Report. This should be done in a few sentences or a paragraph.
2. The name of the cyanide transportation operation, lead auditor signature and date of the audit must be inserted on the bottom of each page of this Summary Audit Report.
3. An operation undergoing a Code Verification Audit that is in substantial compliance must submit a Corrective Action Plan with the Summary Audit Report.
4. The Summary Audit Report and Corrective Action Plan, if appropriate, for a cyanide transportation operation undergoing a Code Verification Audit with all required signatures must be submitted in hard copy to:

International Cyanide Management Institute (ICMI)
1400 I Street, NW, Suite 550
Washington, DC 20005, USA

5. The submittal must be accompanied by 1) a letter from the owner or authorized representative which grants the ICMI permission to post the Summary Audit Report and Corrective Action Plan, if necessary, on the Code Website, and 2) a completed Auditor Credentials Form. The lead auditor's signature on the Auditor Credentials Form must be certified by notarization or equivalent.
6. Action will not be taken on certification based on the Summary Audit Report until the application form for a Code signatory and the required fees are received by ICMI from the applicable cyanide transportation company.
7. The description of the cyanide transport company should include sufficient information to describe the scope and complexity of its operation.



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Auditor's Finding

This Operation is

☒ in full compliance

☐ in substantial compliance *(see below)

☐ not in compliance

with the International Cyanide Management Code.

* For cyanide transportation operations seeking Code certification, the Corrective Action Plan to bring an operation in substantial compliance into full compliance must be enclosed with this Summary Audit Report. The plan must be fully implemented within one year of the date of this audit.

Audit Company: ALPA Servicios Logísticos

Audit Team Leader: Julio C. M. Monteiro

E-mail: jmaq@ig.com.br

Names and Signatures of Other Auditors: Carlo Vargas B. (ICMI - Transport Expertise)

Date(s) of Audit: February 2014

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification 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 Verification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the verification audit. I further attest that the verification 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.

Team Leader Auditor - Signature

Julio C. M. Monteiro

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1. OPERATIONS: *Design, construct and operate cyanide production facilities to prevent release of cyanide.*

Production Practice 1.1: *Design and construct cyanide production facilities consistent with sound, accepted engineering practices and quality control/quality assurance procedures.*

The operation is	X in full compliance with	
	in substantial compliance with	Production Practice 1.1
	not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

The construction of storage facilities ALPA approved by the District Municipality Lurin, Lima, Peru, and subjected to quality control of municipal inspectors and customers ALPA. The designs and drawings submitted were approved under the structural considerations of seismic, electrical, fire, health, in accordance with the Rules of the Peruvian Structural Standards risks, and these signed by a professional engineer qualified referee, enabling ALPA for the Storage of Cylinders and Boxes with cyanide. These records are available at ALPA and where reviewed during the audit. The review of building stores ALPA is performed by a multidisciplinary group of professionals made up 01 Structural Engineer 01 Sanitary Engineer, 01, Electrical Engineer 01 and 01 Architect Engineer Safety and Health at Work, which are qualified referees. This done every two years and is a requirement of the Municipality of Lurin, Lima, Peru for the "Operating License" It was evident that the last revision was made in the month of November 2013 concluding that the facilities of ALPA is suitable for storage cylinders and boxes cyanide. ALPA does not handle cyanide also state; ALPA has implement a management plan cyanide PR-19 Storage Cyanide. Cyanide is stake up to 4 levels previously evaluated the strength of the case and in the case of cylinders are placed on pallets up to two levels of cylinders pallets and up to two levels of block pallets. This will be monitoring by the Department of HSEQ and should storage separated from acids, weak alkaline, fuel, water / liquids, food (consume animal or human). The warehouse built with concrete floor, walls and ceiling of corrugate iron roof has a hump end to end to prevent water ingress as secondary containment.

It also has natural ventilation, which consists of windows covered with microfiber, which allows air circulation and prevents the rain to pass if this given. ALPA production processes not only makes storage boxes and cylinders with sodium cyanide. The failure or power outage does not affect the operation of ALPA nor cause a leak or spill. Warning system for reporting emergency brigade staff and hazardous materials to meet any spills promptly was evident. The boxes and cylinders of cyanide are stored on a pallet surface that is on a concrete floor. There are quality control (QC) and documentation of quality assurance (QA)



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Production Practice 1.2: *Develop and implement plans and procedures to operate cyanide production facilities in a manner that prevents accidental releases.*

The operation is	X in full compliance with in substantial compliance with not in compliance with	Production Practice 1.2
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Summarize the basis for this Finding/Deficiencies Identified: (Due to the sensitivity of security issues regarding storage of cyanide, no descriptions of substantial or non-compliance with this aspect of the Production Practice should be provided.)

The standard practices necessary for the safe and environmentally responsible operation verified and documented as described in the PR-19 Cyanide Storage.

ALPA is aware of the dangers and risks involved in the use of sodium cyanide during storage, therefore has developed an Emergency Plan for the management of cyanide - PL-02 Emergency Plan Storage Sodium Cyanide. The allows them to ensure the safety and health of its Employees, Customers, Contractors, Visitors and others to fulfill the commitment to prevent or minimize the risk to health in an appropriate, timely and coordinated response to emergencies. ALPA stated in PL-02 Emergency Plan Sodium Cyanide Storage changes are made in the Plan, provided that no changes in the patterns or practices, or if the parties each (Peruvian State, Customers, Partners, Suppliers, Centers Emergency Support) request changes or modifications. ALPA implemented a program of preventive maintenance of equipment (forklifts and TELEHANDLER), maintenance and repair. Maintenance records of equipment used for loading / unloading and storage of cyanide where checked. The PL-02 Emergency Plan Storage Sodium Cyanide establishes procedures to dispose of cyanide in contaminated soil. The storage facility built ALPA for ventilation naturally has windows, which covered with microfiber, which allows entry of air entering avoiding rain.

The storage area ALPA has corrugated iron roof and walls, additionally has a system of gutters to catch rainwater and direct it to a sump, the windows are covered with microfiber for ventilation but prevent entry of rainwater. It also has a secondary containment system that consists of a hump in 5cm to avoid ingress of water and this is located opposite the entrance doors of the store. ALPA makes a Hazard Identification and Risk Assessment (HIRA its acronym in Spanish) and Identification of Significant Environmental Aspects (AAS its acronym in Spanish) of the loading, unloading and storage. This IPERC is performed annually agree with the PR-11 and PR-12 IPER Identification AAS and evaluation. Access to Warehouse for ALPA is restricted, prohibited the public has a perimeter fence 3 meters high and security based on four (04) security guards and four (04) dogs with trainer also has a closed system security cameras. The store cyanide has locks on all doors and signals prohibited entry to unauthorized personnel.



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Production Practice 1.3: *Inspect cyanide production facilities to ensure their integrity and prevent accidental releases.*

The operation is X in full compliance with Production Practice 1.3
 in substantial compliance with
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

ALPA does not make storage tanks, ALPA inspects boxes and cylinders referred cyanide during unloading of the same cargo transport units during storage and when your client's office. During storage, he met staff on the implementation of this practice by saying that they do continuously. A visit to the warehouse and conclude that ALPA cyanide were in proper condition without sample rupture, leak or spill realize.

No tanks containing cyanide solutions at ALPA facilities and no piping, pumps or valves handle cyanide solutions on site.

ALPA has load-lifting equipment (forklifts and TELEHANDLER). The lifting and handling charges inspected daily and maintained accordance with ALPA for this provider has the Maintenance Plan. These records where evidenced during the audit.

It was evidence in the formats of review identified specific elements that must be observe and include the date of inspection, name of inspector and deficiencies identified during inspections.

2. WORKER SAFETY: *Protect workers' health and safety from exposure to cyanide.*

Production Practice 2.1: *Develop and implement procedures to protect plant personnel from exposure to cyanide.*

The operation is X in full compliance with Production Practice 2.1
 in substantial compliance with
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

ALPA receives cyanide cylinders and boxes (finished product), and does change the aperture or packaging of any of them. ALPA has developed a proceeding for the entry, storage and disposal of the product PR-19 Cyanide Storage.

Additionally this procedure is part of the general induction of staff working in the cyanide storage area.

After interview was evident that the staff has trained in this procedure PR-19 Storage of cyanide and makes the practices described in this, there are also reports that demonstrate the fact.



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For non-routine and emergency operation activities ALPA has implemented hazard identification and risk assessment (HIRA, its acronym in Español) operations, also has the PR-11 indicating that HIRA procedure should be reviewed IPER at least once a year, in if process changes, at the request of interested parties and whenever an emergency occurs. Additionally, it has the Emergency Plan PL-02 Emergency Plan Cyanide Storage, which provides the necessary measures to prevent exposure of personnel during an emergency, which considers the following emergency scenarios: - Incident no injuries / continuous operations, Mechanical Problems / no continuous, Fall of container / packaging with effusion, Fall of container / packaging without spill, Warehouse Fire and Cyanide Poisoning.

The maintenance may only relate forklifts and TELEHANDLER, held outside the company premises by the supplier of the equipment.

The site has a hazard identification and risk assessment (HIRA for its acronym in Spanish) for operations cyanide in stock. IPER Procedure PR-11 indicates that it is the responsibility of the HSEQ department to maintain IPER always updated including significant changes made in cyanide management practices.

Workers participate in relevant meetings of review of issues of safety and health at work for that a Committee of Safety and Health in the joint work (two Management Representatives and 2 Representatives of Workers). In these reunions are in place the which are carried at least once a month or whenever an emergency occurs topics related to health and safety at work, revision and creation of procedures and recording of decisions is left in a minute book which discusses evidenced. Furthermore, induction talks was evident to all new personnel hired to work the stock cyanide in which the safe handling of the product, first aid in poisoning, spill management is explained. It is noteworthy that after interviews with staff these declare be consulted at any health and safety issue at work.

ALPA uses two (2) monitoring devices confirmation of proper control of exposure to hydrogen cyanide (HCN) to the limits of 4.7 ppm (5 mg/m³) or less, during the visit was evidenced both teams were calibrated and a calibration certificate is issued by them. ALPA has 02 monitoring teams hydrogen cyanide that have their respective calibration certificate valid at any time ALPA has at least (01) while the other equipment is calibrate by the supplier. Reportedly, they have not identified areas or activities with such concentrations. Despite this, the A class of personal protective equipment is required on the installation and use of cyanide when a container is damaged and repairs are made to it. Reportedly, they have not identified areas or activities with such concentrations. Despite this, the A class of Personal Protective Equipment (PPE) is required on the installation and use of cyanide when a container is damaged and repairs are made to it.

Through interviews with staff and storage and forklift driver TELEHANDLER use "Buddy System" that otherwise may notify or communicate with other staff assistance, support or help where it is determined that it is necessary to confirm. ALPA also establishes that all work with sodium cyanide realize must be at least 02 workers and



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was been supervised. (PR-19 Sodium Cyanide Storage) Radios and telephones used to communicate between the relevant personnel related to the operations of cyanide. Forklift operators have radios with them at all times. ALPA executes occupational medical examinations for all Workers at the start of labor relationship to whether or not they are FIT last designated areas also occupational. Medical exams are performer annually to monitor the health of workers and finally at the end of the job links an additional medical examination is performer to certify the good health of the worker at the time of being separate from the organization. This information evidenced during the audit. The protocol is developing occupational medical examination by a medical surgeon with specialty in health and safety at work according to the hazards and level of risk to which it is exposed the worker. ALPA has a policy change of clothes personnel performing work of loading and unloading cyanide level C uses costumes, which are disposable once they have been use. Personnel performing inspection work or visits are not subject to the policy change clothes realize activities where you can generate a spill or expose to the same.

Production Practice 2.2: Develop and implement plans and procedures for rapid and effective response to cyanide exposure.

The operation is	X in full compliance with	
	in substantial compliance with	Production Practice 2.2
	not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

ALPA has developed an Emergency Plan for quick and effective management of sodium cyanide PL-02 Emergency Plan Storage Sodium Cyanide. Response to cyanide exposure shown various detailed procedures

The schedule includes drills 2 times per year, which evidenced during the visit. It is worth mentioning that after reviewing the Training Plan and Training Records was evident that the staff is training in the Emergency Plan and Safe Management of Cyanide (Spill and Poisoning). In addition, where interviewed personnel involved in the operation which claimed to have received training and simulated situations, and have demonstrated knowledge in the application of the guidelines of PL-02 Emergency Plan Cyanide Storage. The site has showers and portable wash stations eyes low pressure dry chemical extinguishers of 50 Kg, these last every 50 meters. According to eyewash stations, interviewed staff inspected daily and extinguishers are inspecting once a month.

ALPA has water distribution system, oxygen resuscitator and antidote, the staff is train to the use of amyl nitrite and after interviews evidenced knowledge of the application of



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amyl nitrite. ALPA told the health center closes (5 minutes drive) and the fire company (10 minutes) on the application of first aid in case of cyanide poisoning and application of sodium nitrite and Sodium Thiosulfate if required.

ALPA also delivers a copy of the MSDS and the PL-02 Emergency Plan Storage Cyanide by evidencing the receipt of the document. Workers provided with telephone for internal communication within the facility and have telephone services for external communication.

ALPA sets the PR-19 Storage of Sodium Cyanide in the elements detailing first aid that must be present during operation with cyanide (receipt, storage and dispatch) also provides a checklist to check the existence of these in if one of them is used is set to be replaced immediately. ALPA in the checklist provides a review of first aid kit (for Cyanide Antidote Kit) this should be reviewed prior to performing any operation related to cyanide

Checklists from 2010 until the date of the audit were reviewed; availability of equipment was confirmed during the audit.

The MSDS is in Spanish was available next to the storage of cyanide. Also, the area has safety signage in Spanish language. No tanks, pipes or containers. Cyanide is stored in warehouses, that are clearly marked with the pictures. The PL-02 Emergency Plan

Cyanide Storage guidelines are stable to care for people with cyanide poisoned by skin contact. ALPA has no medical service on site only handles because boxes and cyanide cylinder however ALPA told the nearest health center (5 minutes by car) and the company of firefighters (10 minutes) on the implementation of first aid in case of cyanide poisoning and application of sodium nitrite and Sodium Thiosulfate, if required. They found in the PL-02 Emergency Plan Storage Cyanide and they deliver a copy thereof evidenced by the document be sent. The PL-02 Cyanide Storage Emergency Plan includes a guideline for the transport of workers exposed to the nearest medical facility (5 minutes). This guideline indicates in which case the exposed worker be evacuated and the name and address of the medical center; how the worker be exposed and the exposed worker transported at all times. ALPA has established an emergency communication centers, alerting doctors about the risk of cyanide exposure. Letters has been send with the information necessary, and maintains ongoing communication letters are detailed email, direct phone and contact person.

There have been two mock cyanide spills in 2013 as noted in the Training Plan that keeps ALPA, simulations were develop within the premises of ALPA, and then preceded to the same feedback from all staff involved. Reports mock improvement opportunities described taken during the visit implementing opportunities for improvement was evident. ALPA has implemented the PR-09 Incident and Accident, which aims to ensure that all accidents and near misses are report and investigated immediately in order to make the respective corrections. This procedure is the responsibility of HSEQ department. The procedure divided into the accident / incident care, Accident Investigation / Treatment Failure and the accident / incident.



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As part of this research, this method indicates that the investigation of the incident / accident must be support by a report. In addition, the PR-08 Continuous Improvement procedure used to monitor the status of corrective actions identified in the report of the incident / accident. ALPA reports that no accidents have occurred with cyanide or whatever is involved, information validated by interviews with company personnel operative.

3. MONITORING: *Ensure that process controls are protective of the environment.*

Production Practice 3.1: *Conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.*

The operation is X in full compliance with
 in substantial compliance with Production Practice 3.1
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

ALPA makes no discharges to surface waters, ALPA stores ended briquettes packed in presentation boxes and cylinders product. The waste generated by an emergency would be handle as hazardous waste. The waste generated by an emergency would be handling as hazardous waste.

4. TRAINING: *Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.*

Production Practice 4.1: *Train employees to operate the plant in a manner that minimizes the potential for cyanide exposures and releases.*

The operation is X in full compliance with
 in substantial compliance with Production Practice 4.1
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

ALPA provides training programs for workers in annual form, training programs in 2012, 2013 and 2014, all included as part of the courses were evident:

Safe Management of Cyanide (Spill and poisoning) - Taught by DuPont - Annual

-Fire fighting - Taught by internal staff - Annual

-First Aid - Taught by the Company IFSECPERU - Annual

-Hazardous Materials 1 - Taught by the Company IFSECPERU - Annual

-Hazardous Materials 2 - Taught by the Company IFSECPERU - Annual

-Safe handling forklift - Taught by the supplier of forklift KOMATSU – Annual

These courses are evaluate and certified by the suppliers.



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ALPA provides training programs for workers in a annual, the training programs of the year show in all the course of "Use and Care of Personal Protective Equipment" which is taught by retailers included equipment "MICKVAL" training is evaluated and certified by the provider annually. ALPA makes the identification of hazards and assessment of risk (IPER its acronym in Spanish) which performed based on the PR-11 IPER, this procedure indicates that the IPER must be performer by process and job to minimize risks to which it is exposed personnel. This forms part of the annual training program and taught to all workers. ALPA also establishes and performs an initial induction and regular training on safety and health at work and environmental impacts (PR-10 Selection and Recruitment), in order to prevent accidents and spills this induction include: operating procedures, safe handling cyanide (spill and intoxication), fire fighting, first aid and use of personal protective equipment. ALPA names a person or entity responsible for each training session, all of whom are qualified ALPA staff and external companies, evidenced after reviewing the resumes of pre-employment with the same instructor. ALPA has a procedure for evaluating potential suppliers in terms of their suitability to work with ALPA. ALPA states and performs an initial induction to all staff and regular training on safety and health at work and environmental impacts (PR-10 Selection and Recruitment), in order to prevent accidents and spills this induction include: operating procedures , safe handling of cyanide (spill and intoxication), fire fighting, first aid and use of personal protective equipment. These records where evidenced during the audit. The PR-19 Sodium Cyanide Storage also provides that the staff in the transaction related to cyanide must be previously entailed the performance of its duties. In addition, 5-minute briefings prior to commencing activities with sodium cyanide (loading and unloading) whose records where evidenced during the audit are given the efficiency of formation of cyanide tested during exposure to cyanide or cyanide spill drills according to ALPA training program. An independent report after each year and depending on the results of the need for this training is prepared and communicated.

Production Practice 4.2: *Train employees to respond to cyanide exposures and releases.*

	X in full compliance with	
The operation is	in substantial compliance with	Production Practice 4.2
	not in compliance with	
	not subject to	

Summarize the basis for this Finding/Deficiencies Identified:

ALPA has the PL-02 Emergency Plan Storage Cyanide, in which all employees are training in the different scenarios that could result in an emergency such as the release of cyanide, also shown in the same scheme for easy care from an emergency. The training is performer by the HSEQ Department once a year. The Training Program ALPA indicated that two drills per year are perform during the visit evidences were available two (02) made by ALPA in 2013. Simulations performed evaluate in terms of effectiveness, to determine the level of knowledge, skills, and identifying weaknesses



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of staff and the organization. This assessment was evident in the reports of the drills conducted in 2013. ALPA maintains records of training conducted where the names, job title, signatures of the workers who received and Instructor indicated that imparted, name of the topic covered, copy the material taught during training and evaluation of the training copy of the resume of the instructor saved. These records where evidenced during the audit also were interviewed three workers.

Mr. Loayza Hinostroza Luiz A. (Stockman)

Mr. Paredes Pinco Freddy, (Forklift Operators)

Mr. Velásquez Damian Elmer (Forklift Operators).

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

Production Practice 5.1: Prepare detailed emergency response plans for potential cyanide releases.

The operation is	X in full compliance with	
	in substantial compliance with	Production Practice 5.1
	not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

The PL-02 Emergency Plan Cyanide Storage (hereinafter referred to as the Plan). The Plan is a document that covers all operations during the operations in the warehouse. A section that describes the characteristics of sodium cyanide, emergency organization, communication protocol, and emergency evaluation levels are included. The Plan provides for the necessary measures to prevent exposure of personnel during an emergency, which considers specifics emergency scenarios according the characteristics of product. ALPA stores ended briquettes packed in presentation boxes and cylinders product. These packages are not OPEN during storage so no catastrophic atmospheric emissions are generated. In case of any release, be detected by Gas Meters Cyanide (HCN). ALPA has a procedure PR-09 Incident and Accident and PR-11 IPER and The Plan will be review after an emergency. This would help prevent future releases.

Signature of Lead Auditor



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Production Practice 5.2: *Involve site personnel and stakeholders in the planning process.*

The operation is X in full compliance with
 in substantial compliance with Production Practice 5.2
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The plan was develop by the HSEQ Department. The nearest residential area is located more than 1 km of the facility. According to the emergency response procedure at worst an area of 400 m should be evacuate; not covering the residential area. However, ALPA has informed the District Government about its operations and that require support for ALPA evacuate in an emergency. ALPA has contacted the local police, Firefighter's Municipality, and the local hospital, and informed them that are consider as supporting facilities for emergency cyanide. The Plan includes a communications protocol in writing stating the emergency communication done with all stakeholders, including Employees, Customers, Regulatory Agencies and other institutions.

The Audit Team to notice that the facility involve site personnel and stakeholders in the planning process. Records, Programs, CD's and interviews, showed the full compliance with this practice.

Production Practice 5.3: *Designate appropriate personnel and commit necessary equipment and resources for emergency response.*

The operation I X in full compliance with
 in substantial compliance with Production Practice 5.3
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The Plan includes the name of the individual members of those responsible for coordinating detail an emergency and their roles and responsibilities. It is the General Manager of ALPA who grants the authority to provide all necessary resources, also activates the emergency response is provided by the company IFSECPERU with which ALPA has an agreement to care for emergencies, the same as was evidenced during the visit. The Plan In the contact number of the people involved in emergency response is show. The Plan identifies the emergency response team that is the prominent cyanide Operation Staff.

The Plan is described in case not have the resources within the organization to handle an emergency will be called the Company IFSECPERU Company specializing in emergency response. All operating and ALPA HSEQ Department (15 people) staff is training in cyanide emergency response as if spilled cyanide may provide staff to assist with the emergency. The program includes training for staff: Safe



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Management of Cyanide (Spill and poisoning, Firefighting, First Aid, Operating Procedures, use and care of Personal Protective Equipment (PPE), Hazardous Materials I and II. The FILE IFSECPERU staff also was evident for emergency care cyanide which contemplated a training plan that includes insurance Cyanide Management (Spill an poisoning, Firefighting, First Aid, Operating Procedures, use and care of Equipment Personal Protection (EPP), Hazardous Materials I, II, III and V. Reports of drills conducted in 2013 involving the fire company San Pedro de Lurin No. 129 this being the nearest, second, delivering communication was evident Plan centers are described in evidence the same informing them of their role in an emergency and risks associated with the operation presented also requested provide their comments on the Plan, this information is done on an annual basis as indicated in the Plan.

Production Practice 5.4: Develop procedures for internal and external emergency notification and reporting.

The operation is	X in full compliance with	
	in substantial compliance with	Production Practice 5.4
	not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

The plan includes a communication protocol that includes internal communication functions, as well as notification to the authorities and external response personnel. The Plan includes a directory of internal and external contacts. It also displays the contact information of the entire team of internal and external response to emergencies; members of that team have telephones and are available 24 hours a day that was revise after calls to these numbers during the visit. The Plan was develop pro HSEQ Department, the nearest area is more than 1 km of the facility. According to the procedure for emergency response emergency in the worst case scenario will not affect more than one area within 100 meters radius and the evacuation of all personnel will be 500-meter radius. ALPA sending letters indicating the cyanide storage activities, contact numbers and I send the Plan to be reviewed by the emergency support agencies and provide their comments and know the role of operations in case of an emergency. This activity was evident on charges of receiving letters and Plan, which is saving in ALPA.

ALPA has informed the Municipality of Lurin on operation and support centers. The Plan includes a communications protocol in writing stating the emergency communication be done with all stakeholders, including; Employees, Customers, Regulatory Agencies and other institutions.

Production Practice 5.5: Incorporate into response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.

Name of Facility – ALPA Servicios Logísticos

Date – February 2014

Signature of Lead Auditor



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The operation is X in full compliance with
in substantial compliance with Production Practice 5.5
not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The plan describes the methodology to decontaminate, remediate soil or other contaminated materials and dispose of all spill cleanup debris and bodies of water test for the presence of cyanide, the methodology.

The application of a detoxifying (hypochlorite, peroxide, ferrous sulfate, etc.);

Limited only if the spill is confine to a limited body of water, puddles pools, etc., at criterion Field Coordinator. Based on the IPER no potential affect the water bodies. None of specific scenarios rather think that a spill would reach the floor (warehouse and concrete patios are paved) or water. The monitoring is limited to the air and is carrying out with detector gas cyanide (HCN) portable

Production Practice 5.6: Periodically evaluate response procedures and capabilities and revise them as needed.

The operation is X in full compliance with
in substantial compliance with Production Practice 5.6
not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The Plan needs to be update at every opportunity there are changes in form and content, in terms of procedures, people, phone numbers, equipment, methods, or any other consideration to allow us to more effectively and efficiently. It should also be amended following comments during drills, emergencies, request any interested parties or at least ONE (01) Once a year, we can fit the pages of signatures, the Plan was submitted in December 2012 and was in review at the time of the audit. Those responsible for these modifications are the parties involve, who must update, and relay is Department of HSEQ Plan to all stakeholders.

The site has an annual program of emergency drills including cyanide spill. Were Performed two (02) years in 2013 and consist of cyanide spill in stock during the unloading of containers. It was evidence that the operation planned and implemented emergency simulation exercises.

Verified through the Training Schedule (2014), including Simulated Emergency Exercises for Sodium Cyanide spills, are schedule for the Following scenarios.

Laid down in the Contingency Plans:

- Cyanide Spill (Situation 1) - April 2014
- Cyanide Spill (Situation 2) - May 2014

In The Plan specifies that should be amended following comments during drills,



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emergency request for any interested parties or at least ONE (01) Once a year, we can fit the pages of signatures, the Plan were submitted in December 2012 and was under review at the time of the audit.

