

ICMI International Cyanide Management Code Consigner Supply Chain Summary Audit Report

Cyanco Pre-Operational Certification Audit – Western United States Supply Chain

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

2012 Audit Cycle



www.mss-team.com



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Cyanco Western U.S. Supply Chain Summary

Consignor Name & Contact Information

Name of Cyanco

Operation: 9450 Double R Blvd. Suite 2, Reno, Nevada 89445 USA

Name and contact Max Jones

information for Director – EHSS & ICMC

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Pre-Operational Information – Cyanco Western U.S. Supply Chain

Cyanco maintains a corporate office in Reno, Nevada, a liquid sodium cyanide production facility near Winnemucca, Nevada, terminal operations in Cadillac, Quebec - Canada, an office outside of Montreal, Quebec, and has recently built a solid sodium cyanide plant in Alvin, Texas.

The new production plant is located at the industrial park of the Chocolate Bayou Plant of Ascend Performance Materials at Alvin/Texas. The plant produces solid sodium cyanide briquettes and is expected to be shipping product along this Western United States Supply Chain at the end of 2012 or early 2013. Initial plans are to ship product in one metric ton bag/boxes packed into intermodal containers. Cyanco has several other methods of shipping, however, including hopper cars and ISO containers. Cyanide produced at this location will be shipped to Western U.S. destinations using truck, rail, and barge.

This pre-operational Western U.S. supply chain includes Houston as the point of manufacture, truck movements to the Union Pacific rail head in Houston, transportation via rail to the rail head in Seattle, Washington. Shipments will then be transported either by truck to destinations in Washington, or along a more complicated route to Alaskan destinations. Shipments to Alaska move along the following route: truck transportation to the Port of Seattle (Harbor Island), rail-barge-rail transportation via the Alaska Railroad and Alaska Marine Lines to the Port of Whittier and onto Fairbanks, Alaska. The cyanide is shipped by rail directly to the Alaska West Express interim storage yard from which point it is distributed to customers in Alaska.

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The following table is used to describe the transportation companies included in this supply chain and the process used to confirm ICMI Code compliance:

Transportation Segment Start Point	Transportation Segment End Point	Company	ICMI Compliance Determination
Cyanco - Chocolate	Union Pacific	Quality Carriers	Cyanco was audited as a
Bayou Plant of Ascend	Railhead - Houston,		Consignor Transporter on
Performance Materials	Texas		May 17, 2012
at Alvin/Texas			Quality Carriers is ICMC
			certified see 2010 report
UP Railhead -	UP Railhead - Seattle,	Union Pacific	Due Diligence Review -
Houston, Texas	Washington		part of Cyanco US/Canada
			Rail Supply Chain ICMC
			certification in 2011
UP Railhead - Seattle,	Gold Mines	Alaska West	AWE is ICMC certified -
Washington		Express (AWE)	see 2012 report
UP Railhead - Seattle,	SEA-PAC Transport	Alaska West	AWE is ICMC certified -
Washington	Services, LLC Harbor	Express (AWE)	see 2012 report
	Island / Port of Seattle,		SEA-PAC and the Harbor
	Washington		Island / Seattle Port were
			audited during this pre-
			operational certification
			audit on May 22 and
			August 9, 2012
SEA-PAC Transport	Port of Whittier,	Alaska Marine	AML was audited during
Services, LLC Harbor	Alaska	Lines (AML)	this pre-operational
Island / Port of Seattle,			certification audit on May
Washington			21, 2012
			AML operations in the Port
			of Whittier were audited on
			May 23, 2012
Port of Whittier,	Alaska West Express	Alaska Railroad	Audited during this pre-
Alaska	(AWE) Interim		operational certification
	Storage yard		audit on May 22-23, 2012
ATTELL	Fairbanks, Alaska	A 1 1 YYY :	ANTE: IOMG
AWE Interim Storage	Gold Mines	Alaska West	AWE is ICMC certified -
yard		Express (AWE)	see 2012 report
Fairbanks, Alaska			



Cyanco has developed formal manuals, procedures, and practices that ensure that all ICMI International Cyanide Management Code requirements are fulfilled. Due Diligence reviews are performed at all Ports and for all Western U.S. carriers that are used to transport sodium cyanide to gold mines.

This pre-operational audit was used to evaluate Cyanco's plans for managing the transportation of its solid sodium cyanide from the production plant in Alvin, Texas to Western U.S. destinations.

Audit Information – Cyanco Western U.S. Supply Chain

The pre-operational audit of Cyanco as a Consignor/Transporter for its Western U.S. Supply Chain was performed by an independent 3rd-party auditor who is pre-approved by the ICMI as a Lead Auditor for all types of Code audits and as a Technical Expert for Code audits of cyanide transportation and production operations. The pre-operational certification audit of Cyanco as a Transporter / Consignor was conducted on May 17, 2012. Due Diligence reviews and auditing of Supply Chain partners was conducted from May 9 through August 10, 2012.

Cyanco's procedures, policies and planned transportation management practices for its Western U.S. Supply Chain were evaluated against the ICMI International Cyanide Management Code requirements, as documented in the ICMI *Cyanide Transportation Pre-operational Verification Protocol* (2011). The audit was conducted through discussions and interviews with multiple individuals in cross-functional roles at Cyanco and its supply chain partners.

The results of this pre-operational certification audit and the related due diligence reviews indicate that Cyanco and its Western U.S. transport management practices are in FULL COMPLIANCE with ICMI pre-operational transportation requirements.

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Cyanco Western U.S. Supply Chain - Auditor's Finding

The Cyanco Western U.S. Supply Chain is:

☑ in full compliance

in substantial compliance not in compliance

with the pre-operational requirements of the International Cyanide Management Code.

Audit Company:	MSS Code Certification Service	
	www.mss-team.com	
Lead / Technical Auditor:	Nicole Jurczyk	
	E-mail: CodeAudits@mss-team.com	
Date(s) of Audit:	May 17, 2012 (on-site at Cyanco); Due Diligence Evaluations	
	and Supply Chain Auditing: May 9 – August 10, 2012	

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 Report accurately describes the findings of the certification audit. I further attest that the certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Certification Protocol for Cyanide Pre-Operational Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

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Consignor Summary

Operational & Audit Information for Consignor

Supply chain management activities and processes included in this audit included Cyanco's due diligence evaluations and management of trucking, rail, and barge supply chain partners, ports, and interim storage facilities. The processes that will be used to track Western U.S. shipments and the emergency response processes in place to respond to any accident or incident involving cyanide were also included in the evaluation.

Plans and procedures were reviewed and personnel at Cyanco and transportation partners were interviewed during this pre-operational certification audit. All plans, procedures, and Due Diligence actions taken to ensure that Western U.S. shipments are made in compliance with ICMI requirements were found to be acceptable.

The results of this certification audit demonstrate that Cyanco's management practices used to ensure fulfillment of International Cyanide Management Code requirements during Western U.S. shipments are in FULL COMPLIANCE with pre-operational ICMI Cyanide Management Code requirements.



Cyanco Consignor / Transporter - Auditor's Finding

Cyanco Consignor / Transporter operations are

☑ in full compliance

in substantial compliance not in compliance

with the pre-operational requirements of the International Cyanide Management Code.

Audit Company:	MSS Code Certification Service	
	www.mss-team.com	
Lead / Technical Auditor:	Nicole Jurczyk	
	E-mail: CodeAudits@mss-team.com	
Date(s) of Audit:	May 17, 2012 (on-site); Due Diligence Evaluations: May 9 –	
	August 10, 2012	

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Cyanco Pre-Operational Western U.S. Supply Chain

Name of Operation

Signature of Lead Auditor

August 27, 2012

Certification Date

Name of Operation

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1. TRANSPORT: Transport cyanide in a manner that minimizes the potential for

accidents and releases.

<u>Transport Practice 1.1:</u> Select cyanide transport routes to minimize the potential for

accidents and releases.

☑ in full compliance with

The operation is in substantial compliance with Transpor

Transport Practice 1.1

not in compliance with

Summarize the basis for this Finding:

Cyanco has committed to implementing a process for selecting transport routes that minimize the potential for accidents and releases. The Cyanco International Cyanide Management Code Compliance Manual (ICMC Manual) defines that all ICMC criteria must be considered during the planning of shipping routes. Examples were available for Western U.S. routes showing that Cyanco Leadership evaluated transportation partners, route selection processes, and emergency response capabilities to confirm suitability of the transportation partners and the routes chosen. The ICMC Manual states that appropriate risk considerations are to be made for each type of mode used.

Interviews were conducted to confirm that before Cyanco initially qualifies a new customer for sodium cyanide, they follow a standard practice to determine that the cyanide can be safely delivered to the customer mine site. The risk evaluations associated with this supply chain focus primarily on the selection of transportation partners who can fulfill ICMI Code criteria and ensure that safety and security standards are acceptable. Infrastructure around the ports is also evaluated for alignment with ICMI Code criteria.

The Cyanco ICMC Manual states appropriate risk considerations are to be made for each type of mode used. In preparation for the start of shipments using the Western U.S. Supply Chain, risk mitigation measures that have been taken are the development and implementation of an improved international shipment tracking process, the revision of the Cyanco Global Emergency Response Procedures, and the coordination of additional global emergency response resources in destination countries.

Cyanco has committed to seeking input from communities, other stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures. Records were available to demonstrate that Cyanco personnel have met with transportation partners and local stakeholders to seek input from communities, non-

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governmental organizations, and governmental authorities to seek input into the planning for their global supply chains.

Cyanco is committed to using formal policies, procedures, and contractual terms and conditions with transportation partners to ensure that cyanide is appropriately handled and transported globally.

<u>Transport Practice 1.2</u> 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 not in compliance with

Transport Practice 1.2

Summarize the basis for this Finding:

Cyanco has committed to using only trained, qualified and licensed (where required) operators and companies to transport its products. In this supply chain, the trucking companies, Quality Carriers and Alaska West Express, are certified International Cyanide Management Code (ICMC) Signatory companies. Their compliance with all ICMC requirements was confirmed during their certification audits.

For transportation partners that are not ICMC certified, Cyanco has committed to performing due diligence evaluations to ensure that operations are managed according to recognized EHS standards and that partners are experienced in the handling of hazardous goods. These requirements are stated in the ICMC Manual.

Cyanco is committed to using formal policies, procedures, and contractual terms and conditions with transportation partners to ensure that cyanide is appropriately handled and transported globally.

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<u>Transport Practice 1.3:</u> Ensure that transport equipment is suitable for the cyanide

shipment.

☑ in full compliance with

The operation is in substantial compliance with Transport Practice 1.3

not in compliance with

Summarize the basis for this Finding:

Cyanco has committed to using only supply chain partners with equipment designed and maintained to operate within the loads it will be handling. The ICMC Manual states that Cyanco reviews all transportation partners to ensure that ICMC transportation requirements are fulfilled.

Cyanco uses only authorized packaging for its solid sodium cyanide shipments. According to interviews with Cyanco personnel, the shipments of bulk and semi-bulk packages will be standard weights with standard blocking and bracing configurations used. Shipping paperwork will indicate the number of packages shipped and the weight of the cargo. This information is to be used by transportation partners to ensure that overloading does not occur.

<u>Transport Practice 1.4:</u> Develop and implement a safety program for transport of cyanide.

☑ in full compliance with

The operation is in substantial compliance with Transport Practice 1.4

not in compliance with

Summarize the basis for this Finding:

Cyanco has committed to ensuring that cyanide is transported in a manner that maintains the integrity of its packaging. Cyanco has committed to using placards or other signage to identify the shipment as cyanide, as required by local regulations or international standards. Section 3.1 of the ICMC Manual addresses this requirement.

Cyanco has committed to implementing a safety program for cyanide transport that includes all ICMC required considerations. The Cyanco ICMC Manual states that Cyanco confirms that its transportation partners are in compliance with all ICMC requirements.

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<u>Transport Practice 1.5:</u> Follow international standards for transportation of cyanide by sea

and air.

☑ in full compliance with

The operation is in substantial compliance with Transport Practice 1.5

not in compliance with

Summarize the basis for this Finding:

Cyanco has committed to transporting shipments of cyanide by sea in compliance with the Dangerous Goods Code of the International Maritime Organization. Cyanco plans to ship its sodium cyanide using transportation partners that have demonstrated safety programs and safe performance.

Cyanco performed due diligence reviews of the Port of Seattle (Harbor Island), the Port of Whittier, and of Alaska Marine Lines (AML) barge operator during this certification audit. Although Cyanco was in a pre-operational state at the time of the audit, sodium cyanide was being transported through these ports and via AML at the time of the audit. Port and barge operations and security were found to be in compliance with ICMC requirements. Intermodal containers had appropriate UN placards and marine pollutant placards on all four sides of each container. Extensive blocking and bracing equipment is used to ensure that the cargo and the railcars remain secure at all times and to ensure that the railcars do not move during ocean transport.

Cyanco does not ship cyanide by air.

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<u>Transport Practice 1.6:</u> Track cyanide shipments to prevent losses during transport.

☑ in full compliance with

The operation is in substantial compliance with Transport Practice 1.6

not in compliance with

Summarize the basis for this Finding:

Cyanco has committed to implementing systems and procedures to track the progress of cyanide shipments. Interviews with the Director of Logistics & Transportation and the Logistics Coordinator were held during the audit. The Logistics Coordinator has designated responsibilities for tracking shipments on a daily basis. Cyanco plans to use bills of lading and shipping papers indicating the number of packages and amount of material to confirm that the chain of custody for the cyanide is recorded and that ICMC requirements are fulfilled.

The barge operator, AML, was also audited for its tracking capabilities. State-of-the-art GPS tracking systems are used to transmit real-time barge location data. This was demonstrated during the audit.

Alaska Railroad will coordinate and manage the transportation segment from the loading of the intermodal containers onto its railcars using its partner, SEA-PAC Transport Services through the delivery of the cyanide to the Alaska West Express Fairbanks Terminal. Chain of custody and tracking practices were reviewed with Alaska Railroad, Alaska West Express, and SEA-PAC. Chain of custody and tracking practices were documented and records from example shipments of different commodities and different shippers were used to confirm that planned arrangements will comply with ICMC requirements.

2. INTERIM STORAGE: Design, construct and operate cyanide trans-shipping depots and

interim storage sites to prevent releases and exposures.

<u>Transport Practice 2.1:</u> Store cyanide in a manner that minimizes the potential for

accidental releases.

☑ in full compliance with

The operation is in substantial compliance with Transport Practice 2.1

not in compliance with

Summarize the basis for this Finding:

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Alaska West Express will store sodium cyanide for Cyanco at its Fairbanks Terminal in Alaska. Alaska West Express is a certified ICMC Signatory company that was audited for transportation and the interim storage of sodium cyanide at this location in May 2012. Interim storage operations were found to be compliant by the third-party auditing firm.

Cyanco plans to have its product loaded onto railcars which are loaded onto barges at the Harbor Island port in Seattle, Washington. The transfer of the intermodal containers onto the railcars that will be used to transport the product will be done by SEA-PAC Transport Services, LLC, a company that specializes in the packaging of cargo that is being loaded onto barges. SEA-PAC was audited during this pre-operational certification audit. Confirmation was made that SEA-PAC is an authorized hazardous materials transportation company, that the company has an emergency response plan, chain of custody processes, and that employees have received cyanide safety training. Cyanide is not stored at SEA-PAC, it is offloaded from trucks and placed onto railcars either immediately or in a short amount of time. SEA-PAC is providing a service to Alaska Railroad due to the logistics of the material entering Seattle at the Union Pacific railhead and needing to be loaded onto a barge at Harbor Island at the Port of Seattle. Cyanco does not plan to store cyanide at this location.

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

<u>Transport Practice 3.1:</u> Prepare detailed emergency response plans for potential cyanide

releases.

☑ in full compliance with

The operation is in substantial compliance with Transport Practice 3.1

not in compliance with

Summarize the basis for this Finding:

Cyanco has committed to developing and implementing an Emergency Response Plan that is appropriate for its Western U.S. supply chain. Details regarding the response procedures to be used in each region of the world, mode of transportation, and type of incident were being revised at the time of the audit. Existing emergency response plans were also reviewed during this preoperational audit.

Current emergency response plans do consider the physical and chemical form of the cyanide. The only form of cyanide to be shipped on this supply chain is solid. Emergency response procedures address actions to be taken in response to a solid cyanide spill.

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Cyanco has committed that its emergency response plans will consider the method of transport. This requirement is reflected in the Cyanco ICMC Manual. Cyanco has committed that the emergency response plans will include descriptions of response actions, as appropriate for the anticipated emergency situation. The Cyanco plans are universally applicable to all types of emergencies. At the time of the audit, emergency procedures were being further enhanced to specifically consider all aspects of responses that may be needed for emergency situations in the Western U.S. supply chain.

All of the plans and emergency response information clearly outline the roles and responsibilities of internal and external responders. Cyanco is committed to enhancing its emergency response procedures to further detail the roles of outside responders for its Western U.S. supply chain.

<u>Transport Practice 3.2:</u> Designate appropriate response personnel and commit

necessary resources for emergency response.

☑ in full compliance with

The operation is in substantial compliance with Transport Practice 3.2

not in compliance with

Summarize the basis for this Finding:

Cyanco has committed to providing emergency response training of Cyanco personnel and to ensuring that its transportation partners are also providing emergency response training to their personnel.

The roles and responsibilities of relevant internal and external personnel are clearly described in the Cyanco emergency response plans and Cyanco is committed to enhancing its procedures to more specifically address roles and responsibilities of internal and external personnel involved in the Western U.S. supply chain.

Current emergency response procedures state that Technical Advisory Team (TAT) Rapid Response Kits are maintained by an emergency response contractor. Information is available regarding the contents of these emergency kits. The types of equipment maintained were found to be appropriate by the auditor.

Cyanco ensures through contractual terms and periodic review that the emergency response equipment maintained by its emergency response provider is available at all times.

Cyanco is committed to using formal policies, procedures, and contracts with safety, health, environmental, and security terms and conditions to ensure that cyanide is appropriately handled and transported by its transportation partners.

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Transport Practice 3.3: Develop procedures for internal and external emergency

notification and reporting.

☑ in full compliance with

The operation is in substantial compliance with **Transport Practice 3.3**

not in compliance with

Summarize the basis for this Finding:

Cyanco has committed to developing procedures and maintaining current contact information for notifying regulatory agencies, outside response providers, medical facilities and potentially affected communities of an emergency. Current emergency response plans include this information and the plans are being enhanced to include international contact information.

The Cyanco ICMC Manual requires that internal and external emergency notification and reporting procedures are kept current. Contact numbers and reporting information is reviewed at least annually, or as needed.

Transport Practice 3.4: Develop procedures for remediation of releases that recognize the

additional hazards of cyanide treatment chemicals.

☑ in full compliance with

The operation is in substantial compliance with **Transport Practice 3.4**

not in compliance with

Summarize the basis for this Finding:

Specific details regarding the remediation, neutralization, decontamination, and disposal of clean-up debris are contained within the Cyanco emergency response procedures. Extensive descriptions of necessary action steps depending on the incident scenario are clearly outlined in the documents.

Cyanco personnel showed a high level of awareness that the use of treatment chemicals is prohibited if cyanide spills into surface waters. Cyanco emergency response procedures specifically prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide for treating a cyanide spill into surface water. Section 3.4 of the ICMC Manual specifically bans the use of treatment chemicals for spills into surface water.

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

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The operation is

✓ in full compliance with in substantial compliance with not in compliance with

Transport Practice 3.5

Summarize the basis for this Finding:

Cyanco is committed to periodically reviewing its emergency response plans and evaluating the plan's adequacy. The ICMC Manual requires that table top simulations be run annually and that emergency response drills are run every 3-5 years. Interviews during the audit indicated that an emergency response drill is planned to occur at least once in each region of the world during the first five years after shipping commences. This is in addition to the annual tabletop simulations that are planned.

Records were available to demonstrate that Cyanco regularly participates in emergency response drills with its mine site customers.

Cyanco is committed to reviewing and revising its emergency response plans as necessary after responding to an actual emergency and after emergency response drills.

Western U.S. Supply Chain – Pre-Operational Due Diligence Investigations and Auditing

Cyanco plans to ship its sodium cyanide using supply chain transportation partners that meet recognized Environmental, Health, and Safety (EHS) standards and that are experienced in the handling of dangerous goods. According to Cyanco's ICMC Manual, all carriers and transportation partners used for cyanide shipments need to be either Certified Signatory companies, have been audited for ICMI Code compliance, or have had a Due Diligence review of their ability to fulfill ICMI Code requirements.

In this supply chain, the trucking companies, Quality Carriers and Alaska West Express, are certified International Cyanide Management Code (ICMC) Signatory companies. Their compliance with all ICMC requirements was confirmed during their certification audits.

Union Pacific Railroad (UP) operations were evaluated by Cyanco through a Due Diligence evaluation. UP operations, including the security maintained at all railheads, the cargo dispatch process, and the hazardous materials tracking processes were evaluated during the Due Diligence review process. The results of this evaluation are included in the Cyanco U.S./Canada Rail Supply Chain certification report, posted by ICMI on April 7, 2011.

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The Due Diligence review of Alaska Marine Lines (AML) was conducted as an on-site evaluation of operations in Seattle and Whittier as part of this pre-operational certification audit. AML personnel were interviewed, documentation and records were reviewed, equipment was inspected, and loading and unloading operations were observed. Routing of the barges is planned to ensure the safest route possible. Barges are held in, or routed to safe harbors in poor weather conditions. The tracking of the barges was demonstrated during the audit. Tracking of barges is done using state-of-the-art GPS systems. Real-time data was available for review during the audit.

AML uses formal policies, procedures, and plans for loading and unloading operations, load securement, barge inspections, maintenance, emergency response, barge tracking, and security planning. Personnel demonstrated a high level of awareness with regards to the handling and proper management of hazardous materials. Records were available to show that barges were being properly maintained. Records showing that the U.S. Coast Guard regularly inspects AML for compliance with U.S. transportation regulations were available. The company has been transporting sodium cyanide safely for a different cyanide manufacturer for many years. AML was found to be in full compliance with ICMC requirements by the auditor.

A Due Diligence evaluation of Alaska Railroad operations was also performed as part of this pre-operational certification audit. Alaska Railroad personnel were interviewed, procedures and records were reviewed, and operations in Seattle and the Port of Whittier were evaluated. Alaska Railroad personnel showed a high level of awareness regarding the hazards of cyanide and the need for ensuring that ICMC requirements are fulfilled. Once shipments along this supply chain commence, Alaska Railroad will coordinate the transportation segment from the point at which the cargo is moved from the truck in Seattle to the Alaska Railroad railcar on Harbor Island (Port of Seattle) to the interim storage location in Fairbanks, Alaska.

The Due Diligence of Harbor Island was used to confirm the suitability of the port for the transport of cyanide. The entire area is under security surveillance by the Seattle Port Authority. The equipment and actual loading dock used for the loading of the cyanide onto the barge is locked at all times when not in use. Access to the area is restricted at all times.

Alaska Railroad personnel provide an oversight function in Seattle to ensure that cargo is properly loaded onto the railcars by SEA-PAC, that the cargo is held in a secure rail yard, and that the cargo is safely loaded onto the AML barge using an Alaska Rail loading dock / rail spur. In Whittier, Alaska Railroad unloads the cargo which is in intermodal containers on railcars. Although this was a pre-operational certification audit for Cyanco, sodium cyanide is already being transported using these supply chain partners for another supplier.

The unloading of sodium cyanide was observed during the audit. The unloading operation was a very well coordinated effort between AML (barge operator) and Alaska Railroad. The operation

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was carefully timed to ensure the highest level of safety as the railcars were unloaded from the barge. Personnel were interviewed, and procedures, records, and emergency plans were reviewed. Access to the Port of Whittier is controlled and the cargo is secure at all times. Sodium cyanide has been safely shipped via a different shipper through the Port of Whittier using AML and Alaska Railroad for many years. Personnel were aware of the hazards of cyanide and the precautions that must be taken. The auditor found that the Port of Whittier and the Alaska Railroad demonstrated full compliance with ICMC requirements.

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