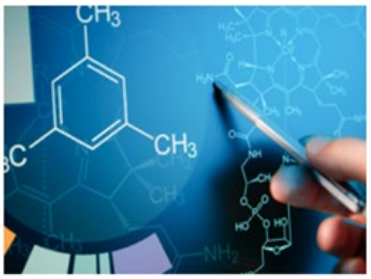
ICMI Transportation Verification Protocol (Revision June 2021)

Summary Audit Report

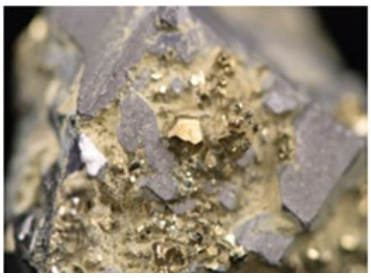
Industrial Maritime Carriers, LLC (Intermarine)

2023 Re-Certification Audit








Submitted to:

The International Cyanide Management Institute
1400 I Street, NW – Suite 550
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MSS®
Code Certification Service

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Operation General Information

Name and address of Operation:	Industrial Maritime Carriers, LLC ("Intermarine") 14035 Industrial Rd Houston, TX 77015 Corporate Office: 2900 North Loop West, Suite 1100 Houston, Texas 77092
Name and contact information:	Chad Call Chief Financial Officer Intermarine chad.call@intermarine.com

Operational Overview

Industrial Maritime Carriers, LLC ("Intermarine") is an international marine logistics and ocean transportation provider headquartered in Houston, TX that has operated for over 30 years. The company operates as two vessel-operating companies: Industrial Maritime Carriers, LLC and Intermarine Carriers, LLC and one management company: Intermarine Americas, LLC. The company is referred to as Intermarine throughout this report.

The Intermarine sodium cyanide port operations are managed by Watco Transloading, LLC ("Watco") at the Watco Greens Port ("WGP") facility located in the Port of Houston, Texas.

The Intermarine certified cyanide operations consist of the following: storage and distribution of solid sodium cyanide at the WGP port facility on the Houston Ship Channel using contracted services (provided by Watco) and the ocean transportation of solid sodium cyanide to international ports using Intermarine-contracted ocean vessels.

Watco provides the labor, foremen and supervisors responsible for providing and operating terminal equipment at WGP. These services include the loading of sodium cyanide cargo. Intermarine contracts ocean vessels (including the crew) to transport cargo, including sodium cyanide, to destination ports.

Sodium cyanide is received by Intermarine in ISO tanks and shipping dry vans (intermodal containers) which are stored temporarily at the WGP facility or loaded directly onto ocean vessels. Intermarine is responsible for route determination, shipment scheduling and tracking, training, safety-program management, contractor management, and emergency-response planning. At the time of the audit, Intermarine was transporting ISO tanks of solid sodium cyanide briquettes produced by Cyanco and transported to the port by Cyanide Code certified trucking companies.

Audit Implementation

This report contains information regarding the on-site International Cyanide Management Code (Cyanide Code) recertification audit of the Intermarine cyanide ocean transportation operations, including interim storage at the WGP facility.

Interviews were conducted with Intermarine and Watco personnel, policies and procedures were reviewed, records were evaluated, operations were physically observed, and equipment and facilities were physically inspected.

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

Auditor's Finding

Intermarine cyanide management practices, including solid cyanide ocean transport operations and interim storage at Watco Greens Port (WGP), were evaluated for Cyanide Code compliance using the ICMI *Cyanide Transportation Verification Protocol.* Intermarine internal policies, standards, and procedures regarding the management of the cyanide storage and transportation were reviewed.

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

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

Compliance Statement

This operation did not experience any compliance issues or significant cyanide incidents during the recertification period.

Auditor Information

Audit Company:	MSS Code Certification Service, a Division of: Management System Solutions, Inc. www.mss-team.com
Lead / Technical Auditor:	Nicole Jurczyk E-mail: njurczyk@mss-team.com
Date of Audit:	December 12-13, 2023

Auditor Attestation

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

I attest that this Detailed 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.

Intermarine		March 10, 2024
Name of Operation	Signature of Lead Auditor	Date

Intermarine		March 10, 2024
Name of Operation	Signature of Lead Auditor	Date

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.

Ocean routes are chosen by the ocean vessels and are regulated by several international organizations including the International Maritime Organization (IMO) and the U.S. Coast Guard. When Intermarine receives a request to ship cyanide, it determines which ocean vessels are available and qualified for solid sodium cyanide transport. Contracted ocean vessels maintain required hazardous cargo carriage certification and training in accordance with IMO regulations and have agreed to fulfill Cyanide Code requirements. The shipping and receiving ports are defined by the customer. The Line Managers decide on the port rotations and the Vessel Master determines the safest routing based on weather and other relevant conditions.

Intermarine has detailed procedures to ensure that ocean vessels selected to transport sodium cyanide and other dangerous cargo are compliant and authorized to carry the cargo. The risks associated with the ocean transport are related to the possibility of loading cyanide onto a vessel that is noncompliant, storing the cyanide next to incompatible materials during the voyage, storing the cyanide too close to the edge of the loading deck where the risk of falling overboard is increased, and/or offloading the cargo at a port that is not authorized to receive dangerous goods. Intermarine work instructions for the Technical Services group (Cargo Planning and Stowage TECH-WI-001) and Sodium Cyanide Cargo Handling operating procedure (QHSE-QOP-703) were reviewed during the audit.

Interviews confirmed that compliance status of the vessel and crew are confirmed during the contracting process. Records were available to demonstrate this. The Cargo Planning and Stowage procedure calls for the stowage of sodium cyanide in compliance with regulatory and Cyanide Code requirements, namely segregated from acids, strong oxidizers, and explosives. Risks are minimized by stowing the cyanide away from the edge of the deck and in a location where the cyanide will not need to be offloaded multiple times at interim ports. Stowage requirements are communicated to the Vessel personnel using a stowage plan. The process for loading a vessel with sodium cyanide ISO tanks in accordance with the stowage plan was observed during the audit.

All ocean vessels comply with International Maritime Organization (IMO) requirements and follow International Maritime Dangerous Goods (IMDG) and U.S. 49 Code of Federal Regulations (CFR) requirements concerning the transportation of the hazardous materials, including the training of

employees. Intermarine maintains information about vessels and their capabilities.

According to interviews with Intermarine personnel, the vessel routing is re-evaluated with the risk criteria in mind each time a voyage is constructed. After the vessel leaves the terminal, it is the onboard crew that assumes responsibility for the final routing of the shipment. The captain of the ship has the authority to make any routing adjustments necessary to safely complete the voyage. The captain stays in contact with the Intermarine Operations Manager at Intermarine throughout the voyage. Local community requirements typically apply to the local port and the movements of hazardous cargo. Shipments adhere to port requirements as to whether cyanide may be discharged.

Records from sodium cyanide shipments made during the three-year recertification period were sampled to confirm implementation of risk management measures such as the building of a stowage plan to minimize risk. All internal and Cyanide Code requirements were found to be fulfilled.

The Watco Greens Port (WGP) in the Port of Houston (Texas USA) is operated by Watco, a company contracted by Intermarine. The port is subject to all U.S. Coast Guard regulations, including regular inspections and interactions, especially regarding the handling of dangerous goods. Additionally, the shipper of the cyanide (Cyanco) is a Signatory Cyanide Producer and is in the Houston area. Confirmation was made that Cyanco continues to maintain community and stakeholder interactions regarding the shipment of cyanide.

No specific high-risk safety or security concerns existed for cyanide shipments at the time of the audit. The cyanide shipments were not going to any parts of the world that are currently under attack. Port security is ensured by Watco. The MARSEC (MARitime SECurity) three-tiered United States Coast Guard maritime security alert system in place. At the time of the audit, the port was at MARSEC 1, the lowest threat level.

Intermarine contracts several parts of its operations including: material handling and ship loading at the port and ocean vessel maintenance and operation during transportation.

Watco is the contracted entity used for material handling and ship loading at WGP. Port Captains, who are employees of Intermarine, manage material handling and ship loading activities very closely. Watco personnel, including the Watco Senior Safety Manager were interviewed during the audit. Awareness of ICMI requirements was excellent. The Watco employees must adhere to Intermarine standard operating procedures (SOPs) in addition to Watco procedures.

Watco performance and adherence to the Intermarine Cyanide Operating Procedure is evaluated on an ongoing basis and formally audited at least annually by internal auditors at Intermarine. Watco adherence to Cyanide Code requirements is also evaluated directly during the recertification audits performed by third party Cyanide Code auditors.

Interviews confirmed that compliance status of the vessel and crew are confirmed during the contracting process and that the Sodium Cyanide Cargo Handling procedure, Dangerous Goods Cargo Manifest, and Stowage Plan are all communicated to Vessel personnel when cyanide is planned into a

voyage. The process for loading a vessel with sodium cyanide ISO tanks in accordance with the stowage plan was observed during the audit and conformed to requirements.

All ocean vessels comply with International Maritime Organization (IMO) requirements and follow International Maritime Dangerous Goods (IMDG) and U.S. 49 Code of Federal Regulations (CFR) requirements concerning the transportation of the hazardous materials, including the training of employees. Intermarine maintains information about vessels and their capabilities.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 1.1

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.

Only trained, qualified, and licensed captains and crew operate the ocean vessels. Compliance is confirmed during the vessel contracting process. Records were sampled during the audit for the recertification period and were found to be acceptable. Contracted ocean vessels maintain required hazardous cargo carriage certification and training in accordance with International Maritime Organization (IMO).

Port personnel have hazardous materials training and cyanide awareness training. Records were sampled and found to be complete.

Watco provides training to their employees on operational procedures and HAZCOM. Watco Supervisors and Foremen are provided with Sodium Cyanide Awareness Training and other Watco employees are provided a general awareness of the hazards of cyanide and other chemicals on the Watco site.

Ocean Vessel Captains are provided with Intermarine's Sodium Cyanide Cargo Handling Procedure. Captains, and other crew members, maintain current hazmat authorizations and complete recurring hazardous materials training. Records were evaluated and found to be acceptable during the audit. The International Convention of Standards of Training, Certification and Watchkeeping for Seafarers (STCW) established in 1978 sets qualification standards for masters, officers, and watch personnel on seagoing merchant ships. STCW was adopted by the International Maritime Organization (IMO) in 1984 and has been revised several times since this date. STCW mandates that all officers and crew working

on ocean going vessels must complete/renew their dangerous goods / hazardous materials training every five years. Vessels in this supply chain call into U.S. ports and are therefore also subject to U.S. Coast Guard requirements that mandate hazmat training to be renewed every three years. In addition to the training required by regulations, the owners of the vessels often also require crew members to complete additional computer training related to hazardous materials at frequencies as often as annually.

Intermarine subcontracts handling and transportation of sodium cyanide. Port personnel (Intermarine Port Captain and Watco contracted personnel) are trained in cyanide handling procedures and on Cyanide Awareness.

Intermarine enters into a Charter Party contractual agreement with ocean vessels it has confirmed to be compliant for carriage of sodium cyanide cargo. This agreement binds the carrier to abide by all legal requirements while transporting the Intermarine cargo. Each ocean vessel and crew must maintain certification to carry dangerous goods and appropriate HAZMAT training.

The Sodium Cyanide Cargo Handling procedure requires that personnel associated with receiving, handling, storing, loading, or transporting Sodium Cyanide cargo be appropriately trained. Intermarine produced training records for relevant personnel, including personnel from contracted entities.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 1.2

Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

Intermarine transports sodium cyanide via ocean vessels. Vessels are not owned or operated by Intermarine however each vessel is contractually obligated to Intermarine to adhere to all International Maritime Organization (IMO) and International Maritime Dangerous Goods (IMDG) requirements through a Charter Party agreement. The *Sodium Cyanide Cargo Handling* procedure requires that "The ocean vessel must be in compliance with the Charter Party to ensure proper maintenance and handling of the vessel and its loaded cargo." The ocean vessels are marked with load lines indicating the loads that they have been approved to carry safely.

Intermarine, through its contracted port operator Watco, handles sodium cyanide in standard ISO shipping tanks and intermodal containers which are handled by top loaders and "reach stackers" (forklift

trucks). All port and material handling activities are performed by Watco, the port owner. Port handling equipment and ships at the port were observed during the audit. All equipment observed appeared suitable and in good condition.

Ships are required to have gear and crane certifications. Cranes and gears (lifting appliances) receive regular maintenance and inspections and recertification at set frequencies (example: every four to ten years, depending on equipment). Intermarine maintains records of the crane and gear certifications. These were reviewed for the contracted vessels and were found to be acceptable.

The subcontractor (and port owner) Watco is responsible for the certification and maintenance of the port loading equipment. Loading equipment observed at the port appeared to be adequately sized for the cyanide cargo loads. The forklifts and cranes are inspected daily prior to use and any issues are brought to the Equipment Manager's attention.

The ocean vessels are marked with load lines that are used to verify that the cargo does not exceed the allowable weight for that vessel. IMO regulations and Coast Guard regulations closely regulate ocean cargo ships to ensure that they are not overloaded. Inspections are conducted frequently to ensure regulatory compliance.

The Stowage Standard Operating Procedure (SOP) details how the stowage plan, including the weights of all the cargo, is considered, and planned against the ship's weight capacity. The proper loading of ships is addressed by Safety of Life at Sea (SOLAS), IMO, and IMDG regulatory requirements. Coast Guard inspections are conducted frequently to ensure regulatory compliance.

Stowage Plans were reviewed and found to be appropriate. The loading of sodium cyanide ISO tanks was observed during the audit and was found to be conformant with Intermarine requirements.

Intermarine ensures contracted entities involved in the handling and transport of sodium cyanide have transport equipment that is suitable for cyanide shipments. Vessel operators must comply with regulatory requirements regarding the maintenance and inspection of ships. They must also comply with the terms in the Charter Party (contract) and with the details of the Intermarine *Sodium Cyanide Cargo Handling* procedure.

Port and vessel personnel are provided with cyanide handling instructions and are trained appropriately on the applicable requirements. Current ship authorization records indicating the regulatory compliance of the ships being used for cyanide shipments were reviewed and were found to be acceptable.

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.

Intermarine Port Captains develop a Stowage Plan for each voyage and the Master of the Vessel reviews, approves, and accepts the stowage plan. The Port Captain reviews the full scope of the cargo of the voyage and the vessel that will be used, reviews the deck plan for each ship, obtains a dangerous cargo manifest from the traffic department, and use the HazCheck Online tool to determine where the hazardous cargo can be placed. During the audit, the HazCheck Online tool for sodium cyanide and the IMDG Segregation Table were utilized to confirm the adequacy of the stowage plans reviewed during the audit. In addition to IMDG requirements, Cyanide Code requirements are also referenced in multiple locations in the procedure and stowage plans. The Intermarine requirements align with the Cyanide Code requirements and call for stowage away from acids, strong oxidizers, and explosives.

ISO tanks and intermodal containers are not opened by Intermarine, Watco, or the vessel crew. The containers are loaded by Cyanco, a Cyanide Code certified cyanide producer.

The Intermarine *Sodium Cyanide Cargo Handling* procedure requires cargo specifies it must be kept in designated staging area prior to loading the cargo on the vessel. A visual assessment of the cargo is required by the procedure with notifications to be made if cargo is compromised. The procedure also addresses vessel loading and requires product segregation from Class 8 (acids / corrosives), Class 5 (oxidizers), and Class 1 (explosives) cargos in addition to an inspection for container integrity before connecting the hook to load.

Several sodium cyanide ISO tanks were observed in a staging area of the port and later were observed as they were loaded onto the vessel. UN 1689 placards are used to identify cyanide shipments and marine pollutant placards were observed on all sides of the containers. The signage, emergency CHEMTREC telephone number, and warning labels on the ISO tanks were in accordance with Dangerous Goods regulations.

Prior to each sailing, there is a walk-around inspection of the vessel that is done by the Port Captain (an Intermarine employee). Any safety concerns are noted and resolved. A formal checklist is used for the inspection. According to interviews, vessel personnel are also responsible for conducting multiple inspections prior to sailing. Forklifts and cranes are maintained by Watco. They are inspected daily prior to use; any issues are brought to the Equipment Manager's attention. Vessel maintenance is performed by the vessel owners. Different parts of the ship are certified as being operational, according to IMO and contractual requirements. Intermarine maintains certifications regarding the lifting equipment and the overall compliance status of the vessels.

All vessels must follow officer and crew work/rest guidelines set by the MLC (Maritime Labor Convention) which states that the crew can work no more than 14 hours and must rest a minimum of

10 hours per 24-hour period. Work & rest hours can be performed continuously or split up, as necessary.

Cargo is packed into sea containers or loaded into ISO tanks by the Shipper. The Port Captain works together with the captain of the vessel to ensure that all necessary lashing and bracing is properly installed when the cargo is brought onboard. Photos are retained from each sailing that show cargo placement and equipment used to ensure that loads do not shift. Photos were reviewed during the audit and the loading and securement of sodium cyanide onto a vessel was observed during the audit. Lashing and other bracing techniques were found to be appropriate.

Intermarine operates with a policy that every person has the right to stop work that they deem unsafe under the Stop Work Authority Policy. This is common practice in all ports. There is a written drug abuse prevention program for employees and contractors in the Employee Handbook. The policy allows for mandatory pre-employment, random and for cause drug and alcohol testing of employees with rehabilitation opportunities offered. All employees are required to sign the drug and alcohol policy prior to consideration of employment.

Intermarine ensures that its contacted entities operate under safety program requirements that fulfill ICMI requirements. The Sodium Cyanide Cargo Handling procedure addresses subcontracting of sodium cyanide handling and requires subcontractor training, competency and interaction with Intermarine. Intermarine Port Captains meet periodically with Watco Superintendents to review operations and safety issues. Vessels and crew compliance with safety, maintenance, and training requirements are tightly controlled by the U.S. Coast Guard and other regulatory entities that ensure fulfillment of United Nations International Maritime Organization (IMO) requirements. Records were available for the recertification period to demonstrate compliance with Cyanide Code Practice safety program requirements.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 1.4

Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

Cyanco, the Cyanide Code certified producer, is responsible for the developing and certifying its cyanide packaging. This was audited and found to be in compliance during the Cyanco Global Ocean Supply Chain Cyanide Code audit.

ISO tanks were observed and other shipments were reviewed using photos during the audit. Shipping containers were appropriately marked and were found to be compliant with Chapter 5.2 of the IMDG Code

requirements. The paperwork from a sample of cyanide shipments from the ocean carriers used in this supply chain was reviewed and found to be complete. All information required by the IMDG Code is required as standard practice on Intermarine shipping paperwork. Intermarine confirmed that the ocean carriers have cyanide emergency response information available on board each vessel, as required by Section 5.4.3.2 of the IMDG Code.

Shipping documents were reviewed for a sample of cyanide shipments made during the recertification period. All information required by the IMDG Code is required as standard practice on Intermarine shipping paperwork. Intermarine maintains records which show that the ocean transporters have valid certifications for the transport of dangerous goods. Records are also maintained to demonstrate that the captains of the vessels in service have been trained on hazardous material handling.

Intermarine Port Captains develop a Stowage Plan for each voyage and the Master of the Vessel reviews, approves, and accepts the stowage plan. The Port Captain reviews the full scope of the cargo of the voyage and the vessel that will be used, reviews the deck plan for each ship, obtains a dangerous cargo manifest from the traffic department, and use the HazCheck Online tool to determine where the hazardous cargo can be placed. The Stowage Plan is developed according to a formal procedure, IMDG segregation requirements, and ICMI Cyanide Code requirements. Examples of stowage plans reviewed during the audit demonstrated that the sodium cyanide has been appropriately stored.

Each contracted vessel has provided emergency information to Intermarine. Intermarine has also shared its emergency procedures with approved vessels. Examples of stowage plans reviewed during the audit demonstrated that the sodium cyanide has been appropriately stored on voyages reviewed from the recertification period.

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

Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

The Operations Manager tracks shipments. Vessel coordinates can be tracked online and there is also a daily reporting requirement for the Ship Master to provide latitude and longitude of the ship. When the ship arrives and sails from ports notification is made to operations (the agents also track the shipments). Daily reports from ship Captains are then used to update Intermarine's internal systems. The Sodium Cyanide Cargo Handling procedure provides an ocean vessel Emergency Notification Flowchart in the

event of an emergency.

Watco equipment operators have radios for communication. Multiple people, including Supervisors, always use these radios during operations at the port.

The ocean vessels have daily communication requirements that serve as a method for the verification of communication capabilities from ocean vessel to land.

Watco maintains radios as part of the preventive maintenance program. The radios are in constant use each day at the port. This approach was deemed to be appropriate and effective by the auditor.

The ocean vessels maintain communication equipment that functions globally. Watco does not transport cyanide outside of the port boundaries and there are no parts of the port that are "black out" areas for communication.

There is a daily reporting requirement for the Ship Master to provide latitude and longitude of the ship. When the ship arrives and sails from ports notification is made to operations (the agents also track the shipments). Daily reports are then used to update Intermarine's internal systems. The Intermarine employee responsible for this tracking information was interviewed during the audit. Practices and records were found to be acceptable.

All cargo entering the exiting the WGP facility is reported and recorded. Watco has formal methods and practices in place to keep track of cargo movement. Formal Dangerous Goods manifests were reviewed for voyages made during the recertification period. The manifests are detailed and provide the information that allows tracking of specific container numbers at any time after receipt by Intermarine through to discharge at the receiving port.

Ocean vessels transport the sodium cyanide from port to port without transfers, so departure and arrival confirmation of the cargo are sufficient. The ship makes notification of when it sails and arrives at the ports and the agents are simultaneously tracking the cargo's progress.

Vessel captains are provided with information on sodium cyanide, specific handling procedures, and the SDS for sodium cyanide. This is part of the information shared prior to each shipment. The amount of cyanide that is shipped on a specific vessel is shown on the Stowage Plan, with the details in the Dangerous Goods Manifest, which is required under IMDG regulations.

All hazardous cargo arriving into the WGP facility must be accompanied by IMO Declarations and Safety Data Sheets (SDSs). Any US Import cargo arriving via ship and exiting terminal also must be accompanied by same documents. Identification information and the amount of the cyanide that is arriving at the terminal is noted in the shipping paperwork and is maintained in the computerized system at the Terminal thereafter.

Intermarine maintains the *Sodium Cyanide Cargo Handling* procedure to ensure that cyanide shipments are tracked to prevent losses during transport. Records were available from ocean shipments to show that

daily reports are being sent through by ship captains and that the location of the shipment was known.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 1.6

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.

Intermarine calls for signage to be used in all areas where cyanide is staged for loading and/or stored. This requirement is included in the Intermarine Sodium Cyanide Cargo Handling procedure. Containers are typically brought to the port shortly before they are loaded onto vessels.

In alignment with the Intermarine requirement, Watco uses portable signs on stands that warn that cyanide is present and that smoking, open flames, eating, and drinking are prohibited in the direct vicinity of sodium cyanide containers. Watco has appropriate signage to alert workers of the presence and hazards of cyanide. The Intermarine Port Captain is also aware of this requirement and checks for the placement of the signs during regular operations. The cyanide is stored exclusively outdoors. The ISO tanks also have UN1689 placards and warn of cyanide being present in the containers.

Personal protective equipment (PPE) at the port includes high visibility vests, steel toed shoes, a hard hat, and safety glasses. This is the same PPE used throughout the port. There is therefore no need to have additional PPE signage in the cyanide staging and/or storage areas. The adherence to PPE requirements at the port were observed as being strictly enforced.

Security measures are in place to prevent unauthorized access to the terminal. Access to the terminal, including the sodium cyanide storage area, is controlled by an eight-foot fence with a 24/7 manned security gate with video surveillance equipment. The security guards enforce strict identification policies for employees, contractors, and visitors. The area is controlled according to U.S. Homeland Security requirements and only people with background checks and a current Transportation Worker Identification Credential (TWIC card) are allowed unescorted access in the terminal.

Sodium cyanide is generally only staged at the port in a “just in time” manner prior to the loading of cargo onto a vessel. The portable signs clearly state that the cyanide needs to be kept away from acids and

oxidizers; explosives are not managed at this facility. There is no physical barrier other than open space between cyanide containers and other stored materials, however, the auditor deemed the segregated storage area and open space between the cyanide and other materials to be sufficient.

All ISO tanks and intermodal containers remain closed and are not opened by Intermarine, Watco, or the vessel crew.

The sodium cyanide containers are stored in a manner designed to minimize the potential for contact with water. If cyanide containers are stored for a period longer than a few hours or days for the loading of a vessel, the cargo is stored in an elevated part of the open-air storage yard to avoid water buildup around the containers. At the time of the audit, only cargo that was actively being loaded onto a ship was at the port.

All storage is done using United State Department of Transportation (DOT)-approved transportation ISO tanks or intermodal containers. The ISO tanks are regularly inspected, and pressure tested by the shipper in accordance with U.S. DOT regulatory requirements to ensure that they are water-tight and of high mechanical integrity. The intermodal containers contain packages with multiple layers of packaging within the sealed containers to ensure that there is no water intrusion. The Intermarine cyanide storage area is outdoors to prevent the buildup of hydrogen cyanide gas.

Intermarine has procedures in place for identifying and responding to a cyanide spill. The cyanide intermodal container and ISO tank integrity is assessed upon receipt to ensure that there is no leakage of the material, in accordance with the *Sodium Cyanide Cargo Handling* procedure. Watco performs daily yard inspections and would activate cyanide emergency response procedures if a leak or spill were identified. Watco maintains spill containment equipment at strategic locations throughout the port to help minimize the impact from an unlikely release of cyanide from the DOT-approved transportation equipment.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 2.1

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.

Intermarine has an emergency management plan (EMP) for the corporation. The Corporate Emergency Management Plan was updated 2023 and again in 2024, following the onsite recertification audit. Intermarine also detailed cyanide specific emergency notification and response actions in its Sodium Cyanide Cargo Handling procedure. Watco, the port owner, also maintains a detailed Emergency Action Plan (EAP) for the port that was also updated in 2023 and in 2024. The remediation partner, OMI, also maintains an Emergency Response Plan that is specific to sodium cyanide response. All four documents were reviewed during the audit.

Each vessel maintains multiple emergency response plans as mandated by different conventions, which often overlap. Vessel owners, mandated by the International Safety Management (ISM) Code require officers & crew to have a response plan and complete yearly training covering different emergency types (abandonment, vessel grounding, fire at port/sea, vessel collision, etc.). Separately, the International Convention for the Prevention of Pollution from Ships (MARPOL) requires that each vessel maintain a SOPEP (Ship Oil Pollution Emergency Plan) that covers spills in open ocean & foreign ports. The US Coast Guard requires that ships run emergency drills once per week and that all potential scenarios be addressed at least every two years. Further, the U.S. Coast Guard requires all vessels navigating U.S. waters greater than 400 GRT (Gross Register Tonnage) to submit NTVRP (Nontank Vessel Response Plan) for approval. This plan also covers spills occurring in U.S. waters.

The Intermarine Sodium Cyanide Cargo Handling procedure is appropriate for ocean transport and port emergencies. Two separate decision trees are included in the document to account for emergencies at sea or at the port. The Watco and OMI ERPs were also found to be sufficiently detailed to be appropriate for port emergencies. The plans include appropriate information on what to do in the event of a spill or release, what precautions to take, parameters used to classify emergencies by severity and type, and include internal and external notification lists and a notification flowchart. Ocean vessels maintain emergency response plans, as required by maritime regulations.

Each ocean vessel maintains emergency response plans that fulfill the International Maritime Dangerous Goods regulations. Safety Data sheets, in paper or electronic form, are always available to crew members. The only form of cyanide that is shipped is solid, UN 1689. This solid form of the material is indicated on the SDSs, which would be referenced in the event of an emergency. All plans were found to be appropriate

for solid sodium cyanide emergencies.

The emergency plans were found to be appropriate for the method of transport and for storage of cyanide at the port. The emergency plans consider a release and potential human exposure at the WGP facility originating from cargo storage and vessel loading activities. The plans consider ocean transport, the only method of transportation in this operation, and interim storage. Ocean vessel emergency response notifications are described in the *Sodium Cyanide Cargo Handling* procedure.

The emergency plans address cyanide handling at the port and include contact information if there is an emergency at sea. The cargo is shipped via ocean vessel so once the vessel sails the cyanide cargo is under the control of the captain of the ship. Intermarine handles emergency communications from the ship in accordance with the Sodium Cyanide Cargo Handling procedure. Ocean vessels are required to maintain emergency response procedures under IMO regulatory requirements. The U.S. Coast Guard conducts regular inspections of ocean vessels throughout U.S. waters.

The Intermarine, Watco, and OMI emergency plans consider the design of the outdoor storage facility and the types of containers (ISO tanks, and intermodal containers). The emergency plans consider the global shipping of products. Each ocean vessel maintains its own emergency response plan according to IMO and SOLAS requirements. Plans include step-by-step instructions for handling each incident type.

All four emergency planning documents include appropriate emergency response actions and notifications in the event of a cyanide release and exposure. At the port, the primary actions are to isolate a spill, decontaminate an exposure victim, block any water flow from going towards the channel, and make notifications.

The OMI (emergency responder) emergency plan has much more detailed information with specific actions that should be taken in case of a large spill versus a small spill, the need to be up-wind, in the case of fire, which types of materials to use and not use. The dangers associated with cyanide are detailed including explosion dangers of hydrogen cyanide gas, the dangers of getting cyanide wet, the PPE to be worn, the containment of cyanide, and the cleanup and decontamination of contaminated materials and people.

Emergency response notifications are clearly identified in a flow chart and contact names and numbers are provided in the EMP. Cyanide exposure response is detailed in the *Sodium Cyanide Cargo Handling* procedure. Notification of cyanide exposure, victim decontamination, and oxygen administration are included in the response procedure.

The emergency planning documents identify the roles of Intermarine personnel, Watco personnel, OMI external responders, and 911 medical responders. Watco, together with its contracted emergency responder, OMI, is responsible for emergency response at the port. The Intermarine Emergency Management Plan (EMP) and the Sodium Cyanide Cargo Handling procedure contain external notification contact lists including the internal and external phone numbers that are to be called. The Sodium Cyanide Cargo Handling procedure provides cyanide-specific notifications and steps that should be taken in a

cyanide related emergency. The details on notifying ICMI are part of this procedure and the International Cyanide Management Institute (ICMI) notification requirement is referenced in the Watco EAP.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 3.1

Transport Practice 3.2

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

Each of the emergency planning documents addresses the need to train relevant personnel on the emergency plan initially and then on a recurring basis. The Watco EAP has this requirement for initial and then annual training noted in the port EAP. The personnel at the port receive refresher training on an annual basis and participate in regular emergency drills. Intermarine also has the requirement to perform a drill annually. The drills are used to refresh emergency response skills and refresher training.

Captains, and other crew members, maintain current hazmat authorizations and complete recurring hazardous materials training. The International Convention of Standards of Training, Certification and Watchkeeping for Seafarers (STCW) established in 1978 sets qualification standards for masters, officers, and watch personnel on seagoing merchant ships. STCW was adopted by the International Maritime Organization (IMO) in 1984 and has been revised several times since this date. STCW mandates that all officers and crew working on ocean going vessels must complete/renew their dangerous goods / hazardous materials training every five years. Vessels in this supply chain call into U.S. ports and are therefore also subject to U.S. Coast Guard requirements that mandate hazmat training to be renewed every three years. In addition to the training required by regulations, the owners of the vessels often also require crew members to complete additional computer training related to hazardous materials at frequencies as often as annually.

The Intermarine EMP identifies an emergency management team (EMT) with names, contact information, roles and responsibilities. The EMP roles identified are Incident Commander, Safety Officer, Security Officer, Operations Section Chief, Planning Section Chief, and Logistics Section Chief. The EMP provides instructions on actions to take in the event of a chemical release/spill, explosion, fire, bomb threat, transportation security incident, or severe weather event.

The Watco EAP has specific detailed information about the roles and responsibilities of Watco personnel and the way in which interactions with external responders are to be managed. The Terminal Manager is the “Responsible Official” in the event of an emergency. This person coordinates all external responders.

EAP Coordinator responsibilities are also detailed. Backup personnel are named by title, for example Shift Supervisors would step in for Operations Managers to become the EAP Coordinators.

The EMP describes the communications procedures to be followed by terminal personnel and visitors, supervisory personnel, security personnel, terminal management and the QHSE coordinator in the event of an emergency. A notification process flowchart is provided for clarity. There are cyanide specific roles and responsibilities detailed in the Intermarine Sodium Cyanide Cargo Handling procedure.

The cargo ships are required to maintain emergency response equipment in compliance with Safety of Life at Sea (SOLAS) requirements.

Watco is responsible for emergency response for the port and maintains a list of emergency response equipment. OMI also maintains lists of emergency response equipment.

Emergency response equipment (spill response equipment) was observed during the audit. The adequate condition and availability of the emergency response equipment is checked during regular port inspections. Personal Protective Equipment (PPE) is also available at the port, this was confirmed through observation during the audit.

Individual ocean vessels are required by SOLAS and IMO regulations to regularly inspect their safety equipment. Watco inspects its emergency response equipment during its regular port inspections on a daily basis and during emergency response drills.

Intermarine contracts the transportation of the cyanide to the ocean vessels that are required to perform emergency response drills on a frequent basis under SOLAS and IMO regulations.

Ocean vessel Captains of each of the approved ocean vessels have current Hazmat emergency response training. The certification is valid for 5 years, after which time the Captain must undergo refresher training and become re-certified to be the captain of a cargo ship that is authorized for transporting dangerous goods.

Intermarine contracts port activities to Watco, who contracts with OMI for emergency response services. Detailed emergency plans were available for each contracted entity. The plans were in alignment with Cyanide Code requirements and contained cyanide-specific information.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 3.2

Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.		
The Intermarine Emergency Management Plan contains notification procedures and current contact information for internal and external entities including Cyanco, CHEMTREC, the ocean vessels, regulatory agencies, external response providers, hospitals, and local police. Cyanco would contact the customers. The Watco EAP is also very detailed and has many contact numbers including those for Intermarine management, OMI environmental services, Port of Houston, Cyanco, regulatory agencies, fire department, police, ICMI, CHEMTREC, and the coast guard. Intermarine and Watco have systems in place to ensure emergency notification and reporting procedures are kept current. The Intermarine Emergency Action Plan requires that the Intermarine Health, Safety & Environment (HSE) Director is responsible for reviewing the EAP, including the accuracy of telephone numbers, at least annually. Both the Intermarine and Watco emergency plans were updated in 2023 and again at the beginning of 2024 following the certification audit and a joint emergency response drill where improvement opportunities were identified. Intermarine developed a new Significant Cyanide Incident reporting procedure in 2023 and communicated the procedure to its subcontractors. The procedure clearly outlines the notification steps to be taken. It is included in the Sodium Cyanide Cargo Handling procedure. The definitions and reporting requirements were found to be consistent with the ICMI's code and included a statement requiring notification to ICMI within 24 hours of a significant cyanide incident. There were no significant cyanide incidents during the recertification period.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 3.3

Transport Practice 3.4 Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.
The Watco emergency response contractor would be responsible for the cleanup of a cyanide spill. OMI maintains a detailed cyanide-specific emergency response plan that calls for the recovery of contaminated solids and liquids and the decontamination of soils and other debris. The plan includes a section on the decontamination of exposed personnel, contaminated PPE, and cyanide-contaminated solids and materials. The waste would be disposed of in accordance with regulations, as hazardous waste. The Intermarine, Watco, and OMI emergency planning documents prohibit the use of sodium

hypochlorite, ferrous sulfate, and hydrogen peroxide to treat cyanide that has been spilled to surface water. This requirement is also stated in the Sodium Cyanide Cargo Handling procedure and Intermarine communicates this requirement directly to the vessel crew by embedding the information in the Dangerous Goods Manifest that travels with the cargo. The Manifest is communicated ahead of the voyage and the ship personnel would reference the manifest if there were a cargo-related emergency on board.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 3.4

Transport Practice 3.5		
Periodically evaluate response procedures and capabilities and revise them as needed.		
Intermarine and Watco review their emergency plans at least annually to confirm continuing adequacy and effectiveness. All emergency planning information was found to be current. The annual review process is documented in each plan and was confirmed through interview. Vessels and port managers contracted by Intermarine conduct emergency response drills before leaving port and again on a weekly basis, as required by regulations. Watco and Intermarine perform drills at least annually. Records were available for the emergency response drills held during each year of the recertification period. The most recent emergency response drill at the beginning of 2024 following the recertification audit involved a scenario where cyanide spilled during the loading process. Notification procedures and general awareness were tested and involved all necessary internal and external stakeholders with defined roles in the emergency response plans. Records from the emergency response drills included information on what went well and areas for improvement that were identified in the critiques. Improvements to the emergency response plans were implemented following the identification of improvement opportunities during the 2024 drill. Updated emergency plans addressed the opportunities and were found to be appropriate for the operation.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 3.5