INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Cyanide Transportation

Summary Audit Report

For
Marítima Dominicana, S.A.S.

June 2019

Bruno Pizzorni – Cyanide Code Auditor

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Lima, Perú

IRCA CERTIFICATED AUDITOR
OCCUPATIONAL HEALTH AND
SAFETY MANAGEMENT SYSTEMS

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Transportation Operation:	Marítima Dominicana, S.A.S.
Transportation Owner	Marítima Dominicana, S.A.S.
Transportation Operator:	Marítima Dominicana, S.A.S.
Name of Responsible Manager:	Dommi Méndez – HSE and HAZMAT Manager Email: domendez@mardom.com
Address and Contact Information:	Carretera Sanchez Km 12 ½ Santo Domingo, Dominican Republic Phone: (809) 539-6000 Ext. 7308

Location and Description of the Operation

Marítima Dominicana, S.A.S. (Mardom), provides solid cyanide transportation to mine sites, among other logistics and port services, in Dominican Republic.

Mardom has more than 45 years of experience in logistics services, transportation and handling of maritime and air cargo, both import and export, as well as providing solutions for all cargo operations.

With presence in all Dominican ports and main airports, Mardom has diversified as a world-class supplier to meet the needs of the sector in one place, offering customers and extensive range of logistics services tailored to the market, including; customs clearance, land transportation and local distribution, as well as the rental of equipment such as dry and refrigerated containers.

Mardom is the first shipping company in the Dominican Republic to be certified under the ISO 9001, ISO 14001 and OHSAS 18001 quality and health safety management systems. As well as being certified in the country for Ship Operations, Customs Brokerage and Land Transportation all under the international EAO standards.

Cyanide is transported to Dominican Republic by ship to Rio Haina Oriental Port and Punta Caucedo Port (as backup port).

Stevedoring operations are performed by the port operator, which releases Iso tanks and containers at a container terminal operated by Mardom; the port authority uses its own vehicles to deliver the container at the Mardom terminal located within the port enclosure. At this point, the cyanide becomes responsibility of Mardom.

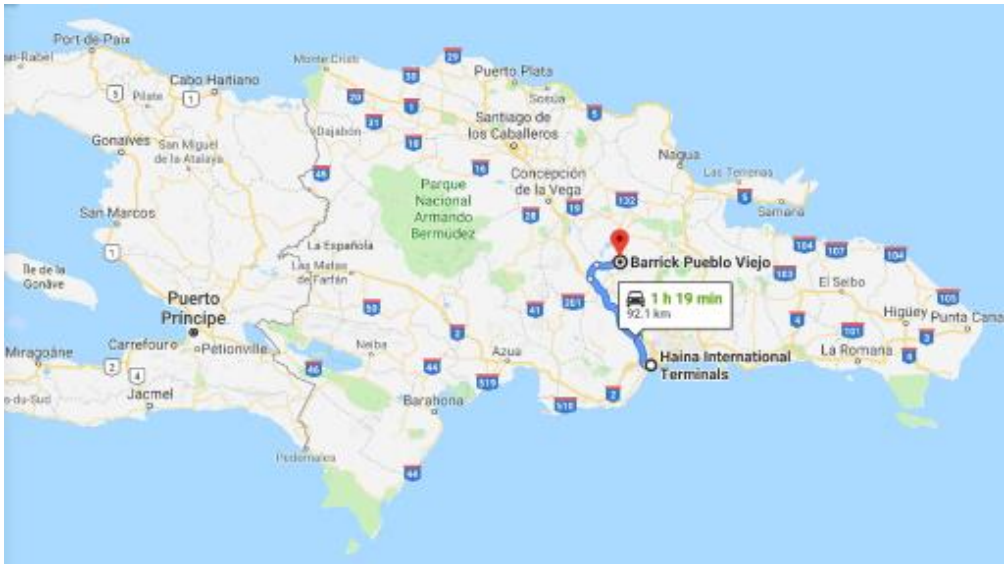
Mardom transports cyanide from the port to the client's mine site using its own trucks without the intervention of further storage facilities. Currently, Mardom transport cyanide only to Pueblo Viejo mine; however, it has the procedures and systems to add transport routes maintaining compliance with the Code.

This audit comprises the ground transportation operations from the moment the Port Authority releases the cyanide at the container terminal operated by Mardom, to the mine.

The activities performed by the port authority (ship unloading, interim storage at storage areas operated by the port authority, etc.) are not included within the scope of this audit.

As previously noted, the main transportation route is from Rio Haina Port to the mine site, 91.6 km from the port. As alternative route, in case of contingency in the main route or problems in the port, the cyanide could go from Punta Caucedo Port to mine; this route has an approximate length of 143.2 km.

Solid cyanide briquettes are delivered by the manufacturer mostly in ISO tanks with 20 metric tons of solid cyanide. Also, deliveries cyanide in 20-foot sea containers containing one-ton Intermediate Bulk Containers (IBC)s, whether in wooden IBCs or in Ecopaks - the upgraded to the standard IBC.



Auditor's Finding

This operation is

- ✓ **in full compliance**
- ○ in substantial compliance
- ○ not in compliance with

with the International Cyanide Management Code.

This operation has maintained full compliance with the International Cyanide Management Code throughout the previous three-year audit cycle.

Auditor's Attestation

Audit Company:	Bruno Pizzorni
Lead and Transportation Technical Auditor:	Bruno Pizzorni E-mail: bruno.pizzornic@ciplima.org.pe
Date(s) of Audit:	April 10 and 11, 2019

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.

Marítima Dominicana, S.A.S.		June2, 2019
Name of Facility	Signature of Lead Auditor	Date

Summary Audit Report

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.

	✓ **in full compliance with**	Transport Practice 1.1
The operation is:	○ in substantial compliance with	
	○ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

Mardom´s ha developed and implemented the procedure PR-SSA-007 Sodium Cyanide Transport which includes selecting the cyanide transport routes to minimize the potential for accidents and releases or the potential impacts of accidents and releases. Mardom maintains a documented process for the cyanide transportation routes to the mine site that takes into account population density, infrastructure, pitch & grade, proximity to water bodies, and the prevalence and likelihood of poor weather and resulting poor driving conditions.

The procedure for Sodium Cyanide Transport has been implemented to evaluate the risks of selected cyanide transport routes and take the measures necessary to manage these risks. Risks related to pitch and grade of roads, traffic congestion, social disturbs, security issues and proximity to water bodies were considered during the development of the routes. In some cases, the pitch and grade of the roads are significant and transit through towns is considered to be lower related risk. Mine customer input is considered when routes are determined.

The transport procedure establishes that routes evaluation to be assessed at least yearly. By other side, the procedure also states that the convoy leader must prepare reports for every trip completed, which are used to review and update the route assessment. Interviews with drivers and management personnel were used to confirm that feedback about driving conditions is communicated. Special conditions noted by customers are noted and communicated to all drivers assigned to the route.

Mardom documents measures taken to address risks identified with the selected routes and maintains records of transportation routes and associated risks and mitigation measures deployed. The risks assessment is documented through matrices, which *are* used to develop emergency scenarios (e.g. truck rollover on dry soil conditions, crash with another vehicle, etc.) in the different route sections. Each scenario has specific preventive measures.

Mardom seeks 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 Mardom personnel have met with local stakeholders to seek input from communities, non-governmental organizations, and governmental authorities to seek input into the planning for their trucking transport operation.

The Cyanide Transport Procedure establishes that all shipments from the ports to the mine site to be performed in convoys of four truck and with one safety escort vehicle at least (where the convoy leader travels). Additionally, according to the convoy leader reports, a mechanical support vehicle escorts the convoy with basic spare-parts. Furthermore, in compliance with local regulations, the convoy is escorted by the national army personnel.

Mardom advises external responders, medical facilities and communities of their roles and/or mutual aid during an emergency response. During the recertification period Mardom periodically provided training related to cyanide handling and emergency response to the port authorities and hospitals, including training from March 23, 2017 to the Intelligence Agency School, who provides the national army personnel for cyanide escorts.

The transport company do not subcontract any of the cyanide handling or transport. All trucks are property of Mardom, all drivers are Mardom´s employees

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.

	✓ **in full compliance with**	Transport Practice 1.2
The operation is:	○ in substantial compliance with	
	○ not in compliance with	

Marítima Dominicana, S.A.S.		June 2, 2019
Name of Facility	Signature of Lead Auditor	Date

Summarize the basis for this Finding/Deficiencies Identified:

Mardom uses only trained, qualified and licensed operators to transport its products. Mardom ensures that its drivers are compliant with ICMC requirements and are assessed by auditors during certification audits. The company maintains a policy to use only qualified drivers who have received appropriate operational and safety training. Records were available for all current cyanide drivers to demonstrate that qualification and training requirements were met.

Interviews with drivers, dispatch, management, and maintenance personnel were used to confirm that all personnel operating cyanide transportation equipment can perform their jobs safely and in a manner that minimizes the potential for cyanide releases and exposures. Training related to cyanide and the delivery of cyanide is given by Mardom´s Health & Safety (H&S) Manager. Training records covering the re-certification period were available for review.

Transport Practice 1.3:

Ensure that transport equipment is suitable for the cyanide shipment.

	✓ **in full compliance with**	Transport Practice 1.3
The operation is:	○ in substantial compliance with	
	○ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

Mardom uses only equipment designed and maintained to operate within the loads it is handling. The Cyanide Transport Procedure states that all drivers and escort leaders must ensure the loads it will be handling. Shipment records were reviewed to confirm that standard weights within the capacity of the tractors, trailers, ISO tanks and containers were being shipped. ISO weight capacities and the fulfillment of ISO tank inspection requirements were reviewed during the audit and were found to be compliant. Mardom uses only authorized packaging for its sodium cyanide shipments.

According to interviews with Mardom personnel, standard weights are loaded, and standard blocking and bracing configurations are used for trailer. Shipping paperwork was reviewed during the audit and showed the number of packages shipped and the weight of the cargo. This information is used to ensure that overloading does not occur. Records were available to demonstrate that equipment is not being overloaded.

The Cyanide Transport Procedure establishes that each trailer will be loaded with only one ISO tank or a 20-foot container and that each truck can only haul one platform trailer. This is verified by the convoy leader.

Transport Practice 1.4:

Develop and implement a safety program for transport of cyanide.

✓ **in full compliance with** Transport Practice 1.4

The operation is: ○ in substantial compliance with

○ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Mardom has formal procedures and training programs used to ensure that cargo, including cyanide, is transported in a manner that is safe and protective of the transportation packaging (ISO tank and containers). Mardom personnel were interviewed to confirm that written procedures continue to be used and implemented in daily operations. A visual inspection is performed by Mardom´s H&S officer at the port when the cargo is released liberation by authorities. Once received the cargo, the employee performs a detailed inspection with a checklist. Containers, and ISO tanks are loaded with standard blocking and bracing configurations.

A visual inspection is performed by Mardom´s H&S personnel both at the port upon cargo liberation by authorities, and also when receiving empty ISO tanks and containers from the mine site. Once received the cargo, the employee performs a detailed inspection with a checklist. Records were available showing completed checklist for cargo integrity and signaling inspections performed at the port and mine site, where any occurrence is observed. All vehicles and trailers were found to be properly placarded during the audit.

Mardom has implemented a safety program for cyanide transport that includes inspections prior to cyanide shipments is being performed. Trucks, and trailers are inspected prior to shipment. Mardom does inspections of its trailers before each departure with any cyanide shipment and maintenance performs its maintenance when needed and according to a preventive maintenance program.

The operation has preventive maintenance program for trucks and stackers (used to load the trailer with the container). These programs are cyclic and based on service hours. These programs include standard requirements for combustion engine vehicles and equipment. Additionally, the trailers are completely inspected on a semiannual basis based on a technical inspection sheet, in addition to pre-trip inspections.

Trucks are maintained according to a preventive maintenance program performed only in authorized workshops in order to keep the manufacturer's warranty. Records for the recertification period were checked and were found to be acceptable.

As established by the Cyanide Transport Procedure, the working day for drivers during a trip with sodium cyanide may not exceed 12 hours per day, allowing detentions every 2 hours for 10 minutes or more to review the equipment, food and others. Operators must rest at least 8 hours prior to each trip. The knowledge of this requirement was confirmed by

interview with two drivers and a convoy leader. According to the reviewed reports, each cyanide transport operation between Santo Domingo and the mine site takes about two to three hours depending on traffic conditions.

The Cyanide Transport Procedure states that ISO tanks and containers must be anchored to the chassis using twist locks or chains. According to interviews with Mardom personnel, in containers and ISO tanks, standard weights are loaded, and standard blocking and bracing configurations are used. Shipping paperwork was reviewed during the audit and showed the amount of cyanide shipped and the weight of the cargo. This information is used by transportation partners to ensure that overloading does not occur.

The Procedure also states that the convoy displacement will be dependent on the climatic / social / political / environmental conditions. In case the convoy is accompanied by an official of the client, the leader could consult the opinion of this person, but the decision if the trip stops or if it continues, is under his responsibility, communicating it to the supplier.

Prior to departure, the convoy leader will make a meeting with all the staff, explaining among others, the policy for alcohol and drug prevention. It also indicates that alcohol testing should be performed to all the members of the convoy, drivers and assistants and that in case of any incident on the trip, the convoy leader will make the assessment of the state of intemperance of those involved, with the breathalyzer. Records for the recertification period were available to show that all parts of the Mardom safety program are effectively being implemented. Blow tests are documented in the convoy leader report.

According to Mardom representatives, records relating cyanide transport are be retained at least for the recertification period. Records were available to show that all parts of the Mardom safety program are effectively being implemented, records samples were found to be complete for this recertification period, no problems were noted.

Transport Practice 1.5:

Follow international standards for transportation of cyanide by sea and air.

	✓ **in full compliance with**	Transport Practice 1.5
The operation is:	○ in substantial compliance with	
	○ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

No shipments are made via air or sea on this transportation operation. Mardom receives the cyanide shipments upon release of the cargo by the port authorities. The scope of this audit is for the ground transportation operations performed by Mardom from Dominican Republic's ports to the mine site.

Transport Practice 1.6:

Track cyanide shipments to prevent losses during transport.

	✓ **in full compliance with**	Transport Practice 1.6
The operation is:	○ in substantial compliance with	
	○ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

Mardom personnel maintain communications with truck drivers making cyanide deliveries. All drivers have communication equipment consisting of mobile phones, all trucks are equipped with two-way radio communication system. Trucks are in contact at all times with the convoy leader and this with Mardom dispatch and the client at the mine site.

Communication equipment is confirmed to be operational at the start of each trip. Procedures, checklists, and interviews were used to confirm this practice.

According to the route assessment, no communications blackout areas were identified in the route. A review of procedures and driver interviews were used to confirm this practice.

Mardom has systems and procedures to track the progress of cyanide shipments. Mardom is the island representative for Scout, a satellite tracking system and has a business unit that provides fleet control systems to third parties. All the trucks are equipped with GPS which is used to track the convoy progress and ensure that no deviations from the route take place. Interviews with the H&S Manager and logistics personnel were held during the audit. The Logistics Coordinator has designated responsibilities for tracking shipments on a daily basis.

Shipping paperwork was found to be conformant to ICMC requirements, including chain of custody requirements. A waybill accompanies the transportation which includes chain of custody data such as container numbers, waybill numbers, shipping documentation, SDS, packing list, bill of lading, customs declarations, producer invoice, among others.

The shipping records indicate the number of packages and amount of material. Upon arrival to the mine site, the client review the seals and weight the cargo to confirm quantities. Information was found to be compliant in general for Mardom shipments. The cyanide manufacturer dispatches all shipments with Safety Data Sheet (SDS) that are appropriate for the type of sodium cyanide being shipped (solid).

Principle 2, Interim Storage:

Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.

Transport Practice 2.1:

Store cyanide in a manner that minimizes the potential for accidental releases.

	✓ **in full compliance with**	Transport Practice 2.1
The operation is:	○ in substantial compliance with	
	○ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

Interim storage activities in this transportation operation, as defined by ICMI, do not take place at Mardom trucks terminal. As stated by the Mardom H&S Manager, and unlike the previous certification audit, ISO tanks and cyanide containers are sent directly from the port to the mine site. Nevertheless if there is an exception where for any reason the cyanide shipment has to enter into Mardom´s truck terminal, they would only be passing through with a stay of less than 24 hours in the trucks terminal, for which it has an appropriate place to park in a fenced truck area designated for in-transit management of cyanide transportation ISO tanks and containers.

On occasion of the audit, the cyanide storage area was visited and found empty. This area is located at the rear of the terminal. It consists of a brick background wall and a perimeter fence high enough to prevent the entry of any unauthorized person to the area. This storage fenced-in portion of the truck yard is separated physically from other parking areas and has all ICMC required signage. The storage area is locked when trailers are present and access to the area is limited to Mardom´s drivers and the facility manager / dispatcher.

Warning signs were observed in the location that comply with ICMC requirements. Warning signs stated that cyanide is present, smoking, open flames, eating and drinking are not allowed, and what personal protective equipment (PPE) is required in the area. PPE requirements were deemed to be appropriate.

The storage area was found to be appropriately fenced, locked, with security measures in place to prevent unauthorized access to cyanide. Access to the area is restricted and has 24/7 safety guards and CCTV surveillance. Security was found to be acceptable.

No other materials are stored in this segregated area. Any cyanide shipment is kept within the containers and its packaging material away from any other chemical within the terminal in a separated area from incompatible materials. The storage of other materials in the area is prohibited.

The area has a concrete floor to minimize the potential for contact of solid cyanide with water. There are no waterways near the cyanide area. Although the area has no roof, containers are not opened. Cyanide is kept in the ISO tanks and maritime containers. Containers are equipped with heavy-duty rubber door seals that keep water and wind out. When maritime containers are received at the port, Mardom personnel inspects them for any signs of container damage like holes, dents and doors seals. There were available filled inspection checklist for the recertification period, confirming this practice is performed consistently.

Cyanide is stored in an open area with adequate ventilation to prevent build-up of hydrogen cyanide gas, no additional ventilation is required. No ISO tanks or containers are opened or stored indoors where cyanide gas could build up. Transportation containers are not opened

The storage area has concrete floor as secondary containment system in place, capable of controlling the extent of any released solid cyanide. Mardom manages only solid sodium cyanide. Any cyanide released to the concrete floor would not mix with low pH water or other incompatible material. There are no waterways near the cyanide area, the concrete floor is not connected to any drainage.

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.

	✓ **in full compliance with**	Transport Practice 3.1
The operation is:	○ in substantial compliance with	
	○ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

Mardom has developed and implemented an Emergency Response Plan (ERP) that is appropriate for its transport operation. The ERP includes details regarding the response procedures to be used in each mode of transportation, and type of incident. This Plan has been agreed with the mine, which provides emergency response team and is responsible for the communication with the media. This is a detailed document that includes, among other information, the emergency response team organization chart, emergency phone directory, communication channels guidelines, emergency scenarios, and instructions to attend specific and general emergency scenarios.

The ERP states what actions are to be taken in the event of a cyanide incident during transit and temporal storage. The document was found to be appropriate for this solid sodium cyanide transportation operation. Emergency scenarios have been identified as result of the route assessment matrix and emergency response actions have been addressed.

The Plan considers the physical and chemical form of the cyanide, with detailed explanation of the sodium cyanide characteristics and toxicity based on the SDS. Solid sodium cyanide is shipped using this transportation operation. Emergency response procedures address actions to be taken in response to this type of sodium cyanide spills. The SDS for solid sodium cyanide is attached to the Plan to ensure that chemical-specific information is readily available at all times.

The Plan considers truck transport. The emergency response actions in the ERP is appropriate for this type of product and method of transportation. Section 2 provides information regarding the packaging and transportation characteristics of the product, the container, and the transportation unit. All emergency scenarios developed are related to ground transportation: incidents without injuries, mechanicals problems, collision, rollover with and without spill, fire during transportation, fall of the load and collision with hurt persons. The scenarios for the storage area include fire and spills.

The ERP considers all aspects of the transport infrastructure as condition of the road. The emergency response actions in the ERP are appropriate for the roads and transport

infrastructure of the island. The Plan includes the emergency scenarios developed from the route assessment. It also identifies the areas where the different scenarios are more likely to take place

The Plan considers the design of the transport vehicle with ISO tanks and sea containers with trucks and trailers, including a detailed description of the vehicle. The emergency response actions in the ERP are appropriate for this type of transport vehicle.

The ERP includes descriptions of response actions, as appropriate for the anticipated emergency situations. The emergency response information clearly outline the roles and responsibilities of internal and external responders. The actions that Mardom will take in an emergency (primarily secure the scene, notify stakeholders and contact authorities) are listed in the ERP. The documentation was found to be acceptable for this type of operation.

In the event of an emergency, in addition to the Pueblo Viejo emergency response team, external emergency responders, such as fire departments, ambulance, police, would provide on-site response. The ERP states that in case of fire in the intermediate storage area or in the truck during transport, Mardom will call the firefighters and the police in the area, if extinction is not possible with their own equipment. The police will be responsible for cordoning off the area to avoid the proximity of the public, the convoy leader will advise the firemen to adequately combat the fire caring that if there is a danger of spillage, water is not allowed for any reason to fight the fire.

In case of a road accident with spill where the concentration of HCN is not detectable, the convoy leader will ask the police to help keeping transit fluid on the road and not allowing vehicles to stop. If there are injured, the convoy leader will request an ambulance so that they can be attended immediately and sent to the nearest hospital.

Transport Practice 3.2:

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

	✓ **in full compliance with**	Transport Practice 3.2
The operation is:	○ in substantial compliance with	
	○ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

Mardom has provided emergency response training to all his personnel involved in the transportation operation as drivers, convoy leaders, managers, convoy mechanics, maintenance shop logistics and dispatch personnel, among others. They receive an appropriate level of training to fulfill their role in emergency response. Formal emergency response training is refreshed annually. Additionally, the cyanide manufacturer has

provided redundant training to Mardom personnel. Training records were available for the recertification period and were complete.

The roles and responsibilities of relevant internal and external personnel are clearly described in the ERP. Section 4 establishes the responsibilities for the members of the initial response team. The ERP also include responsibilities for the on-site commander, the communications leader (responsible for contact with the authorities and the media), field containment and recovery supervisor (from the manufacturer), emergency brigade leader, and the mine emergency brigade leader.

The Plan defines what equipment must be available in convoy´s support pickup vehicles. Appendix 5 of the ERP provides a list of the required emergency response equipment and materials. Among others figure in the list: overall Tyvek suits, leather gloves, PVC booths, cyanide gas detector, water analysis kit, disposable respirators, Cyanokit, medicinal oxygen, polyethylene bags, calcium carbonate and sodium hypochlorite.

Mardom has available the necessary emergency response and health and safety equipment, including personal protective equipment during transport. Each cyanide convoy is made up of 4 trucks with their trailers, plus two pickup trucks (escort vehicles). One pickup truck pulls a cart with all the necessary materials and equipment to attend an emergency on the route, as emergency equipment, extra personal protective equipment, spill containment and recovery material. Equipment is checked as part of the pre-trip inspection process.

As previously noted, MarDom has a training program which includes emergency response refreshment. Training records were available for review, these are kept as assistance list, and in some cases, diplomas are issued and kept in the personnel files. Additionally, in Section 6 of the ERP is established that training is required prior to MarDom personnel gets involve in cyanide operations and that refreshment is required at least on an annual basis.

Emergency equipment is checked as part of the pre-trip inspection process. This practice was confirmed through interview and observation.

Transport Practice 3.3:

Develop procedures for internal and external emergency notification and reporting.

	✓ **in full compliance with**	Transport Practice 3.3
The operation is:	○ in substantial compliance with	
	○ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

The notification procedures, including telephone numbers, are described in the Emergency Response Plan. Mardom information and other emergency contact information is contained in the ERP. The Plan lists current emergency numbers for local hospitals,

ambulance, fire, and environmental responders. The Mardom phone list also included up-to-date contact information for cyanide supplier personnel, regulatory agencies, and potentially affected communities.

The Plan sates it must be updated when there are changes in the background and form, in terms of procedures, persons, telephone numbers, routes, equipment, methods, or any other consideration that allows more efficiency and effectiveness.

Transport Practice 3.4:

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

	✓ **in full compliance with**	Transport Practice 3.4
The operation is:	○ in substantial compliance with	
	○ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

Mardom personnel is responsible for containing cyanide spills and performing cleanup and remediation. Specific details regarding the remediation, neutralization, decontamination, and disposal of clean-up debris are contained within the Mardom ERP. Descriptions of necessary action steps depending on the incident scenario are clearly outlined in the document.

The ERP includes text that addresses the remediation and neutralization of cyanide solutions. Final disposition of cyanide contaminated materials to be done by either two companies specialized in HAZMAT disposal: CAPSA and AIDSA.

Mardom personnel showed good level of awareness that the use of treatment chemicals is prohibited if cyanide spills into surface waters. Mardom ERP specifically prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide for treating a cyanide spill into surface water. Section 5 of the ERP 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.

	✓ **in full compliance with**	Transport Practice 3.5
The operation is:	○ in substantial compliance with	
	○ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

Mardom´s ERP updated version of the Emergency Response Plan is from April 19, 2109. The Plan has provisions for periodically reviewing and evaluating the Plan´s adequacy. Section 7 of the Plan states it must be updated when there are changes in the background and form, in terms of procedures, persons, telephone numbers, routes, equipment, methods, or any other consideration that allows more efficiency and effectiveness.

The Plan states to perform annually a mock emergency drill, being a tabletop drill or a practical simulation on field, with the purpose of evaluating the effectiveness of the Plan and correcting the anomalies found. The auditor reviewed mock drills records covering the recertification period, all simulating both cyanide-related exposures and releases.

The operation has evaluated the emergency response procedures and revised them as necessary, following any incident or mock drill during the audit cycle The ERP indicates that the objective of the annual mock emergency drills is to measure the effectiveness of the response procedure, indicating, among others, that after all simulation a report of the event must be made indicating the strengths and weaknesses, as well as the action plan for correction. Also states it must be updated when there are changes in the background and form, in terms of procedures, persons, telephone numbers, routes, equipment, methods, or any other consideration that allows more efficiency and effectiveness.