ICMI International Cyanide Management Code
Summary Audit Report

TransWood, Inc. Winnemucca Terminal
Sodium Cyanide Solution Transportation Operations
Re-Certification Audit

Submitted to:
The International Cyanide Management Institute
1400 I Street, NW – Suite 550
Washington, DC 20005
USA
2019 Audit Cycle

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TransWood, Inc. Winnemucca Terminal Sodium Cyanide Solution Transportation Operations

Contact Information:

Name and Location of Operation:	TransWood, Inc. – Winnemucca Terminal 3109 Desert Gem Rd. Winnemucca, NV 89445
Audit Scope:	Bulk liquid transportation of sodium cyanide to gold mines in Nevada and the Western U.S.
Name and contact information:	Shelley Meckley - Terminal Manager P.O. Box 2213 Winnemucca, NV 89445 Email: smeckley@transwood.com

Location detail and description of operation:

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

The TransWood Winnemucca Terminal transports liquid sodium cyanide in bulk tankers from the Cyanco production facility in Winnemucca, Nevada, to gold mines in Nevada and the Western USA. The terminal is located 1.5 miles west of Winnemucca on Jungo Road. The terminal is one of 30 TransWood terminals serving 22 states in the USA. The carrier transports dry and liquid bulk loads and is headquartered in Omaha, Nebraska.

TransWood maintains a formal environmental, health, safety, and security (EHSS) management system that is certified by a third-party auditing firm to the American Chemistry Council's Responsible Care Management System (RCMS®) technical specification. The Winnemucca Terminal is included in the overall TransWood RCMS management system. The RCMS processes are applied to all operations and are used to ensure compliance to all legal and voluntary EHSS requirements, including the International Cyanide Management Code (ICMC).
This TransWood terminal is dedicated exclusively to the maintenance and dispatch of bulk cyanide loads for Cyanco. The terminal has a full-service maintenance shop and all equipment is

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

Cyanide Code compliance is achieved in close collaboration with Cyanco. Trucks are loaded by Cyanco operators, driven by TransWood drivers, and monitored throughout transit by Cyanco and TransWood. TransWood also works very closely with Cyanco to ensure that all ICMC requirements are fulfilled. Compliance with cyanide training, emergency response planning, and route determination are all jointly managed.

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

Auditor's Finding

This operation is in full compliance with the International Cyanide Management Code.
This operation has not experienced any cyanide incidents or compliance problems during the previous three-year audit cycle.

Audit Company:	CN Auditing Group, Inc. http://cnauditing.com/
Audit Team Leader and Technical Expert:	Bruno Pizzorni Email: ICMC@cnauditing.com
Date(s) of Audit:	July 23 - 24, 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 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.

TransWood, Inc. Winnemucca Terminal		September 15, 2019
Name of Operation	Signature of Lead Auditor	Date

Cyanide Transportation Verification Protocol

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.

Finding: Is the transporter in full compliance, substantial compliance, or non-compliance with Transport Practice 1.1?

☒ Full Compliance ☐ Substantial Compliance ☐ Non-Compliance

Explain the basis for the finding.

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

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

TransWood evaluates the risks of selected cyanide transport routes and take the measures necessary to manage these risks The Terminal Manager performs the risk ranking with input from truck drivers, road information available through the internet and personal knowledge of the routes. When options exist, the route with the lowest risk is chosen in order to minimize the potential for accidents and/or releases. In some cases, the pitch and grade of the roads are significant and transit through cities is considered to be lower risk. Stakeholder input (Cyanco, mine customers, and local authorities) is considered when routes are determined. Appropriate risk mitigation measures are used. Weather conditions are constantly monitored, and deliveries are postponed if a route is considered to be unsafe.

TransWood periodically reevaluates routes used for cyanide deliveries and gets feedback on route condition from the drivers. The routes are evaluated prior to first delivery and again formally every three years thereafter. The Terminal Manager has a process of gathering feedback from drivers when they come back to the terminal to re-fuel after deliveries are made. Through this process, drivers have regular access to the Terminal Manager and provide feedback about driving conditions, any road construction, and as needed. The Regional EHSS Manager is notified. Special conditions reported by customers are noted and communicated to all drivers

assigned to the route. The routes driven by TransWood vary in length. Drivers can often complete more than one trip in a day, although a small number of routes are long distance trips. The transporter documents the measures taken to address risks identified on the selected routes. Risk mitigation measures are noted on the route documentation, where applicable. The dispatch orders indicate the routes. Risk mitigation measures focus primarily on the avoidance of high traffic times of day and the avoidance of roads that are dangerous in poor weather conditions.

TransWood and Cyanco seek input from communities, stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures. The route planning procedure shows what considerations are made when planning a route. Extensive interaction occurs between TransWood, Cyanco, and the mine customers. Conditions at mine sites or internal routes may need to change. Community interactions are generally meetings with City Councils and community leaders.

Where routes present special safety or security concerns, TransWood uses additional safety measures to address the concern. As stated by the Terminal Manager, if it is a bad route they do not go and their drivers have the right to say no, this is an implicit agreement.

Most routes are short in length and security concerns are minimal. TransWood has a robust QUALCOM communication and GPS tracking system to track all cyanide movements.

The transporter, through Cyanco, advised external responders, medical facilities and communities of their roles and/or mutual aid during an emergency response. Cyanco largely manages communications with local emergency responders for both itself and TransWood. Cyanco has formal communication and training every 2 years with local emergency responders and with hospitals.

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

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.

Finding: Is the transporter in full compliance, substantial compliance, or non-compliance with Transport Practice 1.2?

☒ Full Compliance ☐ Substantial Compliance ☐ Non-Compliance

Explain the basis for the finding.

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

There is a zero tolerance on speeding and reckless driving. A road test is part of the qualification process. CDL is required with hazmat and tanker endorsement at the time of hire. All drivers have a U.S. DOT Class A Commercial Driver's License (CDL) with a Hazardous Materials / Tanker endorsement. New hires drive only during the day and go out with an experienced driver for about 5 weeks. They also complete a skills evaluation process prior to delivering each type of shipment and prior to driving a route for the first time.

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

Transport Practice 1.3: Ensure that transport equipment is suitable for the cyanide shipment.

Finding: Is the transporter in full compliance, substantial compliance, or non-compliance with Transport Practice 1.3?

☒ Full Compliance ☐ Substantial Compliance ☐ Non-Compliance

Explain the basis for the finding.

TransWood uses equipment designed and maintained to operate within the loads it will be handling. Equipment is designed by US manufacturer engineers to meet U.S. DOT weight rating standards. Gross Vehicle Weight Rating (GVWR) is certified by the manufacturer and documented on each vehicle with a label. Equipment labels were reviewed during the audit. All tractors and trailers have been checked and all are rated for weights that exceed maximum loaded weights.

Tractors have automatic transmissions. Modifications are made to all standard trucks to make them more suitable for the mine roads and the loads hauled, they are "custom made". Trailers have reinforced double frames to meet stress in bumpy roads. Improvements in trailers include the use of double frames and longer frame rails.

The transporter has procedures to verify the adequacy of the equipment for the load it must bear. Truck inspections and preventive maintenance actions are performed regularly to ensure that the equipment is safe to operate and that it can continue to carry the loads for which is it designated. The maintenance program is very well organized, spare parts inventory is maintained at a high level, and maintenance personnel are highly qualified.

Defined checklists showing all necessary maintenance activities are used and records were available to demonstrate that equipment is typically checked at appropriate frequencies. Cyanco requires tanks and valves to pass a pressure test every year or when needed. Regulatory-required inspections are scheduled, tracked and documented. Tractors and trailers have records showing that they are appropriately maintained. The files show all preventive maintenance activities, repair activities, and inspection activities that were performed a truck and/or trailer over time.

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

The equipment is capable of transporting loads in excess of the maximum loads shipped. The regulatory limits on truck weight are typically the limiting factor that dictates the maximum amount of cyanide that can be transported.

Transport Practice 1.4: Develop and implement a safety program for transport of cyanide.

Finding: Is the transporter in full compliance, substantial compliance, or non-compliance with Transport Practice 1.4?

☒ Full Compliance ☐ Substantial Compliance ☐ Non-Compliance

Explain the basis for the finding.

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

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

TransWood drivers conduct pre-trip inspections prior to departure. Mechanical defects are called to the attention of the on-site mechanics. Issues that would affect safety and/or legal compliance are resolved prior to movement off-site. Drivers perform a driver vehicle inspection at the end of each day of operation. Completed checklists are submitted into the office at the end of each day.

The transporter employs full-time mechanics who perform preventive maintenance on all transportation equipment at regular intervals. Records indicate that the maintenance is being conducted as planned. Equipment such as brakes and tires are changed out long before equipment failure would occur. Pre-defined checklists showing the required maintenance tasks are used to record actions. The incoming and outgoing condition of the equipment is recorded on the checklists and associated repair orders.

The Safety Program includes limitations on drivers' hours in accordance with Federal Motor Carrier Safety Regulations (FMCSR). Drivers are informed of legal requirements regarding limits on driving hours, are encouraged to stop driving if they become too tired (empowerment), are provided with fatigue training, and are monitored monthly for adherence to driving hour limitations through spot checks performed at the terminal and monthly audits performed by headquarters. Driver logs are audited by a third party to ensure adherence to the regulatory requirements. Two years ago, TransWood implemented a federally mandated electronic log system. This allows to keep track of drivers' hours on duty and off duty.

TransWood has a process of shipping only full tankers or moving empty tankers. This is done to reduce the risk of roll-over and the risk of an accident. The tankers are generally shipped at 92-93% full.

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

There is a written drug abuse prevention program. TransWood participates in random drug and alcohol testing and maintains a strict zero-tolerance policy. Drug testing is done randomly, as part of the pre-employment process, post-accident testing, at the mine site and if there is suspicion of a problem. The auditor records and found them to be complete for the re-certification audit period.

The auditor confirmed that TransWood keep records documenting that the above activities have been conducted: vehicle inspections prior to each departure, vehicle preventive maintenance records, control on operator or drivers' hours, procedures to modify or suspend a trip, and a drug abuse prevention program.

Transport Practice 1.5: Follow international standards for transportation of cyanide by sea and air.

Finding: Is the transporter in full compliance, substantial compliance, or non-compliance with Transport Practice 1.5?
☒ Full Compliance ☐ Substantial Compliance ☐ Non-Compliance
Explain the basis for the finding.

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

Transport Practice 1.6: Track cyanide shipments to prevent losses during transport.

Finding: Is the transporter in full compliance, substantial compliance, or non-compliance with Transport Practice 1.6?
☒ Full Compliance ☐ Substantial Compliance ☐ Non-Compliance
Explain the basis for the finding.

The trucks have the means to communicate with the transport company, the mining operation and the cyanide producer and emergency responders. Cyanide shipments are tracked using a the Omnitracks Qualcomm/GPS tracking new system that is maintained and monitored from Cyanco´s Control Room. Shipments are tracked by both Cyanco and TransWood personnel. TransWood drivers also have cell phones as a back-up means of communication.

The communication equipment is periodically tested to ensure it functions properly. The communication and tracking equipment is properly maintained and is used daily. Communication systems is part of the pre-trip inspections and is maintained along with the formal preventive maintenance program for each tractor. Cyanco continuously monitors the signal that appears on the Control Board.

TransWood has systems to track the progress of cyanide shipments. There are no blackout areas for the Qualcomm system along the designated routes. The company uses a QUALCOM communication and GPS tracking system.

The transporter has inventory controls and chain of custody documentation to prevent loss of cyanide during shipment. Cyanco and TransWood work together to manage a unique inventory management system in which they monitor customer tank levels and dispatch shipments automatically after querying the customer's computer systems. TransWood ships full loads.

Bill of Lading paperwork shows the amount of cyanide delivered. This paperwork is used to document the chain of custody and is signed upon delivery of the product to the customer. The

amount of cyanide delivered is carefully monitored by the driver and remotely through the TransWood dispatch office. Trucks are weighed when dispatched and when they return to ensure proper chain of custody for all cyanide shipped.

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

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.

Finding: Is the transporter in full compliance, substantial compliance, or non-compliance with Transport Practice 2.1?

☒ Full Compliance ☐ Substantial Compliance ☐ Non-Compliance

Explain the basis for the finding.

TransWood does not have any interim storage responsibilities. Additionally, no trucks containing cyanide are allowed to be stored at the terminal. This Cyanide Code requirement is not applicable to the operation.

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.

Finding: Is the transporter in full compliance, substantial compliance, or non-compliance with Transport Practice 3.1?

☒ Full Compliance ☐ Substantial Compliance ☐ Non-Compliance

Explain the basis for the finding.

TransWood has an Emergency Response Plan for its own operations and it uses the documented Cyanco Emergency Response Plan (ERP) that addresses all of the Code requirements for the transportation of cyanide. The ERP is appropriate for the selected transportation routes. The ERP was reviewed and was found to be acceptable. TransWood drivers have only a notification role in emergency response. Emergency response is then directed and carried out by Cyanco employees, emergency responders, and mine personnel if the emergency happens at a mine site. Drivers have hazardous materials training and security training, and they keep a copy of the Emergency Response Guide (ERG) with them at all times during transport. TransWood only transports cyanide via truck and all scenarios considered in the Plan were related to truck accidents. Liquid sodium cyanide (the only physical form transported), roadway infrastructure differences, and the roles of the different emergency responders are discussed in the Plan.

The ERP considers the physical and chemical form of the cyanide. The only form of cyanide that is transported is cyanide solution. The more detailed information regarding the chemical form of the cyanide solution is on the safety data sheets (SDS) that are kept in the truck at all times. All drivers are trained in emergency procedures including the use of the break-away emergency shut-off system in case of a spill situation during unloading. Awareness of the steps that would need to be taken in the event of an emergency was confirmed during this re-certification audit.

The Plan considers the method of transport. The only mode of transportation is truck, which is addressed by the ERP.

The Plan considers all aspects of the transport infrastructure such as conditions of the road. The differences in infrastructure for the defined routes are addressed in the ERP. As there are not multiple modes of transportation, the different road types such as highway, public, private, and rugged mine site were considered. Drivers showed good awareness of the need to use different routes depending on weather conditions.

The ERP does not specifically mention the design of the transport vehicle. The emergency response actions outlined in the ERP are primarily notification actions. Professional emergency responders together with technical guidance from Cyanco would be responsible for addressing issues involving the way in which the structure of the vessel should be managed after an emergency.

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

The Plan identifies the roles of outside responders, medical facilities or communities in emergency response procedures. The ERP identifies the roles of outside responders, namely the Cyanco emergency response team, police, fire, medical responders, and hospitals. If an offsite emergency requires Cyanco's personnel expertise, those personnel will be made available in a support/liaison role pursuant to their level of training.

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

Emergencies occurring during transport may require the involvement of outside agencies and response personnel. Cyanco has a contract in place with Patriot Environmental Services specific to sodium cyanide response.

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

Transport Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response.

Finding: Is the transporter in full compliance, substantial compliance, or non-compliance with Transport Practice 3.2?

☒ Full Compliance ☐ Substantial Compliance ☐ Non-Compliance

Explain the basis for the finding.

The transporter provides emergency response training of appropriate personnel. Training on the emergency response Plan was given to all employees. Records were reviewed. Training is

refreshed every year. Drivers were interviewed and awareness of emergency procedures and documentation was confirmed. Training records through the recertification period were reviewed and were found to be acceptable.

There are descriptions of the specific emergency response duties and responsibilities of personnel. The roles and responsibilities of personnel are described in the Cyanco ERP. The only role described for TransWood is that of the driver: call the emergency response company for help by radio or phone, isolate the area and wait until help arrives. This was accepted due to the fact that Cyanco assumes all emergency response responsibilities for TransWood cyanide shipments.

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

The transporter has the necessary emergency response and health and safety equipment, including personal protective equipment, available during transport. Each truck has a designated emergency equipment bag. The bags and contents of the bags are spot checked as part of the tractor preventive maintenance program.

Drivers receive initial and periodic refresher training in emergency response procedures including implementation of the Emergency Response Plan. TransWood drivers receive an appropriate level of training to enable them to fulfill their role in emergency response, which is limited to notification. Formal training in cyanide is given annually. HAZMAT refresher training is every 3 years.

There are procedures to inspect emergency response equipment and assure its availability when required. The Emergency Plan defines what equipment must be available in each truck and extra personal protective equipment is available in each bag. A random sampling methodology is used to inspect emergency equipment bags on a regular basis when the trucks are brought in for maintenance and inspections.

Transport Practice 3.3: Develop procedures for internal and external emergency notification and reporting.

Finding: Is the transporter in full compliance, substantial compliance, or non-compliance with Transport Practice 3.3?
☒ Full Compliance ☐ Substantial Compliance ☐ Non-Compliance
Explain the basis for the finding.

TransWood has procedures and current contact information for notifying the shipper, the receiver, regulatory agencies, outside response providers, medical facilities and potentially affected communities of an emergency. The notification procedures are described in the Emergency Response Plan (ERP). The notification call list is checked for accuracy once per year when the Plan is reviewed and tested. Cyanco offers much of the support in determining further notification needs.

Systems are in place to ensure that internal and external emergency notification and reporting procedures are kept current. The Cyanco ERP is reviewed and tested (by means of a drill and/or tabletop exercise) once each year. During this activity, the phone numbers are checked for accuracy.

Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

Finding: Is the transporter in full compliance, substantial compliance, or non-compliance with Transport Practice 3.4?
☒ Full Compliance ☐ Substantial Compliance ☐ Non-Compliance
Explain the basis for the finding.

There are procedures for remediation, such as decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris. The Cyanco/TransWood ERP includes text that addresses the remediation and neutralization of cyanide solutions and solids. Cyanco´s members of the Emergency Response Team (ERT), may also assist in spill clean-up and remediation activities.

The ERP discusses the steps to be taken in the event of a cyanide release to ground or water. Neutralization of soil is discussed, although the Plan also lists the name and telephone number of a commercial remediation management contractor who would be called to assist with any large-scale remediation effort. The hazards experienced with a cyanide release to water are also discussed in the plan. Cyanco may contract with Patriot Environmental Services or another

commercial remediation or waste management contractor for remediation services, including the recovery or neutralization of cyanide solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill cleanup debris.

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

The procedure prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water. TransWood would not be directly involved in the remediation of a cyanide spill. The Cyanco ERP, however, does address the requirement that none of the chemicals mentioned above be used to treat a release to surface water.

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

Finding: Is the transporter in full compliance, substantial compliance, or non-compliance with Transport Practice 3.5?

☒ Full Compliance ☐ Substantial Compliance ☐ Non-Compliance

Explain the basis for the finding.

There are provisions for periodically reviewing and evaluating the Plan's adequacy and they have been implemented. The ERP states that the procedures will be reviewed annually by Cyanco and TransWood, and that drills are to be conducted annually. The auditor reviewed yearly records to show that Emergency Response Plan was reviewed.

The ERP has provisions for periodically conducting mock emergency drills and they have been implemented. During the period of this recertification audit, emergency drills were held. The mock drills conducted simulated transport-related cyanide release and exposure incidents. Mines often request that TransWood participate during their emergency drills. The operation conducts mock emergency drills, holds a drill critique, and evaluates the need for further training or adjustment to the emergency procedures.

There are procedures to evaluate the Plan's performance after its implementation and revise it as needed, and they been implemented. The ERP performance is reviewed after actual emergencies and after the annual drill. Changes are made to the Plan, as needed. Cyanco is responsible for making changes to the Plan. Evidence was available to show that emergency plans were evaluated following drills and that actions were appropriately processed. There were no modifications to the documented emergency plans deemed to be necessary following drills.