



**ICMI Cyanide Code Consigner Supply Chain /
Alaska West Express Summary Audit Report**

**DuPont U.S. / Canada Road Transportation Supply
Chain Certification Audit**

**Submitted to:
International Cyanide Management Institute
888 16th Street, NW – Suite 303
Washington, DC 20006
USA**

2010 Audit Cycle



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U.S. / Canada Road Supply Chain Summary

Consignor Name & Contact Information

Name of Operation: E.I. DuPont de Nemours and Company
2571 Fite Road
Memphis, TN 38127 USA

Name and contact information for DuPont Contact: Donald Jeffery
Cyanide Business Global Product Stewardship Manager
Email: Donald.W.Jeffery@USA.dupont.com
Tel. (623) 444-2989

Company Background Information

E.I. duPont de Nemours and Company, Inc. (DuPont) is a science-based company operating in more than 70 countries. DuPont offers a wide range of products and services for markets including agriculture, nutrition, electronics, communications, safety and protection, home and construction, transportation and apparel. Solid sodium cyanide for use in the gold mining sector is manufactured at the Memphis, Tennessee plant, which is part of the DuPont Chemicals & Fluoroproducts business. The plant is located just outside of Memphis in Woodstock, Tennessee.

DuPont was one of the original 14 Cyanide Code signatory companies announced on November 3, 2005. As such, DuPont made the commitment to obtain Cyanide Code certification for its Memphis Solid Cyanide Plant and its packaging operations. DuPont was the first Cyanide Producer to achieve certification in June 2006.

DuPont transportation supply chains are highly complex due to the global reach of its supply capabilities. After its initial certification in 2006, DuPont contracted ICMI-approved Code Transportation Auditors to perform non-certification audits for its supply chain in the U.S., Canada, Mexico, and throughout Central and South America. Audits were conducted of DuPont operations and trucking partners. Due Diligence Reviews were conducted for ocean carriers (including ports) and rail partners (including rail yards).

This report contains information regarding the certification audit conducted of DuPont Cyanide Transportation Supply Chain management and results of a certification audit performed at one of DuPont's trucking partners, Alaska West Express. DuPont trucking partners in the U.S. and

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Canada who are Signatories to the Code are referenced here, but the details of those certification audits are contained in separate reports.

This certification audit of DuPont, its supply chain management practices, and its partner Alaska West Express was conducted according to the 2009-adopted ICMI auditing process that calls for consignors to become signatories and undergo transportation supply chain third-party certification audits.

Description of the U.S./Canada Road Supply Chain

DuPont has been producing and shipping sodium cyanide since 1953. In the United States, the solid sodium cyanide briquettes are packaged at the Memphis Plant, at the LSI Terminal directly adjacent to the plant and at the DuPont packaging terminal in Carlin, Nevada, USA. In the "U.S./Canada Road Transportation Supply Chain" sodium cyanide is shipped in semi-bulk bag-in-box and metal bins. Dry van trailers, flatbed trailers, and intermodal containers loaded onto chassis are used. Shipments to Alaska are typically made using a packed intermodal container and a combination of rail, barge, and truck. Rail and barge movements to Alaska were certified in 2010 (reference 2010 certification audit report for DuPont's Rail/Barge supply chain). Only the U.S./Canada *road* portion of the Memphis-Alaska supply chain is addressed in this report.

This evaluation included the following components:

1. Certification audit of DuPont supply chain management practices for the coordination and tracking of road shipments in the U.S. and Canada.
2. Certification audit of Alaska West Express cyanide transportation operations based in Fairbanks, Alaska.

Other DuPont trucking partners used in the U.S. and Canada underwent separate certification audits as part of their obligations as Code Signatories. The results of those audits are contained in separate reports. The carriers who are Signatory Carriers who are also managed by DuPont as part of their U.S./Canada Road Supply Chain include: Empire Express, IMCG, RSB Logistic, and Miller Transporters.

All truck transportation in the United States and Canada using U.S. and Canada trucking partners are within scope of DuPont Consignor Certification Audit. Truck deliveries to Alaskan mines are also specifically addressed in this report through the certification audit conducted at Alaska West Express in Fairbanks, Alaska.

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Personnel interviewed during the September 21-22, 2010 combined DuPont U.S./Canada Road Consignor and Alaska West Express Certification Audit:

Transport Practice Discussed → Audit Participants	1.1 Route selection Risk Assessment	1.2 Driver / Operator Training & Qualifications	1.3 Equipment Suitability	1.4 Safety Program & Preventive Maintenance	1.5 Ocean Transport N/A	1.6 Tracking of shipments	2.1 Interim Storage	3.1-3.5 Emergency Response	Supply Chain Management - General Discussions
Global Tech Service Consultant	X	X			-	X	X	X	X
Cyanide Business Global Product Stewardship Manager	X	X	X	X	-	X	X	X	X
Alaska West Express Director HSSE	X	X	X	X	-	X	X	X	
Dispatcher	X	X	X		-	X		X	
HSSE Specialist				X	-				
Safety & Operations Maintenance Manager				X	-				
Terminal Manager		X	X	X	-				
Driver	X	X	X	X	-	X		X	
Driver	X	X	X	X	-	X		X	
Material Handler					-		X	X	

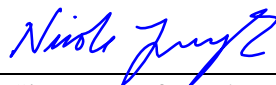
Audit Implementation & Conclusions

The audit was performed by an independent third-party auditor who was pre-approved by the ICMI as a Lead Auditor for all types of Code audits and as a technical expert for Code audits of cyanide transportation and production operations.

Cyanide transportation management practices for the DuPont road transportation moves were evaluated against the Cyanide Code requirements documented in the ICMI Cyanide Code (2009), ICMI Cyanide Code Transportation Protocol (2009), and the ICMI Auditor Guidance for Use of the Cyanide Transportation Certification Protocol (2009). DuPont internal Standards, Policies, Practices, and Procedures regarding the management of the Cyanide Transportation Supply Chain were reviewed. The audit was conducted through discussions and interviews with DuPont personnel. Additionally, records regarding carrier selection, ongoing transportation partner performance evaluations, incident tracking, equipment maintenance, security measures, road safety information, shipment tracking, cargo labeling practices, shipping documentation,

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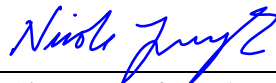
community involvement, and emergency response records were randomly sampled during this 2010 audit cycle of DuPont's supply chain management practices and were found to be acceptable.

DuPont and its transportation partners were evaluated previously during a non-certification Cyanide Code Certification audit using the 2005 revision of the Cyanide Code transportation Protocol. Although the 2007 audit was a non-certification audit, this audit was conducted in accordance with Re-Certification Guidelines, namely the confirmation that DuPont and its transportation partners have continued to be in conformance since the original audit in 2007.

The results of the this certification audit and the related due diligence reviews indicate that DuPont and all portions of its US/Canada Road cyanide supply chain continue to be in FULL COMPLIANCE with Cyanide Code requirements.

DuPont US/Canada Road Supply Chain

Name of Operation



Signature of Lead Auditor

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Date

U.S. / Canada Road Supply Chain - Auditor's finding and attestation

This U.S. / Canada Road Supply Chain is

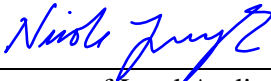
- in full compliance
- in substantial compliance
- not in compliance

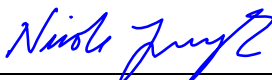
with the International Cyanide Management Code.

Audit Company:	Management System Solutions, Inc. www.mss-team.com
Lead / Technical Auditor:	Nicole Jurczyk E-mail: CodeAudits@mss-team.com
Date(s) of Audit:	September 21-22, 2010

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 the Audit Reports accurately describe 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.

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Consignor Summary

Operational & Audit Information for Consignor

The DuPont Corporate Sourcing & Logistics group located in Wilmington, Delaware manages the domestic and international transportation of sodium cyanide. This group has overall responsibility and authority for coordinating carrier selection, safety, security, and quality performance tracking, road carrier contracts, booking of shipments, shipment tracking, and incident investigation.

Cyanide Product Stewards within the DuPont Cyanides Business coordinate activities associated with route risk evaluation when customers are originally established and again at established frequencies. The Product Stewards also coordinate community communications, training sessions, carrier evaluations, customer evaluations, and package & label reviews. Corporate Emergency Response Specialists work together with the DuPont Cyanides Business to coordinate emergency response planning procedures, preparation and maintenance of emergency equipment, training of DuPont emergency response personnel, and evaluation of plans and procedures through periodic emergency response drills.

DuPont maintains formal standards, policies, guidelines, and procedures for ensuring Distribution Safety. DuPont Corporate standards exist for Incident Prevention, Emergency Response, Transportation Risk Assessment, Distribution Regulatory Compliance, and Training, and Distribution Handling & Storage. In addition, the Sourcing & Logistics Groups maintain desk manuals with specific procedures for the procurement of transportation services and the management of carriers.

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DuPont Consignor / Transporter - Auditor's Finding

The DuPont cyanide transportation management practices using trucking carriers were evaluated against the Cyanide Code requirements documented in the *ICMI Cyanide Code* (2009), *ICMI Cyanide Code Transportation Protocol* (2009), and the *ICMI Auditor Guidance for Use of the Cyanide Transportation Verification Protocol* (2009). DuPont internal Standards, Policies, Practices, and Procedures regarding the management of the Cyanide Transportation Supply Chain were reviewed. DuPont take supply chain management responsibility for carrier selection, ongoing carrier performance evaluations, incident tracking, security measures, shipment tracking, cargo labeling practices, shipping documentation, community involvement, and emergency response.

DuPont Consignor / Transporter operations are

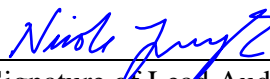
- in full compliance**
 in substantial compliance
 not in compliance

with the International Cyanide Management Code.

Audit Company:	Management System Solutions, Inc. www.mss-team.com
Lead / Technical Auditor:	Nicole Jurczyk E-mail: CodeAudits@mss-team.com
Date(s) of Audit:	September 21-22, 2010

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that the loaded trailers or containers are not to be opened or stored anywhere along the route. DuPont and dispatch personnel at all trucking companies track shipments closely to monitor the progress of the shipments. All trucks are sealed prior to departure and seals are checked upon arrival at destinations.

DuPont uses its formal standards, policies, guidelines, formal contracts with safety, health, environmental, and security terms and conditions to ensure that cyanide is appropriately handled and transported by its transportation partners.

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.

The operation is in full compliance with
in substantial compliance with Transport Practice 1.2
not in compliance with

Summarize the basis for this Finding:

DuPont contractually requires its U.S. and Canadian trucking carriers to use drivers with three years of experience with transporting hazardous materials and who have valid commercial licenses with a hazardous materials endorsements. DuPont also provides training in the form of a DVD training package, face-to-face classroom training, and emergency drill training to its trucking carriers.

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

The operation is in full compliance with
in substantial compliance with Transport Practice 1.3
not in compliance with

Summarize the basis for this Finding:

Tractors and van trailers that are used in the U.S./Canada Road Supply Chain are provided by, and maintained by the trucking carriers. Some chassis used to transport intermodal containers are owned and maintained by DuPont and some are owned and maintained by carriers. The DuPont fleet is managed by the DuPont Sourcing and Logistics group based in Wilmington, DE. Computer databases with all equipment information and date of last inspection and next inspection are maintained by the group. All equipment is designed and maintained to operate within the loads it will be handling. The inter-modal freight containers used for transport of cyanide to Alaska are also owned and maintained by DuPont. DuPont maintains specific specifications for each type of equipment that it owns or leases.

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The DuPont packaging partner LSI maintains detailed procedures for loading intermodal containers. The shipments of bulk and semi-bulk packages in van trailers, in intermodal containers, and on flatbed trailers are standard weights and standard blocking and bracing configurations are used. The adequacy of the transportation equipment is confirmed prior to each shipment.

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

The operation is in full compliance with
 in substantial compliance with Transport Practice 1.4
 not in compliance with

Summarize the basis for this Finding:

The shipments of bulk and semi-bulk packages in van trailers, intermodal containers, and on chassis are standard weights and standard blocking and bracing configurations are used. Procedures and blocking and bracing activities were reviewed and were found to be acceptable during the 2009 DuPont Production audit that included all U.S. production and packaging operations.

Appropriate placards are displayed on all four sides of the transport vehicles. A photo of a loaded inter-modal container being shipped to Alaska was available for review this audit cycle. Additionally, the International Maritime Organization (IMO) requirement for the marine pollutant signage to be posted on the container was also observed as being properly placed on the inter-modal containers during an earlier 2010 audit of a carrier that included the location where the intermodal containers are packed. DuPont and LSI both have operational procedures and checklists for the loading of cyanide. All documentation (procedures and checklists) require for proper placarding to be confirmed prior to the shipment being released.

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

The operation is in full compliance with
 in substantial compliance with Transport Practice 1.5
 not in compliance with

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Name of Operation

Nicole Jung

Signature of Lead Auditor

December 17, 2010

Date

Summarize the basis for this Finding:

The only part of this U.S./Road supply chain that involve transport by sea (by barge) is the transport of intermodal containers from Memphis, TN to Alaskan customers. The details regarding the fulfillment of this section of the Code can be found in the DuPont U.S. Canada Rail and Barge Certification Audit Report.

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

The operation is in full compliance with
in substantial compliance with Transport Practice 1.6
not in compliance with

Summarize the basis for this Finding:

DuPont tracks shipments continuously through its close relationships with all of its carriers. The primary tracking of shipments, however, is the responsibility of the individual trucking partners. DuPont shipping papers fulfill Cyanide Code requirements. The weight, number of packages, and product identification information is on all shipping papers. Additionally, DuPont maintains a process in which each driver that is dispatched from a DuPont or LSI packaging facility receives a Cyanide Emergency Transportation Sheet that details that hazards of the product, the emergency response steps to be taken in that case of an accident, and the emergency contact information for U.S./Canada. Drivers are required to sign the information sheet showing that they received the information.

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.

The operation is in full compliance with
in substantial compliance with Transport Practice 2.1
not in compliance with

Summarize the basis for this Finding:

The interim storage requirements do not apply to the DuPont supply chain management activities with regard to this supply chain.

The interim storage activities at individual carriers, such as Alaska West Express and Empire Express are addressed in the carrier-specific sections of this and other carrier audit reports.

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.*

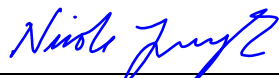
The operation is in full compliance with
in substantial compliance with Transport Practice 3.1
not in compliance with

Summarize the basis for this Finding:

For the U.S./Canada Road Supply chain there are several key documents that were reviewed as part of this Certification audit cycle: 1) Cyanides Global Response Plan for Off-Site Incidents; 2) U.S. Integrated Emergency Response Team Standard Operating Guidelines; and 3) Sodium Cyanide Emergency Response Procedures; 4) Transportation Emergency Information fact sheet for DuPont Solid (Sodium or Potassium) Cyanide. Together, the documents provide extensively detailed plans, procedures and information to address all ICMI Cyanide Code emergency response requirements. DuPont’s emergency response plans are appropriate for all modes of transportation used by DuPont and for interim facilities. The most detailed scenarios with specific action steps to be taken were found in the Emergency Response Procedures. The scenarios and emergency plans address actions to be taken for spills inside buildings, outside, and in sea containers. Plans also include steps to be taken in case of fire or human exposure. The Transportation Emergency Information sheet has quick, but complete information that has been seen in use during transportation activities observed during previous DuPont Cyanide Code audits. The emergency response procedures consider steps to be taken for wet, dry and gaseous cyanide.

The DuPont plans are general and universally applicable to all types of emergencies. The Transportation Emergency Information sheet has details of action steps for transporters. This was deemed appropriate by the auditor. Professional emergency responders together with technical guidance from DuPont would be responsible for addressing issues involving the way in which the structure of a transportation container or vessel should be managed after an emergency. The three response plans describe the different levels of response actions for anticipated emergency situations. The emergency procedures offer descriptions of the tactical steps that need to be taken to contain and clean up a spill or manage an exposure incident. The Integrated Emergency Response Team Guidelines define the action steps to be taken by the responding team and the notifications that need to be made in case of an emergency. The Cyanides Global Response Plan for Off-Site Incidents describes the steps that are to be taken by Cyanide Hot Line and other Cyanides Business personnel. All of the plans and emergency response information clearly outline the roles and responsibilities of internal and external responders.

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

The operation is in full compliance with
 in substantial compliance with Transport Practice 3.4
 not in compliance with

Summarize the basis for this Finding:

Specific details regarding the remediation, neutralization, decontamination, and disposal of clean-up debris are contained within the Emergency Response Procedures. Extensive descriptions of necessary action steps depending on the incident scenario are clearly outlined in the document. Interviews with DuPont personnel during this and previous Cyanide Code audits showed a high level of awareness that the use of treatment chemicals is prohibited if cyanide spills into surface waters. Page 7 of the Emergency Response Procedures specifically prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide for treating a cyanide spill into surface water.

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

The operation is in full compliance with
 in substantial compliance with Transport Practice 3.5
 not in compliance with

Summarize the basis for this Finding:

According to Section 4 of the Cyanides Global Response Plan for Off-Site Incidents, emergency plans including notification numbers are checked at least annually. The Cyanides plan had last been updated in 2010 and the U.S. Integrated Emergency Response plan was last updated in 2009. The Emergency Response Procedures were last updated in 2010.

Many emergency drills are conducted at DuPont on an on-going basis. Emergency response drills at the Memphis Plant, for example are conducted quarterly. This was evaluated during the 2009 re-certification audit. According to the Cyanides Global Response Plan for Off-Site Incidents, the plan is to be tested by conducting drills at least annually.

Records were available to show that the Global Cyanides Business has conducted emergency response drills each year for the past three years. Drills typically involve at least one transportation partner and often one or more customers. Drill critiques were sampled and were found to be appropriate.

DuPont US/Canada Road Supply Chain

Name of Operation

Nicole Jung

Signature of Lead Auditor

December 17, 2010

Date

Alaska West Express - Summary

Operational and Audit Information for Alaska West Express

Alaska West Express (AWE) is part of the Lynden family of companies. AWE provides truckload transportation throughout the United States and Canada, and specializes in providing transportation to and from destinations in Alaska. AWE transports liquid- and dry-bulk products, petroleum, and hazardous and non-hazardous chemicals. AWE has terminals in Anchorage and Fairbanks, Alaska, as well as Tacoma, Washington.

AWE has been in operation for over 30 years. The Fairbanks Terminal is specialized in transporting commodities and equipment to mining customers in the Region. At the time of the audit they were receiving intermodal containers packed with intermediate bulk containers of solid sodium cyanide via Alaska Rail. AWE offloads the intermodal containers, stores them in a secure yard, and transports the containers to customer when requested to do so.

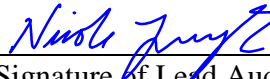
Alaska West Express - Auditor's Finding

Alaska West Express cyanide transportation operations are in FULL COMPLIANCE with the International Cyanide Management Code.

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Lead / Technical Auditor:	Nicole Jurczyk E-mail: CodeAudits@mss-team.com
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I attest that the Audit Reports accurately describe 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.

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Alaska West Express Certification Audit Results

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.*

The operation is in full compliance with
 in substantial compliance with Transport Practice 1.1
 not in compliance with

Summarize the basis for this Finding:

The Alaska West Express Fairbanks Terminal is used to temporarily store the cyanide intermodal containers until the cyanide is required by the customers. Alaska West Express (AWE) maintains a documented procedure for the evaluation of routes used to transport cyanide. According to interviews, all cyanide delivery routes have been evaluated to determine if comparable routes would be available that would reduce the risks associated with proximity to high population densities, poor road infrastructure (sharp turns), pitch & grade, proximity to water bodies, and prevalence and likelihood of poor weather and resulting poor driving conditions. Routing considerations were found to be consistent with those required by the Code. At the time of the audit the practice was consistent with Code requirements. The risks associated with each of the routes (grade, road condition, traffic patterns, proximity to water, etc.) were evaluated and are detailed in the procedure. The necessary risk mitigation measures for each route are also detailed in the procedure. Specific safety measures are taken where necessary. Drivers and Dispatchers were interviewed and awareness of necessary safety measures to be taken was excellent.

Feedback regarding the condition of the route is gathered after each delivery and any problems with the routes would be communicated immediately via radio or cell phone. The route planning procedure also calls for driver feedback to be considered and for drivers to communicate any problems with the route immediately.

Local emergency response agencies are invited to all training provided by DuPont throughout the state of Alaska. AWE Director of HSSE is a member of several emergency response organizations including the Fairbanks Local Emergency Planning Committee and the Fairbanks North Star Borough HazMat Team. AWE has advised all emergency responders of their roles in the event of an emergency. AWE does not subcontract any part of its operations.

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

The operation is in full compliance with
 in substantial compliance with Transport Practice 1.5
 not in compliance with

Summarize the basis for this Finding:

AWE does not transport containers by sea or by air.

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

The operation is in full compliance with
 in substantial compliance with Transport Practice 1.6
 not in compliance with

Summarize the basis for this Finding:

The AWE procedure regarding cyanide route planning details that trucks shall either be equipped with QUALCOMM/SHAW satellite tracking or other means of communications, such as radios, CBs radios or cell phone. Interviews confirmed this practice. Blackout areas do not present a problem on the routes traveled by AWE. AWE transports many commodities to the mines and dispatches multiple trucks to each mine each day and they remain in close contact with trucks throughout each day. Interviews with Drivers and Dispatchers confirmed that Dispatch tracks each load until it is delivered. Intermodal containers are kept sealed and locked. AWE maintains inventory controls on all containers stored in the secure yard. AWE does not open the containers. Customers sign the shipping papers when they receive the cyanide. Records of this process were available for review and were found to be complete. The amount of cyanide is noted on the shipping paperwork. Material Safety Data Sheets were available at the Terminal and are sent with the drivers. This practice was confirmed through interviews.

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.*

The operation is in full compliance with
in substantial compliance with Transport Practice 2.1
not in compliance with

Summarize the basis for this Finding:

Intermodal containers are stored in an open, but secure storage yard at the Fairfax AWE Terminal. The intermodal containers have DOT placards affixed. All employees that have contact with containers are cyanide trained. Due to security concerns, there are no signs indicating that cyanide is stored in the area. Interviews indicated that no smoking, eating, drinking, or open flames are allowed in the storage area. As the intermodal containers are never opened in the AWE yard, no personal protective equipment must be worn. AWE's approach to the storage of the intermodal containers was found to be acceptable by the auditor. The cyanide is protected against unauthorized access. The storage area is fenced and manned at all times. Keys are removed from forklifts with the capacity to move the cyanide containers when operators are not on site.

Sodium Cyanide is stored separate from any materials in a secured location and is always kept in 20 ft shipping container. There are no incompatible materials stored in proximity to the cyanide. The intermodal containers are not opened and are stored outside. There is therefore no opportunity for the build-up of cyanide gas. The solid cyanide briquettes are sealed within multiple layers of packaging, which are then sealed within intermodal containers. Additional spill containment was not deemed to be necessary by AWE. Upon inspection of the area, the auditor also concluded that additional spill containment was not necessary for this storage scenario.

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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.*

The operation is in full compliance with
in substantial compliance with Transport Practice 3.1
not in compliance with

Summarize the basis for this Finding:

AWE maintains a Contingency Plan that provides information to be used in the event of any emergency, including incidents involving cyanide. The plan was reviewed during the audit and was found to be appropriate for the selected transportation routes and the interim storage facility. The Contingency Plan is not product specific, it is appropriate for all materials transported by AWE. Cyanide-specific details of emergency planning are provided by DuPont in their technical "PUSH" bulletin, the MSDS and the Cyanide Safety and Emergency Response training that is provided.

The plan covers general response scenarios for situations that would involve trucking incidents, roll-over incidents, and/or storage yard incidents. The plan addresses differences in road infrastructure, such as public main roads versus narrow mine roads. The product is stored and transported in standard design 20 ft Ocean containers mounted on chasses. The plan adequately addresses the emergency planning needs associated with an incident from the use of this type of equipment. The contingency plan gives contact information for external response organizations and details the roles of others outside of AWE.

AWE has robust emergency response capabilities and in many situations AWE may be the only responder. The AWE Health, Safety, Security, and Environmental Director is also the Chief of the Fairbanks Norstar Borrow Hazmat Team, the entity that would respond to any incident. AWE personnel are also very involved with the Local Emergency Planning Committee (LEPC) and the roles and responsibilities have been clarified during those meetings.

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

The operation is in full compliance with
in substantial compliance with Transport Practice 3.2
not in compliance with

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

The operation is in full compliance with
 in substantial compliance with Transport Practice 3.4
 not in compliance with

Summarize the basis for this Finding:

AWE's environmental consultant, based in Anchorage, Alaska has been contracted to manage any remediation project as required by regulatory agencies in consultation with DuPont as necessary. Driver responsibilities are defined for incidents and do not permit remediation activity. They are cyanide trained and are only permitted to do containment until emergency response and remediation experts arrive. Cyanide treatment chemicals are not readily available for drivers and AWE does not permit drivers to treat a cyanide release. The driver's responsibility is limited to containment and they are trained regularly to these procedures. Driver awareness of this issue and the ban on the use of chemicals to treat cyanide in surface water was confirmed through interview.

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

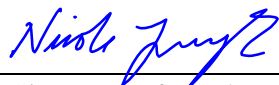
The operation is in full compliance with
 in substantial compliance with Transport Practice 3.5
 not in compliance with

Summarize the basis for this Finding:

The Contingency Plan is reviewed at least annually for adequacy. The last review was conducted in 2010. The record of review is maintained as a signature from the HSSE Director on a Document & Review Certification page in the Contingency Plan itself. AWE trains responders annually, however, not product specific. All transportation events are treated as drills, responses are critiqued, and plans are upgraded as appropriate. In the event that there are no actual emergencies to respond to in a given year, AWE will conduct a hands-on drill. The critiques maintained for actual emergencies are extensive and accident investigations are thorough. Meetings are held after emergencies and/or drills to evaluate what parts of the plan could or should be improved. Documentation was available to show that proposed changes to the plan were implemented, as necessary.

DuPont US/Canada Road Supply Chain

Name of Operation



Signature of Lead Auditor

December 17, 2010

Date