



***INTERNATIONAL CYANIDE
MANAGEMENT INSTITUTE***

***Cyanide Transportation Verification
For The
International Cyanide Management Code***

Miller Transporters, Inc.

***Summary Audit Report
For Audit Conducted June 20-21, 2007***



NSF International Strategic Registrations

Summary Audit Report

Name of Cyanide Transportation Company: Miller Transporters, Inc.
Name of Responsible Manager: Lee Miller, VP, Quality and Corporate Support
Address: 5500 Highway 80 W.
State/Province: Jackson, MS 39209 *Country:* U.S.A.
Telephone: 601-922-8331 *Fax:* 601-923-2539
E-Mail: lmillert@millert.com

Name of Cyanide Transportation Facility: Miller Transporters, Inc. Memphis Terminal
Name of Facility Owner: Miller Transporters, Inc.
Name of Facility Operator: Miller Transporter, Inc.
Name of Responsible Manager: Dudley Alexander, Terminal Manager
Address: 2000 Channel Avenue
State/Province: Memphis, TN 38113 *Country:* U.S.A.
Telephone: 901-948-1594 *Fax:* 901-948-9938
E-Mail: dalexander@millert.com

Location detail and description of operation:

On June 20-21, 2007, NSF International Strategic Registrations conducted an audit of the Miller Transporters, Inc. cyanide transportation activities against the Transport Practices of the International Cyanide Management Code.

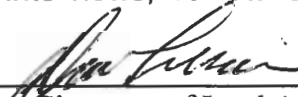
Miller Transporters is a bulk transportation company specializing in chemicals and hazardous materials. Starting from one truck hauling gasoline in 1942, the company now operates 600 tractors and has a fleet of 1100 trailers. With headquarters in Jackson, MS, the company operates 18 terminals in 14 states.

Miller Transporters has a number of safety awards to its credit. In April, 2007, Miller Transporters won the Grand Award as the winner in the "29 to 36 million miles class" in the National Tank Truck Carriers 2006 Tank Truck Safety Contest. The company was also awarded the overall Outstanding Performance Trophy by being selected from the 18 carriers that won the Grand Award in each of their respective mileage categories.

This audit was conducted at the Memphis, TN terminal through which a majority of the company's cyanide transportation activity is dispatched and managed. Participants included corporate personnel as well as those from the Memphis terminal.

This audit involved an in-depth examination of Miller Transporters regarding the transport of cyanide products, including how the company handles the products, how the company minimizes the potential for accidents and releases, and how the company prepares for emergencies if they should happen. The audit was conducted by collecting objective evidence via employee interviews, review of documents, and checks of records.

Miller Transporters, Inc
Name of Facility



Signature of Lead Auditor

06/21/2007
Date

Auditor's Finding

This operation is

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

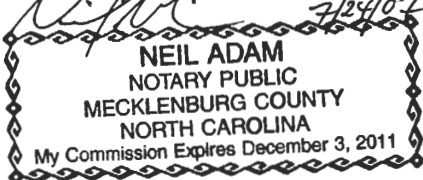
with the International Cyanide Management Code.

It is the professional opinion of the auditor that Miller Transporters' plans, procedures and management systems may reasonably be expected to meet the performance goals of the Transport Practices. For each Transport Practice, evidence exists that these systems, plans and procedures exist, are implemented and meet the objectives of the Code. The auditor finds that Miller Transporters' cyanide transportation operation is conducted in a safe and environmentally protective manner and is in Full Compliance with each Transport Practice. Therefore, Miller Transporters is found to be in Full Compliance with the Code


Audit Company: NSF International Strategic Registrations
Address: 789 N. Dixboro Road, Ann Arbor, MI 48105
Telephone: 734-827-6800 *Internet:* www.nsf-isr.org
Audit Team Leader: Don Lisman
E-mail: dlisman@nsf-isr.org
Names and Signatures of Other Auditors: None
Date(s) of Audit: June 20-21, 2007

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.



Miller Transporters, Inc
Name of Facility

 7/24/07
Signature of Lead Auditor

06/21/2007
Date

SUMMARY AUDIT REPORT

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/Deficiencies Identified:

The company has practices and procedures in place to fully evaluate and select the routes for transport for all destinations to which it transports cyanide. The documented Sodium and Potassium Cyanide Trip Routing Process uses hazardous material route selection software, insurance industry data, and driver input to select the route. Each delivery location has a primary, approved route and an alternate, approved route. Each route used is quantified by total length (in miles), population exposed, accident frequency, and incident frequency. Infrastructure, pitch and grade, and bridges and water crossings are all considered as part of the transport route selection process. The detailed routing for each shipment is specified on the Miller Transporters Load Profile, which is part of the paperwork accompanying each shipment. Processes are in place to ensure both driver feedback and scheduled review of the routes.

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/Deficiencies Identified:

All drivers driving for Miller Transporters must meet stringent requirements and possess a valid Class A Commercial Driver's License with Tank Truck and Hazardous Materials Endorsements. Standard Procedures in the company's Operating Manual outline both Driver Qualifications and Driver Training. Additionally, drivers transporting cyanide must attend the Cyanide Safety Awareness for Transporters course at least every three years and must view the Cyanide Safety video at least annually. When drivers first become involved with cyanide, they must make three trips with a driver/trainer. A check of training records confirmed that all drivers involved in transporting cyanide were current on their training requirements.

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

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Summarize the basis for this Finding/Deficiencies Identified:

All equipment used by Miller Transporters for the shipment of cyanide is designed to operate within the range of loads carried. All equipment meets U.S. Department of Transportation (D.O.T.) specifications, and all cyanide transported is done so within the D.O.T. limits. Procedures are in place to control the amount of product loaded, and loads are verified by scale weighing and review of shipping papers by Miller Transporters drivers before transport. In the case of special trailers which are subjected to additional, non-highway, weight during the unloading process when water is added to dissolve cyanide in dry form, the auditor confirmed the adequacy of design of the trailers by reviewing documentation from the manufacturer confirming that the static loading of cyanide plus water during unloading is within the manufacturer's stated Gross Vehicle Weight Rating. The auditor also was provided with evidence from the shipper of certification of containers and packaging to meet D.O.T. requirements.

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/Deficiencies Identified:

Per Miller Transporters' procedures, pre-trip and daily equipment checks are made on all equipment. The pre-trip inspection includes inspection for any evidence of product residue or any unsealed valves, hatches or locks. Metal bins on flatbed trailers are secured by a chaining procedure which is documented in written instructions, photographs and diagrams. Straps are added to the metal bins for added security. Drivers are required to stop every two hours or 100 miles to check for loose chains or straps. All placards and labels are applied as required. Miller Transporters procedures for preventive maintenance, driver's hours, and substance abuse all meet or exceed D.O.T. requirements. All records requested by the auditor were complete, legible and readily provided.

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

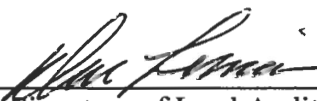
The operation is in full compliance with
 in substantial compliance with Transport Practice 1.5
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Miller Transporters does not transport any cyanide by sea or air. This section of the Code does not apply.

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

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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/Deficiencies Identified:

All Miller Transporters tractors are equipped with communication devices. Communications with Dispatch can be accomplished via keyboard. Drivers carry cell phones. Communications devices are verified to be fully functional along all parts of the cyanide transport routes. For travel to Canada, Canada Calling Plans have been added to cell phones to ensure maximum availability of service in that country. The Bill of Lading shows the amount of cyanide in transit and is accompanied by the weight certificate which also confirms the amount. A Material Safety Data Sheet accompanies every shipment as part of the paperwork.

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/Deficiencies Identified:**

Miller Transporters does not store cyanide. All storage of loaded trailers prior to shipment is at the producer's site under its procedures. When the driver leaves the producer's site with a load, the trailer is transported directly to the delivery site with no interim storage or trans-loading.

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/Deficiencies Identified:

The Miller Transporters Action Plan for Incident and Accident of Potassium/Sodium Cyanide in the United States and Canada provides information and procedures for emergency response. Miller Transporters has identified cyanide-capable emergency responders along all the routes

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where cyanide is transported. In addition, Miller Transporters maintains emergency response teams and emergency response equipment trailers at eleven strategically-located terminals within its network.

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

Summarize the basis for this Finding/Deficiencies Identified:

Specific emergency response duties are defined in the Miller Transporters Action Plan for Incident and Accident of Potassium/Sodium Cyanide in the United States and Canada. Miller's emergency responders are all Haz-Mat certified and attend annual refresher training. Miller Transporter drivers attend initial emergency response training and receive emergency response refresher training once per year. Miller Transporters has emergency response equipment trailers at eleven strategically-located terminals within its network. Each trailer contains a comprehensive selection of hand tools, fittings, clean-up tools, safety clothing, lights, emergency signals, clean-up materials, and repair and response equipment. The emergency response trailers are in the preventive maintenance system and are inspected quarterly. The contents are inventoried annually and after each use to ensure availability of all tools, supplies and equipment.

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

The operation is in full compliance with
 in substantial compliance with Transport Practice 3.3
 not in compliance with

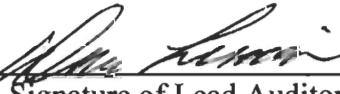
Summarize the basis for this Finding/Deficiencies Identified:

The telephone numbers for the shipper's emergency hotline, Chemtrec, and Canutec (in Canada) are all included with the shipping papers for each shipment. The Miller Transporters Action Plan for Incident and Accident of Potassium/Sodium Cyanide in the United States and Canada provides contact numbers for Miller's Hazardous Materials Teams plus a long list of federal, state and local agency contact numbers. Miller Transporters emergency contact lists are updated upon every notification of a change. Procedures are reviewed at least annually.

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

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Summarize the basis for this Finding/Deficiencies Identified:

Procedures are in place for the remediation of contamination and the disposal of debris resulting from any cyanide incident. The caution not to use chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water is included in the Miller Transporters Action Plan for Incident and Accident of Potassium/Sodium Cyanide in the United State and Canada.

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

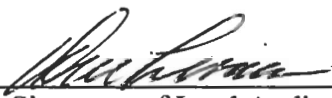
The operation is in full compliance with
 in substantial compliance with Transport Practice 3.5
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Miller Transporters Procedure SP 0230 Operations Manual Updates requires annual review of procedures. The auditor confirmed that the emergency response plan had been reviewed and updated within the last twelve months. Mock drills are regularly held as part of the ongoing training for Miller Transporters Hazardous Materials Teams. The most recent drill was held May 15, 2007. The auditor reviewed the scenario, interviewed participants and reviewed the event notes of three of the responders participating in the drill. Critiques are held following each exercise and each real event. Suggestions are reviewed and plans and procedures are revised or updated accordingly to ensure continual improvement.

End of Report

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