

**ICMI Cyanide Code Transportation
Certification Audit
Summary Report**

**RSB Logistic, Inc.
Saskatoon, Saskatchewan - Canada**

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

2010 Audit Cycle



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**Management System Solutions, Inc.
P.O. Box 780 999
Orlando, FL 32878
www.mss-team.com**

AUDIT REPORT

Name of Operation: RSB Logistic Inc.
Name and contact information for RSB Contact: Bruce Natske
Safety and Maintenance Manager
Tel: 306-242-8300
Email: Bruce.Natske@rsblogistic.com


Location detail and description of operation:

RSB Logistic Inc. is the North American subsidiary of RSB Logistic Projektspedition GmbH, (previously RSB Logistic GmbH) located in Koln, Germany. RSB Logistic Inc. is headquartered in Saskatoon, Saskatchewan, Canada and has been in operation since 1978. RSB has been transporting solid sodium cyanide for DuPont for approximately 10 years. The cyanide is transported in semi-bulk bag-in-box and metal bins. Dry van trailers and flatbed trailers are used. The shipments originate in the United States and are generally bound for Canadian customers.

The operation was originally audited and was found to be in full compliance to the ICMI Cyanide Code in 2007 using the non-certification approach that was available at that time.

RSB is responsible for route determination, shipment tracking, truck inspections, preventive maintenance, training, safety program management, and emergency response planning. All of these operations were reviewed during the certification audit. The ICMI-approved Transportation Auditor verified that RSB operations are in FULL COMPLIANCE with Cyanide Code requirements for transporters.

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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:

RSB tractors and trailers were evaluated during this audit. At the time of the audit, the decision had been made to only use equipment that was owned or leased by RSB. With this approach, RSB can ensure that equipment used for cyanide loads is suitable and that it is properly maintained. Tractor and loaded trailer weights are monitored to ensure that trucks are not overweight.

Weight tolerances were confirmed through the review of records and specification information for the equipment. A review of shipping papers and scale tickets confirmed that loads have not exceeded the equipment capacity ratings.

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:

Cyanide packages are loaded into or onto RSB trailers by the shipper. RSB drivers confirm that the load has been properly secured after the cargo has been loaded. Appropriate placards are displayed on all four sides of the trailers. According to Driver and Manager interviews, this is confirmed during the pre-trip inspections.

RSB maintains documented procedures that address pre-trip inspections, preventive maintenance, limitations on driver hours, and the drug and alcohol abuse prevention program. RSB has a formally defined preventive maintenance program for its equipment. Maintenance records were well maintained.

Driver hours are limited to ensure that they are fit for duty. Drivers and dispatchers were aware of the requirements, (i.e., number of driving hours, on duty hours, rest, etc). Driver's logs are prepared on each trip and drivers are monitored through a log auditing program to ensure regulatory compliance and adherence to company policy. Documented procedures detail the

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process to be used if a driver needs to modify or suspend a shipment due to unsafe conditions. Drivers are instructed to stop driving if weather conditions are unsuitable. A drug abuse prevention program has been implemented and drivers may be required to undergo random sampling at any point. Records were available to demonstrate conformance to all safety program requirements.

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:

RSB does not ship cyanide by sea or by air. This section of the Cyanide Code does not apply to the operation

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:

RSB uses multiple GPS and communication systems to ensure that Drivers are always able to communicate with Dispatch personnel and others, as necessary. According to interviews, communication system function is confirmed during the pre-trip inspection process. In addition to GPS tracking, drivers update Dispatch personnel at defined frequencies to inform them of shipment status. Interviews with drivers, dispatchers, and management personnel and a review of computer records from shipments made in 2010 were used to confirm that cyanide shipments are being tracked carefully.

The communication equipment is in daily use, and a back-up method of communication is available at all times. The proper functioning of equipment is checked during the driver pre-trip inspections. Blackout areas do not present a significant problem on the routes traveled, but defined tracking procedures are available and were well understood for the few instances where

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blackout areas do exist. Communication and/or tracking instructions are part of the overall Driver Routing Instruction package that is issued to each driver at the start of each trip.

Drivers have shipping documentation including the Bill of Lading with them at all times during a shipment. Bills of Lading were reviewed for cyanide shipments made in 2010. Information regarding the type of material transported, the type of container, the number of packages, and the weight of the shipment is consistently entered onto the Bill of Lading by the shipper. Drivers carry Emergency Response Guides and specific information regarding toxic/water sensitive materials with them during deliveries. This practice was confirmed through interview. Dry van trailers are sealed upon loading and are not opened by RSB. Shipping paperwork was reviewed and the seal numbers on containers and the weight of the shipment are confirmed at the point of transfer of custody. Shipping paperwork was found to be conformant to Code requirements, including chain of custody requirements.

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:

RSB does not have any cyanide interim storage responsibilities. A policy was recently created that defines the specific requirement that cyanide shipments not be brought to the RSB yard for overnight storage. A record was available to show that this requirement was communicated to appropriate personnel.

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

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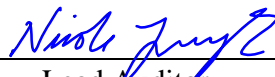
Transport Practice 3.5: *Periodically evaluate response procedures and capabilities and revise them as needed.*

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 emergency procedures are reviewed as necessary, and contact information is reviewed at least annually. The roles and responsibilities document for the Safety/Maintenance Manager defines that a mock emergency drill is held each year. Records were available to show that the most recent drill was held on September 9, 2010. Interviews confirmed that the plan is reviewed after each drill and would also be reviewed after any deployment of the plan. Any necessary changes would be made, as necessary.

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