

SUMMARY AUDIT REPORT



ICMI Cyanide Code Principle 1
CUSA, S.A.C.
Cyanide Production Certification Audit
(Storage Cyanide in a Warehouse)
Surquillo, Lima - Perú

Submitted to:
International Cyanide Management Institute (ICMI)
1400 I Street, NW – Suite 550
Washington, DC 20005, USA



Geosoluciones Panamá, S.A.
P.O. Box 0923-00340
Santiago, Panamá

Initial Audit

Signature of Lead Auditor

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Name of Facility

September 27, 2013
Date

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A- SUMMARY AUDIT REPORT FOR CYANIDE STORAGE OPERATIONS

A.1 Information of the Audited Operation

Name of Cyanide Warehouse Facility: CUSA, S.A.C.
Name of Facility Owner: CUSA
Name of Facility Operator: CUSA
Name of Responsible Manager: José Luis San Martín Gandolfo
Address: Calle Los Negocios N°467, Surquillo
State/Province: Country: Lima / Perú
Telephone: (511) 989589574 E-Mail: jlsanmartin@cusa-chem.com

(CERTIFICATION AUDIT)

Location detail and description of operation:

CUSA, S.A.C., with more than 48 years in Peru, as a chemical distributor, is present in the mining market throughout, since 2002.


On July 31, 2013 signed the Code as a road transport from the port of entry to CUSA's warehouse and to customer mines using trucking companies individually certified under the International Cyanide Management Institute.

At the time of the audit, CUSA had a building exclusively for the storage of cyanide which is in charge of the logistics department supervisor. The Warehouse facilities are located in Surquillo, District of Lima, Republic of Peru.

CUSA has a process for selecting suppliers GOP-PRO-001, in which are indicate the guidelines to be met, such as a signatory to the International Cyanide Management Institute.

According to the process map, when the purchase order is generated by the client, CUSA have a close communication with the transporter, which must be certified under the Code. Until September 2013, CUSA had been made five (5) shipments of cyanide.

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CUSA, has its own vehicle, however for the transport of sodium cyanide from their warehouse to customers, employs ICMI certifies suppliers.


The company works along with MANUCHAR (Belgium) to face the new challenges in a globalized world, with soundness and professionalism on each of our commercial lines.

Also, in the year 2004, the company expanded its action field by the start-up of operations in Bolivia through QUIMICAS ALIADAS S.R.L. which headquarter is located in the city of Santa Cruz and its branches are in La Paz and Cochabamba.

In 2006, CUSA started operating in Guayaquil (Equator) through MAPRIPLASTEC. Marketing a several products including sodium cyanide

Since its foundation in October 1964 by Mr. Manuel Ugarte Almonte, **CUSA** has served as a nexus among important suppliers of chemical products across the world and main industrial companies in Peru.

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A.2 Overall Auditor's Finding

This operation is in full compliance with the International Cyanide Management Code.

Audit Company: Geosoluciones Panamá, S.A.

Audit Team Leader: Jorge Efrén Chong Pérez
Names and Signatures of Other Auditors:

Email: geosoluciones@cwpanama.net




Date(s) of Audit: September 27, 2013

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanided 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.

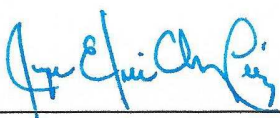
I attest that this Summary Audit Report accurately describe the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Production Operations and using standard and accepted practices for health, safety and environmental audits.

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B- CYANIDE PRODUCTION VERIFICATION PROTOCOL CYANIDE STORAGE FACILITY IN A WAREHOUSE

1. OPERATIONS: Design, construct and operate cyanide production facilities to prevent release of cyanide.

Production Practice 1.1: Design and construct cyanide production facilities consistent with sound, accepted engineering practices and quality control/quality assurance procedures.

This operation is

- in full compliance*
- in substantial compliance* *Production Practice 1.1*
- not in compliance*

Summarize the basis for this Finding/Deficiencies Identified:

The storage facility construction was approved by the Municipality of Callao, and subjected to quality control by municipality inspectors and the contractor. Were presented the designs and plans approved under structural considerations to seismic and winds risk, in according with the Structural Regulation Gazette, signed by a qualified professional engineer. These records are available and were reviewed.


Letter of cyanide storage "build as design" and extract the Peruvian Standard for structural regulation, used for calculations were presented.

A qualified professional engineer did an inspection of the work performed, as indicated in note issued by Mr. Jaime A. Flores Peña.

There is quality control and quality assurance documentation.

Storage facility materials used for construction are compatible with the product and with the packaging used, such as concrete, steel, and ferrous metal perimeter fencing.

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Sodium cyanide containers are protected with additional stretch wrap film, which is a plastic film with intrinsic adhesive structure, which gives the contact adhesive property. This allows giving dimensional stability to various products for their palletizing.

The stretch film has chemical and mechanical properties that make it resistant to permanent tension elongation and rip.

There are no interlocking or automatic systems to shut down to preventing undesired states in a state machine because no moving parts at the cyanide storage, which in a general sense can include any electrical, electronic, or mechanical device or system.

Cyanide is managed on a concrete surface over pallets. To ensure the stability of pallets, containers are wrapped in a film of low density polyethylene.

The cyanide storage facility does not employ cyanide filling or vessels' process.

The storage cyanide in a warehouse does not involve handling pipes and storage tanks.

Storage of cyanide in a warehouse does not consider the use of pipelines for cyanide solution.

Production Practice 1.2: Develop and implement plans and procedures to operate cyanide production facilities in a manner that prevents accidental releases.

This operation is

- in full compliance*
- in substantial compliance* *Production Practice 1.2*
- not in compliance*

Summarize the basis for this Finding/Deficiencies Identified:

The standard practices necessary for its safe and environmentally sound operation are verified and documented in the form FOR-GOP, such as:

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Infrastructure

Keep floors clean and dry, without water stagnation.

- ✓ Walls and ceilings in good condition (no corrosion or deteriorated) any structural Wooden Pallets in good condition.
- ✓ Means and cleaning tools available.
- ✓ Trash receptacles available.

Product

- ✓ Proper stacking of containers.
- ✓ Adequate spacing between groups of containers
- ✓ Order empty pallets.
- ✓ Dust-free products.
- ✓ Sealed containers.

Clothing and PPE

- ✓ Clean clothing
- ✓ Personal protection equipment available


CUSA, SAC is aware of the dangers and risks involved in the handling of sodium cyanide during storage; therefore, has developed an emergency response plan for cyanide management (PLA.GOP.001), called "Plan de Contingencia para el Manejo de Cianuro", that allows them to ensure the safety and health of their staff, customers, contractors, visitors, and others; as well as, to fulfill the commitment to prevent or minimize risks to health in an adequate, timely, and coordinated response to emergencies.

CUSA quality procedures and section 16. of the Emergency Response Plan states that there will be changes, whenever there are changes to designs or practices.

The parties involved are responsible for changes or modifications.

CUSA implemented a preventive maintenance program for the equipment (forklifts), maintenance, and repair. The records were checked.

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During the entry or exit of product from the warehouse, hydrogen cyanide (HCN) levels are monitored with a calibrated instrument according to manufacturer's recommendations. Routinely inspection is performed three (3) times per day.

According to the manufacturer, the HCN instrument is user-adjustable calibration.

Likewise, for weight control, a duly calibrated balance or scale is used.

CUSA does not handle any cyanide solution or cyanide-contaminated water.

The Emergency Response Plan, called "Plan de Contingencia para el Manejo de Cianuro", Section 12. (4), establishes procedures to dispose cyanide in contaminated soil.

The CUSA storage facility was designed and constructed so that there is enough natural ventilation.

To avoid or minimize the risk of moisture the facility has a roof that covers the full extent of the storage and has side protections.

Additionally, all stored containers are protected by an additional film of low density polyethylene.

Access to CUSA facilities are prohibited to the public by a perimeter fence with security guards.


Additionally, the cyanide storage has safety wiring and prohibitions and warnings signaling.

During product handling, access restriction is also done by CUSA.

CUSA does not pack, but it has established procedures to ensure that the original packaging be stored unaffected.

CUSA has implemented continuous improvement means, which have been designed for transferring the load from the warehouse to the trucks.

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Production Practice 1.3: Inspect cyanide production facilities to ensure their integrity and prevent accidental releases.

This operation is

- in full compliance
 in substantial compliance Production Practice 1.3
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

CUSA conducts routine inspections in order to verify the structural integrity of the cyanide storage. Inspection records were checked.

The lifting equipment and cargo handling are inspected and maintained in accordance with dealer's (TRITON) recommendations in Peru.

Observed item, date of inspection, name of inspector, and deficiencies that may be found is documented in the form of daily inspections.

Correction action nature, date and graphic documentation are recorded in the quality system, e.g., the roof of the old store, which was improved.

2. WORKER SAFETY: Protect workers' health and safety from exposure to cyanide.


Production Practice 2.1: Develop and implement procedures to protect plant personnel from exposure to cyanide.

This operation is

- in full compliance
 in substantial compliance Production Practice 2.1
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

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CUSA has established a procedure for product entry and exit, which is graphically described.

Additionally, CUSA has developed a risk map "Mapa de Riesgos", of the facility.

For non-routine and emergency operation, CUSA has been implementing Hazard Identification and Risk Analysis "Identificación de Peligros y Análisis de Riesgos" (IPER, for Spanish acronym) for operations. Additionally, it has the Emergency Response Plan, which establishes the necessary measures to avoid exposure of personnel during an emergency.

For maintenance activities the IPER and Job Safety Analysis serve the same purpose than the last item.

The storage facility implements procedures to review and propose operational changes.

CUSA considers workers input to assess health and safety procedures in safety briefings and implemented suggestion boxes "Buzón de Sugerencias."

CUSA uses monitoring devices to confirm an appropriate control of hydrogen cyanide exposure to limits 4.7 ppm (5 mg/m³) or less.


The HCN monitoring equipment is calibrated by the user, and records are maintained for at least one year.

CUSA developed a risk map in which workers may be exposed to cyanide gas or dust in concentrations greater than 4.7 ppm. The use of PPE is required.

Interview with CUSA storage and forklift supervisor, confirms the use of "buddy system" that can otherwise notify or communicate with other personnel for assistance, help, or aid where it has determined it necessary.

CUSA carries out health checks and physical performance to ensure the physical performance of its staff. Medical records of performance were reviewed.

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CUSA implemented the no reusable coverall to work in the cyanide unloading or loading facility. Personnel performing visual inspection uses work uniforms and they are not subject to clothing change policy “Condiciones para el Cambio de Equipo de Protección Personal”.

During loading and unloading operations there are warning signs indicating the use of personal protective equipment.

There are signs prohibiting from smoking, eating and drinking, and having open flames in areas where there is the potential for cyanide contamination.

Production Practice 2.2: Develop and implement plans and procedures for rapid and effective response to cyanide exposure.

This operation is

- in full compliance*
 in substantial compliance *Production Practice 2.2*
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:


CUSA has developed an Emergency Response Plan, called “Plan de Contingencia para el Manejo de Cianuro”, for quick and effective management of cyanide PLA.GOP.001.

To cyanide exposure response, Section 11. h., indicates the rescue procedure for poisoning symptoms, first aid in case of ingestion, or, if absorbed through the skin, supplying ammonium nitrile, according to the decision tree “árbol de decisiones”.

CUSA maintains showers, low-pressure eye wash stations and non-acidic fire extinguishers. Inspections to portable eye wash stations are documented by CUSA.

In the form 11-step checklist is indicated that the installation must have water, oxygen, resuscitator, antidote, and a means of communication readily available for emergency notification. The existence of the above means, have been put into practice during the drill conducted on August 16, 2013.

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CUSA inspects the first-aid kit regularly; inspection records were reviewed.

The MSDS and first aid procedures were translated from English into Spanish language so that the workforce can understand them.

CUSA does not use storage tanks, process tanks, and pipes. Cyanide metal containers are identified to alert workers of their contents.

The Emergency Response Plan in Section 12.f. indicates the procedure for decontamination, if exposed to the skin.

CUSA has the means to stabilize an exposed person in the facility. Additionally, it has emergency response crews who must act before the arrival of the physician, as described in the Emergency Response Plan, Section 12. h.

CUSA has a procedure to transfer persons exposed, and it has a communication procedure, as well. Locally, there are medical facilities available. CUSA has contacted and sent information about cyanide and their activities through formal letters addressed to medical centers and firefighter emergency responders.

CUSA has established a communication emergency alerting to medical centers about the cyanide exposed risk. Letters have been sent with the necessary information, and to maintain ongoing communication.

On August 16, 2013, a drill exercise was put in practice to test response procedures and lessons learned for various exposure scenarios to a cyanide spill.

Section 11. a. indicates that the storage manager is responsible for investigating and evaluating exposure incidents, in order to determine if the facility's safety and health programs and procedures are adequate or need to be revised.

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3. **MONITORING: Ensure that process controls are protective of the environment.**

Production Practice 3.1: Conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.

This operation is

- in full compliance*
 in substantial compliance *Production Practice 3.1*
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

The facility doesn't have a direct or indirect discharge to surface water.

Handling of WAD cyanide concentrations doesn't apply to this cyanide storage.

Processes do not involve storage management solutions that could invade groundwater.

CUSA limits atmospheric process emissions of hydrogen cyanide gas with regular monitoring three (3) times per day and continuously when there are visual inspections or cyanide loading / unloading.

The storage facility doesn't discharge cyanide to surface or ground water up gradient and down gradient of the site.

CUSA conducted adequate monitoring frequency of hydrogen cyanide gas, through regular monitoring three (3) times a day and continuously during visual inspections or cyanide loading / unloading.

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4. TRAINING: *Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.*

Production Practice 4.1: *Train employees to operate the plant in a manner that minimizes the potential for cyanide exposures and releases.*

This operation is

- in full compliance*
- in substantial compliance* *Production Practice 4.1*
- not in compliance*

Summarize the basis for this Finding/Deficiencies Identified:

The facility trains workers to understand the hazards of cyanide. Refresher training is periodically conducted, in accordance with a programmed training plan.


Initial safety training inductions, safety briefings, and scheduled formal training are given. Training records on personal protective equipment, housekeeping, cyanide management, and evaluation of environmental aspects were reviewed.

CUSA trains workers in the use of personal protective equipment by qualified instructors, as well as when and where is required. Workers were observed carrying proper use of PPEs, and sample training records were reviewed.

The storage facility trains their workers to perform tasks with a minimum production risk to health and safety. Each worker receives an initial induction and recurrent training on environmental impacts, in order to prevent discharges.

The storage facility has the training elements necessary for each job. CUSA has an annual training plan and corps of qualified trainers. Resumes and training records were revised.

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CUSA provides training by qualified personnel. Instructors' Resumes records were reviewed, qualified as forklifts, cranes, and rigging instructor and a qualified mechanical professional engineer for equipment operator.

A professional industrial engineer, trainer accredited by DUPONT in cyanide emergency response, provides formal training and is a drill coordinator.

Employees are trained with an initial induction before starting their work. Induction records for workers were reviewed. Drivers of transporter companies serving CUSA are trained, as well. The workers of this company receive a safety talk, before they start services.

CUSA evaluates their training program effectiveness by testing their personnel and by internal audits, as part of the quality management system.

Production Practice 4.2: Train employees to respond to cyanide exposures and releases.

This operation is


- in full compliance*
 in substantial compliance *Production Practice 4.2*
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

CUSA trains employees in cyanide release and exposures response. According to the procedure, two drills should be performed each year being the most recent one documented on August 16, 2013.

Drills performed are evaluated in terms of effectiveness, to determine the level of knowledge, skills as well as weakness identification.

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Personnel training records, including employee name, instructor, covered topics, and written knowledge assessments are retained by CUSA.

5. EMERGENCY RESPONSE: *Protect communities and the environment through the development of emergency response strategies and capabilities.*

Production Practice 5.1: Prepare detailed emergency response plans for potential cyanide releases.

This operation is

- in full compliance*
 in substantial compliance *Production Practice 5.1*
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

CUSA has developed an Emergency Response Plan, which covers potential spills or otherwise requires response.

The Emergency Response Plan, called “Plan de Contingencia para el Manejo de Cianuro”, in Section 12.f. (3) indicates spill water control procedures, which is considered the most severe scenario, among those considered.

CUSA considers release control in cyanide storage equipment loading or unloading, Section 12.f. (1) and (3).


The Emergency Response Plan, in Section 12.f. (2) considers emergency response in fire or explosion.

CUSA does not use pipes, valves, or tanks with solutions.

The lack of power does not compromise other equipment such as pumps, electromechanical systems, etc.

If there are failures in the lifting equipment, maintenance personnel are available to solve the situation.

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CUSA does not use ponds, valves and tanks with solutions.

The Emergency Response Plan, Section 12., considers emergency response actions, including cyanide storage workers evacuation and indicates the evacuation criteria, through risk assessing and toxic emissions generation.

The Emergency Response Plan Section 12. b. and f. (3) 17., identifies actions in case of cyanide exposure using antidotes, and requests that antidotes are available for emergencies.

Emergency Response Plan, Section 13, considers spill control at the source and indicates the necessary tools, equipment, proper use of PPE, and cyanide spilled disposal.

The Emergency Response Plan in Section 13. considers the likely event of a spill. According to with the accident investigation, actions are taken, in order to prevent future spills.

Production Practice 5.2: Involve site personnel and stakeholders in the planning process.

This operation is


- in full compliance*
- in substantial compliance* *Production Practice 5.2*
- not in compliance*

Summarize the basis for this Finding/Deficiencies Identified:

In the emergency response planning process, CUSA involves its employees, customers, service providers.

Letters have been sent to emergency response centers and have established agreements with carriers to involve the workforce and stakeholders in the emergency response process.

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The information has been forwarded to the authorities and health centers responsible for responding to emergencies. The storage site is located in an industrial area.

The Emergency Response Plan, Section 10. d., indicates that several agencies were involved in emergency response planning, such as police, firefighters, and health care centers.

CUSA maintains constant communication with stakeholders, including suppliers and carriers, to ensure the control under risk conditions, through formal agreements.

Production Practice 5.3: Designate appropriate personnel and commit necessary equipment and resources for emergency response.

This operation is

- in full compliance*
 in substantial compliance *Production Practice 5.3*
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:


The cyanide storage supervisor has the authority to perform the coordination and provides the necessary resources to implement the plan. According to Section 3. and Section 7. d., it indicates that the operations manager assumes the role, or designates a person as alternate coordinator, at his discretion.

The Emergency Response Plan identifies the emergency brigade, who will act as first and second stages of response, as is indicated in Section 11., according to the emergency severity.

The Emergency Response Plan in Section 15. c. indicates that emergency brigade will have appropriate training.

The CUSA emergency procedure involves response at any time of day, by the warehouse and security personnel. Then, the warehouse manager performs the necessary coordination of first or second stage, according to the severity of the incident.

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The Emergency Response Plan, Section 11. ordinal a. indicates the emergency coordinator activities and responsibilities, as well as and the members of the brigade.

The Emergency Response Plan in Section 12. g. indicates the list of emergency response equipment that should be available.

Cyanide storage in a warehouse, is governed by an inspection plan called "11 steps" on which verifies that emergency equipment is available.

The Emergency Response Plan, Section 11., describes the roles of those who act in emergencies, as indicated to with the arrival of the second response teams, if there are people exposed, they the second responders would proceed to lead them to health centers.

Response actions sequence, in which government agencies intervene, as firefighters and civil defense, and external companies, is described.

CUSA has confirmed on drill report that external institutions engages in exercises and drills implementation.

Production Practice 5.4: Develop procedures for internal and external emergency notification and reporting.


This operation is

- in full compliance*
 in substantial compliance *Production Practice 5.4*
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

Emergency Response Plan, Section 10, includes procedures and contact information for management notification, regulatory agencies, outside response providers, and medical facilities of the emergency.

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In the Emergency Response Plan, Section 14., CUSA include procedures and contact information for notifying potentially affected communities of the incident and/or response measures and for communication with the media.

Production Practice 5.5: Incorporate into response plans and remediation measure monitoring elements that account for the additional hazards of using cyanide treatment chemicals.

This operation is

- in full compliance*
 in substantial compliance *Production Practice 5.5*
 not in compliance

Summarize the basis for this Finding/Deficiencies Identified:


The Emergency Response Plan, Section 12. ordinal i. indicates an abstract "decision tree" which shows about the remediation measures to be taken in case of dry spills or neutralization solution.

In the subsections f. to h. (pages 20-27) are indicated detailed measures outlined for each probable scenario considered in the risk analysis of the operation.

The Emergency Response Plan, Section 12. f. (3) 24. prohibits the use of chemicals: such as sodium hypochlorite, ferrous sulfate, and hydrogen peroxide to treat cyanide that has been released into surface water.

The Emergency Response Plan in Section 12. f. (3) 10., indicates requirements in case of a or release for environmental monitoring to identity the extent and effects, including sampling.

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Production Practice 5.6: Periodically evaluate response procedures and capabilities and revise them as needed.

This operation is

- in full compliance
 in substantial compliance
 not in compliance
- Production Practice 5.6


Summarize the basis for this Finding/Deficiencies Identified:

The Emergency Response Plan, Section 16., includes periodical reviews whenever there are changes have in telephone numbers, procedures, equipment, drills, or other considerations to allow improvement.

The Emergency Response Plan, Section 14. e. indicates that CUSA must conduct at least two drills per year.

Emergency Response Plan, section 16. indicate that the plan will be reviewed after the event of an emergency. According with the master list, the Emergency Response Plan was created on August 11, 2013, and revised on September 19, 2013.

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