

CARGO TRANSPORT S.A.C.

***Ground Transportation of Sodium Cyanide Nationwide
Lima, Peru***

Preoperational Summary Audit Report

***For The
International Cyanide Management Code***

January 2020

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Information on the Audited Operation

Name of Cyanide Transport Operation:	Cargo Transport S.A.C.
Name of the Company Ownership	Cargo Transport S.A.C.
Name of Operating Company:	Cargo Transport S.A.C.
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Location detail and description of operation:

Cargo Transport S. A. C. (Cargo Transport) is a Peruvian company with 20 years of experience in ground transportation of hazardous materials. It provides the main wholesale companies in the sector and through them to 250 service stations, mines, airports, ports and industries, offering local, national and international distribution operations.

At the time of the audit, the cyanide transport operation was not yet active but had enough progress in its planning and design phases to be audited to determine their conformity with the Principles and Rules of Procedure of the Code. The auditor used the Transportation Verification Protocol to determine if Cargo Transport's pre-operational transportation operation could be conditionally certified based on the expectation that it will meet the Principles and Standards of Code Procedure.

Cargo Transport has highly qualified professionals and a modern fleet, according to the needs of its customers and the market. With 392 workers, 83% is assigned directly to the main processes in the company's value chain and the remaining 17% is assigned to back office support processes.

As a logistics operator is a company that designs, plans, organizes, executes and controls processes associated with the transport of hazardous materials. The main products it currently transports are gas, lubricants, ethanol, turbo, fuels and chemicals.

Cargo Transport has designed and implemented an Integrated Management System (IMS) in health and safety, environmental and quality, allows them to monitor and control the service it provides to its customers, becoming one of its most important strengths since it has allowed the sustained growth of the company and the search continuous improvement.

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The commercial operation of Cargo Transport involves the processes of loading, transporting and unloading hazardous materials. The IMS allows them to take care of all strategic processes. The IMS is duly certified by SGS (Société Générale de Surveillance) of Peru. In 2014 the company integrated to the IMS processes that allowed them to control and prevent illicit acts such as sabotage, money laundering, conspiracies, theft, etc., which have been certified in compliance with the international standard BASC (Business Alliance for Secure Commerce). In 2016 they included the international standard ISO 3900, Road Safety Management System, aimed at reducing and eliminating the risk of traffic accidents and in 2019 they certified their Corporate Carbon Footprint.



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Auditor's Finding

This operation is

- in full compliance with the International Cyanide Management Code
- in substantial compliance
- not in compliance

Audit Company:	Bruno Pizzorni		
Audit Team Leader and Technical Auditor:	Bruno Pizzorni	E-mail:	bpizzorni73@gmail.com
Date(s) of Audit:	January 30, 2020		

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 Preoperational 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.

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Principle 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 Transport Practice 1.1
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

Cargo Transport personnel by means of the form *Hazard Identification and Risk Assessment*, identifies, evaluates and selects the routes that minimizes the potential for accidents and releases or the potential impacts of accidents and releases, establishes actions to be taken to correct detected deficiencies, and elaborates the *Route Evaluation Report*. They travel the route to identify the hazards, assess the risks registering in the Hazard Identification and Risk Assessment. The hazards and risks evaluation include fields to identify population density, road characteristics and signaling, check points, bridges, road infrastructure, pitch and grade, and prevalence and proximity of water bodies and fog.

Cargo Transport has developed and implemented the procedure *Hazards Identification, Risks Evaluation and Controls* to carry out hazard identification, evaluation and control of the risks inherent to their activities. The procedure states routes must be evaluated for the transport of hazardous materials in the different operations to ensure that the conditions, activities or processes carried out have a correct identification of hazards and risk assessment. Each time the customer reports a new delivery address, the Health, Safety and Environment (HSE) Supervisor or his designee will carry out the risk assessment to reach that address, using the format *Hazard Identification and Risk Assessment*, prior coordination with the traffic area for programming the transport units.

The procedure *Hazards Identification, Risks Evaluation and Controls* states the frequency of updating the hazards identification, risks evaluation and controls is at least once a year or whenever there is a route change, an alternate route and in the delivery address.

The measures taken to address risks identified with the selected routes are documented in the *Route Hazard and Risk Identification Matrix* and in the *Route Evaluation Report*. The HSE Supervisor will monitor the control measures to be implemented. Review and monitoring of the risks will be carried out to verify the effectiveness of the actions implemented, through documentary review, personnel interview and/or visual inspections.

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As requested, input from communities in the selection of routes is provided by the mine as considers that direct interaction between the transporter and local communities could be sensitive and detrimental to the mine operation. Interaction with police is also limited to specific places as it could be detrimental for the transport company to spread information to this institution.

During the selection of routes and development of risk management measures, Cargo Transport interacts with other stakeholders and applicable governmental agencies, as necessary. They also interact with other transport companies as mutual aid in HAZMAT transport operations on the route, as stated by the HSE Supervisor. Interaction with the client is also considered in the risk's evaluations. In the case of its mining client, the mine validates the route assessment before being authorized the transporter to operate for the site.

Cargo Transport has developed the procedure *Sodium Cyanide Ground Transportation*, where states a series of additional safety and security measures for routes that present special safety or security concerns. Examples are, among others: only trucks with their own semi-trailers will be used; the transport will be under the modality of convoy with escort; the convoy can include one or more vehicles as an escort, at the client's request; the convoy movement will be dependent on the weather conditions; the Convoy Supervisor will evaluate the safety of the route in each case, being able to stop the convoy if in his opinion the conditions do not allow a safe transit.

Before transporting cyanide, Cargo Transport will advise, external responders, medical facilities and communities if necessary, of their roll and mutual aid during an emergency response.

All cyanide transport operations will be performed with Cargo Transport own trucks. The company will not subcontract any of the cyanide transport.

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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 Transport Practice 1.2
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

Cargo Transport uses trained, qualified and licensed drivers to operate its transport vehicles. The procedure *Description Of Driver Functions* requires for the candidate's profile to have, among others, complete school education; professional driving license for vehicles with trailer; 2 years' experience in the transport of cargo in general and in the handling of semi-trailers; knowledge of defensive driving, firefighting (fire extinguishers), first aid, hazardous materials handling, waste management and emergency response. The selected applicant must take the medical exams and the courses requested by the company. Before being allowed to transport HAZMAT, all drivers must be in full compliance with all the above requirements.

All drivers, convoy leaders and other personnel that will be involved in the cyanide transport operation in Cargo Transport have been provided with initial training in the potential for cyanide releases and exposures. The training *Safety Management and Emergency Response with Sodium Cyanide* has already included in their *Annual Training Plan* dated January 26, 2019. This is a one-day training which concludes with a cyanide spill mock drill. Training was provided by an external specialized company.

Transport Practice 1.3:

Ensure that transport equipment is suitable for the cyanide shipment.

The operation is:

- ✓ in full compliance with Transport Practice 1.3
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

Cargo Transport has appropriate trucks and trailers (tractor- semitrailer) designed and maintained to operate within the loads it will be handling. The transporter maintains a fleet of Volvo FH 480 and FH 500, among others, along with semitrailers for cargo transport. Each tractor- semitrailer will haul only one 20 feet sea container or an isotank with 20-ton

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solid sodium cyanide. All trucks are rated above 450 horsepower (hp), which allows adequate performance in the steep roads at los Andes mountains.

Each tractor- semitrailer configuration has passed local authorities' inspections regarding weights and measures which specifies the maximum load the vehicle can transport. According to Cargo Transport calculations, gross weight for the 20-foot sea containers with cyanide will be among 21.9 to 23.6 tons and isotanks between 19.4 and 23 tons.

The manufacturer of the semitrailers is a locally authorized and recognized firm and provides Cargo Transport with the respective quality dossier for each unit manufactured, which includes a study of forces, balance point and ant roll-over systems or Trailer Electronic Braking System (TEBS). This is an intelligently processing data provided by various trailer sensors, which determines whether the current vehicle dynamics are unsafe or inefficient and triggers countermeasures by actively warning the vehicle operator and, where possible, directing the actuation of brake and/or suspension controls to bring the vehicle back to the desired safe and efficient state.

Cargo Transport has developed and implemented the procedure *Programming, Control And Monitoring Of Units* to stablish the activities, controls, registers and necessary indicators to execute the transport service, which includes procedures to verify the adequacy of the equipment for the load it must bear. According to the process, the programmer employee, receive the service requirement identifying the type of cargo, drivers shifts, available vehicles, load and quantity of containers to ensure the vehicles adequacy, generating the Schedule Sheet. With this information assigns the transport unit and the driver generating that would comply with the service requirement. The transport unit may only be programmed if it has no observations of the HSE and/or Maintenance Area. For the designation of the driver, valid medical examinations and training will be considered.

Cargo Transport has developed and will implement the procedure *Ground Transportation of Sodium Cyanide* specifying instructions to prevent overloading the vehicle. It describes the process to program the tractor-semitrailers to transport a single 20 feet sea container or isotank with cyanide. All cargo to be received must come with its weight format and measurements of the cargo declarer. The load capacity of the vehicle is in accordance with the vehicle configuration, as stablished by the local regulation for weights and measures.

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Transport Practice 1.4:

Develop and implement a safety program for transport of cyanide.

The operation is:

- in full compliance with Transport Practice 1.4
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

The procedure for *Ground Transportation of Sodium Cyanide* states that on receipt of the cargo, to perform verification of seal numbers (in container doors or in isotank valves), to perform visual verification of integrity and conservation status of containers or isotanks, verification of correct attachment point fastening on semi-trailer platform (maritime anchor pineapples), to visual verification of stowage and lashing and verification of security labeling of maritime container, truck and semi-trailer.

Before the start of transport, the Supervisor Escort or driver must perform the verification of the unit and the escort vehicle, using the formats (JM-02-R- 07) Pre-use truck inspection and (JM02-R-06) Pre-use inspection of the tractor-semitrailer, which are inspections for correct transporting. During transport of HAZMAT, Cargo Transport Supervisors perform random on trip evaluations to the driver's driving by mean of the checklist *Verification Of The Transport Procedure Of Dangerous Materials* which helps avoiding accidents on route and therefore contributing to maintain the integrity of the producer's packing.

Cargo Transport has the procedure *Signaling and Color Code* to ensure each vehicle is labelled to identify the shipment. The procedure states, among others, the standards for transport sodium cyanide, including the United Nations Number (U.N). Labels will be placed in tanks and containers for easy recognition and safe handling. The drivers and the Escort Supervisor conduct pre-trip vehicle safety checks prior to departure of the truck. These checks include confirmation that the cargo placarding is displayed on all four sides of the vehicle.

The transporter has implemented a safety program for cargo transport where cyanide transportation will be included, that considers vehicle inspections prior to each departure, a preventive maintenance program, limitations on operators driving ours, procedures to prevent loads from shifting, procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered and a drug abuse prevention program.

The procedure *Units Inspection* states the driver must make a pre-use inspection of the unit using the proper formats for the truck and the trailer, as appropriate. The driver must observe and verify the operability and the state of the points indicated in the pre-use

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inspection format of the unit and write down if necessary, the observations that he deem appropriate. He must deliver the inspection to the Maintenance Supervisor informing of substandard conditions found and additional observations of the equipment and / or accessories of the unit, as a result of the inspections. Any issues that could affect safety or the operation of the vehicle are resolved prior to departure.

Cargo Transport has a preventive maintenance program developed in an Excel spreadsheet to provide on time preventive maintenance to its vehicles. Maintenance for each vehicle is tracked through the spreadsheet, which provide information by way of traffic light type regarding preventive maintenance, following up of required actions and alerts when next maintenance will be required. The system is fed by the vehicle pre-use inspections, where vehicle mileage is recorded and any needed corrective action is registered, including drivers' feedback. Preventive maintenance is scheduled according the manufacturer specifications. This is also tracked by mean of the spreadsheet *Preventive Maintenance*, where a traffic light type system alerts regarding proximity of next maintenance.

Vehicles maintenance, during its guarantee period, is only performed in the manufacturer authorized workshops. Cargo Transport has their own maintenance workshops where all other maintenance I performed.

The procedure for *Ground Transportation of Sodium Cyanide* states transport of Sodium Cyanide will take place during the day from 6 am to 6 pm, performing the following activities. Any activity detected out of this range, will sound an alarm in the 24-hour satellite tracking system at the control room and reports will be automatically send to supervisors.

The transporter has limitations on its drivers' hours for hazardous cargo. Drivers are limited to an "on-duty" workday of 12 hours.

The Traffic area is in charge to assign the drivers according to their availability. The area manages information where all drivers' hours in transport operations is registered as well as their resting period, ensuring they are having enough rest time according to that established.

The procedure *Ground Transportation of Sodium Cyanide* includes statements for securing and blocking sea containers to the trailer bed using the clamping mechanisms that are part of the trailer itself. The integrity of the clamping mechanism and the attachment point on the container is checked during a pre-trip inspection prior to the departure of the truck or the cyanide convoy. There are specific locations on the trailer that will accept the container, thereby eliminating the possibility of an unbalanced load. Before the start of transport, the Supervisor Escort or Driver must perform the verification of the unit and the escort vehicle, to ensure inspection for correct transporting.

The procedure also include instructions to suspend transportation if conditions to travel are not appropriate. The movement of the convoy will be dependent on the weather

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conditions; the Supervisor Escort, will evaluate the safety of the route in each case, being able to stop the convoy if in his opinion the conditions do not allow a safe transit. If something happens that does not allow the convoy to reach its destination, the driver will park in an appropriate and safe place that the Escort Supervisor has identified and will inform the Fleet Supervisor and the traffic area.

Cargo Transport has an alcohol and drug policy which states it is strictly forbidden both the consumption, possession, distribution and/or sale of these substances during the workday as well as not being able to perform their activities because they are under the effect of them. Before each trip, Cargo Transport drivers must undergo alcohol testing and periodically disclose evidence of drug use. Violation of this policy could result in the separation of the worker from the organization.

The transporter's safety program includes retention of records documenting its safety program, including procedures, inspections, preventive maintenance, driving hours and alcohol tests, among others.

Transport Practice 1.5:

Follow international standards for transportation of cyanide by sea and air.

The operation is:

- in full compliance with Transport Practice 1.5
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

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

Transport Practice 1.6:

Track cyanide shipments to prevent losses during transport.

The operation is:

- in full compliance with Transport Practice 1.6
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

All drivers and personnel involved in the transport operation are provided with cell phones and a contact list to communicate with the transport company, the cargo dispatcher and

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emergency responders. The transport operators have a communications group in WhatsApp application where any novelty or alert in the operation is reported.

All trucks are equipped with two-way VHF radios to communicate between them and from specific sectors from the route to their main mining client. Trucks are also equipped with GPS that always allows Cargo Transport to track their units all time, with periodic reporting to the operation and the client, according to settings.

The procedure *Programming, Control and Monitoring of Units* states as basic conditions that all drivers will be assigned communication equipment. The procedure *Ground Transportation of Sodium Cyanide* states the Escort Supervisor and the driver must carry out a verification of radios, communication equipment for the transport of Sodium Cyanide.

Communications equipment is tested to insure it functions properly before the vehicle's departure. The GPS Manager/GPS Monitoring Central performs the control and monitoring of the units using GPS (Global Positioning System). Minor reparations to radio equipment are performed at the truck shop and maintenance is periodically performed by an external provider. Cargo Transport's communication system is part of the pre-work inspections and is maintained along with the formal preventive maintenance program. The system is used each day and correct operation of the system is confirmed at that time.

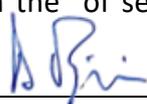
Cargo Transport identifies communication blackout area during the route risk assessments. For areas without communications coverage or intermittent coverage, they monitor from the Traffic Control to the GPS signal. If the vehicle does not appear on the screen when expected, the Emergency Response Plan is activated. Trucks are continuous monitored along the route in real time, and any delay will be immediately notice at traffic Control. Convoys area equipped with satellite phones when required. All trucks have a panic button which would be activated in an emergency to allow tracking the vehicle by satellite signal.

Cargo Transport has a GPS tracking system which allows, among other utilities, continuously monitoring of the location of the trucks. Communications with the base are performed upon dispatch, upon arrival at the customer sites, and after unloading is complete. The GPS allows the control and monitoring of the units in real time and the random verification by the Fleet Supervisor of the times and stops recorded by the driver on the *(JT-05-R-01) Roadmap*. The Fleet Administration Area will request a GPS operation report quarterly from the service providers.

Cargo Transport has inventory controls and chain of custody documentation to prevent loss of cargo during shipment and will keep these controls when transporting cyanide. Upon client's authorization for the service, Cargo Transport issues a bill of lading called remission guide indicating the cargo weight, name of the product, class, quantity, origin, place of delivery, seal number, departure and arrival hour, signature and stamp of the client indicating that they received the cargo in conformance. On cargo reception, the procedure states to verification the of seal numbers (in container doors or in isotank

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valves). On arrival to destiny, in the case of isotanks a weighing will be made to the units. After downloading the client or end user, the Supervisor Escort or driver will verify the seal and signature of remission guides.

Cargo Transport's shipping paperwork details the amount and weight of the cargo in transit and must travel with the product Material Safety Data Sheets (MSDS). Examples of bills of lading and shipping papers reviewed clearly indicates the number of packages and amount of cargo transported.

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Principle 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 Transport Practice 2.1
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

Cargo Transport will not operate cyanide trans-shipping depots or interim storage sites in its transport operation. If a delivery is interrupted, loaded cyanide trucks would be stored in a secure location. Principle 2, Interim Storage, does not apply to the operation.

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Principle 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 Transport Practice 3.1
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

Cargo Transport has an *Emergency Response Plan* where Appendix 4 is the *Emergency Response Protocol During Ground Transportation with Sodium Cyanide*. The Plan states the necessary procedures to control emergency situations. It indicates the sequence of activities that must be carried out for the control of each of the possible emergencies such as personal accidents, fires, earthquakes, spills, pollution, vehicle accidents, assault and kidnapping

The plan is appropriate, in general, for cyanide transportation routes. It is designed for specific emergency circumstances that could arise during cyanide cargo transportation, including potential releases. It considers appropriate response actions for emergencies, includes details regarding responsibilities, communications procedures, updated notification numbers for emergency responders. The Plan was found to be up-to-date and appropriate for the future cyanide transport operation.

Cargo Transport will transport solid sodium cyanide in briquettes. The plan considers the physical and chemical form of the cyanide. It details the characteristics of the sodium cyanide to transport as a dry white crystalline solid, compacted in the form of briquettes, hygroscopic as it has a high affinity with atmospheric humidity, which forms moist solids (dissolves slowly) and generates small amounts of hydrogen cyanide gas (HCN). Alkaline because of its high caustic soda content makes it have an average pH greater than 11.5. Odorless while dry. In contact with moist air, it can give off the smell of ammonia / bitter almonds, and generate an itchy sensation in eyes, mucous membranes and skin.

The plan considers transporting solid sodium cyanide by trucks conforming convoy, one 20-foot sea container or isotank on each platform. It details sodium cyanide is in briquettes in 20-foot sea containers on a flat platform, considering a full cargo container stowed at origin (17 tons in case of drums , 20 to 23 tons in the case of Intermediate Bulk Containers

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ore IBC boxes). The plan also considers the case of transporting bulk solid cyanide in isotanks, on a platform attachment points like those of a 20-foot sea container.

Cargo Transport's plan will consider the conditions of the roads (highway, secondary and mine roads) and urban areas, bridges conditions and danger of landslides on the route, among others, and address the emergency response to events that could occur in relation to these risks and hazards. The plan, when updated for the cyanide transport operation, will include water bodies, inclination and slope of the road.

Cargo Transport's plan describes the design and configuration of the transport vehicle in the plan. The document states that must follow local regulation and describes the vehicles configuration as truck plus semitrailer as appropriate for each cargo and route, for example to transport HAZMAT to mining sites into the Andes heights.

The current plan includes descriptions of response actions for solid sodium cyanide releases and exposure incidents, such as first aid and medical assistance, as appropriate for the anticipated emergency during transportation.

The current plan does not establish the roles of outside responders, medical facilities or communities in emergency response procedures. Cargo Transport will identify the roles of these entities on updating its plan.

Transport Practice 3.2:

Designate appropriate response personnel and commit necessary resources for emergency response.

The operation is:

- in full compliance with Transport Practice 3.2
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

Cargo Transport provides emergency response training to all drivers, convoy leaders, managers, maintenance shop, logistics, Traffic Control, administrative personnel and to the surveillance service personnel at the company's area. Drivers receive training in HAZMAT I and II, convoy leaders and emergency responders in HAZMAT I, II and III. . Supervisor are trained in Incidents Command and in Crisis Management. They receive an appropriate level of training to fulfill their role in emergency response.

The auditor reviewed training records in cyanide awareness, in the emergency plan, in the use of fire extinguishers and hydrants, and in first aids. Formal emergency response training is refreshed annually.

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The current plan describes the personnel responsibilities and duties for the specific emergency response.

The plan includes a complete emergency response list of materials, equipment and first aids related to cyanide emergencies, that should be available either in the transport vehicle or in the escort truck during a cyanide transport operation.

Cargo Transport has available the emergency response and health and safety equipment including personal protective equipment, necessary for general cargo, HAZMAT materials. A checklist is used to verify that the emergency equipment it is available, and it is documented in the convoy report. The availability of this equipment was confirmed during the audit. Before beginning the cyanide transport operation, Cargo Transport will include equipment for cyanide related emergencies, as first aids kits, antidote, oxygen and all the necessary material to prevent HCN formation and to collect cyanide spills. Also, optionally or at the request of its clients, it will include self-contained breathing air equipment (SCBA).

Cargo Transport's vehicle operators receive initial and annually refresher training in emergency response procedures, including implementation of the emergency response plan. The auditor reviewed assistance records for emergency response training, including training in firefighting. Cargo Transport will train all personnel involved in the cyanide transport operation in the emergency response plan before any cyanide transport operation.

The plan states it is responsibility of the HSE Supervisor to perform monthly inspections to the response equipment for cyanide related emergencies to the cargo vehicles and to the escort pickup vehicles. The pre-use checklist both for tractor-platform and for the escort pickup, includes fields to verify the emergency response equipment to assure its availability when required.

The auditor reviewed several inspection records, although not for cyanide response equipment by the moment.

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Transport Practice 3.3:

Develop procedures for internal and external emergency notification and reporting.

The operation is:

- in full compliance with Transport Practice 3.3
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

The notification procedures, including telephone numbers, are described in the emergency response plan. It includes procedures and current contact information for notifying the the shipper, the receiver, regulatory agencies and potentially affected communities of an emergency. It lists current emergency numbers for local hospitals, ambulance, firefighters, police and environmental responders.

The plan states to update the emergency contact list, according to the format (HS-16-R-02) *Emergency Telephones*, which will be verified and / or updated monthly by the HSE Area. Reporting procedure are kept current, they are part of the Emergency Response Plan version 5.

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 Transport Practice 3.4
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

The plan states that all cyanide waste generated and / or recovered (solid or liquid) must be disposed of as hazardous material. Procedures for spill remediation provide clarity on the chemicals to use in chemical stabilization of sodium cyanide, by adding calcium oxide to raise the pH. For cyanide neutralization of any nonrecoverable spill, the plan states to use a solution of sodium hypochlorite at 5%. Both chemicals are carried in the convoy escort van as part of the truck emergency response kit, in 5 or 10 gallon drums with 20 kg of lime and caustic soda each. The emergency response procedures identify Cargo Transport as the party responsible for performing cyanide spill remediation, including the recovery of cyanide solutions and solids and spill cleanup debris. Final contaminated

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material will be disposed by specialized hazardous waste transport company (EPS) Outsourcing Green or Ecomarine.

Appendix 4 of the plan details specific procedures for remediation due to cyanide spills, such as recovery and neutralization of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris. The procedure *Waste Management* states hazardous materials must be arranged in red cylinders, labeled and intended for this purpose. Waste will be transferred based on the standards established by the specialized hazardous waste transport company (EPS).

Cargo Transport states in the emergency response plan the prohibition to chemicals such as sodium hypochlorite and hydrogen peroxide to treat cyanide that has been released into surface water. The transporter will include the prohibition to use ferrous sulfate.

Transport Practice 3.5:

Periodically evaluate response procedures and capabilities and revise them as needed.

The operation is:

- in full compliance with Transport Practice 3.5
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

According to Cargo Transport's procedure *Documented Information Control*, all the Integrated Management System procedures, including the emergency response plan, must be reviewed annually. The auditor reviewed the plan version 5, dated January 3, 2020, concluding this disposition has been implemented.

Cargo Transport has an annual plan for mock drills which will include cyanide emergencies mock drills. The auditor reviewed emergency drills performed for HAZMAT. The transporter performed an emergency mock drill simulating a cyanide spill and will perform a mock drill simulating a case of cyanide exposure.

Cargo Transport will develop and implement a procedure to evaluate the plan's performance after its implementation and revise it as needed.

Cargo Transport S.A.C.

Name of Facility



Lead Auditor

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January 30, 2020

Date