

SUMMARY AUDIT REPORT

for the October 2016
CYANIDE PRODUCTION
International Cyanide Management Code Recertification Audit



Prepared for:
Cyanco Canada Inc.

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

FINAL
28 March 2017



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Name of Plant: Cadillac Transloading Terminal

Name of Plant Owner: Cyanco Canada Inc.

Name of Plant Operator: Cyanco Canada Inc.

Name of Responsible Manager: Andre Masson, Cadillac Terminal Manager

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Location details and description of operation:

Cyanco Canada Inc. (Cyanco) owns and operates a sodium cyanide transloading facility located at 33 Rue Dumont Est in Cadillac, Quebec, Canada. The site, situated on an approximately 20-acre parcel (84,241 m²), is located approximately 400 km north-northwest of Ottawa, Ontario. The site consists of an approximately 465 m² building, located on the eastern portion of the property. This building houses the process plant, cyanide storage, product quality control laboratory, and office. A gravel yard for tanker trailers and employee parking area lies west of the building. A Canadian Pacific Railway track runs along the southern boundary of the site. Two rail spurs enter the property, specifically one for parking loaded railcars and tanker cars and another entering the site building, where operations take place.

The facility is used for the receipt, temporary storage and dispatch of sodium cyanide. The sodium cyanide is received in solid briquette form in rail hopper wagons, or in 30% solution in rail tankers, from Cyanco's production facilities located in Alvin, Texas, and Winnemucca, Nevada, respectively. The solid cyanide in rail hoppers consist of three compartments for a total net load weight averaging 80,000 kg (176,000 pounds) of cyanide briquettes. The railcars are brought inside of the terminal building on the rail spur using a diesel fuelled Trackmobile™. Water is heated in a gas-fired water heater to 27° Celsius, and is pumped directly into the hopper cars using flexible hoses. The water dissolves the briquettes and as the solution is formed, it is pumped into one of two storage tanks (T-100 and T-200). To rinse the rail cars, clean water is pumped through the cars. Water is discharged to the main sump,

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and is pumped back to T-100 for recycle. The rail car is dried using a blower. A scrubber system is connected to the rail hopper and storage tanks to control emissions of hydrogen cyanide. Solution is received in tanker railcars. The railcar tanker is heated using a water heat transfer system to allow the solution to more easily flow during transfer during winter months. The cyanide is transferred to one of three tanks and the rail tankers are cleaned in the same way as with solid cyanide hopper railcars.

Solution is shipped to clients using road tanker trailers owned and maintained by Cyanco and transported using tractors/drivers of ICMC-certified cyanide transporter, Transport Nord-Ouest, under contract to Cyanco. After the solution is ready for shipment, it is pumped into the loading tank. A sample of the solution is taken from the loading tank and analysed for quality control. Emissions from the tank trailers are vented through the scrubber system as the tankers are filled.

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The operation is:

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

with the *International Cyanide Management Code* and has not experienced any cyanide releases or incidents in the previous three-year audit cycle.

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Names and Signatures of Other Auditors

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Date(s) of Audit: 18 October 2016

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 Detailed Audit Findings Report (DAFR) 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 latest version of the *International Cyanide Management Code Verification Protocol for Cyanide Production* and using standard and accepted practices for health, safety and environmental audits

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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.

The operation is: ■ in full compliance with Production Practice 1.1.
 in substantial compliance
 not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

There have been no significant changes to the design and construction of the Cyanco Cadillac terminal facility since the 2013 ICMC recertification audit. As described in the 2013 ICMC Detailed Audit Findings report, all equipment and facilities are constructed with materials that are compatible with solid cyanide and cyanide reagent solutions. The cyanide transloading plant at the Cadillac site including all storage facilities, tanks, pipelines, containment areas, water handling etc. has been designed and built according to local Canadian laws and regulations. A QA/QC program had been implemented during construction of the facility and construction supervision and inspection were carried out by qualified personnel. A complete set of approved as-built engineering drawings and quality control and quality assurance QA/QC records were not readily available on site for review during the audit. Subsequent to the site audit, the as-built drawings and QA/QC documentation were gathered and amalgamated and documented in a logbook at the Terminal.

Automatic systems and interlocks are incorporated into the operating system design to shut down the process in the event of a malfunction or an emergency. An automatic shutdown system monitors pressure gauges, temperature sensors and high level indicators and any readings outside the normal operating ranges will shut down the process. There are also manual emergency stop buttons located strategically around the plant and office.

All cyanide transfer operations are conducted within the concrete containment (sized to hold 110% of the largest tank volume) that extends over the entire building footprint. The floor and containment basins are also protected and sealed with a poly-urea coating, and were observed to be in good condition. Each storage tank is sized and equipped with instruments to prevent overfilling during cyanide transfer operations.

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All pipelines and hoses are located within this containment. In the event of a pipeline or hose failure during a product transfer, the automated system would detect a pressure change and shut down the process to minimize any spillage to the containment. Spills would be pumped back to the process.

Production Practice

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

The operation is: ■ in full compliance with Production Practice 1.2.
 in substantial compliance
 not in compliance

Discuss the basis for the Finding/Deficiencies Identified:

Cyanco has developed and implemented plans and procedures for the operation of the Cadillac Terminal. These are managed within an integrated management system for quality and environmental management that has been certified to ISO 9001:2008 and ISO 14001:2004. The operations manual for the facility includes a detailed overview of the process elements and operating procedures for all tasks involved with off-loading railcars, dissolution of solid cyanide, purging tanks, and loading tanker trucks, as well as procedures for confined space entry, waste disposal and analytical procedures. In addition, other plans and procedures are in place for safe operation of the facilities, including, inspection and safety, general safety, management of change, and emergency response.

There has been no significant change since the 2013 ICMC recertification audit. Cyanco has a Management of Change Procedure that applies to all modifications to equipment, procedures, raw materials, and processing conditions outside approved limits. The procedure has not been used frequently (approximately four times in the past 10 years) and was last applied when a second heating line to the existing tank car system was added.

An inspection and preventative maintenance program is in place for critical equipment and monitoring devices are maintained as recommended by the manufacturer. Terminal operators conduct routine inspections. Maintenance of equipment is primarily undertaken by appropriately experienced contractors. Inspection and maintenance is scheduled annually and tracked using a monthly wallchart. Maintenance records are maintained.

Instrumentation is used to monitor the process and potential HCN gas generation in the plant. Process monitoring devices are checked and calibrated on an annual PM schedule. To prevent any release of fumes into the atmosphere, all off-gases from the cyanide transfer operation are collected and scrubbed with caustic prior to discharge. The wet scrubber is tested weekly to ensure the scrubber operates effectively. Test records are recorded in a log book.

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maintenance schedules are sufficient to ensure the facility is well maintained and equipment is functioning within design parameters.

The facility uses an interactive monthly wall chart to schedule and document routine and planned inspections and maintenance. The monthly charts are generally retained; however, the records for 2014, and 2015 were accidentally discarded sometime in early 2016 when a new Terminal Manager was appointed. The wall chart record retention program has since been renewed and Wall Chart records were available for review for the period covering the past three months. Specialist service contractors are retained as part of monthly, quarterly, semi-annual or annual maintenance, depending on the equipment, and records are maintained.

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.

The operation is: ■ in full compliance with Production Practice 2.1.
 in substantial compliance
 not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

Cyanco has established written procedures that include minimum personal protective equipment (PPE) that must be worn for various tasks. A clothing change policy is in place that requires employees to change from street clothes before working on the process side of the building and to change, wash and launder work clothes before leaving the terminal at the end of the day. No contaminated clothing or used gloves are permitted in the office (which is the only area of the facility where food and drink is allowed).

The facility is equipped with fixed HCN gas monitors to alert workers of potential elevated HCN. The HCN fixed and portable monitors are calibrated twice a year by an external firm. Portable HCN monitors are required to be worn by operators/contractors when conducting tasks where there is a potential for HCN generation. In the event of exposure to solid or liquid cyanide, the facility is equipped with six shower/ eyewash stations located strategically about the plant. The operation of the stations is tested weekly and are connected to the PLC system so that the process will immediately shut down if a station is used.

The facility is managed by a Terminal Manager and two operators who are supported closely by the Canadian Accounts Manager (a previous Terminal Manager at Cadillac). The team work together and initiatives for improvement in health and safety are freely exchanged and supported by facility and corporate Cyanco management. As discussed in Section 1.2, Cyanco

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has a management of change procedure to ensure that the safety of plant processes and operations are not compromised by changes to the process. Cyanco requires that all new hires complete a medical examination, with records retention, to confirm that the hire is fit to perform the job.

All workers and contractors are required to wear the designated PPE in all process areas. During the audit, the operators were observed to be wearing appropriate PPE as required by procedure. Procedure requires that the buddy system is applied for all process steps. The terminal operators do not undertake any significant maintenance at the facility as this is performed by experienced appointed service contractors. All contractors are pre-approved by Cyanco and must follow Cyanco procedures and meet Canadian and Quebec health and safety regulations.

Cyanide warning signage and signage is posted on the gate at the site entrance and on each door to the plant. Cyanide placards and/or warning signage are also posted on the railcars, road tanker trailers and process tanks to alert workers of the proximity of cyanide. There is signage on the plant entrance from the office stipulating the minimum required PPE. The office area is the only area in the terminal site where food and beverages are allowed to be taken. The cyanide awareness training program also stresses the hazards of ingesting or inhaling cyanide and stipulates appropriate hygiene practices.

Production Practice

2.2 Operate unloading, storage and mixing facilities using inspections, preventive maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.

The operation is: ■ in full compliance with Production Practice 2.2.
 in substantial compliance
 not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

Cyanco maintains a comprehensive Emergency Response Plan (ERP), initially developed in 1997, with the latest version dated 29 January 2016. There have been two revisions since the last certification audit, specifically December 2013 and May 2014. The ERP addresses all terminal activities. The terminal maintains a separate ERP for the transportation of Cyanco’s cyanide throughout Canada, with contracted first respondents. In emergency situations, Cyanco depends on outside assistance in responding to and mitigating emergencies associated with sodium cyanide at the terminal site. The ERP addresses the appropriate responses and resources required.

As discussed in Section 2.1 the facility is equipped with shower/ eyewash stations located strategically about the plant. The stations are connected to an automated system so that the

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process will immediately shut down if a station is used. Fire extinguishers and first aid boxes are located and appropriately identified. They are inspected on an annual basis.

There have been no changes in procedure since the 2013 ICMC Recertification Audit, with the exception of the change to Cyanokit from the previous antidote kit. Antidote management and handling are in place, including access to additional Cyanokits at the nearby hospital. The facility has potable water, medical oxygen, antidote kits and ready access to the local fire department and/or hospital. The Safety Data Sheets, first aid procedures and other information on cyanide safety for solid briquette sodium cyanide and 30% cyanide solution are provided in both English and French. Cyanide placards and/or warning signage are posted in appropriate locations to alert workers of the proximity of cyanide. The direction of cyanide flow in pipes is indicated.

The clothing change policy has not changed since the 2013 ICMC Recertification Audit. No contaminated clothing or used gloves are permitted off-site. There is a locker room at the facility equipped with a washing machine. Employees are required to change from street clothes before working on the process side of the building and to change, wash and launder work clothes before leaving the terminal at the end of the day. These rules are established to prevent any poisoning with sodium cyanide from contaminated soiled clothing or hands.

All Cyanco terminal employees have detailed training to provide first aid assistance to workers exposed to cyanide. In addition, they have training for the immediate use of the medical oxygen as a first response prior to the arrival of the fire department/paramedics. The medical staff of the Centre de santé et de services sociaux (CSSS) are involved in the development and training of the Cyanco employees for first aid response. Since the site visit, Cyanco provided a detailed procedure and process for the transport of an exposed worker, and will include in the 2017 update of the ERP.

Cyanco conducts annual mock emergency drills to test response procedures for various exposure scenarios. The lessons learned are incorporated into the ERP, as evidenced by the revisions. There have been no changes to the status of cyanide exposure incidents at the terminal facility since the 2013 ICMC recertification audit. There have been no exposures since the operation began in 1998. There are procedures to report, investigate and evaluate a cyanide exposure incident, if one were to occur.

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.

The operation is: in full compliance with Production Practice 3.1.

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in substantial compliance
not in compliance

Discuss the basis for the Finding/Deficiencies Identified:

The facility is designed as a zero discharge operation and there is no direct or indirect discharge to surface water. All offloading and loading transfer operations are conducted within a concrete containment area and any spills would be captured within the containment and returned to the process. The only wastewater discharge from the site is sanitary sewage which is fully independent from the process and collection sumps within the plant.

Because the facility is designed with primary and secondary containment; process operations are only undertaken within contained areas; and the operation has an effective inspection and maintenance program in place, no continuous groundwater monitoring program has been required by the regulators or deemed necessary for this operation. There have been no spills since the operation began in 1998.

The potential for HCN gas emissions are monitored using fixed HCN monitors located strategically about the plant and the use of two portable monitors when conducting tasks where there is a potential for cyanide exposure. All off-gases from the transfer process are collected and passed through a wet scrubber prior to discharge. As a result of the scrubber, the potential for HCN emissions affecting workers or the community is considered to be extremely low.

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.

The operation is: ■ in full compliance with Production Practice 4.1.
 in substantial compliance
 not in compliance

Discuss the basis for the Finding/Deficiencies Identified:

Cyanco developed a comprehensive *Training and Operations Manual* issued November 2015 that provides a step-by-step process description with photographs for each of the processes. Each employee is required to sign that they certify that they have read the manual entirely and acknowledge that they will follow procedures. All employees are skilled chemical workers. There is a Cyanco requirement for this initial training and subsequent annual training.

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Other required training is carried out using several learning methods, including written materials, in-classroom (with CSSS), Cyanco created videos and on-line courses (through YOWCanada.com). These training modules focus on specifics of dangerous materials (NaCN, HCN). Since the last audit, six video modules were developed in 2014, for training both Cyanco employees and Cyanco clients. All the training records and certificates are documented. Training was provided in February and June 2016, and the next refresher training for all personnel is scheduled for February 2017 by CSSS. Emergency response and safety training was carried out in November 2014, September 2015 and August 2016.

Cyanco has established written procedures that include minimum PPE that must be worn for various tasks. Procedures require immediate replacement of PPE that is broken (e.g., glasses) or punctured (e.g., gloves, boots or coveralls). The *Training and Operations Manual* provides the minimum personal protective equipment and additional PPE for specific tasks.

The minimum personal protective equipment to be worn in the plant includes a hard hat, safety glasses, safety shoes or boots and rubber gloves. In addition, a chemical suit (slicker suit), goggles and chemical resistant gloves are required whenever there is a potential for exposure to solid or liquid sodium cyanide, e.g., during unloading and loading operations, or any situation where there is a risk of contamination. No contaminated clothing or used gloves are permitted in the office (which is the only area of the facility where food and drink is allowed).

Training on the selection, use and care of PPE is included in the operator training. Employees are instructed prior to working with cyanide at the plant. New employees are integrated into their job by a defined process, outlined in the *Training and Operations Manual* issued November 2015 that provides a step-by-step process description with photographs for each of the process equipment (21 standard operating procedures).

Training has been developed and delivered both internally and externally, by qualified personnel. Training effectiveness is evaluated on an individual basis, and includes practical or written tests, observation, and reinforcement within the team.

Production Practice

4.2 Train employees to respond to cyanide exposures and releases.

The operation is: ■ in full compliance with Production Practice 4.2.
 in substantial compliance
 not in compliance

Discuss the basis for the Finding/Deficiencies Identified:

The Emergency Response Plan provides the plan activation in case of a cyanide release. As per 4.1, the training includes procedures to be followed if a cyanide release is discovered.

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Cyanco conducts annual mock emergency drills to test response procedures for various exposure scenarios. Emergency review and planning meetings are conducted to discuss and review scenarios and determine readiness. Cyanco takes the opportunity to include cyanide safety training prior to the scenarios. Since the last recertification audit, meetings were held in November 2014, September 2015 and August 2016. These scenarios have included: a sodium cyanide solution leak from a railway car; sodium cyanide briquettes in an adjacent fire on a railway line, and a full-scale emergency response training exercise. All training records and certificates for the last three years are documented and retained.

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.

The operation is: ■ in full compliance with Production Practice 5.1.
 in substantial compliance
 not in compliance

Discuss the basis for the Finding/Deficiencies Identified:

Cyanco maintains a comprehensive ERP, initially developed in 1997, with the latest version dated 29 January 2016. There have been two revisions to the ERP since the last certification audit, specifically December 2013 and May 2014. The ERP addresses all terminal activities. The terminal maintains a separate ERP for the transportation of Cyanco's cyanide throughout Canada, with qualified contractors being first respondents. In emergency situations, Cyanco depends on outside assistance in responding to and mitigating emergencies associated with sodium cyanide at the terminal site. The ERP addresses the responses,

The ERP considers failures, but was not specific to the requirements of the Code. Also although the ERP include cyanide first aid response and cyanide release controls, it did not provided specific guidance to these requirements. Subsequent to the site visit, Cyanco provided evidence and documentation which addressed each potential failure scenario and specific guidance on cyanide antidote use and first aid measures, and control cyanide releases at source. This documentation is to be incorporated into the 2017 update of the ERP.

Production Practice

5.2 Involve site personnel and stakeholders in the planning process.

The operation is: ■ in full compliance with Production Practice 5.2.
 in substantial compliance

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not in compliance

Discuss the basis for the Finding/Deficiencies Identified:

Cyanco continues to make its workers and potentially affected communities aware of the ERP and their roles within the Plan. Workers and potentially affected communities are well informed of the nature of the hazards and risks associated with the cyanide production facility operation. In the emergency response planning process, Cyanco provides all outside entities with a response role with registered copies of the ERP.

Production Practice

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

The operation is: ■ in full compliance with Production Practice 5.3.
 in substantial compliance
 not in compliance

Discuss the basis for the Finding/Deficiencies Identified:

The ERP includes: designation of emergency response coordinators responsibilities; training requirements for emergency responders; call-out procedures and 24-hour contract information; responsibilities of the emergency response coordinator(s); a list of the Emergency response equipment; requirements for monthly inspections of emergency response equipment; and the roles of outside responders. In the event of an emergency situation, the Cyanco terminal ER Coordinator would advise Chemtrec. The medical resources and facilities operate on request, according to the activities and actions driven by the ERP. The emergency response team (ERT) is not specifically identified, as there are only three employees at Cadillac and all are trained for first response. Further response roles and responsibilities are addressed in the ERP, for the Emergency Response Contractor, Surveillance Contractor, Fire Department, and Quebec Provincial Police (QPP (Surete du Quebec)).

Production Practice

5.4 Develop procedures for internal and external emergency notification and reporting.

The operation is: ■ in full compliance with Production Practice 5.4.
 in substantial compliance
 not in compliance

Discuss the basis for the Finding/Deficiencies Identified:

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Emergency situations are addressed in the ERP and the ERA #2-1008-139. The ERA #2-1008-139 is a separate ERP for the transportation of Cyanco's cyanide throughout Canada, with contractors being first respondents. According to the North American "2016 Emergency Response Guidebook – A Guidebook for First Responders During the Initial Phase of a Dangerous Goods/ Hazardous Materials Transportation Incident", issued by Transport Canada and the US Department of Transportation, the site is obligated to advise and inform the community with respect to potential hazards, emissions and other safety risks.

In emergency situations, Cyanco depends on outside assistance in responding to and mitigating emergencies associated with sodium cyanide at the terminal site. Cyanco provides them with registered copies of the most recent ERP. Current contact information is provided in the ERP.

Production Practice

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

The operation is: ■ in full compliance with Production Practice 5.5.
 in substantial compliance
 not in compliance

Describe the basis for the Finding/Deficiencies Identified:

The process hazards are identified in the *Hazard Analysis* binder. This document is identified in the ERP, and addresses recovery of solution.

Mud and sand brought into the containment areas and washed from tanker trucks is cleaned up and temporarily stored in drums prior to being transported offsite by a licenced waste management contractor and appropriately managed at an approved hazardous waste facility. The drums are analysed prior to disposal and although the waste is managed as a hazardous waste are generally found to contain low concentrations of cyanide. This hazardous waste disposal procedure would be used to dispose of other sodium cyanide solid wastes if such were to be generated.

At the time of the site visit, the ERP did not have documented procedure to address the potential need for environmental monitoring in the event of a release. Subsequent to the site visit, Cyanco provided documentation to indicate that they would reference the 2016 Emergency Response Guidebook, Guide 157 for Toxic and/or Corrosive Substances (non-combustible/water-sensitive) and Table 1 for the Initial Isolation and Protective Action Distances. Subsequent to the site visit, the documentation was revised to address the decontamination and collection of soil and the potential need for environmental monitoring.

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The sampling methodology, parameters, laboratory and number of sample locations, dependent on the size of cyanide spill impact, were detailed. The required PPE and tools are included. Cyanco indicated that this information would be included in the 2017 ERP and the updated Training and Operations Manual.

Production Practice

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

The operation is: ■ in full compliance with Production Practice 5.6.
 in substantial compliance
 not in compliance

Describe the basis for the Finding/Deficiencies Identified:

There have been no changes to the status of emergencies or incidents at the terminal facility since the 2013 ICMC recertification audit. There have been no emergencies since the operation began in 1998. If an emergency did occur that required the implementation of the ERP, as per 2.2, the ERP would be evaluated and revised, as necessary.

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