
International Cyanide Management Code



Re-Certification Audit of:

Cyanco Cheyenne Transloading Terminal

Summary Audit Report

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

2020 Audit Cycle



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Cyanco Cheyenne Transloading Terminal Summary

Company Names & Contact Information

Name and location of Operation:	Cyanco Cheyenne Transloading Terminal Swan Ranch Industrial Park 6143 Tundra Drive Cheyenne, WY 82007
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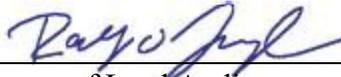
Operational Overview

The Cyanco Cheyenne Transload Terminal located in Cheyenne, Wyoming is a sodium cyanide transloading facility operated by TransWood Inc. The Cheyenne transload building where all transloading operations are carried out is over 8,000 square feet in size. Cyanide solution is transported by rail car via the Union Pacific railroad from Winnemucca to Cheyenne, moved on-site into a fenced area, and then loaded into ISO container trailers for truck transport to mines. This operation has been Cyanide Code certified since 2017.

Audit Implementation

This re-certification audit was conducted through on-site observations, reviews of records and procedures, and interviews with senior management, operations management, engineering, and environmental, health & safety (EH&S) staff. TransWood and Cyanco personnel were involved

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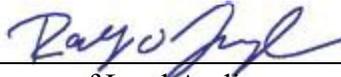
in the audit. The audit team used the ICMI “Cyanide Production Verification Protocol” to evaluate International Cyanide Management Code (Cyanide Code) compliance.

Procedures, site conditions and records were evaluated during this audit. The assessment was based on random samples of information and therefore deficiencies may exist which have not been identified. The depth to which records and data were sampled was typical of an environmental, health and safety (EH&S) management system audit. Although legally required records were sampled to evaluate Cyanide Code compliance, legal compliance with federal, regional, and local regulations was not part of the scope of this evaluation.

The audit was performed by an independent third-party audit team that fulfills all ICMI Cyanide Code Lead Auditor and Technical Auditor requirements for cyanide transportation and production operations.

All aspects of the cyanide operations were included in this Cyanide Code Initial Certification Audit. The operation was found to be in FULL COMPLIANCE with Cyanide Code Cyanide Production requirements.

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Auditor's Finding

The cyanide management practices for the Cyanco Cheyenne transloading operation were evaluated for Cyanide Code compliance using the International Cyanide Management Institute (ICMI) *Cyanide Production Verification Protocol*. Cyanco Cheyenne internal standards, policies, practices, and procedures regarding the management of the cyanide operations were reviewed.

The audit team found that the overall level of preparedness and understanding of ICMI Cyanide Code requirements was very good. Management systems upon which the operation is based are mature, and requested records were readily available for review.

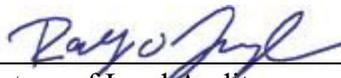
There were no compliance problems or significant spills/releases during the recertification period.

The results of this re-certification audit demonstrate that the Cyanco Cheyenne transload terminal and cyanide-related operations are in FULL COMPLIANCE with International Cyanide Management Code requirements.

Audit Company:	CN Auditing Group www.cnauditing.com
Lead / Technical Auditor:	Ralf Jurczyk E-mail: rj@cnauditing.com
Auditor:	Nancy Hitchins
Date of Audit:	July 28, 2020

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Certification 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 the Audit Reports accurately describe the findings of the re-certification audit. I further attest that the re-certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code *Cyanide Production Verification Protocol* and using standard and accepted practices for health, safety and environmental audits.

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Cyanco Operational Certification Audit Results

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**

Summarize the basis for this Finding:

The Cheyenne Terminal was found to be in full compliance with International Cyanide Management Code (ICMC) Production Practice 1.1. The terminal was designed in a manner that is consistent with sound, accepted engineering practices and quality control procedures.

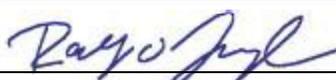
The operation implemented quality control and quality assurance programs as part of the Cheyenne transload terminal construction project. Confirmation was made during the initial certification audit that engineering records, including quality control and quality assurance records, are on file and readily accessible. The terminal hand-off, sign-off, commissioning, and Certificate of Completion for the terminal were reviewed during the initial certification audit and were found to be acceptable. Extensive design and build records were also reviewed during the pre-operational audit and were found to be complete and acceptable. Confirmation was also made during this re-certification audit that records continue to be maintained and are still retrievable.

There were no structural or procedural changes to the operation during the re-certification period. This was confirmed through observation and interview.

Records were available to demonstrate that appropriately qualified personnel reviewed the facility construction process at frequent intervals to confirm that all stages of the facility conformed to engineering plans. The Pre-Startup Safety Review (PSSR) that was conducted prior to commencing operations was reviewed during the initial certification audit and was found to be acceptable.

The materials of construction for the cyanide transload facility are compatible with reagents that are used in the transloading processes. Materials of construction specifications were sampled during the audit and were found to be acceptable.

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Each critical system has an interlock mechanism, which is designed to stop the flow of cyanide and prevent releases in the event of a system upset. Additionally, emergency stop buttons are present in the transloading area. Records of third-party testing and calibrations of these systems from the recertification period were available for review. Rail car inspections are conducted on every inbound and outbound rail car when they are placed and prior to their removal from the transload facility. All piping is secured when transloading is complete. Interviews with operators confirmed this practice.

All cyanide transload activities are conducted on a sloped concrete surface inside the transload building which would direct any spills to a secondary sump containment system that is appropriately sized for the process and associated piping. All cyanide piping is within the building and containment area. Since the transloading occurs indoors, the containment of rainwater is not a concern for this operation. The transload process is designed so that tank overfilling is not possible and the process is monitored all times when loading. Additionally, level indicators on the ISO tank are used to ensure the vessel is not overfilled. There are no cyanide-related activities performed outside of the building and containment area and there are no storage tanks on site.

All equipment and concrete surfaces were found to be in very good condition during the audit. No maintenance or equipment issues were noted as being deficient.

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

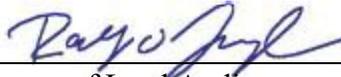
The operation is in full compliance with Production Practice 1.2

Summarize the basis for this Finding:

The Cheyenne Terminal was found to be in full compliance with ICMC Production Practice 1.2. The Cheyenne transload facility has procedures that describe the standard practices necessary for its safe and environmentally sound operation in a manner that prevents accidental releases.

Procedures are in place which address normal operations, process upsets, maintenance and emergencies and were found to be complete. The facility Emergency Response Plan describes the procedures to be followed in the event of a fire, explosion, and exposure or cyanide release. The terminal has a management of change (MOC) procedure that was found to be appropriate for the operation. The MOC process requires that proposed changes be signed off by an Environmental, Health, and Safety resource. There were reportedly no changes to the operation during the recertification period. This was confirmed through physical observation of the operation and through interviews with operators.

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A preventive maintenance program was developed for the facility. The maintenance procedure was reviewed and was found to be appropriate for the operation including all equipment and devices necessary for cyanide production and handling.

The operation has implemented a process to monitor critical process parameters. Facility personnel complete a daily inspection checklist to monitor critical parameters that could potentially affect health, safety, and environmental performance. This operation does not have any process instruments that require calibration. Records of HCN monitor calibrations for the re-certification period were reviewed during the audit and were found to be complete.

The operation has also implemented procedures for disposing of contaminated fluids and solids that may result from cyanide operations. Procedures were reviewed and were found to be appropriate.

The production building has adequate ventilation to prevent the build-up of hydrogen cyanide gas. Additionally, the building has a temperature alarm which notifies operational personnel in the event of a low temperature that could adversely affect operations. All cyanide transload activities are conducted inside the transload building to prevent contact with water.

The perimeter of the facility is completely fenced to ensure that no unauthorized personnel access the site. Operators have 24/7 access to security camera information.

The operation ensures that all iso tanks are placarded and marked in the appropriate languages and according to regulations for the countries through which the material is transported.

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

The operation is in full compliance with Production Practice 1.3

Summarize the basis for this Finding:

The Cheyenne Terminal was found to be in full compliance with ICMC Production Practice 1.3.

Preventive maintenance procedures and inspection records were available for all equipment during the audit of the facility. Routine inspection of pipelines, pumps and valves for deterioration and leakage are performed.



Daily, monthly, and annual inspection frequencies have been established, depending on the type of equipment being inspected. Frequencies were found to be sufficient. Records were available for the re-certification period for review and were acceptable.

The secondary containment system for the transload operation appears to be appropriately sized for the equipment and operations and is inspected monthly. Records were available for review. There are no cyanide solution storage tanks at the facility.

The documented program identifies the items that need to be inspected and/or observed. Records reviewed included the date of the inspections, the name of the inspector, and any observed deficiencies. Interviews confirmed that the operators will note the results of corrective actions if there is a repair identified as necessary and that records are retained. There were no examples of deficiencies found during inspections. The equipment appeared to be in good working order during the audit.

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

Summarize the basis for this Finding:

The Cheyenne Terminal was found to be in full compliance with ICMC Production Practice 2.1.

The facility has implemented procedures for transloading and shipping of cyanide, including appropriate PPE necessary to minimize worker exposure. Procedures are in place for normal operations, abnormal operations, emergency and maintenance-related activities.

The operation uses a Management of Change procedure to review proposed changes in documentation, facility design and operations that have the potential to impact facility performance. There were no changes reported for the re-certification period.

The operation holds monthly site safety meetings with employees to obtain worker input on safety issues and communicate safety information. Records of safety meetings are retained at the site.

The operation uses stationary cyanide monitoring devices in the transloading area which are calibrated quarterly. These monitors are set to alarm at 4.7 ppm and help protect against elevated

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HCN exposure potential for personnel involved in the transloading operation. In the event that the HCN monitors alarm at 4.7 ppm, employees are instructed to stop cyanide solution flow (if any), ventilate the area, and leave until the alarm is cleared. In the unlikely event that the alarm would sound at 10 ppm, the operators would stop cyanide activities, open the building doors, and leave the building immediately until the upset condition (release) is resolved.

In addition, procedures defining personal protective equipment requirements are in place and enforced at the terminal, including the requirement that PPE be decontaminated and remain the transload building.

PPE requirements for contractors and visitors to the transload area were clearly defined and communicated. Procedures ensure that at least two people work in the operation at all times and that radio contact between operators is maintained. There is also a requirement that someone be working in the office if operators are working in the transload building.

Employee health is evaluated prior to employment to ensure their fitness to perform their specified work tasks.

The facility has appropriate cyanide warning signs and PPE signs posted in operational areas. This was confirmed during the audit of the transload building. Cyanide warning signs are posted on the perimeter fence and appropriate signage is in place in the transload building indicating that eating, drinking, smoking, and open flames are prohibited. Management and Operators showed very good awareness of the restrictions and of the potential dangers of not adhering to those restrictions. Eating, smoking, and smoking are allowed in the office building.

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

The operation is in full compliance with Production Practice 2.2

Summarize the basis for this Finding:

The Cheyenne Terminal was found to be in full compliance with ICMC Production Practice 2.1.

The operation has an Emergency Response Plan (ERP) in place for rapid and effective response to cyanide exposure. Procedures are comprehensive and include procedural steps to be followed in the event of a cyanide-related emergency. The operation provides first aid to workers who are potentially exposed to cyanide and would use emergency response procedures to obtain further medical assistance in the event of an emergency. The facility has procedures in place to

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communicate an emergency situation to site personnel and local responders and to obtain transport for exposed workers to locally available qualified off-site medical facilities in the event of an emergency.

Shower / low-pressure eye wash stations and ABC powder fire extinguishers are appropriately placed in the transload building. The operation has the following in place: water, oxygen (with breathing mask) in both buildings, and Automated External Defibrillator (AED), and a resuscitator. The facility keeps two cyanokits in the office building in a temperature controlled office which would be provided to the paramedic at the time of arrival, in the event of an emergency. The cyanokits were in-date at the time of the audit. The ERP contains instructions for communicating an emergency to facility, emergency response, and regulatory personnel.

Emergency showers and eye wash stations are inspected daily. The facility inspects its other emergency equipment monthly and maintains records of these inspections. Emergency response equipment inspection records were sampled for the re-certification period and were found to be acceptable.

The facility has communicated with the local hospital to alert them of the possibility of cyanide victims at the facility. The operation conducts at least one emergency response drill per year and integrates learnings back into facility procedures as appropriate. Cyanide training and joint drills were conducted with emergency responders in 2018 and 2019. The 2020 emergency drill was a tabletop drill due to the pandemic situation. This was accepted by the audit team. The ERP requires that emergency plans be reviewed and updated as appropriate in accordance with actual emergency or drill critique recommendations. The operation has an incident investigation procedure for investigating, evaluating and reporting incidents, including cyanide exposure cases. There were no incidents or exposures during the re-certification period.

Cyanco sodium cyanide solution safety data sheets (SDSs) and first aid procedures are available to workers in the office building in English, the language of the workforce. SDSs are maintained in an SDS book. Operators and office personnel have ready access to the SDSs. This was confirmed during the audit through interview and observations.

The facility has markings in place alerting workers to equipment and piping that contains cyanide. Observations during the audit confirmed that the markings on process equipment indicate the direction of cyanide, water and air flow in pipes.

The operation has a decontamination procedure that requires all personnel to change out of their personal protective equipment (PPE) and work boots after performing the transload operation. All PPE must be decontaminated and is kept in the transload building. Contractors and visitors are not allowed in areas where there is a potential for cyanide exposure or contamination. In an abnormal operating condition if this situation were to occur, contractors and visitors would be required to

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decontaminate prior to leaving the transload building. This policy was confirmed through interviews. Operators demonstrated the proper donning of PPE and good awareness of requirements.

The operation provides first aid to workers who are potentially exposed to cyanide and would use emergency response procedures to obtain further medical assistance in the event of an emergency. Procedures are in place to obtain transport for exposed workers to locally available qualified off site medical facilities in the event of an emergency. The operation has communicated with the local medical facility to confirm their capability for treating a potential cyanide exposure victim. Records of Cyanide Safety Awareness Training conducted with members of the hospital staff were available for review during the audit. Additionally, fire department and emergency responders also participated in man-down drills in 2018 and 2019. Records were found to be complete.

The Emergency Response Plan (ERP) calls for at least one emergency exposure drill per year. An emergency drill of the site's ability to respond to a cyanide exposure scenario was conducted in 2018, 2019, and 2020. The 2020 drill was a tabletop drill due to the pandemic. Lessons learned from the emergency drills are considered when updating the ERP and emergency procedures. According to the ERP, emergency plans should be reviewed and updated after any emergency or recommendations following an emergency response drill.

The operation has an incident investigation procedure for in place investigating, evaluating and reporting incidents, including cyanide exposure cases. There were no incidents and/or exposures during the re-certification period. Procedures for investigating and evaluating exposure incidents appear to be appropriate for ensuring facility programs protect worker health and safety.

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

Summarize the basis for this Finding:

The Cheyenne Terminal was found to be in full compliance with ICMC Production Practice 3.1.

Indoor air cyanide concentrations are monitored using stationary HCN detectors that are set to alarm at 4.7 ppm. The operation's transloading operation is designed and operated to limit atmospheric process emissions of hydrogen cyanide gas such that the health of workers and the community are protected. The audit team found that the operation conducts monitoring at

frequencies adequate to characterize the medium being monitored and to identify changes in a timely manner.

The facility does not have direct or indirect discharges to surface water. There are no surface water bodies near the facility. Operations are compliant with ICMC requirements and its operations do not impact groundwater due to topographical conditions in the area. According to the Groundwater Atlas of Wyoming compiled by the Wyoming State Geological Survey, groundwater wells near this location are 8,500 feet below the surface. Also, there are no cyanide-related activities conducted outside at this operation. No groundwater monitoring is done, this was accepted by the audit team.

In the unlikely event of a release of cyanide to the environment in the future, the operation has procedures in place for engaging the appropriate resources to ensure that remediation needs are fulfilled.

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

Summarize the basis for this Finding:

The Cheyenne Terminal was found to be in full compliance with ICMC Production Practice 4.1.

The operation has provided training to all personnel on the Emergency Response Plan to ensure that they understand the hazards of cyanide and how to properly respond to an incident. Site personnel receive training regarding the use, storage and cleaning of the personal protective equipment (PPE) required by each activity or task.

The operation also trains its workers in the operational procedures needed to perform their normal tasks with minimum risk to worker health and safety and in a manner that prevents unplanned cyanide releases. Training is provided initially to personnel who work with cyanide and is refreshed annually. Training records were available for the re-certification period to demonstrate that all employees have received training before working with cyanide.



Operational Standard Operating Procedures (SOPs) are in place. The facility uses the SOPs to supplement cyanide awareness training materials. The training elements necessary for each job are identified in the training materials. A review of the SOP training records, including test results, was found to be complete for employees who work with cyanide.

The facility provides testing for all critical training topics such as transload procedures, ERP, cyanide safety training, and lock-out/tag out. Testing results are maintained with training records. A training plan was provided for review.

Confirmation was made that the individuals who are involved in the development and delivery of training are highly qualified and capable of providing safety and operations training. Individuals providing the training have many years of cyanide operational, safety, and health experience. Training materials are developed by Environmental, Health, and Safety professionals from Cyanco.

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

The operation is in full compliance with Production Practice 4.2

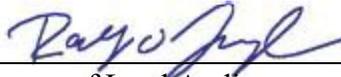
Summarize the basis for this Finding:

The Cheyenne Terminal was found to be in full compliance with ICMC Production Practice 4.2.

The operation trains all personnel on its Emergency Response Plan. The ERP provides details on what is to be done if a cyanide release is discovered. The operation conducts drills at least annually to evaluate general response to chemical emergencies, including cyanide exposure. Records of the 2018, 2019, and 2020 drills, including the after-action report/critique, were evaluated during the audit, and deemed acceptable. Evaluation of training needs / employee performance is part of the drill critique process and is incorporated into the identification of corrective actions and improvement opportunities.

Training records are maintained electronically and in paper format at the facility and observed records were found to be conformant with ICMI requirements. The operation keeps training records for at least as long as the employee is working at the site.

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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

Summarize the basis for this Finding:

The Cheyenne Terminal was found to be in full compliance with ICMC Production Practice 5.1.

The operation has an Emergency Response Plan (ERP) in place that considers the potential failure scenarios appropriate for its site-specific environmental and operating circumstances. The scenarios addressed in the ERP appear to be appropriate for the operation. The ERP document was last updated in 2020.

The ERP includes a list of telephone numbers and the notification procedure to be followed in the event of an emergency. The plan describes first aid measures to be taken in the event of cyanide exposure. The instructions on how to use the cyanide antidote would be given to a responding paramedic in the event of a cyanide exposure. An evacuation procedure for site personnel in the event of an emergency is included in the ERP. The facility has no immediate residential or industrial neighbors.

The ERP calls for the control of releases at their source and provides information on the use of the emergency stop buttons in the transload building. The plan describes the necessary actions to take for release containment, assessment, mitigation and prevention. Cyanide remediation is addressed in the plan and contact information for an environmental services company is included.



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

The operation is in full compliance with Production Practice 5.2

Summarize the basis for this Finding:

The Cheyenne Terminal was found to be in full compliance with ICMC Production Practice 5.2.

The operation engages its stakeholders on a regular basis to ensure that its emergency plans remain current and address changing conditions. The operation involves its workforce and external responders (including paramedics who might need to administer an antidote) in the emergency response planning and drill processes. The facility has held meetings with local stakeholders including individuals from the county, city, hospital, and appropriate emergency services organizations. The operation conducted joint drills in 2018 and 2019 with facility employees and emergency response organizations. The operation has also coordinated with the Local Emergency Planning Committee on a regular basis.

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

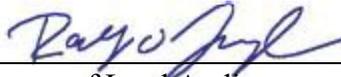
Summarize the basis for this Finding:

The Cheyenne Terminal was found to be in full compliance with ICMC Production Practice 5.3.

The operation's ERP designates primary and alternate emergency response coordinators with explicit authorities and responsibilities. The operation does not have its own emergency responders, but rather coordinates with external responders, Cyanco corporate, and its emergency response / remediation contractors. Operators are trained to stop operations and evacuate the transload building in the event of a release.

All facility personnel have been trained on the ERP. The ERP includes 24-hour telephone numbers for the terminal managers, local emergency response agencies, and Cyanco personnel including leadership. The responsibilities, authorities, and duties for managing an emergency situation are clearly described in the plan.

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The ERP includes a list of emergency response equipment that will be maintained by the site. The emergency response equipment is inspected monthly by site personnel and records for the re-certification period were available to demonstrate this practice.

The role of outside responders is explained in the ERP. The operation has communicated with outside entities included in the plan to ensure they are aware of their roles in emergency response. External responders were included in the 2018 and 2019 emergency response drills. Interactions with external responders were found to be appropriate for the operation.

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

Summarize the basis for this Finding:

The Cheyenne Terminal was found to be in full compliance with ICMC Production Practice 5.4.

There are no residential communities near the facility. The ERP includes up-to-date telephone numbers for the hospital, local emergency agencies, and Cyanco emergency contacts. The plan includes emergency communication responsibilities for the notification of all stakeholders, Cyanco and TransWood personnel, authorities, external responders, and the media, as warranted.

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

Summarize the basis for this Finding:

The Cheyenne Terminal was found to be in full compliance with ICMC Production Practice 5.5.

The operation's ERP describes specific, appropriate remediation measures, such as recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris, and provision of an alternate drinking water supply, as appropriate. The ERP includes contact information for an environmental services company.

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Chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide are prohibited from being used to treat cyanide that has been released into surface water. The facility does not have direct or indirect discharge to surface water and there are no surface water bodies near the facility.

The ERP indicates that Cyanco, along with regulatory authorities and the environmental services firm, will determine the required environmental monitoring in the event of a release requiring monitoring and/or remediation. The ERP includes contact information for an environmental services company.

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

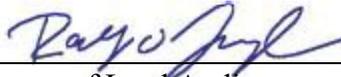
The operation is in full compliance with Production Practice 5.6

Summarize the basis for this Finding:

The Cheyenne Terminal was found to be in full compliance with ICMC Production Practice 5.6.

Emergency plans are reviewed at least once a year and an emergency cyanide spill with worker exposure drill is performed at least once a year. The ERP was updated in May 2020 and all employees have received training on the plan. Emergency response drills were held in 2018, 2019, and 2020. The 2018 and 2019 drills were conducted jointly with local emergency response organizations. The ERP requires that emergency plans be reviewed and updated after an actual emergency or emergency response drill. Drill and incident critiques and after-action reports serve as the method for evaluating the ERP effectiveness. Records were available to demonstrate full implementation.

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