

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

**Intermodal Cartage Co., Inc.
Memphis, Tennessee - USA**

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

2013 Audit Cycle





Company Information:

Name of Operation:	Intermodal Cartago Co., Inc. 5707 East Holmes Road Memphis, TN 38141-8206
Name and contact information for IMCG Contact:	Daphne Hall Director of Safety & Compliance Services - ILS dhall@iils.com Phone: (901) 746-1636

Location detail and description of operation:

Intermodal Cartage Company, Inc. (IMCG) has been an established trucking operation in Memphis, TN since 1982. The company has thirteen locations in the Midwest and Southern part of the USA. The company has been transporting solid sodium cyanide for DuPont from the DuPont Memphis Plant and the associated LSI packaging facility to nearby rail heads in Memphis, Tennessee and Marion, Arkansas since October 2006. Local shipments to rail heads and ocean ports were evaluated as part of this audit.

The operation was originally audited and was found to be in full compliance to the ICMI Cyanide Code in 2010. Solid sodium cyanide is packed into intermodal containers or ISO tanks by DuPont personnel at the DuPont Memphis Plant and Lemm Services, Inc. (LSI) personnel at the adjacent LSI packaging terminal. Cyanide shipments are dispatched by DuPont personnel at the DuPont Plant and by an Intermodal Cartage employee who is a resident contractor at the LSI packaging facility.

IMCG is affiliated with a number of companies operating from the same industrial complex including Inland Intermodal Logistics Services (ILS) and River City Capital Leasing, LLC. ILS provides safety and risk management services to IMCG and preventive maintenance is performed by River City Capital Leasing, LLC. Personnel from IMCG, ILS, and River City Capital Leasing were audited during this certification audit.

IMCG and its sister companies are responsible for route determination, shipment tracking, truck inspections, preventive maintenance, training, safety program management, and emergency response planning. All of these operations were reviewed during the certification audit. The ICMI-approved

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Nicole Jung
Lead Auditor

December 17, 2013
Date

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Transportation Auditor verified that IMCG operations are in FULL COMPLIANCE with Cyanide Code requirements for transporters.

Auditor's Finding

This operation is in FULL COMPLIANCE with the International Cyanide Management Code.

This operation has not experienced any significant cyanide incidents, releases, exposures since the previous ICMI Cyanide Code audit in 2010. The operation was found to have been in compliance with the ICMI Cyanide Code since the previous certification audit.

Audit Company:	MSS Code Certification Service, a Division of Management System Solutions®, Inc. www.mss-team.com
Auditor:	Nicole Jurczyk E-mail: CodeAudits@mss-team.com
Date(s) of Audit:	September 18-19, 2013

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International 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 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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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
 in substantial compliance with Transport Practice 1.1
 not in compliance with

Summarize the basis for this Finding:

Intermodal Cartage (IMCG) uses a documented route selection method that takes into account population density, infrastructure, pitch & grade, proximity to water bodies, and prevalence and likelihood of poor weather and resulting poor driving conditions. The “Local Cyanide Route Selection” and “Over-the-Road Cyanide Route Selection” procedures detail the considerations that need to be made, the process for review and driver feedback, and the final approval process. Records were available to show that documented procedures are followed.

Most Cyanide shipments made by IMCG are short and consist of movement of material from the DuPont Plant or packaging facility (LSI) to rail heads in the area. Risks such as traffic congestion, dangerous turns, and poor road conditions were considered during the development of the routes. Several roads were excluded from the route selection process due to poor road or bridge infrastructure. This was done in order to mitigate avoidable risks. According to procedure, routes are reviewed at least annually. Records were available to confirm that local routes have been reviewed on a regular basis and that driver feedback is evaluated. Occasionally over-the-road (OTR) shipments to ocean ports need to be made. IMCG maintains a procedure that requires route evaluation and approval prior to scheduling the delivery. Evidence was available that all routes driven since the previous certification audit were evaluated, found acceptable, and had gone through an approval process.

No special security concerns exist on the designated routes. Drivers only need to follow the pre-determined routes and avoid unnecessary stops. Containers are sealed prior to shipment. Interviews and records confirmed that processes are in place to ensure the security of the load from the point of loading until the point of discharge.

Records were available to show that IMCG contacted the Memphis City Fire Department to discuss emergency planning for the routes traveled. Community input regarding the transport of cyanide is gathered through the use of routing software that indicates whether communities have

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restricted use of specific roadways for the transportation of hazardous materials. IMCG is a registered hazardous materials transporter through the U.S. DOT Pipelines and Hazardous Material Safety Administration (PHMSA). As such, fees paid by the company are partially allocated to the training of a national emergency response network. IMCG also works together with its customers to ensure that emergency responder roles are understood.

All approved cyanide drivers had been trained on the documented routes. Interviews confirmed that drivers adhere to designated routes and request authorization prior to deviating from established routes. IMCG uses only company drivers to transport cyanide loads. The ICMI Cyanide Code requirements regarding the use of subcontractors are not applicable to this transportation operation.

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
in substantial compliance with Transport Practice 1.2
not in compliance with

Summarize the basis for this Finding:

IMCG uses only trained, qualified and licensed drivers. Record reviews and interviews were used to confirm that all personnel operating cyanide transport equipment are appropriately qualified and have been trained sufficiently to enable them to perform their jobs safely and appropriately. Yard handling of containers is done by trained and certified operators who have received cyanide safety training.

Training records were very well organized and available for each of the drivers who are authorized for transporting cyanide. Complete training, qualification, and medical records are maintained for Drivers. Training records showed that drivers had been trained on the hazards of cyanide, established routes, pre-trip inspection procedures, and emergency notification procedures. Cyanide Safety training is given to drivers annually. Records were available to show that each driver had most recently received this training in 2013.

Records for all drivers and operations personnel are maintained centrally in a Cyanide Transportation Training Record Book. A sample of drivers' licenses were reviewed and showed

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chassis and that the chassis is properly secured to the tractor. Appropriate placards are displayed on all four sides of the equipment. This is also confirmed during the pre-trip inspection. Equipment markings were found to be adequate and conformant during the audit.

IMCG maintains documented procedures that address pre-trip inspections, preventive maintenance, limitations on driver hours, and the drug and alcohol abuse prevention program. Records from pre-trip inspections were sampled and were found to be complete. Preventive maintenance is contracted out to an IMCG sister company by the name of River City Capital Leasing, LLC. The maintenance shop is located at the same facility as IMCG and the two companies share the same Senior Leadership. A complete preventive maintenance service is performed per manufacturer recommendations. Annual inspections are also conducted per United States Department of Transportation requirements. Computer system controls are in place to prevent the dispatch of equipment for which critical inspection and/or preventive maintenance tasks have not been done. Equipment preventive maintenance files were reviewed and were found to be acceptable.

The Safety Program includes limitations on drivers' hours in accordance with U.S. Federal Motor Carrier Safety Regulations (FMCSR). Drivers and dispatchers were very aware of the requirements, (i.e., number of driving hours, on duty hours, rest, etc). ICMG drivers maintain electronic logs which are monitored to ensure compliance with driver Hours of Service regulations. Records were available to demonstrate compliance with requirements. The majority of shipments are short distance shipments that occur during day-time hours.

Interviews with drivers and dispatchers confirmed that they can modify or cancel a shipment if driving conditions are considered to be unsafe. Any significant changes to the route or a suspension of the delivery are discussed with management as necessary.

A drug abuse prevention program is part of the company's overall safety compliance program. Drivers are randomly required to undergo drug and alcohol random sampling on a regular basis.

Records demonstrating compliance with all ICMI Cyanide Code safety program requirements were well organized and readily available for review during the audit.

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

Transport Practice 3.1: *Prepare detailed emergency response plans for potential cyanide releases.*

The operation is in full compliance with
in substantial compliance with Transport Practice 3.1
not in compliance with

Summarize the basis for this Finding:

IMCG has documented cyanide emergency response plans (ERPs) for local deliveries and over-the-road shipments to ocean ports that address all of the ICMI Cyanide Code requirements for the transportation of cyanide. The plans were reviewed and were found to be acceptable. IMCG drivers are to secure the scene and make a number of notifications.

The document entitled “Vehicle Accident Procedures and Reporting for Drivers” lists out the notification telephone numbers and the roles of external responders such as the contracted emergency response company HazMat One. The emergency planning documents identify the roles of local responders (fire and police). As a registered U.S. Department of transportation (DOT) Pipelines and Hazardous Material Safety Administration (PHMSA) hazardous materials transporter, IMCG also relies on the national network of trained emergency responders from the communities through which they travel.

Drivers have the emergency response sheets, emergency telephone numbers, and the MSDS with them during all deliveries. IMCG only transports cyanide via truck and all scenarios considered in the plan were related to truck accidents or small cyanide spills from packaging. Solid sodium cyanide (the only physical form transported), roadway infrastructure differences, and the roles of the different emergency responders are discussed in the plan.

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