ICMC SUMMARY AUDIT REPORT
ORICA MINING CHEMICALS BAG TO BULK TRANSFER FACILITY, VENTANILLA, PERU
2018

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INFORMATION ON THE AUDITED OPERATION

| Company / Client: | Orica Mining Chemicals  
| Bag to Bulk Transfer Facility, Ventanilla, Peru |
| Street: | Av. Dionisio Derteano 144, P.20, San Isidro |
| City / State | Lima, Peru |
| Company Contact: | Luis Villegas  
| Cyanide Operations Team Lead  
| Office +51 217 - 6000 | Mobile +51 993 517 625 | Email: Luis.villegas@orica.com |
| Type of Audit: | ICMI Cyanide Code 3rd Party Recertification Audit |
| Standard | ICMI Cyanide Code: Cyanide Production Verification Protocol |
| Audit Dates: | March 12, 13, 2018 |
| ICMI Approved Lead and Technical Auditor: | Bruno Pizzorni  
| Mobile: +51 947 259 440 | Email: bpizzorni73@gmail.com |
| Scope: | Transloading operations at the Box to Sparge Ventanilla Transfer Facility |

LOCATION DETAIL AND DESCRIPTION OF OPERATION:

Orica is a global leader in the manufacture and distribution of sodium cyanide to the mining industry. It’s manufacturing facility in Yarwun, Queensland, supplies sodium cyanide to key mining regions in Latin America, Africa and Oceania.

Orica Mining Services Peru S.A. operates their Ventanilla Box to Sparge transfer facility located at Callao, Perú.

The facility manages cyanide briquettes packed in double bags, one of polyethylene and the other of polypropylene of 1,135 kilograms that are contained in wooden box which arrive to Callao port in 20' containers with 20 boxes each.

The containers after the import process are transported by land to the warehouse (own or with a third company). After arrival at warehouses, the container is sent according to need and / or request to the transfer plant.

Once the vehicle transports the container up to the transfer plant, the container is removed from the vehicle by a Reach Stacker of 40 tons capacity. From this location the sodium cyanide is distributed by Orica in isotanks to the mine client.

The isotanks of the Sparge system will be charged with the sodium cyanide contained in the boxes through the transfer plant. Each isotank will transport up to 22.7 tons of sodium cyanide by transport terrestrial on the road.

Orica Mining Services  
Bag to Bulk Transfer Facility, Ventanilla  

6/11/2018
Orica’s transfer facility in Callao, Peru was constructed to supply mine site customers in Peru with cyanide transported within sparge isotanks. The transfer facility comprises a purpose-built structure that houses material handling equipment and there are associated facilities (a partly open warehouse protecting sea containers containing boxed cyanide, change rooms, equipment storage, office, ablutions, guard house and yard area) located within the Neptunia S.A container warehouse at Callao.

The transfer facility was constructed in 2007 and commissioned with the first isotank batch transfer completed on 6 June 2007.
**Auditor’s Finding**

The Orica Mining Chemicals Bag to Bulk Transfer Facility is:

- [x] in full compliance
- [ ] in substantial compliance
- [ ] not in compliance

with the ICMC requirements of the International Cyanide Management Code.

The operations included in this audit have not experienced any significant cyanide incidents, releases, or exposures since the production facility was originally certified in 2015. The operations were found to have been in compliance with the ICMI Cyanide Code since the previous ICMC certification in 2015.

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<tr>
<th>Audit Company:</th>
<th>Bruno Pizzorni</th>
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<tr>
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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 Certification Auditors.

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

Orica Mining Services  
Bag to Bulk Transfer Facility, Ventanilla  
Name of Cyanide Producer  Signature of Lead Auditor  Date  
Orica Mining Services  
Bag to Bulk Transfer Facility, Ventanilla  6/11/2018
PRODUCTION PROTOCOL RESULTS

Principle 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.

☑ in full compliance with
☐ in substantial compliance with Production Practice 1.1
☐ not in compliance with

Summarize the basis for this Finding:

Although no new installations have been built since last recertification audit, quality assurance and quality control records have been retained for the structures that were assembled locally within Peru. Appropriately qualified personnel reviewed facility construction and provided documentation that the facility has been built as proposed and approved.

The materials used for construction of cyanide production facilities are compatible with the reagents used and the processes employed. Stainless steel is used for process equipment that meets cyanides during box to bulk transfer operations, isotanks are constructed in carbon steel, the area around where cyanides are transferred is sealed with concrete in good condition.

Automatic systems, or “interlocks”, to shut down production systems and prevent releases due to power outages or equipment failures are not required due to safety features designed into the transfer facility. The powered systems associated with the materials handling systems are configured to “stay put” as a safe mode if power fails.

Cyanide is managed on a concrete surface that can minimize seepage to the subsurface. The entire work area has concrete pavement, approximately 200 m² which is good conditions.

The facility employs methods to prevent the overfilling of cyanide process and storage vessels. Several transfer operations were observed during the audit. It was observed that the access hatch to the isotank was opened, the operator inspects the interior of the isotank to verify the volume of liquids or solids remaining so that operators can readily see whether the transfer hopper has sufficient capacity to hold a bag of cyanides before introducing it to the hopper for discharge.

Secondary containments are provided for process and storage tanks and containers constructed of materials that provide a competent barrier to leakage, and which are sized to hold a volume greater than that of the largest tank or container within the containment and any piping draining back to the tank. The isotank loading bay is a
secondary containment. It is sealed with concrete and curbs to increase its effectiveness in containing any cyanides spilled during filling.

Spill containment measures are provided for all cyanide solution pipelines. All cyanide solution pipelines are located within the paved and indoors area of the transfer facility. Any water contaminated with cyanide is drained into a containment pit, a suction pump is used to remove the liquid from the pit to a storage tank.

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

- [x] in full compliance with
- [ ] in substantial compliance with
- [ ] not in compliance with

**Summarize the basis for this Finding:**

The transfer facility has procedures that describe the standard practices necessary for its safe and environmentally sound operation. These procedures address such matters as process description, the use of personal protective equipment and cyanide test kits, pre-transfer inspection and other preparations by the operating team and detailed instruction for the transfer operation.

For contingencies during upsets in its activities that may result in cyanide exposures or releases, Orica has a procedure with instructions covering scenarios outside normal operational control that increase the risk of cyanide exposures or releases.

The transfer facility is managed subject to a procedure to identify when site operating practices have or will be changed from those on which the initial design and operating practices were predicated. The operation has a corporate database that allows to register and control any changes to operating practices regarding the original design. It is a system to which all employees have access and different areas (those required depending on the case) approve the change after evaluating them through a series of questions that include health, safety and environmental considerations.

Preventive maintenance programs are implemented, and activities documented, for equipment and devices necessary for cyanide production and handling. Periodic inspections are undertaken by facility personnel under the supervision of the facility Supervisor.

Process parameters are monitored with portable hydrogen cyanide (HCN) gas monitors, which area calibrated every 6 months according to the manufacturer's specifications and stated in the Maintenance Plan.

The transfer facility has an environmentally sound procedure to prevent unauthorized/unregulated discharge to the environment of any cyanide solution or cyanide-contaminated water that is collected in a secondary containment area. All water collected in the transfer facility secondary containment is pumped into a one cubic meter tank where it is temporarily stored prior to being pumped into the sparge isotank as part of the sparge isotank filling process.
The facility has an environmentally sound procedure for disposal of cyanide or cyanide-contaminated solids. The Waste Management Plan details that cyanide packing and all hazardous solid wastes including the used bags, personal protective equipment (PPE) and other contaminated waste arising from housekeeping (cleaning cloths and sweepings) are to be placed in used cyanide boxes (sealed when full) pending disposal by the licensed contractor.

The storage of cyanide at the transfer facility has adequate ventilation to prevent the build-up of hydrogen cyanide gas. The covered area has natural ventilation. The opening of shipping containers is subject to a procedure requiring ventilation and atmospheric testing prior to entry.

Cyanide is stored with measures to avoid or minimize the potential for exposure of cyanide to moisture. Shipping containers by their design provide for material to be stored on a platform elevated above ground level and under cover. This is a secure area where public access is prohibited.

There are procedural arrangements to ensure that the cyanide supplied by Orica in Peru is packaged as required by the political jurisdictions through which loads will pass. Placards and other signage is used to identify the shipment being dispatched from the transfer facility as cyanide, as required by national and international regulations or standards.

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

☑ in full compliance with

The operation is ☐ in substantial compliance with ☐ not in compliance with Production Practice 1.3

**Summarize the basis for this Finding:**

The transfer facility conducts routine inspections of tanks, valves, pipelines, containments and other cyanide production and storage facilities noted in this question. The major plant items that require inspection are those used in the handling of solid sodium cyanide from boxes through the transfer system to the isotanks.

Inspection frequencies are sufficient to assure that equipment is functioning within design parameters. The checklists document inspections that occur batch-wise, weekly and fortnightly.

Inspections are documented. In each case, the date of the inspection was noted, and the inspector was identified. The checklists incorporate a table detailing identified corrective actions, the status of the corrective actions and the review of the status of the corrective actions raised by previous inspections.
Principle 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.

☑ in full compliance with

The operation is □ in substantial compliance with Production Practice 2.1
□ not in compliance with

Summarize the basis for this Finding:

The site has developed formal procedures to minimize worker exposure during normal plant operations, non-routine and emergency operations; and maintenance related activities. The procedures in use confirm that they describe safe practices, and the level of detail contained in the procedures is commensurate with the risks involved with the task.

The transfer facility is managed subject to a procedure to identify when site operating practices have or will be changed from those on which the initial design and operating practices were predicated. The operation has a corporate database that allows to register and control any changes to operating practices regarding the original design. It is a system to which all employees have access and different areas (those required depending on the case) approve the change after evaluating them through a series of questions that include health, safety and environmental considerations.

The operation solicits worker input in developing and evaluating health and safety procedures. There is an established dialogue between the Cyanide Operations Team Lead, the supervisor and workers. The site has also established a suggestions box for employees to make comments on any issue including health and safety procedures.

The facility uses monitoring devices to confirm that controls are adequate to limit worker exposure to HCN gas to 4.7 parts per million (ppm) or less, as cyanide. In case of detecting HCN levels higher than 4.7 ppm, the Plant’s Operational Contingency Plan states to evacuate personnel who are near the danger zone. Tasks may include forklift operations during the transfer of cyanide boxes from the shipping container, the transfer operations from the storage containers to the lifting position, isotank hatch opening and closing, opening boxes at the lifting position, splitting and discharging bags through the transfer hopper and waste bag storage and handling operations.

HCN monitoring equipment is maintained, tested and calibrated in a manner consistent with the directions of the manufacturer. The facility calibrates their HCN monitors according to the Annual Plan in which is established the facility manager send the instruments every six months to calibration.

The transfer facility has identified areas and activities where workers may be exposed to HCN gas or sodium cyanide dust and requires the use of personal protective equipment as necessary in these areas when these activities are being performed. The
areas identified include the transfer facility, waste cyanide bag storage area and
warehouse areas where cyanide boxes are transferred in and out of shipping containers.
There are provisions to ensure that a buddy system is used, or workers can otherwise
notify or communicate with other personnel for assistance, help or aid where deemed
necessary. The arrangements consist of one pair of employees on the lower level
preparing bags for transfer, one employee on the upper level controlling the transfer,
one supervisor and a security guard who is responsible for ensuring that unauthorized
personnel do not gain access to the facility during a transfer.

The transfer facility does assess the health of employees to determine their fitness to
perform their specified tasks prior to commencing employment. The health assessment
process of all transfer facility workers is tracked in a matrix that indicates the date and
provides evidence that the medical exams where carried out on transfer facility workers.

The operation has a clothing change procedure for employees, contractors and visitors
to areas with the potential for cyanide contamination of clothing. The procedure
requires once the operators have completely completed the operation to fill isotanks in
the corresponding shift, the disposable suits, considered contaminated, should be
removed and placed in the container at the Waste Storage zone.

Warning signs advising workers that cyanide is present and that, if necessary, suitable
PPE must be worn, are located around the site. The operation has demarcated the area
with a blue line. PPE requirements to enter areas within the blue line are clearly
identified through use of signage, Standard Operating Procedures, and training, among
others.

Personnel are prohibited from smoking, eating and drinking, and having open flames in
some areas where there is the potential for cyanide contamination. Signs are displayed
at the entrances to the transfer facility building that prohibit open flames, eating and
drinking.

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

☑ in full compliance with
☐ in substantial compliance with Production Practice 2.2
☐ not in compliance with

Summarize the basis for this Finding:
The facility has developed a Contingency Plan to respond to cyanide exposures
developed specifically for the transfer facility.

Showers, low-pressure eye wash stations and non-acidic fire extinguishers are located
strategically throughout the transfer facility. Dry powder fire extinguishers were
observed throughout the transfer facility. No carbon dioxide fire extinguishers were
observed. All the equipment is subject of regular maintenance, inspection and testing.

Water, oxygen, antidote, resuscitator and means of communication are readily available
for use in the plant. Items include: a medical oxygen cylinder, antidote kit containing
sodium nitrite, sodium thiosulfate and amyl nitrite, an automatic defibrillator (resuscitator), a designated water supply tank and pump and mobile telephones.

The transfer facility Supervisor inspects its first aid equipment to assure that it is available when needed. Inspections require the Supervisor to check the water pressure, blockages and leaks for the eye washes and showers, to check the oxygen cylinder equipment, antidote kit contents and first aid equipment. The Supervisor maintains a list of first-aid and emergency response equipment to ensure is tested and to track their expiry dates.

Safety Data Sheets (SDS) and first aid procedures on cyanide safety are in Spanish, the language of the workforce and are available to workers in the transfer facility. All procedures including the SDS are in a file in the transfer facility office and all employees at the transfer facility have access to the file.

Storage tanks, containers and piping containing cyanide are identified to alert workers of their contents and the direction of flow. Shipping containers packed with intermediate bulk container (IBC) cyanide boxes and sparge isotanks delivered for transfer operations are clearly labelled as to their contents through emergency information panels. Containers used for the storage of IBCs at the Transfer Facility prior to transfer and containers used to store waste bags and liners and used personal protective equipment (within used IBCs) are also clearly identified to alert workers of their contents.

The facility has a decontamination procedure for employees, contractors and visitors leaving areas with the potential for skin exposure to cyanide. All visitors and transfer facility workers receive an induction detailing information about the danger of cyanide, risks at the Plant and safety information in general including cyanide exposure procedures.

The transfer facility has on-site capability to provide first aid assistance to workers exposed to cyanide. An external training provider trains the workforce, including in the administration of amyl nitrite and oxygen. The operation has developed a training matrix identifying necessary training for specific positions, scheduling the identified training and tracking the implementation of the training.

The facility has developed a procedure to transport exposed workers to locally available qualified, off-site medical facilities. In the event of any cyanide exposure the Contingency Plan is initiated and requires the first person on the scene to notify the Plant Supervisor and appropriate emergency aid entities for response. In the event of cyanide exposure an ambulance will be dispatched.

The transfer facility has alerted local hospitals of the potential need to treat patients for cyanide exposure. The notification has been conducted through letters and meetings. The transfer facility has issued the hospitals with instructions on how to administer sodium cyanide antidotes.

The operation is confident that alerted local hospitals have adequate, qualified staff, equipment and expertise to respond to cyanide exposures.

Mock emergency drills are conducted periodically to test response procedures for various exposure scenarios. The Contingency Plan requires each simulation drill to be
evaluated and a report produced, including a photographic record, chronological record, and final recommendations. Records of the drills were reviewed. The recommendations have been documented in the debrief reports and responsible persons have been assigned to close out the required actions.

Procedures are in place to investigate and evaluate cyanide exposure incidents to determine if the transfer facility’s programs and procedures to protect worker health and safety and to respond to cyanide exposures are adequate or need to be revised. The facility has an Incident Reporting procedure and Preventative and Corrective Actions procedure. The procedure require all incidents to be reported to Orica’s Off-Site Facilities Manager for investigation and corrective action using the Orica incident reporting and investigation procedure.
**Principle 3 – Monitoring:**

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

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

- [x] in full compliance with Production Practice 3.1
- [ ] in substantial compliance with Production Practice 3.1
- [ ] not in compliance with Production Practice 3.1

**Summarize the basis for this Finding:**

The transfer facility is located along the Callao coastal strip of the Pacific Ocean. The facility does not have a direct discharge to the ocean, is a dry process. Waste liquid from draining residual liquor contained in isotanks (5 liter approx.) is transferred to a 1000-liter tank. Liquid is pumped back into the isotank being filled after the solid cyanide transfer operation has been completed. The isotank containing cyanide and the waste liquid is then transported to the mine site. Negligible storm water is generated from the transfer facility and it is not discharged off-site. The site has a continuous cover of bitumen and cement.

The facility does not have an indirect discharge to surface water. Seepage is unlikely to be generated from the transfer facility because: is a dry process and does not directly generate waste process solutions, the site has a continuous cover with asphalt and concrete – all in good condition, and the facility is sheltered from the elements and the site experiences an extremely low rainfall.

The plant has a transfer hopper which is a closed space consisting of doors with automatic closing system, designed to receive and discharge the sodium cyanide from polypropylene bags to the isotanks. The transfer hopper has negative internal pressure, generated by a fan that controls emissions of cyanide particles to the environment.

Monitoring is conducted at frequencies adequate to characterize the medium being monitored. Orica engages a consultant to undertake biannual ambient air quality monitoring at four locations surrounding the transfer facility. The monitoring program is documented, and results are compiled and reported periodically.
Principle 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.

☑ in full compliance with
The operation is ☐ in substantial compliance with ☐ not in compliance with Production Practice 4.1

Summarize the basis for this Finding:
The facility provides training to its workers to understand the hazards of cyanide and refresher training is periodically conducted. Instruction material deals with risks of cyanide, poisoning symptoms, alert and first aids, medical treatment, investigation of facility failures, cyanide emergencies and cyanide recognition. The procedures to follow in the event of exposure are set out.
The transfer facility trains workers in the use of PPE and when and where this equipment is required. PPE training materials introduce the items of personal protective equipment used at the transfer facility under all circumstances and in all locations. Practical training in the correct use of PPE is covered as part of pre-transfer meetings. The facility Supervisor monitors the operators for the correct use and condition of PPE before every cyanide transfer operation.
The transfer facility trains workers to perform their normal production tasks with minimum risk to worker health and safety and in a manner that prevents unplanned cyanide releases. The operators are trained on the transfer facility as soon as they are integrated to the operation.
The training elements necessary for each job are identified in the Standard Operating Procedures (SOPs). The transfer facility Main Items and Key Facts identifies training required for transfer operators and drivers. The matrix details the training elements covered, the level of training, the date of the training, the people trained, and the supporting evidence of the training performed.
Appropriately qualified personnel provide the training. The Plant Supervisor gives training to the transfer facility operators. He has extensive experience in gold mining operations. Recognized Peruvian training and services companies specialized in firefighting and safety consulting, also provides training services to the workers.
Employees are trained prior to being allowed to work with cyanide. The procedures states that the transfer facility is not able to be used until all operators have been trained in the task that they are conducting.
The transfer facility evaluates the effectiveness of cyanide training by testing. Evaluation quizzes are used to evaluate the effectiveness of Cyanide Awareness Training.
questioning and on the job observation by the facility Supervisor are the means of assessment for work procedures.

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

☑ in full compliance with

☐ in substantial compliance with Production Practice 4.2

☐ not in compliance with

*Summarize the basis for this Finding:*

Orica trains transfer facility workers in the procedures to be followed if a cyanide release is discovered. The Contingency Plan notes all Cyanide transfer facility personnel are to be trained how to recognize an emergency, notify the emergency response team and practice in implementing the Contingency Plan. The facility has a training matrix for the Contingency Plan.

The facility trains their workers to respond to exposure to cyanide and drills are performed to test and improve their response skills. The Contingency Plan requires simulation drills in the implementation of the Operational Contingency Plan to be carried out to test the procedures, equipment, and resources described in the Contingency Plan, and to train personnel in emergency responses. Drills are planned to be conducted periodically, records are retained.

Emergency drills are evaluated from a training aspect. The Contingency Plan requires drills to be conducted periodically covering low level emergencies, medium scale and full emergency response drills. The auditor reviewed mock drills briefing notes simulating an earthquake with tsunami, fire, explosion, cyanide leak and cyanide poisoning first aids drill and several recommendations developed.

Training records are retained throughout an individual’s employment documenting the training they have received, including the names of the employee and the trainer, the date of training, the topics covered. A training database identifies all training elements relevant to the facility, including assessment records for individual participants, demonstrating how their knowledge was assessed. Training files retained for Orica-specific training include original assessment records for individual participants, demonstrating how their knowledge was assessed and details of their assessments. Copies of certificates issued to employees are also retained in the record keeping system.
Principle 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.

☑ in full compliance with

The operation is ☐ in substantial compliance with ☐ not in compliance with Production Practice 5.1

Summarize the basis for this Finding:

The Transfer Facility has developed the following written emergency response plans and procedures: Contingency Plan – Emergency Response (Contingency Plan) Sodium Cyanide Sparge Pant, List of Key Contact Personnel Procedure, Earthquakes and Tsunamis Procedure, Incident Management Procedure, and the Preventative and Corrective Actions Procedure.

The Contingency Plan considers the potential failure scenarios appropriate for its site-specific environmental and operating circumstances. It’s scope is limited to emergencies with the potential to impact people, environment and property resulting from the operation of the transfer facility. The emergency scenarios include dropping an IBC during a transfer operation resulting in a spillage of solid cyanide. A risk assessment by Orica determined that the zone of influence of such a scenario was limited to the transfer facility building. The assessment also identified fires, explosions, power outages, intoxication by HCN or cyanide, cyanide spill, and natural disasters, including earthquakes and sea quakes. The transfer facility does not have ponds or waste treatment facilities.

The Contingency Plan describes specific response actions, as appropriate for the anticipated emergency situations, such as evacuating site personnel and potentially affected communities from the area of exposure. The response actions include use of cyanide antidotes and first aid measures for cyanide exposure. Placards located strategically around the site describe cyanide first aid measures for persons intoxicated by HCN or cyanide. The Contingency Plan considers minor and major cyanide spills and the emergency response procedures detail the procedure to limit the spread of releases and control the releases at their source. The plan also describes procedures necessary for containment, assessment, mitigation and future prevention of releases.

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

☑ in full compliance with

The operation is ☐ in substantial compliance with ☐ not in compliance with Production Practice 5.2

Orica Mining Services
Bag to Bulk Transfer Facility, Ventanilla

6/11/2018
Summarize the basis for this Finding:
The transfer facility has involved its workforce and stakeholders in the emergency response planning process. The workers have been involved in the emergency response planning process through initial training and simulation exercises.
The facility has involved local response agencies in the emergency planning and response process. They have been provided with the Contingency Plan and were formally asked for comments about their role in case of an emergency. The facility has alerted local hospitals of the potential need to treat patients for cyanide exposure. The operation is confident that alerted local hospitals have adequate, qualified staff, equipment and expertise to respond to cyanide exposures.
The transfer facility have an established process to engage in regular consultation or communication with stakeholders to assure that the Plan addresses current conditions and risks. The Contingency Plan is reviewed annually, and it remains applicable to the transfer facility’s current conditions and risks.

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

☑ in full compliance with

The operation is ☐ in substantial compliance with Production Practice 5.3

☐ not in compliance with

Summarize the basis for this Finding:
The Contingency Plan designates primary and alternate emergency response coordinators with explicit authority to commit the resources necessary to implement the Contingency Plan. Also identifies the Emergency Response Teams and training requirements. The plan includes call-out procedures and 24-hour contact information for the coordinators and response team members and clearly specifies the duties for all Emergency Response Team positions. A list of emergency response equipment is contained within the Contingency Plan. A procedure is in place to inspect emergency response equipment and assure its availability. The Contingency Plan clearly describes the role of outside responders as Civil Defense authorities, Callao Fire Department, Police and medical facilities.

Every year, during the recertification period, Orica has provided documentation of the Contingency Plan to the Civil Defense Authority, Fire Brigade, Police and to Neptunia, confirming their awareness and engaging them in ongoing development of emergency arrangements.
Production Practice 5.4: Develop procedures for internal and external emergency notification and reporting.

☑ in full compliance with

The operation is □ in substantial compliance with □ not in compliance with Production Practice 5.4

Summarize the basis for this Finding:
The Contingency Plan contains clear flow charts describing the call out procedures for emergencies. Management, contractors, emergency response team, outside response providers and medical facilities are included within the flow charts. Duties for all positions and entities listed within the Contingency Plan are clearly described. The roles of the Civil Defense authorities, Callao Fire Department, Police and medical facilities and relevant contact information have been included within the Contingency Plan.

No community has been identified as likely to be affected by an emergency based on a review of potential releases from the transfer facility and the distances involved.

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

☑ in full compliance with

The operation is □ in substantial compliance with □ not in compliance with Production Practice 5.5

Summarize the basis for this Finding:
The Contingency Plan 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. The Contingency Plan also notes that bottled water would be used as an alternate potable water supply if an emergency warranted it.

The Contingency Plan addresses environmental monitoring to identify the extent and effects of a release, including sampling methodologies and parameters.
Production Practice 5.6: Periodically evaluate response procedures and capabilities and revise them as needed.

☑ in full compliance with

☐ in substantial compliance with Production Practice 5.6

☐ not in compliance with

Summarize the basis for this Finding:
The Contingency Plan contains provisions for periodically reviewing and evaluating its adequacy, and they are being implemented. The Contingency Plan notes that it is required to be updated in the event of a drill and/or emergency if deficiencies are identified during the implementation of the Contingency Plan.

Mock emergency drills are conducted periodically to test response procedures for various exposure scenarios. The Contingency Plan requires simulation drills to be evaluated and a report produced, including a photographic record, chronological record, and final recommendations.

Drills conducted to date have resulted in improvements to the Contingency Plan relating to emergency response equipment and supplies.