

HAZARD AUDIT REPORT FOR EVOLUTION MINING PTY LIMITED, COWAL GOLD OPERATIONS, NSW

Prepared by: Dean Shewring

7 May 2019

Pinnacle Risk Management Pty Limited ABN 83 098 666 703

> PO Box 5024 Elanora Heights NSW Australia 2101 Telephone: (02) 9913 7284 Facsimile: (02) 9913 7930

Hazard Audit Report for Evolution Mining, Cowal Gold Operations

Acknowledgment

The author would like to thank the Evolution Mining staff who were involved with the hazard audit for their proactive and enthusiastic approach to the audit.

Disclaimer

This report was prepared by Pinnacle Risk Management Pty Limited (Pinnacle Risk Management) as an account of work for Evolution Mining Pty Limited (Evolution). The material in it reflects Pinnacle Risk Management's best judgement in the light of the information available to it at the time of preparation. However, as Pinnacle Risk Management cannot control the conditions under which this report may be used, Pinnacle Risk Management will not be responsible for damages of any nature resulting from use of or reliance upon this report. Pinnacle Risk Management's responsibility for advice given is subject to the terms of engagement with Evolution.

| Rev | Date | Description | Reviewed By |
|-----|---------|-------------------|-------------|
| А | 18/4/19 | Draft for Comment | Evolution |
| В | 7/5/19 | Final Revision | Evolution |

_

Contents

| Exe | CUTIVE | SUMMARY | |
|-----|-----------------------------------|---|--|
| GLO | SSARY | 77 | |
| 1 | 1 INTRODUCTION AND SCOPE OF AUDIT | | |
| | 1.1 | Objectives, Requirements and Scope8 | |
| | 1.1.1 | Audit Objectives | |
| | 1.1.2 | Requirements of the Audit9 | |
| | 1.1.3 | Scope of the Audit9 | |
| | 1.2 | Methodology 10 | |
| | 1.2.1 | Basic Approach 10 | |
| | 1.2.2 | Personnel Interviewed 11 | |
| | 1.2.3 | Summary and Conclusions12 | |
| 2 | SITE C | Overview | |
| | 2.1 | Site Location, Surrounding Land Uses and Layout | |
| | 2.2 | Process Description18 | |
| | 2.3 | Properties of Materials Being Handled / Processed | |
| 3 | Haza | RD AUDIT OF PLANT OPERATIONS | |
| | 3.1 | Plant and Equipment20 | |
| | 3.2 | Loading and Unloading Operations22 | |
| | 3.3 | Storages | |
| | 3.4 | Process Control | |
| | 3.5 | Fire Safety 25 | |
| | 3.6 | Environmental Protection | |
| | 3.6.1 | Hazardous Waste and Chemical Management Plan Review | |
| 4 | Haza | RD AUDIT OF MANAGEMENT SYSTEMS | |
| | 4.1 | Plant Procedures, Records and Other Documentation | |

| | 4.1.1 | Materials Handling | 32 |
|---|--------|--|----|
| | 4.1.2 | Operating Procedures | 32 |
| | 4.1.3 | Maintenance Procedures, Permits, Testing and Records | 33 |
| | 4.1.4 | Plant Modification | 35 |
| | 4.2 | Operator Training | 36 |
| | 4.3 | Emergency Planning | 37 |
| 5 | SITE I | HISTORY | 39 |
| | 5.1 | Incident History | 39 |
| | 5.2 | Previous Studies | 40 |
| 6 | Appe | NDIX A - DOPE APPROVAL CORRESPONDENCE | 41 |
| 7 | Appe | NDIX B – SELECTED DOCUMENTS OBTAINED OR SIGHTED | 43 |
| 8 | Appe | NDIX C - RECOMMENDATIONS IMPLEMENTATION PROGRAM | 45 |
| 9 | REFE | RENCES | 48 |

LIST OF FIGURES

| Figure 1 – Site Location | .14 |
|------------------------------------|-----|
| Figure 2 – Site Layout | .15 |
| Figure 3 – Processing Plant Layout | .16 |

LIST OF TABLES

| able 1 – Summary of Materials18 |
|---------------------------------|
|---------------------------------|

EXECUTIVE SUMMARY

This report constitutes the fifth hazard audit that has been undertaken for the Evolution Mining Cowal Gold Operations, NSW. The report is written in accordance with the Department of Planning's Hazard Audit Guidelines.

The scope of the audit covers a critical examination of the systems and procedures, which exist in order to operate and maintain the facility for the purpose for which it was designed. This required a review of the Evolution documentation systems at the mine site and records of the mine's operational history since the previous hazard audit.

The following points summarise the results of this hazard audit:

- As with previous hazard audits, the personnel interviewed during this audit showed an adequate appreciation of the hazards associated with the operations and knowledge of the control measures used to reduce the risk of a potential hazardous event;
- The site has an established safety management system. All key elements of a typical safety management system, e.g. HIPAP 9, are in-place;
- Procedures and documents have, generally, been kept up-to-date and are being updated, e.g. the emergency response plan;
- There is a strong culture of incident reporting and performing work area inspections at the site;
- The processing plant has an on-going issue with corrosion to structural steelwork including platforms. This is being addressed by an on-going maintenance programme. There was a noticeable improvement in structural integrity during this audit;
- From the reviews performed on the safety management system, the main finding was that modification forms are not being correctly closed-out; and
- The recommendations made throughout this hazard audit report are largely designed to further enhance the existing safety management system.

The hazards associated with the facility have been previously identified and are included in various forms of the Evolution safety management system. Being a mining and processing site with explosive, corrosive, oxidising, radioactive, toxic, combustible and flammable materials, large machinery and large civil structures, e.g. tailings dams, there are a number of hazardous events associated with potential losses of containment or control leading to impact to people, the environment, property and/or the business. The hazards associated with the materials and processes were found to be well known and understood by the Evolution staff involved in the audit.

The recommendations made throughout this report are to be included in an implementation program to monitor improvement progress. This implementation

program will require regular review and updating (of actions that have been completed).

The following recommendations were discussed during the audit close-out meeting and are summarised from the report:

- Recommendation No. 1 Ensure there are adequate flange covers on all pipes containing hazardous materials. This is to include the FTL hydrochloric acid dosing pump (e.g. the three flanges on the pump discharge line).
- Recommendation No. 2 Review the need for a mechanical support for the PAX mixing tank transfer pump suction line as this pipe is connected to the pump with a braided hose, i.e. there is the potential for stresses on the tank nozzle and possible failure.
- Recommendation No. 3 Improve the housekeeping in the corrosives section of the reagent shed, i.e. remove the spilt material and prevent an accumulation of combustible material such as plastic.
- Recommendation No. 4 Include in the preventative maintenance system the need for routine cleaning of the dam supplying the fire water pumps, e.g. to prevent weed build-up which can cause blockages in the fire water system.
- Recommendation No. 5 Ensure that all HAZOP actions from the FTL project are adequately closed-out.
- Recommendation No. 6 Provide means in the maintenance system to ensure the internal integrity of the hydrogen peroxide Isocontainers remains adequate.
- Recommendation No. 7 Perform a review of all modifications made in the years 2016 to 2019 to ensure they have been closed out acceptably (including all relevant documentation updates).
- Recommendation No. 8 Provide means to ensure all modifications are closed out acceptably (including all relevant documentation updates) for future modifications. This should include means to keep the modification register up-to-date (last revised in 2016).
- Recommendation No. 9 Ensure that all recommendations from the 2016 hazard audit have been adequately closed out (with the exception of recommendations 1, 2, 3, 4, 5, 7, 10, 11, 12 and 13 which were checked during this audit and found to be adequately addressed).

GLOSSARY

| AS | |
|-------|--|
| 7.0 | Australian Standard |
| BLEVE | Boiling Liquid Expanding Vapour Explosion |
| EPA | Environmental Projection Authority |
| EPL | Environmental Protection Licence |
| ERP | Emergency Response Plan |
| FHA | Final Hazard Analysis |
| FSS | Fire Safety Study |
| FTL | Flotation Tails Leach |
| HAZID | Hazard Identification |
| HAZOP | Hazard and Operability Study |
| HIPAP | Hazardous Industry Planning Advisory Paper |
| ICAM | Incident Cause Analysis Method |
| ISO | International Standards Organisation |
| JHA | Job Hazard Analysis |
| LPG | Liquefied Petroleum Gas |
| PAX | Potassium Amyl Xanthate |
| P&ID | Piping and Instrumentation Drawing |
| PPE | Personnel Protective Equipment |
| PPM | Parts Per Million |
| PSV | Pressure Safety Valve |
| QHSE | Quality Health Safety Environment |
| SMBS | Sodium Metabisulphite |
| SSAN | Security Sensitive Ammonium Nitrate |
| UPS | Uninterruptible Power Supply |
| VESDA | Very Early Smoke Detection Apparatus |

REPORT

1 INTRODUCTION AND SCOPE OF AUDIT

1.1 OBJECTIVES, REQUIREMENTS AND SCOPE

1.1.1 Audit Objectives

This report constitutes the fifth hazard audit that has been undertaken for Evolution Mining (Evolution) for the Cowal Gold Operations.

Condition 5.4(c) of the Cowal Gold Operations Development Consent specifies the following requirements for the hazard audit.

Twelve months after the commencement of operations of the proposed development or within such further period as the Secretary may agree, the Applicant shall carry out a comprehensive hazard audit of the proposed development and submit a report of the audit to the Secretary.

The audit shall be carried out at the Applicant's expense by a duly qualified independent person or team approved by the Secretary prior to commencement of the audit. Further audits shall be carried out every three years or as determined by the Secretary and a report of each audit shall within a month of the audit be submitted to the Secretary. Hazard audits should be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper (HIPAP) No. 5, "Hazard Audit Guidelines".

This report details the results of the hazard audit and is written to meet the requirements of HIPAP No. 5 guidelines (Ref 1).

The facility, operations and safety systems were included in this hazard audit.

The fundamental objectives of the hazard audit were:

- To review the significant changes made at the site since the last hazard audit (Ref 2);
- To identify areas where improvements to operational and organisational safeguards are required with respect to safety, health and the environment; and
- To recommend appropriate measures to improve safety, health and environmental deficiencies in the areas identified.

The audit was conducted by Dean Shewring from Pinnacle Risk Management. The correspondence granting lead auditor approval is included in Appendix A. The audit was conducted over three days (April 15 to 17, 2019).

1.1.2 Requirements of the Audit

The audit of the facility included both the hardware and safety management systems. The term "hardware" covers the facility and equipment including instrumentation and control systems, and protection systems. The term "safety management systems" is used to denote people systems and people factors and covers the following items:

- Organisation (formal, emergency, tasks and roles);
- Methods and procedures;
- Knowledge and skills (operator and maintenance employee training, ability to recognise faults and take corrective action); and
- Attitudes towards tasks (reflecting whether the safety management systems are functioning effectively).

It is essential that the hardware and safety management systems complement each other. For example, elaborate control and protection systems may be built into the installation based on rigorous hazard analysis, but without regular inspection and testing, their performance would deteriorate so that they would be ineffective when a demand is placed upon them. The performance of the management system of safety controls is a key element in effective risk management.

1.1.3 Scope of the Audit

The scope of the audit covers a critical examination of the systems and procedures, which exist in order to operate and maintain the facility for the purpose for which it was designed. This requires a review of the documentation systems at the plant and records of the facility's operational history since the previous hazard audit. In particular, it requires a review of the degree and frequency with which operating conditions vary from the design intent.

The scope of the audit includes the following topics:

- Plant and process systems;
- Process control;
- Review of operating procedures;
- Process operator training;
- Maintenance procedures;
- Safety training of employees;

- Plant modification control;
- Testing of protection systems;
- Electrical equipment handling;
- Unusual incident reporting;
- Injury/accident reporting;
- Fire protection and training;
- Emergency procedures;
- Safety management systems;
- Security of premises, and;
- Environmental protection.

1.2 METHODOLOGY

1.2.1 Basic Approach

This hazard audit has been conducted in compliance with the Department of Planning's HIPAP No. 5 (Ref 1).

The remit of the audit was discussed with Evolution personnel prior to the audit. An outline of the scope of the audit was presented prior to the site based audit work. This allowed the requirements of the audit to be canvassed within Evolution which in turn allowed planning for the appropriate people to be available during the audit.

Selected documents obtained or sighted have been listed in Appendix B.

In broad terms, the methodology used was that of conducting detailed discussions with key operations, safety, engineering and maintenance personnel. Several site tours were conducted. Personnel within a "vertical cross-section" of the operation were interviewed.

The approach to the audit is best summarised as follows (Ref 1):

"Generally, checklists or scoring schemes should not be used. They are inflexible and do not facilitate evaluation. They do not question the validity of existing systems and tend to ignore interactions between various parts of the facility. They are least satisfactory when the design is new and many hazards have not been encountered before.....

In general, a more investigative approach is required. The specific method used to audit the site is left to the discretion of the auditor

or audit team leader. The auditor may carry out the audit in different ways to evaluate different aspects of the facility's operations. The various elements of the audit may be performed at different levels of detail, depending on the reason for the audit, the nature of hazards at the facility and the scale of the development."

This approach is adopted by Pinnacle Risk Management in conducting hazard audits. Depending on the facility and the associated hazards, the depth of auditing of the required areas of operation is determined by the lead auditor both prior to and during the audit. Whilst the guidelines issued by the Department are used in determining the audit scope, the guidelines themselves are not used as a complete checklist. In particular, as this is the fifth hazard audit, the focus of the reviews was on the changes made to the hardware and safety management systems over the last three years.

1.2.2 Personnel Interviewed

The following personnel were interviewed during the hazard audit:

| Kate Nixon | Advisor – Environmental Systems | | |
|-------------------|--|--|--|
| Danielle Wallace | Superintendent - Environment and Social Responsibility | | |
| Nicola Shea | Advisor – Safety | | |
| Tom Wood | Senior Advisor - Training | | |
| Mick Davies | Coordinator – Planning, Processing | | |
| Mick Hopper | Foreman – Mechanical, Processing | | |
| Amit Sharma | Electrical Engineer | | |
| Greg Higgins | Leading Hand – Day Services, Processing | | |
| Michael Hughes | Project Director | | |
| Ryan Shanks | Coordinator – Emergency Response and Security | | |
| Dave Sheil | Engineer – Mechanical, Processing | | |
| Ronnie Pettit | Leading Hand – Electrical, Processing | | |
| Luke Chandler-Var | Vliet Planner - Processing | | |
| Luciano Benedosso | D Planner - Processing | | |

1.2.3 Summary and Conclusions

The following points summarise the results of this hazard audit:

- As with previous hazard audits, the personnel interviewed during this audit showed an adequate appreciation of the hazards associated with the operations and knowledge of the control measures used to reduce the risk of a potential hazardous event;
- The site has an established safety management system. All key elements of a typical safety management system, e.g. HIPAP 9, are in-place;
- Procedures and documents have, generally, been kept up-to-date and are being updated, e.g. the emergency response plan;
- There is a strong culture of incident reporting and performing work area inspections at the site;
- The processing plant has an on-going issue with corrosion to structural steelwork including platforms. This is being addressed by an on-going maintenance programme. There was a noticeable improvement in structural integrity during this audit;
- From the reviews performed on the safety management system, the main finding was that modification forms are not being correctly closed-out; and
- The recommendations made throughout this hazard audit report are largely designed to further enhance the existing safety management system.

The hazards associated with the facility have been previously identified and are included in various forms of the Evolution safety management system. Being a mining and processing site with explosive, corrosive, oxidising, radioactive, toxic, combustible and flammable materials, large machinery and large civil structures, e.g. tailings dams, there are a number of hazardous events associated with potential losses of containment or control leading to impact to people, the environment, property and/or the business. The hazards associated with the materials and processes were found to be well known and understood by the Evolution staff involved in the audit.

All safety management systems need to be dynamic in nature, i.e. they need constant review and modification if necessary. One of the aims of this audit is to provide assistance in progressing improvements to the existing safety management system. The recommendations made throughout this report are included in a separate implementation program to monitor improvement progress (a copy is included in Appendix C). This implementation program will require regular review and updating (of actions that have been completed).

2 SITE OVERVIEW

2.1 SITE LOCATION, SURROUNDING LAND USES AND LAYOUT

Descriptions of the site location, surrounding land uses and layout are given in the Final Hazard Analysis (FHA, Ref 3) and the Environmental Impact Statement (Ref 4). These descriptions are not reproduced in this report.

The site location is shown in Figure 1. The site layout is shown in Figure 2 and Figure 3.

Given the distance to the nearest residence (approximately 4 km), it is unlikely that the consequential impacts from a fire, explosion or toxic release are likely to have significant effect (as concluded in the FHA, Ref 3). Also, from the FHA, the risk associated with external events, e.g. earthquakes, is low.

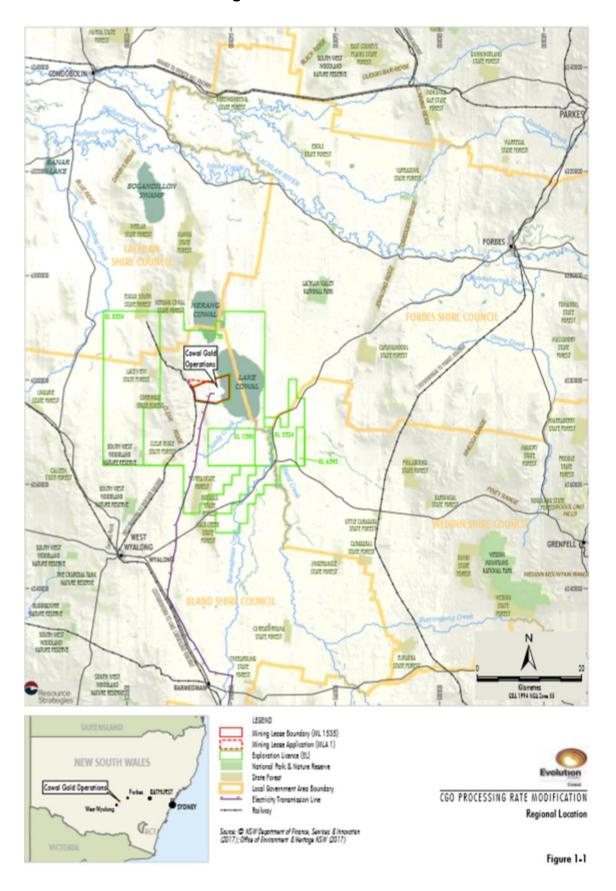
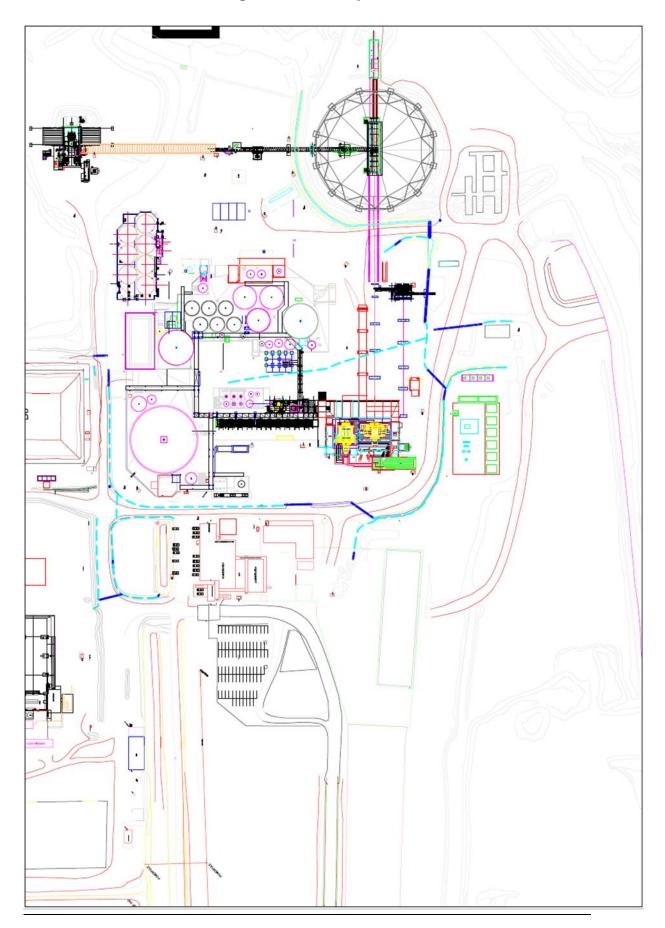


Figure 1 – Site Location

Figure 2 – Site Layout



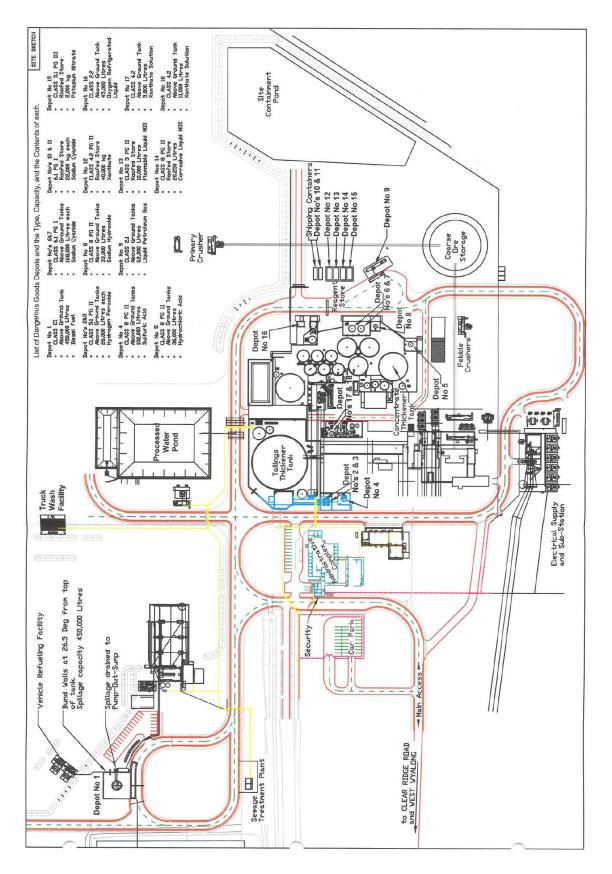


Figure 3 – Processing Plant Layout

There has been one major change to the processing plant since the previous hazard audit as well as some relatively minor modifications have been performed. The major change is the Flotation Tails Leach (FTL) process addition. This includes six leach tanks, an activated carbon kiln, an acid wash column and another cyanide destruct tank. Given the significance of this change, this hazard audit included reviewing the new equipment, control systems, safety management systems and project documentation.

During the audit, the facility layout, building design and construction, site security and utilities were reviewed and inspected. Whilst some of these site areas are discussed in more detail later in this report, no major shortcomings were found in these areas.

There is one main control room for the processing plant. The operators monitor and remotely control the process from this location. As the control room is located at an elevated position near vibrating equipment, some vibrations are transferred to the control room. To date, this has not been a cause for any significant impact.

No events were identified whose risk would be unacceptable with respect to propagation to the control room although it is possible that some events could impact these areas if they occur, e.g. low likelihood events such as a LPG BLEVE (boiling liquid expanding vapour explosion).

Security for the site comprises the following measures:

- The site is fenced (some of which is typical farm fencing). Processing plant areas, e.g. sodium cyanide, and the ammonia nitrate and explosives storage compounds are fully fenced and sign-posted;
- Staffed entrance gate and/or security patrols;
- Closed circuit television cameras at selected locations;
- Regular operational staff inspections;
- > Operator vigilance (the site is permanently manned by operational staff);
- Area lighting for night surveillance;
- Electric fences are installed along the north, east and south sides of the mine lease;
- Increased security for the gold room (primarily for prevention of gold theft); and
- Radios are carried by all operational staff and are fitted in vehicles.

There are approximately 300 to 380 people during normal business hours and 30 to 50 people outside of normal hours on the site at any one time.

The security system for the site was observed and found to be operating as intended.

The facility normally operates 7 days per week, 24 hours per day. All personnel gain access via the main gate (either via their security codes or by signing in as a visitor). As this gate is located away from the plant areas it can be expected to be safe to use for people / vehicle control for most plant emergencies.

During the audit, the reliability of utilities was reviewed. The main utility is power. In the event of a power failure, the process is designed to fail safe. Loss of other utilities, e.g. instrument air or hydraulics, will also result in a predetermined, safe shutdown.

Given the types of hazards on the site with the training programmes implemented and the protective equipment provided, e.g. fire protection response vehicles and medical assistance, there are sufficient people available to either handle most minor to moderate potential hazardous situations. However, large scale events will require assistance from the NSW emergency services as per the emergency response plan.

2.2 **PROCESS DESCRIPTION**

A detailed description of the process was given in the Final Hazard Analysis (Ref 3). To avoid unnecessary duplication, further information regarding the facility's process description can be found in this reference and it is not reproduced in this report.

However, as detailed in the FHA, there are two main modes of plant operation. The initial mode is termed "oxide ore"; the second mode is termed "primary ore". The difference is the result of ore changes. The facility is operating in primary ore mode.

2.3 PROPERTIES OF MATERIALS BEING HANDLED / PROCESSED

From the Evolution emergency response plan, Table 1 lists the hazardous materials handled, stored and/or processed at the facility.

| Material | HAZCHEM Code | UN No. | Average Quantity Stored On-Site (tonnes) |
|-------------------------------------|-----------------|---------------|--|
| Interfroth | 3 (Y) | 1993 | 20 |
| SIBX (sodium isobutyl- xanthate) | 1 (Y) | 3342 | 60 |
| Sodium Cyanide | 2 (X) | 1689 | 200 |
| Quicklime (calcium oxide) | 4W | 1910 | 500 |
| Carbon | No Allocation | No Allocation | 10 |

Table 1 – Summary of Materials

| Material | HAZCHEM Code | UN No. | Average Quantity Stored On-Site (tonnes) |
|--|-----------------|---------------|--|
| Oxygen | 2 PE | 1073 | 45 |
| Hydrochloric Acid | 2 R | 1789 | 37 |
| Sulfamic Acid | 2 Z | 2967 | 30 |
| Borax | No Allocation | No Allocation | 1 |
| Silica Flour | No Allocation | No Allocation | 0.3 |
| Soda Ash | No Allocation | No Allocation | 0.3 |
| Caustic Soda | 2 R | 1824 | 16 |
| Flocculants (Magnafloc 155) | No Allocation | No Allocation | 27.5 |
| LPG | 2 WE | 1075 | 27 |
| A 238 Aeropromotor | 2 R | 1719 | 40 |
| Hydrogen Peroxide | 2 PE | 2015 | 62 |
| Sulphuric Acid | 2 P | 1830 | 187 |
| Diesel | No Allocation | No Allocation | 500,000 Litres |
| Ammonium Nitrate | 1 (Y) | 1942 | 150 |
| Detonators / Primers | E | 0360 | 20 |
| Explosives, i.e. Powergel and Energan | E | 0042 | 0.5 |
| PAX (potassium amyl nitrate) | 1 (Y) | 3342 | 40 |

In addition to those materials listed in Table 1, there are nucleonic instruments, e.g. density meters, within the process.

Given the materials listed in Table 1, there are a number of potential hazardous events that could lead to fires, explosions and/or toxic or radioactive impact. These events were examined in the Final Hazard Analysis (Ref 3) as part of Development Consent and found to be acceptable based on risk.

Material inventory and usage is monitored via the computer control system. The plant metallurgist reviews the usage for plant optimisation reasons.

Further discussion of the properties of the materials can be found in Reference 3.

3 HAZARD AUDIT OF PLANT OPERATIONS

3.1 PLANT AND EQUIPMENT

The mine operations are conducted as per the requirements of the Work Health and Safety (Mines and Petroleum Sites) Regulation 2014 and the Work Health and Safety Act 2011.

Several trips into the processing plant and mining areas were made over the three days on site.

This included inspecting the:

- Mining operations (pit, explosives storage and handling and ore transfer);
- Ore crushing and milling;
- Lake Cowal and the mobile drilling rigs;
- Processing plant and chemical storage and handling;
- Tailings storage dams; and
- Water storage ponds.

Generally, for the equipment inspected, all items (including control functions) appeared to be operated satisfactorily.

Checks on major equipment, including pipes, vessels and instruments, indicated appropriate identification by labels and signs. The facility is well laid out. It is noted that the facility was reviewed by the HAZOP technique when built.

Operation outside of the design values for most parts of the process is not possible due to process control (including trips, e.g. low tanks levels for the outlet pumps and low speed for conveyors) and equipment specifications. Much of the process occurs at ambient conditions (typical for many mining processes).

Records of plant performance are kept within the computer control system.

Master Piping and Instrumentation Diagrams (P&IDs) are kept electronically and via hard copies.

There are pressure vessels on the site, e.g. elution column and hydraulic receivers, and these are routinely inspected and tested as per AS 3788 Pressure Equipment – In Service Inspection and AS 3873 Pressure Equipment – Operation and Maintenance. Some PSV (pressure safety valves) test tags were reviewed during the audit and found to be adequately labelled (PSVs are replaced on a basis as determined by a Certified Boiler Inspector).

A review of the site utilities was undertaken. Power has proven to be reliable in supply. Should this service fail then the process fails safe as all drives are stopped.

There is also an emergency power generator on-site. The critical power users, e.g. the control system, have their own uninterruptible power supply.

For loss of instrument air, the automatic valves close to their predetermined positions as required during detail design and the project's HAZOP study. Loss of hydraulic power, e.g. the mills, also results in a predetermined shutdown. Given the reviews performed, no significant hazardous scenarios were determined for loss of a utility.

Emergency stop / local isolation buttons are located throughout the site. For the stop buttons inspected, they appeared to be suitably located, e.g. the stop buttons for the chemical dosing pumps and the FTL project kiln. Lanyards were also located adjacent to the conveyors.

Discussions with various operations staff showed that they generally had an adequate level of understanding of the hazards involved and what to do in an emergency, and that the plant was operated safely.

During the audit, observations of the operator tasks were performed. This included mine activities (loading of trucks with ore and ore movement).

To assist the operators with emergency response, gas monitors, e.g. hydrogen cyanide and sulphur dioxide, have been installed throughout the relevant plant areas.

Safety showers and eyewash stations are tested fortnightly throughout the site and prior to each chemical transfer.

As mentioned previously, the new FTL equipment was reviewed during this audit. Commissioning began in late January and is still on-going. The new equipment is essentially a copy of the existing leach process and hence familiar to the operators. The feed is the underflow from the flotation tails thickener. This project was required to improve the gold recovery from the plant, i.e. from the thickener underflow. The new equipment appears to be appropriately installed and is operating without significant process safety incidents.

From the review of process operations, the following recommendation is made.

| Recommendation No. 1 | Ensure there are adequate flange covers on all pipes containing hazardous materials. This is to include |
|----------------------|---|
| | the FTL hydrochloric acid dosing pump (e.g. the three flanges on the pump discharge line). |

Recommendation No. 2 Review the need for a mechanical support for the PAX mixing tank transfer pump suction line as this pipe is connected to the pump with a braided hose, i.e. there is the potential for stresses on the tank nozzle and possible failure.

3.2 LOADING AND UNLOADING OPERATIONS

Unloading activities occur within the mining and processing areas and are a twoperson activity. There are only a few loading operations, e.g. waste products and product gold, at the site and these are typical of facilities such as the Cowal Gold Operations.

In the mining area, trucks are loaded with ore following blasting. Standard mines practices are implemented in the pit and these were observed during the audit. Excavators load ore onto mining trucks for removal from the pit. Ore is loaded into the crusher via the conventional technique of reversing trucks to a predetermined position (reversing stop in-place at the dump hopper) and then raising the tray.

The materials listed in Table 1 are delivered to site in either solid or liquid form. Solids, e.g. PAX in sealed wooden boxes, are moved via forklift to their storage areas.

Bulk liquid chemicals (e.g. hydrochloric acid, sodium hydroxide and LPG) are delivered to the site by road tanker. These chemicals are used within the processing plant. Diesel is used for fuelling the mining vehicle fleet. Bulk liquid unloading operations are performed by site inducted tanker drivers. There are containment systems for the unloading areas should spills occur.

There were no obvious signs of any significant spills in the unloading areas.

There are fire extinguishers installed throughout the processing plant area if required and a safety shower / eyewash station installed (tested fortnightly) near each unloading bay.

All material unloaded / loaded is recorded in the Evolution transport records system.

Off-site transportation takes place via various transport companies. A separate transport study (Ref 5) was conducted on the transport requirements and no unacceptable risks were found.

3.3 STORAGES

There are a number of different storage types on the facility, i.e.:

- Ore and spoil stockpiles;
- Materials listed in Table 1 in tanks and sheds; and
- Tailings storage dams.

The product, gold, is refined and stored in a high security building (not inspected due to security restrictions).

Ore and mine spoil are stored as per typical mining practices. Dust is minimised as much as possible, e.g. water spraying in the pit with saline water, use of emulsified bitumen on non-pit light vehicle roads (eliminates water maintenance) and revegetation of earthen walls. A separate report has been commissioned by Evolution to determine the dust impact on the surrounding area and it was found that little impact was occurring outside of the mining lease.

The sodium cyanide mixing and storage area was found to be in good condition at the time of the audit.

Solid flotation reagents such as PAX were inspected within the flotation reagents shed. There was evidence of a spill in the corrosives section (not cleaned-up). See the recommendation below. All the PAX wooden boxes inspected were in a sound condition. During rain events, it is possible that water can enter the PAX storage area (water is not compatible with PAX; there is the potential for heat generation and subsequent fires). Historically, little rain has been reported to have entered the reagents shed and when there is sufficient quantity, it is pumped out. Provided the sealed plastic bags containing the PAX remain intact then PAX degradation from any potential water ingress is unlikely.

There leaks associated with the copper sulphate, xanthate and sodium metabisulphite (SMBS) reagents dosing systems observed during the last hazard audit have been fixed.

The explosives and detonators are stored in a separate fenced compound away from the mining and processing plant areas (as per standard mining practice). Signage is included on the fencing. Evolution is currently constructing a new explosives storage facility (not yet operational).

Liquid chemical storages are all bunded, including the diesel.

Tank levels are determined by instrumentation. There are high level instruments to help prevent tank overflow. There were no obvious signs of tank overflows at the time of the audit.

There is a computer-based materials inventory system that details information such as the amounts of materials stored on the facility. This information is regularly backed-up.

The tanks and roadway layout provide enough space for operation and access in an emergency.

The south tailings storage facility is in use. Its walls have undergone their sixth lift. The north tailings storage facility is currently undergoing its sixth wall lift. Rock buttressing is now used to further improve wall stability and help prevent breaches. The decant areas have been increased in size (allows water to be reclaimed back to the processing plant).

Given the above observations, the following recommendation is made:

Recommendation No. 3 Improve the housekeeping in the corrosives section of the reagent shed, i.e. remove the spilt material and prevent an accumulation of combustible material such as plastic.

3.4 PROCESS CONTROL

The operations for the crusher, the processing plant, the gold room and the tailings pumping system are monitored and controlled by a computer control system (Yokogawa Centum CS 3000). Process control is performed via clearly represented screens at the operator interface terminals in the control room. The operators at this location have overall control of the processing plant operation, e.g. setpoints and task requirements.

Additional operators are available for outside tasks. There are at least two people per shift who have adequate training and experience to operate the control system for the plant.

The mining operations are manually controlled as per typical mining practices, e.g. the placement of different coloured cones within the pit to indicate where entry is not permitted due to explosives use.

The processing plant and primary crusher control rooms have a number of features including the computer control system displays, camera output, emergency buttons, radios and documentation (both electronic and hard copy, e.g. safety datasheet manual).

The computer control systems operations include setpoints (e.g. dosing chemical pumped flows), trips, interlocks, valve opening and closing, and, machine run and fault indications. A history of control operations and process alarms are available via trending and printouts. To supplement the computing systems, process monitoring is also performed by operator walk-arounds. All alarms are prioritised to avoid alarm flooding.

The computer control system has so far proven reliable when called upon to control operations.

For backup power supply in an emergency, there is an UPS (uninterruptible power supply) for the computer control system. As mentioned previously, the facility also has an emergency powered generator. Manual control of the plant is also possible via the computer control system. Critical trips, e.g. the emergency stops, are hard-wired.

The FTL High Voltage switchroom and its UPS system and testing were reviewed. The UPS testing includes a five minute drain test to check for adequacy of backup power supply.

The cyanide levels in the tailings were reviewed. Typically, the cyanide concentration to the tailings dams is approximately 5 ppm. As per the Development

Consent requirements, cyanide in the tailings should not exceed 20 ppm for 10% of the year and should never exceed 30 ppm. The reviewed plant history shows that the plant is complying with these criteria.

Failure of any part or all of the computer control system will mean the process stops and immediate attention by the operators is given. No unsafe failure modes were identified during the audit.

The FTL project process control was reviewed during the audit. This included the new kiln and its local control panel. The plant is in commissioning mode and the associated control screens are therefore highlighted with "Commissioning". The instrumented protections were reviewed with no significant issues identified.

3.5 FIRE SAFETY

The fire prevention, detection and protection systems were previously reviewed in the Fire Safety Study (FSS) for the facility (Ref 6). The facility's fire protection equipment is detailed and assessed in this study and concluded to be adequate for the nature of fire hazards associated with the operations. Generally, the review performed during this audit indicated that the fire protection equipment has been installed and maintained as per the requirements of the original plant design intent.

The main fire or explosion hazards for this facility are a release of LPG, hydraulic oil, heating oil or diesel, oxygen enhanced combustion, general building type fires, vehicle fires, drilling rig fires, electrical fires, oxidising agent, e.g. ammonium nitrate or hydrogen peroxide, with a combustible material such as wood, activated carbon fires, PAX decomposition products, e.g. carbon disulphide, conveyor fires, transformer explosions and fires, explosives and detonators misfires and grass fires.

Fire water to the facility is from the Lachlan River Regulated Water Source, Bland Creek Paleochannel groundwater production bores or other on-site process or stormwater water dams. The fire water is stored in a 9 megalitre pond (dam) which is designed to constantly overflow to an adjacent dam (D6). It is pumped via an electric or diesel pump. These pumps are tested weekly to check the reliability. A smaller jockey pump is installed for small flow demands.

An annual flow test is performed on the fire water pumps (insurance requirement). The pumps have been found to continue to provide acceptable flow / head. The pressure switches that initiate the fire water pumps are tested by lowering the pressure to check the setpoint for pump start, i.e. the entire loop is tested.

The fire water pumps were inspected during this audit and no issues were found.

The facility is ringed with dual hydrants. Fire extinguishers (powder chemical) and hose reels are also located throughout the plant. Predetermined equipment, e.g. hydraulic drives, have fixed spray systems. Several fire extinguisher test tags were inspected and found to be in-test. Several hose cabinets were inspected and the hoses were found to be present and in good condition.

In addition to the above fire protection equipment, the site also has two fire trucks and spill response trailers near the main gate. In the event of a large fire, assistance from the emergency services can also be provided (as per the site's emergency response plan).

To help prevent potential sources of ignition, any hot work is controlled by a Hot Work Permit.

All fire protection equipment inspected was in accessible areas. The facility's fire protection equipment is maintained by specialist subcontractors (to the requirements of AS 1851, "Maintenance of Fire Protection Equipment"). Test tags were in-place for the equipment checked during the audit.

Fire training for site personnel is performed and includes extinguisher use.

Appropriate staff members are also First Aid trained. First Aid facilities exist on the facility. Random checks of these showed that the necessary equipment was available.

As mentioned above, hydrogen cyanide gas monitors are installed to detect any gas releases (hydrogen cyanide is both toxic and flammable).

Contaminated fire water will flow to either to the processing plant bunded areas or to ground. As shown in the FSS (Ref 6), the risk associated with contaminated fire water is low.

There are VESDA (Very Early Smoke Detection Apparatus) systems installed in the High Voltage switchrooms, i.e. including the FTL switchroom. This system is maintained by an external contractor.

Given the above observations, the following recommendation is made:

Recommendation No. 4 Include in the preventative maintenance system the need for routine cleaning of the dam supplying the fire water pumps, e.g. to prevent weed build-up which can cause blockages in the fire water system.

3.6 Environmental Protection

Environmental systems to reduce or eliminate contamination of air, soil, surface water and groundwater systems were evaluated.

The facility has a number of Environmental Management Plans and Monitoring Programmes as required by the Development Consent. Internal and external auditing is performed, e.g. Planned General Inspections, to ensure environmental compliance.

Generally, the equipment and systems aimed at protecting the environment appeared appropriate to the types of materials handled at the facility, with staff showing a good understanding of the relevant environmental issues. Environmental records are kept in both electronic and hard copy forms by the Environmental Manager. Any environmental incidents, including wildlife fatalities, are recorded in the Evolution incident reporting system (QHSE – Quality Health Safety and Environment).

Licensing:

The site has an Environmental Protection Licence 11912 as issued by the NSW Environmental Projection Authority (EPA). This licence was discussed with environmental personnel during the audit. There are no major issues arising from the last three years of operation of the facility with respect to compliance with the licence requirements although the following two events were reported:

1. Suppliers of the reagents sometimes change the transport routes without Evolution's consent. Therefore, transport routes may not be in compliance with the Transport of Hazardous Materials Study.

2. There was a relatively minor release from the northern tailings storage facility. The cause has been determined, controls have been implemented and the released liquid was contained within the outer tailings storage facility bund.

Stormwater, Effluent and Spill Management:

There have been no discharges of stormwater and/or contained liquid wastes to any area outside the internal catchment drainage system. Stormwater and contained liquid wastes are reclaimed back into the process via bund sump pumps. The main process liquid effluent is the tailings flow and this is monitored for cyanide concentration as discussed above in Section 3.4. Water is recycled as much as possible, e.g. thickener overflow stream, as water is not in plentiful supply at this location.

The integrity of the tailings bund walls are independently checked and reported. Regular inspections of the tailings walls and dams are performed by a number of people, e.g. multiple daily patrols by processing and environmental personnel and sampling visits by laboratory personnel. This includes wildlife inspections. The southern tailings storage facility has undergone its sixth wall lift. The northern tailings storage facility is now having the sixth lift performed. These were inspected with no issues found.

Dosing chemical transfer areas from road tankers are paved. Any diesel spills at the vehicle filling bay are pumped to an oil / water separator. Waste oils or absorbents with oil are disposed of via licensed contractors.

Absorbent material and spill response kits and trailers are available at the facility. One spill response container was inspected during the audit and found to contain the stated items.

There is a surface water sampling programme which includes sampling Lake Cowal waters (currently the lake is dry). There are groundwater monitoring observation bore holes across the site. These are sampled monthly and quarterly. There are no known groundwater problems associated with the facility. Given the containment designs for environmental protection, the designs do not pose unacceptable environmental risks provided the requirements of the safety management system are maintained.

Solid Waste:

Solid wastes include:

- General, non-hazardous wastes, e.g. empty bags, are disposed of via the Bland Shire Council Waste Management facility or on-site waste rock dumps as per varied EPL (Environmental Protection Licence);
- Special waste used haul truck tyres landfilled on-site as per varied EPL;
- On-site bioremediation and disposal of small quantities of hydrocarbons spilt to ground as per varied EPL;
- Used batteries (disposed of via a licensed recycler); and
- Drums with contaminated material (disposed of via a licensed contractor) and empty drums (returned to some suppliers).

The site is asbestos free.

There were no new hazardous solid wastes identified during the hazard audit or any known issues with the disposal of the above wastes.

Gaseous and Dust Emissions:

The main atmospheric emission is dust. Dust emissions are reduced by techniques such as water sprays (water spray trucks are used in the mining operations) and road sealing programmes with emulsified bitumen. There are some local gaseous emissions, e.g. hydrogen cyanide from the leach tanks and the two kiln stacks, but the levels must be kept low due to safety concerns.

There are no recommendations made for this area of review.

3.6.1 Hazardous Waste and Chemical Management Plan Review

The Hazardous Waste and Chemical Management Plan was reviewed during the audit. The following observations are made from this review:

- The maintenance on the hazardous reagents storage tanks and handling systems could be checked against the requirements of the relevant Australian Standards (as listed in the plan);
- For the reagent storages, it may be beneficial to confirm that these were built to the relevant Australian Standards, i.e. check with the plant designers, and that they were also approved by Dangerous Goods Consultants. As some of the Australian Standards may have been revised then it may be beneficial to perform a gap analysis on the installed reagent storage tanks and piping systems and the latest revision of the standards to determine if good practice is being met;

- For the original Preliminary Risk Assessment recommendations in Sections 3.1 and 3.2.1, it may be beneficial to have these in a table with the corresponding actions taken;
- The emergency response actions in Chapter 8 should be consistent with the soon-to-be-revised emergency response plan; and
- Section 11 mentions auditing criteria but none is provided. If auditing criteria is not required then delete these entries. Otherwise, provide auditing criteria in this section.

4 HAZARD AUDIT OF MANAGEMENT SYSTEMS

During this audit, the safety management system was checked to ensure it contains the requirements of HIPAP 9 (Ref 7).

The Evolution overall approach to safety management includes the following components:

- Safety, health and environmental policies;
- Safety, health and environmental standards; and
- Safety, health, environmental and community relations management systems.

Procedures, forms and checklists reside in the safety management system.

The established procedures include:

- ➤ Training;
- Operating instructions;
- Permits to work;
- Contractor management;
- Management of change;
- Emergency response;
- Incident recording; and
- Maintenance.

Auditing of the compliance with the company requirements is mostly achieved by the following means:

- 1. Internal audits, e.g. six monthly corporate safety, hygiene and environmental audits;
- 2. Critical controls audits. There are metrics for these controls to monitor their performance;
- 3. Quarterly contractor meetings where key performance indicators are reviewed;
- 4. Daily and weekly walk-arounds and work area inspections, e.g. by the Superintendents, Managers and Mine Manager;
- 5. Plant monthly inspections, e.g. Planned General Inspections;

- 6. Verification and assurance audits, e.g. permits reviews; and
- 7. External audits such as hazard audits, annual Independent Environment Audit, International Cyanide Management Code audits, annual ISO 14001 audit and the International Mining Industry Underwriters audits (the latter for insurance purposes).

The General Manager has responsibility for overall safety and environmental protection for the site.

As part of his role to the commitment of occupational health, safety and environmental best practice, the General Manager's activities include:

- Ensuring compliance with the safety and environmental management system's requirements, e.g. managers spend at least 30% of their time in the field;
- Monitoring of the operations via walk-arounds;
- Involvement with Evolution corporate meetings / reviews; and
- Quarterly community meetings (the presentations are published on the Evolution website).

Weekly reviews of the safety and environment incidents reports are also performed by the Chief Operating Officer.

Evolution has a risk register. In summary, hazards associated with the operations at the site are identified via the following techniques and then risk assessed.

- Process hazards are identified via HAZOP, Semi-Quantitative Risk Analysis and Bow Tie Diagrams;
- Approved operational procedures contain hazards and risk mitigation measures. Principal Hazards, i.e. higher risk tasks, also have critical controls nominated. These critical controls are monitored and maintained; and
- Maintenance hazards via job hazard analyses and approved procedures. The job hazard analyses are being converted to Safe Work Instructions.

During the audit, some of the process safety information for the FTL project was reviewed, i.e.:

- The P&IDs (piping and instrumentation diagrams);
- The Single Line Diagrams;
- The HAZID and HAZOP studies;
- The tank construction manuals, e.g. including the Inspection and Test Plans and the materials of construction certificates; and

> The commissioning checks, e.g. line pressure testing.

Given the above observations, the following recommendation is made:

Recommendation No. 5 Ensure that all HAZOP actions from the FTL project are adequately closed-out.

4.1 PLANT PROCEDURES, RECORDS AND OTHER DOCUMENTATION

4.1.1 Materials Handling

Material inventory data is logged via the computer control system and alarms are utilised to alert operators when to replenish low stocks. Delivery records are kept for future use if required. Contractors responsible for various areas, e.g. liquid oxygen, will supply dosing chemicals when needed.

The handling of ore, slurry and chemicals, including explosives, have been previously discussed (Sections 3.1 to 3.3). There are no further recommendations made for this area of plant operation.

4.1.2 Operating Procedures

Operating procedures for the facility were written during the commissioning period by a specialist company. There are more than 400 operating procedures for the processing plant and more than 80 for the environmental section.

The procedures are currently being rewritten as Safe Work Instructions. These are available to site personnel in both electronic and hard copy form. The operators also have electronic access to Chem Alert information (safety data sheets) and incident reporting (if required).

Operations such as startup and controlled or emergency shutdowns are included in the procedures.

The procedures include the hazards associated with the particular activity and actions to be taken, e.g. chemical spill. Also included in the procedures are useful photographs, e.g. where to take the sample, and computer control system screen outputs. Exclusion zones are used for potentially hazardous operations, e.g. barricading and signage for sodium cyanide transfers from a road tanker. Personal protective equipment is also provided at the beginning of each procedure.

The relevant Superintendents approve all changes to the operating procedures. Operations personnel are included in the review process for modified procedures.

Assessment of how well the requirements of the procedures are known by the process operators is included in the operator training program (see Section 4.2).

Activities that do not have written procedures are reviewed for hazards by conducting a JHA (job hazard analysis).

New operators are constantly supervised until appropriate training has been received (see Section 4.2).

The FTL process is currently being commissioned based on the existing leach system procedures. During the next hazard audit, the final FTL procedures can be checked to ensure adequacy and completeness.

4.1.3 Maintenance Procedures, Permits, Testing and Records

Maintenance programs and test records are kept in both soft and hard copy form. Maintenance requirements are stored within a computing system. Maintenance activities include both scheduled and unscheduled work (i.e. preventative and corrective maintenance).

The reviewed maintenance frequencies used / planned are typical of common industry practice (e.g. the hydrogen cyanide analysers are tested every month).

Preventative maintenance programs typically detail the maintenance and inspection requirements, including the maintenance frequencies, for the following generic equipment items:

- 1. Vessels, process tanks, machines (e.g. crusher and mills), conveyors, vehicles and other large equipment items;
- 2. Pipes;
- 3. Control valves and emergency isolation valves; and
- 4. Instruments, i.e. pressure, temperature, flow, level, analysis and others, e.g. vibration and position switches.

Corrective maintenance can be initiated by anyone (i.e. a work request is generated). Priorities are assigned to each task. For maintenance tasks, work permits are produced and supplied to the personnel performing the work. Permits are generated as required, e.g. hot work permit.

All preventative maintenance tasks are assigned a task number. When a preventative maintenance task is required, a work request is produced and this is reviewed by both the mechanical and electrical supervisors as well as operational staff. Again, a priority is assigned. Weekly forecasts for preventative maintenance are generated by the maintenance system. Test frequencies are performance based.

On completion of the job, the work is closed out within the maintenance system.

Checks on the work orders include:

- Morning tool box / pre-start meetings;
- Management by walking around; and
- Schedule maintenance planning meetings every Tuesday and Thursday.

The results of the maintenance activities, e.g. calibrations, tests etc, are recorded.

Maintenance manuals (including vendor manuals) are kept by the Maintenance Superintendent.

Trained external contractors are used to perform selected maintenance activities, e.g. fire protection systems maintenance and oxygen system maintenance. Contractors are chosen based on experience in the same field and the suitability to perform the required tasks. Evolution's contractor assessment process includes reviews of the supplier's health, safety and environment plans, procedures and risk assessments.

Evolution has a permit to work system. This includes practices for lock out, tag out of process and electrical systems to make the work area safe. Permits include hot work, excavation, crane / man-cage, High Voltage, isolation and confined space entry. Any special precautions, e.g. hazard mitigation, are included on the work permit. JHAs are performed for non-routine tasks for hazard identification. Higher risk areas are reviewed by the relevant Superintendents. Tool box / prestart talks are held to clarify work scope and minimise the likelihood of incidents.

The High Voltage permits for the last three years were reviewed. These appeared to be adequately completed.

The electrical installation and maintenance of the FTL power supply was reviewed. All drives are isolated remotely for maintenance, i.e. via locks at the main isolators. Testing-for-dead is performed prior to the work commencing.

Line or equipment venting and isolation are performed by the operators prior to handover for the maintenance to begin. Isolation requirements are included in the work permit. Maintenance personnel also approve the permits to perform the work.

Should replacement parts be required for maintenance, materials of construction are determined by existing supplier information, by details of installed parts (which is included on the order forms when required), pipe specifications on the P&IDs or by supplier recommendations.

Evolution has a hose register for all hoses conveying hazardous materials.

Checks on the more critical protections associated with the FTL project were performed. This included the following:

- Safety showers and eyewash stations;
- Cyanide detectors;
- Kiln instrumented permissives and trips; and
- Lifting gear.

Whilst finalisation of the maintenance requirements is pending, checks are being performed on the above-listed items to ensure they are fit-for-purpose.

The following recommendation is made from the maintenance reviews:

Recommendation No. 6 Provide means in the maintenance system to ensure the internal integrity of the hydrogen peroxide Isocontainers remains adequate.

4.1.4 Plant Modification

All process changes (as defined within the Evolution management of change procedure) are reviewed via an electronic change management system. The process is summarised as follows:

- Requests for change can be initiated by anyone. The changes can be temporary, permanent or emergency requirements;
- An electronic form is submitted to predetermined people for review, e.g. production, technical and maintenance staff;
- An evaluation is performed;
- Action items are sent to the appropriate people;
- Final approval is given by the nominated senior personnel depending on the modification scope / size;
- The change is completed as per the maintenance procedural requirements; and
- Field checks are performed including a final pre-startup review and then the modification is closed-out.

Larger, more complex and potentially hazardous changes are reviewed at site via the HAZOP technique or other forms of risk assessment.

For smaller, less potentially hazardous changes, the screening checklists within the change management system are used.

The master plant drawings are stored electronically and in hard copy. These are revised on an as needs basis depending on the details of the modification.

During this audit, the FTL project modification was reviewed in detail, i.e. the design, assessment, implementation and close-out processes.

Other change forms reviewed indicated the close-out sections (8 and 9) were not being completed.

Recommendation No. 7 Perform a review of all modifications made in the years 2016 to 2019 to ensure they have been closed out acceptably (including all relevant documentation updates).

Recommendation No. 8 Provide means to ensure all modifications are closed out acceptably (including all relevant documentation updates) for future modifications. This should include means to keep the modification register upto-date (last revised in 2016).

4.2 **OPERATOR TRAINING**

Elements of the training practices have been discussed throughout this report. A summarised description of operator and safety training is given below.

Operators and maintainers in the processing plant and mining department receive training via a number of means. These include:

- Induction training which includes hazards awareness as well as specific awareness training, e.g. hazards of hydrogen cyanide;
- Basic training and assessment in equipment, plant operation and computer systems from Evolution supervisors, e.g. spill response;
- External courses, e.g. Orica safety and operability course on sodium cyanide; and
- > Tool box talks and plant meetings.

The explosives contractor staff and selected Evolution staff are also SSAN (Security Sensitive Ammonium Nitrate) trained and approved.

The site training programme has been developed by an external company and is reviewed and updated by Evolution personnel.

On successful completion of defined training requirements that are based on the operating procedures, the new operators are graded to a "1" level. Further training and assessment are performed as required by the Evolution training system until the operators reach grade 4 (the highest grade possible, i.e. competent in all processing plant operations). Non-trained personnel are not permitted to perform the relevant operations by themselves.

Training procedures and records are kept by the Evolution training supervisor in both hard copy and electronic form. Competency and understanding tests are included as part of the training programme. Each employee's training needs and what has been completed is included within the training system.

Safety training includes:

- Site induction for all employees, contractors and non-escorted visitors;
- Processing plant induction;
- Lock-out tag-out procedures (Level 1 for all people, Level 3 for permit issuers);

- Fire protection;
- Confined space rescue;
- First Aid (all shift employees);
- Open air breathing apparatus;
- Procedural requirements, e.g. how to use the change management system;
- Hazardous materials awareness course for the operators, maintenance technicians and workshop personnel;
- > Dedicated training on specific hazards, e.g. sodium cyanide; and
- Job hazard analyses.

Training records are kept for each employee. Contractors are included in the safety training. Reviews are performed, e.g. on permits, to ensure compliance.

At all times, there are people on-site trained in first aid, fire fighting and confined space rescue.

Monthly refresher training lists are produced which show people's training needs. These lists are sent to the Mine Manager for review.

There have been no major changes to the training programmes at the site and hence there are no recommendations from this area of the audit. As the designs and operations associated with the FTL project are essentially the same as the existing leach system then the same operating procedures are currently being used during the commissioning phase and hence significant training was not required.

4.3 EMERGENCY PLANNING

An emergency response plan (ERP) exists for the entire site. It is currently undergoing a significant revision. The existing ERP and the draft for the revised ERP were both reviewed.

These ERP's were reviewed and found to contain the main requirements of the Department of Planning's HIPAP No. 1, "Industrial Emergency Planning Guidelines" that are relevant to this site. The existing document has been reviewed and approved by the Department of Planning. Copies are distributed to selected personnel.

The ERP includes events such as fires, explosions, bomb threats, natural events and spills. Off-site impacts are also included. Contact numbers, e.g. police, ambulance, fire brigade and neighbours, are given.

As the site is large, there are a number of emergency assembly areas. Hence, there are options available for assembly if an assembly point is unsafe, e.g. fire

nearby. Evolution has developed a system for accounting for personnel at each emergency assembly area, i.e. via the security swipe cards. The emergency operations centre is located in the Administration Conference Room.

The person with overall control, the "Emergency Services Coordinator", is located in the emergency operations centre. Within each area, there are nominated incident controllers for handling specific emergency response actions, e.g. the senior operator in the control room for the processing plant. These people are identified via a tabard. Control is handed over to the Fire and Rescue NSW / Rural Fire Brigade should they be required to attend.

All emergency response officers and members of the emergency response team are trained by the Rural Fire Service.

Given the site layout, there is adequate site access and egress for emergency vehicles via the main gate and perimeter road.

Emergency situations are noted via an audible alarm.

Emergency drills are routinely performed to practice the emergency response requirements, e.g. man-down in the cyanide area. The ERP is updated as a result of the learnings from all simulated exercises. One corporate level crisis emergency simulation is performed each year as well as four local emergency simulations.

First aid can be supplied by a number of means, e.g. shift personnel trained in First Aid as well as any of the Emergency Response Officers.

There are First Aid boxes and emergency PPE (personal protective equipment) boxes located throughout the facility. Random checks performed during the audit showed that the necessary equipment was available in the inspected boxes.

For the last three years of operation, there have been no major emergency events with off-site impacts.

5 SITE HISTORY

5.1 INCIDENT HISTORY

Hazardous situations, near misses or incidents are reported within the electronic incident reporting system. Environmental impacts are also included.

All incident entries are reviewed in the morning managers' meetings.

All employees are trained in how to use the incident recording system.

When an incident occurs, the following basic steps are taken:

- A supervisor assesses the scale of the incident;
- Verbal reporting to the relevant Superintendent is performed;
- > The incident is reported, i.e. entered into incident recording system;
- The incident is graded, e.g. type of hazard, the hazard potential, injury or environmental;
- An incident report is produced and investigated;
- Incident investigation includes root cause analysis (ICAM (Incident Cause Analysis Method) or 5-Whys methodologies used);
- Actions from the incident investigation are entered into the incident recording system with responsible people assigned to each action; and
- > Managers ensure that each investigation is adequately closed out.

The incident reports for the past three years of operation were reviewed and/or discussed during the audit. There were 1,847 records. This shows a continued high level of reporting vigilance and commitment to improve. The majority of incident investigations have been completed (with the exception of the more recent entries). The incidents reported were mostly of minor nature. Examples include:

- ➢ Wildlife injuries;
- Vehicle accidents;
- Injuries;
- Equipment failures;
- Near misses;
- Procedural failures; and

Losses of containment.

The more significant incidents were reviewed. Events included a release of xanthate during flushing and the incorrect use of a diesel pump (used during the FTL project in the cyanide destruct area). No adverse off-site impact was recorded for any of these events. Appropriate controls have been or soon will be installed.

Statutory reporting, e.g. to the Department of Primary Industries - Mineral Resources, is also performed as required.

5.2 **PREVIOUS STUDIES**

Since the last hazard audit, there have been no changes to the facility that required further Hazard Studies (including the FTL project). Correspondingly, there are no recommendations from recent statutory Hazard Studies to be reviewed (the recommendations from the original facility Hazard Studies were reviewed during the first hazard audit).

The 19 recommendations made in the last hazard audit report (Ref 2) were reviewed during this audit. Whilst spot checks indicated that some of these have been addressed, e.g. recommendations 1, 2, 3, 4, 5, 7, 10, 11 and 12, the response to the remaining recommendations needs to be provided.

Recommendation 13 from Ref 2 is no longer required as Evolution use a different methodology for risk assessments.

Recommendation No. 9 Ensure that all recommendations from the 2016 hazard audit have been adequately closed out (with the exception of recommendations 1, 2, 3, 4, 5, 7, 10, 11, 12 and 13 which were checked during this audit and found to be adequately addressed).

6 APPENDIX A - DOPE APPROVAL CORRESPONDENCE

Hazard Audit Report for Evolution Mining, Cowal Gold Operations

Appendix A - DoPE Approval Correspondence



 Planning Services

 Resource & Energy Assessments

 Contact:
 Paul Freeman

 Tel:
 9274 6587

 Email:
 paul freeman@planning.nsw.gov.au

Ms Danielle Wallace Superintendent – Environment and Social Responsibility Cowal Gold Operations Evolution Mining Limited PO Box 210 WEST WYALONG NSW 2671

Via email: Danielle.wallace@evolutionmining.com.au

Dear Ms Wallace

Cowal Gold Mine (DA 14/98) - Independent Hazard Audit

I refer to your letter dated 19 March 2019 asking the Secretary to approve an independent hazard auditor for the Cowal Gold Mine in accordance with condition 5.4(c) of the development consent for the mine.

The Department has carefully reviewed the request for Mr Dean Shewring of Pinnacle Risk Management Pty Limited to undertake the hazard audit. The Department considers Mr Shewring is appropriately qualified and independent.

Accordingly, the Secretary has approved Mr Shewring to undertake the hazard audit for the Cowal Gold Mine.

If you wish to discuss the matter further, please contact Paul Freeman on 9274 6587.

Yours sincerely

26/3/19

Steve & Donoghue A/Director Resource and Energy Assessments as nominee of the Secretary

320 Street Sydney NSW 2000 | GPO Box 39 Sydney NSW 2001 www.planning.nsw.gov.au

7 APPENDIX B – SELECTED DOCUMENTS OBTAINED OR SIGHTED

Hazard Audit Report for Evolution Mining, Cowal Gold Operations

| Document Name / Type | | | | | |
|--|--|--|--|--|--|
| Emergency Response Plans (current and the draft new plan) | | | | | |
| Hazardous Waste and Chemical Management Plan | | | | | |
| Transport of Hazardous Materials Study | | | | | |
| Results of Simulated Emergency Exercises | | | | | |
| Safety Management System | | | | | |
| Company Policies | | | | | |
| Training Records, e.g. Dangerous Goods Awareness | | | | | |
| Modification Procedure | | | | | |
| 2016 – 2019 Incident Records | | | | | |
| QHSE (Quality, Health, Safety and Environment) Reporting System | | | | | |
| Risk Register | | | | | |
| Evolution Bow Ties | | | | | |
| Job Hazard Analyses | | | | | |
| Tailings Storage Facility Wall Lift Plans | | | | | |
| Permits to Work | | | | | |
| Documentation for Selected Modifications, e.g. the FTL project's HAZID and HAZOP studies | | | | | |
| Maintenance Records | | | | | |
| UPS Testing Procedure | | | | | |
| High Voltage Permits | | | | | |
| Internal Audit Records | | | | | |
| Piping and Instrumentation Diagrams | | | | | |
| Single Line Diagrams | | | | | |

Appendix B – Selected Documents Obtained or Sighted

8 APPENDIX C - RECOMMENDATIONS IMPLEMENTATION PROGRAM

Hazard Audit Report for Evolution Mining, Cowal Gold Operations

| ltem No. | Hazard Audit Recommendation | Action Taken | Responsibility | Required Completion Date |
|-------------|--|--------------|---|--------------------------------|
| 1 | Ensure there are adequate flange covers on all pipes containing hazardous materials. This is to include the FTL hydrochloric acid dosing pump (e.g. the three flanges on the pump discharge line) | | Processing Superintendent | |
| 2 | Review the need for a mechanical support for the PAX mixing tank transfer pump suction line as this pipe is connected to the pump with a braided hose, i.e. there is the potential for stresses on the tank nozzle and possible failure | | Processing Superintendent | |
| 3 | Improve the housekeeping in the corrosives section of the reagent shed, i.e. remove the spilt material and prevent an accumulation of combustible material such as plastic | | Processing Superintendent | |
| 4 | Include in the preventative maintenance system the need for routine cleaning of the dam supplying the fire water pumps, e.g. to prevent weed build-up which can cause blockages in the fire water system | | Processing Superintendent | |
| 5 | Ensure that all HAZOP actions from the FTL project are adequately closed-out | | Projects Director | |
| 6 | Provide means in the maintenance system to ensure the internal integrity of the hydrogen peroxide Isocontainers remains adequate | | Processing Maintenance Superintendent | |

Appendix C - Recommendations Implementation Program

| ltem No. | Hazard Audit Recommendation | Action Taken | Responsibility | Required Completion Date |
|-------------|---|--------------|--|--------------------------------|
| 7 | Perform a review of all modifications made in the years 2016 to 2019 to ensure they have been closed out acceptably (including all relevant documentation updates) | | Safety and Training Superintendent | |
| 8 | Provide means to ensure all modifications are closed out acceptably (including all relevant documentation updates) for future modifications. This should include means to keep the modification register up-to-date (last revised in 2016) | | Safety and Training Superintendent | |
| 9 | Ensure that all recommendations from the 2016 hazard audit have been adequately closed out (with the exception of recommendations 1, 2, 3, 4, 5, 7, 10, 11, 12 and 13 which were checked during this audit and found to be adequately addressed) | | Safety and Training Superintendent | |

9 **REFERENCES**

- 1 Department of Planning NSW, *Hazardous Industry Planning Advisory Paper No. 5: Hazard Audit Guidelines;* NSW Government, Sydney, 2011
- 2 Pinnacle Risk Management Pty Ltd, *Hazard Audit Report for Evolution Mining Pty Limited, Cowal Gold Operations, NSW, 5* June 2016
- 3 Pinnacle Risk Management Pty Ltd, *Final Hazards Analysis, Cowal Gold Project, NSW, Barrick Australia Ltd,* May 2006
- 4 North Limited, *Cowal Gold Project, Environmental Impact Statement*, 13 March 1998
- 5 Barrick Australia Ltd, *Transport of Hazardous Materials Study*, 2005
- 6 Pinnacle Risk Management Pty Ltd, Fire Safety Study, Cowal Gold Project, NSW, Barrick Gold of Australia Ltd, Dec 2004
- 7 Department of Planning NSW, *Hazardous Industry Planning Advisory Paper No. 9: Safety Management;* NSW Government, Sydney, 2011