

# TÜMAD

MADENCİLİK SANAYİ VE TİCARET A.Ş.



## EMERGENCY ACTION PLAN for LAPSEKİ PROJECT

by TÜMAD Madencilik San. ve Tic. AŞ

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## EMERGENCY ACTION PLAN for LAPSEKİ PROJECT

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#### **ABBREVIATIONS AND DEFINITIONS**

Project	: The Lapseki Gold and Silver Mine and Processing Project
TÜMAD	: TÜMAD Madencilik San. ve Tic. A.Ş.
EBRD	: European Bank for Reconstruction and Development
EIA	: Environmental Impact Assessment
ER	: Emergency Response
EAP	: Emergency Action Plan
ERT	: Emergency Response Team
ESMS	: Environmental and Social Management System
EU	: European Union
LPG	: Liquid Petroleum Gas
OHS	: Occupational Health and Safety
PPE	: Personal Protective Equipment
PR(s)	: Performance Requirement(s)

**Emergency Situation:** A situation which includes the incidents that are likely to cause injury or death, to harm to assets and/or the environment and minimization of losses and the need to take some measures so that these situations do not result in serious conditions.

**Incident Controller:** Describes the administrator of the area where emergency has taken place, who is responsible for taking necessary precautions at the scene and restricts the entry to the scene in an emergency.

**Emergency Controller:** Describes the operation manager who will make decisions on the response to emergency and ensure that the mine site is evacuated and the necessary precautions are taken in an emergency.

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## 1 INTRODUCTION

TÜMAD Madencilik San. ve Tic. A.Ş. (TÜMAD) plans to establish the Lapseki Gold and Silver Mine and Processing Project (the Lapseki Project) within the administrative boundaries of the Şahinli and Kocabaşlar Villages of the Lapseki District in the Province of Çanakkale. The construction phase of the Lapseki Project has been at completion stage and the operation phase will start in October 2017.

The project is seeking finance and this document is produced as a part of studies conducted to assess the Environmental and Social Impacts of the Project as per the EBRD Performance Requirements (PRs).

This document is the Emergency Action Plan, for the TÜMAD's Lapseki Gold Mine for the operation phase. The Integrated Management System (IMS) document registration number for this Plan is (TMD\_LAP\_ISG\_PLN.002). This management plans sets the requirements for the operation phase of the Lapseki Project is an integral part of the Environmental and Social Management System (ESMS) implemented by TÜMAD for the Project.

This Management Plan is based on the Project(s) ESMS Framework (TMD\_EYS\_PLN.004) of TÜMAD, which is owned by the TÜMAD General Manager. Any subsequent changes to the TÜMAD ESMS may result in the changes to this document.

This Management Plan will be reviewed on a minimum of a six monthly basis during construction and commissioning. During operation phase, this Plan will be reviewed on an annual basis to determine whether any changes or updates are required to the Management Framework unless a more frequent update is required to reflect changing project design or ESMS requirements and procedures.

Any requests for changes to this Management Plan must be addressed to the owner of this Management Plan and will be subject to appropriate review and approval processes as outlined in the Management of Change Procedure (TMD\_EYS\_PRD.006).

## 2 PURPOSE

This Plan has been prepared to define the response actions to be taken in case of an emergency situation that may occur at Lapseki mine site. The Emergency Plan will be applied in accordance with the applicable legislation and for the protection of the following;

- Human life
- Environment
- Assets
- Commercial Liabilities
- Reputation of TUMAD

The Emergency Plan identifies possible emergency incidents that may occur at Lapseki Gold Mine and pose a risk to the worker, company assets, community and/or the environment. While this plan does not include every possible emergency situation, it provides general procedures that can be combined or implemented with any possible emergency so that the requirement can be fulfilled.

The plan provides clear, precise and efficient rules to the workers responsible for emergency management, and ensures that they are well informed and competent in their implementation. This plan identifies the company and regulatory framework for emergency management and, beyond that, provides structure on post incident activities for the Lapseki Gold Mine and its surroundings.

The main purpose of the emergency plan can be listed as below:

- To prevent possible injury or loss of life,
- To minimize losses and damage to property, equipment, and the environment,
- To provide a chain of command for intervention in the emergency situations with a timely and coordinated approach,

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- To ensure that all necessary equipment, personnel and other resources are available for effective control of the emergency situation
- To ensure appropriate information is available to the Project stakeholders: to inform and protect local communities, to inform emergency services and relevant authorities.
- To ensure that all personnel and contractors are fully aware of their responsibilities during any emergency.

### 3 SCOPE

Emergency Action Plan covers all TÜMAD operations including contractor activities for the operation phase of the Lapseki Project.

This plan also refers to the rehabilitation actions after the emergency situation and emergency situations during the handling of cyanide.

#### 3.1 Overlap with the Other Management Plans

This Management Plan is part of the overall suite of Management Plans developed for the TÜMAD Project and as part of ESMS overlaps with the following management plans;

- Stakeholder Engagement Plans (TMD\_LAP\_EYS\_PLN.001 & TMD\_IVR\_EYS\_PLN.001); Particularly in relation to the disclosure of information to stakeholders
- Cyanide Management Plan (TMD\_CEV\_PLN.008); Particularly in relation the emergencies during the transport and use of cyanide
- Traffic Management Plan (TMD\_ISG\_PLN.005); Particularly in relation to the traffic accidents
- Explosive and Hazardous Materials Management Plan (TMD\_ISG\_PLN.006); Particularly in relation to the spills of hazardous materials
- Community Health and Safety Security Management Plan (TMD\_EYS\_PLN.006); Particularly in relation to the emergencies having an impact on community
- Health and Safety Management Plan (TMD\_ISG\_PLN.007); Particularly in relation to the emergency response element in the general framework of Health and Safety Management
- HR Training Plan (TMD\_IK\_PLN.001); Particularly in relation to the trainings associated with emergency cases
- OHS Training Plan (TMD\_ISG\_PLN.001); Particularly in relation to the trainings associated with emergency cases
- Local Procurement Management Plan (TMD\_EYS\_PLN.005); Particularly in relation to the requirements defined for suppliers for emergency response
- Labour Management Plan (TMD\_IK\_PLN.002); Particularly in relation to the requirements defined for general labour force for emergency response
- Waste Management Plan (TMD\_CEV\_PLN.004); Particularly in relation to the emergency cases for waste handling
- Incident Accident Investigation Loss and Reporting Procedure (TMD\_ISG\_PRD.007); Particularly in relation to the requirements investigating the emergency cases and post emergency rehabilitation actions
- Fire extinguisher control and replacement procedure (TMD\_ISG\_PRD.008)
- Cyanide Transport Procedure (TMD\_ISG\_PRD.009); Particularly in relation to the response to emergencies during cyanide transport
- Cyanide Storage Procedure (TMD\_ISG\_PRD.010); Particularly in relation to the requirements defined for storage of cyanide
- Spill Clean Up Plan (TMD\_CEV\_PLN.009)

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- Sodium Cyanide Preparation and Storage Procedure (TMD\_İSG\_PRD.012); Particularly in relation to the requirements defined for storage of cyanide.

#### **4 PROJECT STANDARDS**

Standards applicable to the Project must be complied with during all Project activities (the “Project Standards”). TÜMAD comply with the more stringent of national standards and other applicable standards.

Project Standards are defined by;

- applicable Turkish Standards;
- Turkish Environmental Impact Assessment (EIA) requirements;
- other commitments to and requirements of Turkish Government authorities;
- applicable international standards and guidelines;
- applicable TÜMAD standards, policies and procedures;
- Other industry guidelines with which TÜMAD has committed to comply.

##### **4.1 Applicable Turkish National Standards**

- Communiqué on Major Accident Prevention Policy Documents (Official Gazette 29435, 4 August 2015).
- Regulation on Prevention and Effect Control of Major Industrial Accidents (Official Gazette 28867, 30 December 2013).
- Regulation on Emergency Situation at Workplaces (Official Gazette 28681, 18 June 2013).

##### **4.2 Turkish EIA requirements**

Measures to be taken during use/in case of emergency are presented in the EIA. These measures are mainly composed of;

- Definition of emergency cases
- Definition of communication channels, assembly points, response equipment
- Definition of roles and responsibilities.

These measures are completely transferred to appropriate sections of this Plan.

##### **4.3 Other Commitments to and Requirements of Turkish Government Authorities**

Not applicable.

##### **4.4 Applicable International Standards and Guidelines**

The international standards and guidelines which TÜMAD will implement are as following:

**European Bank for Reconstruction and Development (EBRD):** EBRD Performance Requirement 4 Health & Safety sets out requirements with regard to emergency preparedness and response in accordance with EU requirements under the Seveso III Directive<sup>1</sup>. Key requirements are to ensure the following are in place:

- Major Accident Prevention Policy
- Safety Management System
- Safety Report
- Emergency Action Plan
- Disclosure of key information to the public

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**International Cyanide Management Code:** TÜMAD will implement the International Cyanide Management Code covering emergency response related to the transportation, use and management of cyanide (Cyanide Management Plan, TMD\_CEV\_PLN.008).

**UNEP APELL for Mining:** The UNEP APELL “Guidance for the Mining Industry in Raising Awareness and Preparedness for Emergencies at Local Level” provides applicable guidelines for emergency preparedness and response for mining operations. The Guidance will be taken into consideration for the preparation of emergency preparedness measures.

**Other Standards**

ISO 9001:2015 “Quality Management System Requirements”

ISO 14001:2015 “Environmental Management System Requirements”

OHSAS 18001:2007 “Occupational Health and Safety” Management System”

**4.5 Applicable TÜMAD Standards, Policies and Procedures**

List of applicable TÜMAD standards, policies and procedures are given in Section 3.1.

**5 ROLES AND RESPONSIBILITIES**

This plan is prepared by the OHS Department and is controlled by the OHS Department Manager and the Emergency Response Team (ERT) representative. This plan is approved, issued and owned by the General Manager. Every individual assigned with the role in the Plan will have an alternate that will assume this role if the individual is absent or should they get injured during the emergency situation.

**Table 1: Roles and Responsibilities**

<b>Roles</b>	<b>Responsibility</b>
<b>General Manager</b>	<ul style="list-style-type: none"><li>• Approval of this Plan and provide necessary resources for the implementation of this Plan,</li><li>• Taking the decision to initiate the total minefield evacuation,</li><li>• Coordinating the post emergency rehabilitation works.</li></ul>
<b>Head of OHS Department</b>	<ul style="list-style-type: none"><li>• Overall responsibility for the implementation of this Plan together with Head of Environmental Department for environmental emergencies,</li><li>• Maintaining and revision of this Plan and monitoring performance of implementation of this Plan,</li><li>• Ensuring each emergency case is reported in line with the TÜMAD Incident Accident Investigation Loss and Reporting Procedure,</li><li>• Preparing and executing emergency drill scenarios (minimum every 6 months),</li><li>• Provision of suggestions for performance improvement in accordance to the results of the emergency drills.</li></ul>

<b>Roles</b>	<b>Responsibility</b>
<b>Head of Environment Department</b>	<ul style="list-style-type: none"> <li>Overall responsibility for the implementation of this Plan for environmental emergencies,</li> <li>Support Head of OHS department for;</li> <li>Preparing and executing emergency drill scenarios (minimum every 6 months),</li> <li>Provision of suggestions for performance improvement in accordance to the results of the emergency drills.</li> </ul>
<b>Operations Manager (Emergency Controller)</b>	<ul style="list-style-type: none"> <li>Presiding over the drill scenarios specified in the emergency plans, ensuring that the necessary facilities are provided, evaluating the results of the drill.</li> </ul>
<b>Emergency Response Team Leader</b>	<ul style="list-style-type: none"> <li>Coordinating the ERT and implement relevant emergency response actions with the ERT,</li> <li>Allocation of resources for management of incident and normalization,</li> <li>Identify priorities for the ERT,</li> <li>Deciding on the communication requirements with communities during the emergency.</li> </ul>
<b>Emergency Response Team</b>	<ul style="list-style-type: none"> <li>Appointed and trained personnel responsible to implement emergency plans, drill scenarios in line with the coordination of ERT Leader.</li> </ul>
<b>Emergency Services Coordinator</b>	<ul style="list-style-type: none"> <li>Liaison between ERT leader/Incident Controller and site and external emergency response services.</li> </ul>
<b>Head of Community Relations Department</b>	<ul style="list-style-type: none"> <li>Communicating with Lapseki Mayor, local authorities and ruling members of Şahinli, Kocabaşlar, Yeniceköy, Subaşı, Karaömerler and surrounding village in case emergencies,</li> <li>Coordinating all press and community relations functions related to the emergency,</li> <li>Developing strategies for media related studies,</li> <li>Preparing statements for the press spokesperson,</li> <li>Defining the press strategy, preparing statements for any emergency communication,</li> <li>Choosing and training support teams, disseminating real-time information to the villages,</li> <li>Ensuring consistent statements about events and returning to normal processes.</li> </ul>

<b>Roles</b>	<b>Responsibility</b>
<b>Head of Human Resources Department</b>	<ul style="list-style-type: none"> <li>• Providing employees and their families with the latest emergency information,</li> <li>• Being responsible for issues that concern employees and their families,</li> <li>• Meeting the needs of Mine Search and Rescue Team during rescue</li> <li>• Establishing consulting conditions,</li> <li>• Working aligned with the Head of Community Relations.</li> </ul>
<b>Incident Controller</b>	<ul style="list-style-type: none"> <li>• Being responsible to take necessary precautions at the scene and restrict the entry to the scene in an emergency until the ERT arrives the scene.</li> </ul>
<b>Private Security Unit Manager</b>	<ul style="list-style-type: none"> <li>• Ensuring that the entire site is secured,</li> <li>• Recording events and communications in the “Emergency Notification Form”,</li> <li>• Tracking the telephones and radios until the end of the emergency,</li> <li>• Ensuring that telephone lines and wireless network are switched on.</li> </ul>
<b>All worker and contractors</b>	<ul style="list-style-type: none"> <li>• Attendance to the necessary training and drills and follow the measures given in this Plan.</li> </ul>
<b>Communication/Control Room Coordinator</b>	<ul style="list-style-type: none"> <li>• Establishing regular communication throughout the incident,</li> <li>• Coordinating the communication between ERT, the incident and the Control Room,</li> <li>• Being responsible from the management of the emergency response equipment and control room,</li> <li>• Ensuring the safety and integrity of the control room.</li> </ul>
<b>Workplace Physician/Nurses</b>	<ul style="list-style-type: none"> <li>• Taking part in the ERT during emergencies,</li> <li>• Assessing the need for medical services,</li> <li>• Assessing the need for ambulance as needed.</li> </ul>
<b>Commercial Services Coordinator</b>	<ul style="list-style-type: none"> <li>• Being responsible from all legal and insurance legislation, commercial and risk management issues,</li> <li>• Keeping a record of all decisions,</li> <li>• Managing all legal financial and insurance risks and aspects during the emergency.</li> </ul>

<b>Roles</b>	<b>Responsibility</b>
<b>Post Emergency Rehabilitation Coordinator</b>	<ul style="list-style-type: none"> <li>• Post-emergency coordination and planning,</li> <li>• Defining short and long term normalization targets,</li> <li>• Identifying the resources needed to realize the objectives,</li> <li>• Managing the resumption of work (trade) and normalization processes.</li> </ul>
<b>Press Spokesperson</b>	<ul style="list-style-type: none"> <li>• Submission of notices for the media in coordination with Head of Community Relations.</li> </ul>

## **6 IMPLEMENTATION**

### **6.1 Potential Hazards and Risk Assessment**

Potential events that could impact Project-related activities, personnel or assets include:

- fire (contained and conflagration);
- explosion (accident or terrorist);
- earthquake;
- slope failure, mudslide and subsidence, including failure of heap leach facilities;
- epidemic or pandemic, e.g. avian and human pandemic;
- weather – extreme temperatures, snow storms or extreme rainfall;
- aircraft accidents;
- road incident or road obstruction (accident, chemical spill, bridge/culvert collapse etc.);
- spillage of hazardous or potentially-hazardous materials (on or off-site);
- industrial action;
- community unrest;
- criminal, sabotage or arson attack;
- security emergency;
- geopolitical emergency;
- interruption to or failure of telecommunications systems;
- failure of significant computer systems;
- closed access roads.

The TÜMAD Emergency Action Plan incorporates outputs from performed risk identification, classification and assessment activities.

### **6.2 Incident Classification**

TÜMAD has identified five levels of incident to guide the incident responses.

**Table 2: Level of Incident**

<b>LEVEL OF EMERGENCIES</b>	<b>Level 1</b>	<b>Level 2</b>	<b>Level 3</b>	<b>Level 4</b>	<b>Level 5</b>
<b>OCCUPATIONAL HEALTH and SAFETY</b>	<i>First Aid</i>	<i>Injury Requires Medical Treatment / Injury Requires Temporary Duty</i>	<i>Accident of Single Workforce Loss</i>	<i>Accident of Multiple Workforce Loss</i>	<i>Death or Permanent Damages</i>
<b>ENVIRONMENT</b>	<i>Low or None Environmental Impact</i>	<i>Low Environmental Impact</i>	<i>Medium Environmental Impact</i>	<i>High Environmental Impact</i>	<i>Serious – irreversible Environmental Impact</i>
<b>MEDIA &amp; COMMUNITY RELATIONS</b>	<i>Individual complaint;</i>	<i>Some rare complaints; Attention of local media</i>	<i>Some rare complaints; Attention of local media</i>	<i>An increase in the rate of complaints, Increasing attention of local/national media</i>	<i>High level of concern or interest from the local community Attention of national or international media</i>
<b>PECUNIARY LOSS</b>	<i>&lt; 1,000 TL</i>	<i>1,000 TL-10,000 TL</i>	<i>10,000TL – 100,000TL</i>	<i>&gt; 100,000 TL</i>	<i>&gt; 1,000,000 TL</i>
<b>SECURITY</b>	<i>Infringements of interior policies and procedures; No material damage.</i>	<i>Minor offences: e.g. area trespassing, minor material loss</i>	<i>Noticeable material loss. Social unrest on low level</i>	<i>Serious material loss causing halt of production. Serious crimes committed against persons. High level of social unrest. High levels of fraud or embezzlement.</i>	<i>Serious crimes; Multiple deaths; The mandatory evacuation of all personnel</i>
<b>INSPECTION RESPONSIBILITY AND TIMEFRAME</b>	<i>Manager / Chief 3 days</i>	<i>Head of Inspection Team 1 week</i>	<i>Manager 3 weeks</i>	<i>Occupational Health and Safety, Manager of Environment or Community Relations 3 weeks</i>	<i>Management &amp; Head Office's Inspection 3 weeks</i>

All incidents with a consequence of major (e.g. single fatality) or catastrophic (e.g. multiple fatalities) require notification of the following within 24 hours or earlier:

- All Stage 1 emergencies will be reported to Department's Head within 24 hours.
- All Stage 2 and 3 emergencies will be reported to Operations Manager within 24 hours.
- All Stage 4 emergencies will be reported to General Manager within 12 hours.
- All Stage 5 emergencies will be reported to General Manager within 3 hours.

### 6.3 Management Controls

In response to an emergency, the primary concerns are to:

- protect personnel, the community, the environment, TÜMAD assets and information;
- ensure that the Project can continue to operate with as little effect on schedule and as much as possible in the situation;
- ensure that stakeholders and staff do not lose confidence in the Project and its ability to continue in operation.

If there is any emergency situation in or around the Lapseki Gold Mine, the General Manager or the Operations Manager or the Private Security Unit Manager should be notified immediately.

The implementation of emergency response procedures include the following components:

- first actions;
- alert levels and reporting lines;
- internal and external notification and communication;
- distribution list (phone cascade, electronic and paper messages);
- activation of the Emergency Response Team;
- activation of the Emergency Action Plan;
- list of key resources (internal/external) and contact information (centre of expertise database);
- onsite command post;
- location of resources;
- logistics;
- site evacuation;
- protection of vital records protocols;
- external emergency services/security protocols, muster points and assembly areas;
- emergency equipment;
- emergency response teams;
- operations shutdown;
- locking of equipment;
- control of energy sources;
- location of main valves and main switches;
- dangerous goods and hazardous materials;
- spill response and protection from contamination;
- emergency communication protocol;
- site re-integration (recovery);
- post-incident investigation protocols;
- internal notifications/reporting tools;
- lessons learned review processes including management of implementation of recommendations from this process; and
- emergency response training and practice drills.

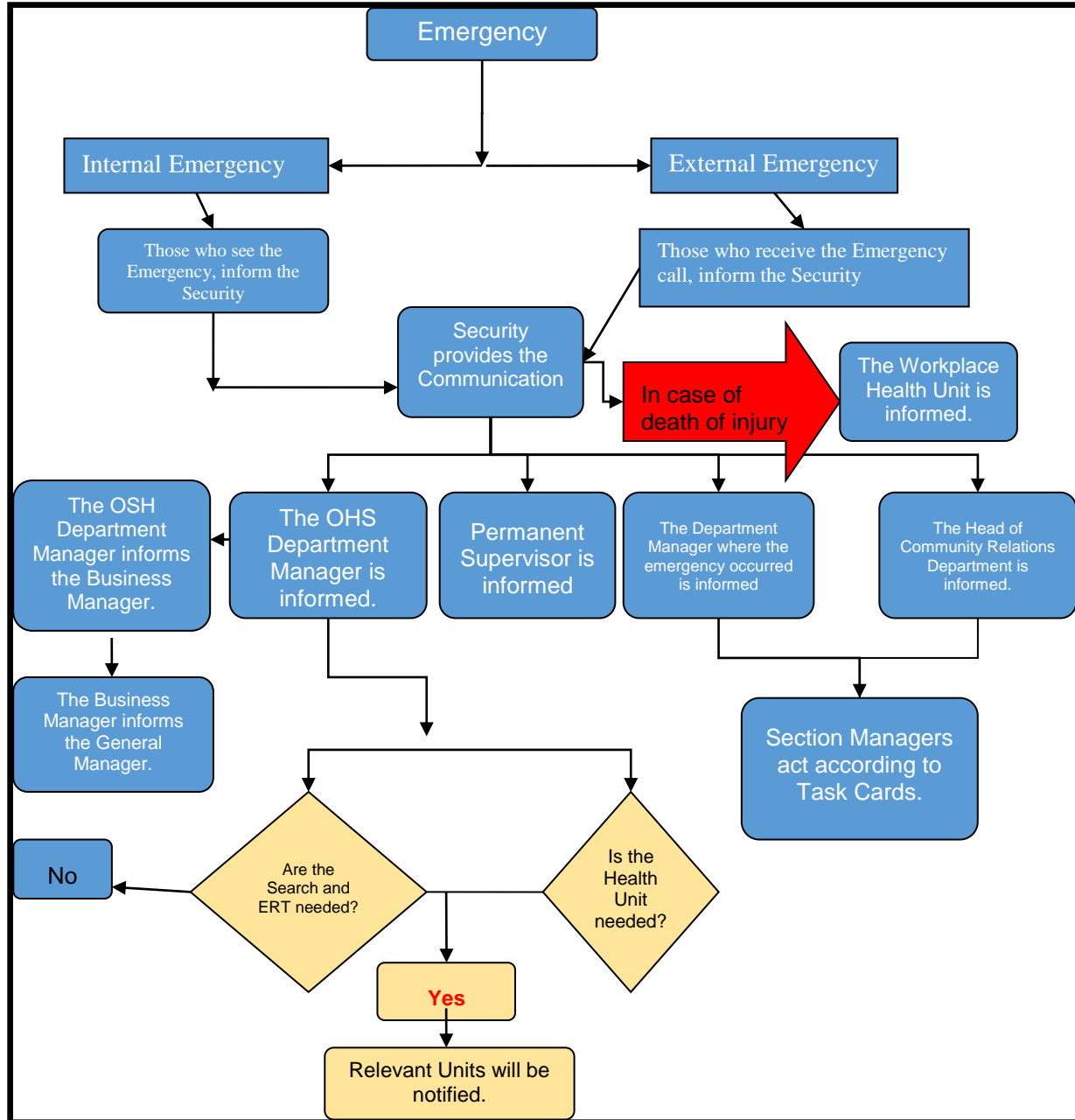
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#### 6.4 Communication in Emergency

Emergency contact flow chart and telephone list will be hanged where employees can easily see and read. Internal and external emergency contact numbers and Radio and Horn communication instructions are given in Appendix 1. Emergency contact numbers will be controlled and updated when there is a change in appointed personnel or their contact number.

The general flowchart of the emergency notification is given in figure below.



**Figure 1: Emergency Flow Scheme**

##### 6.4.1 Announcement

The evacuation decision of the working area will be taken by the General Manager or his representatives.

The evacuation decision of the work area will be announced with a general alarm wherever there is an audible alarm. The alarm is done by radio, telephone and/or personally where there is no audible alarm.

The relevant manager is responsible for the evacuation of all personnel from the designated area.

The General Manager and Department Managers are responsible for promptly notifying all other employees/contractors/visitors/suppliers of evacuation of an area in Lapseki Mine field or the surrounding area.

#### **6.4.2 Emergency Action Style**

When hearing the announcement all employees/contractors/visitors/suppliers or any other person who is available in mine site will:

- Stop work immediately,
- Leave workplace and proceed to the safest assembly point,
- Stay calm and do not run and panic other people,
- Warn others in the vicinity on the way to the assembly point,
- Stay in the assembly area and await further instructions.

Each department manager is responsible for counting all staff in his/her department during evacuation. The department manager may appoint another person to perform this task. Evacuations shall be carried out according to the list on the Safety Unit and/or on the work schedule.

#### **6.4.3 Visitors/Suppliers**

The visitor/suppliers register maintained by the security unit includes a list those visit the mine site in the day of incident. The register will include the departments/persons which they are visiting. The persons in this list must be reached during evacuation. Visitors and suppliers will be reached by the department which are visiting.

#### **6.4.4 Affected Communities**

Head of Community Relations is responsible to assess the emergency situation that would impact the surrounding communities together with the OHS and Security Departments. TÜMAD will have key contact numbers of possible affected communities (e.g mukhtars, their helpers, owner of village houses etc.). Considering the level of the emergency situation and the impact on the neighbourhood communities, affected communities will be informed and external emergency services will be included where necessary for the evacuation processes.

#### **6.4.5 Law Enforcement Force**

Lapseki District Gendarmerie Command Office is the competent law enforcement force to be informed if law enforcement support is needed in case of emergency in mine site.

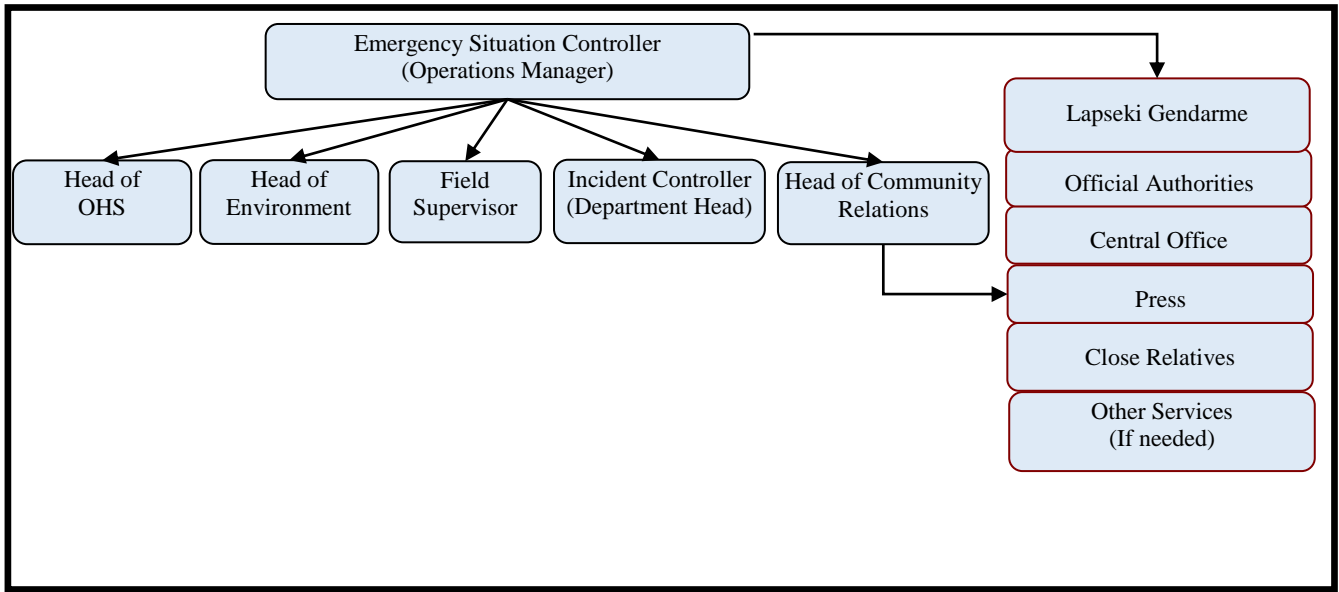
### **6.5 Emergency Management Team**

#### **6.5.1 Structure of the Emergency Management Team**

Lapseki Project Emergency Management Team is formed as below;

- General Manager,
- Operations Manager (**Emergency Situation Controller**),
- Head of OHS Department,
- Head of Environment Department,
- Department Head (Includes one or more during an emergency)(**Incident Controller**),
- Head of Community Relations/Community Liaison Officer,
- Private Security Unit Manager,
- Doctor and the nurse.

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**Figure 2: Structure of Emergency Response Team**

### 6.5.2 Duties and Responsibilities

All staff members mentioned above are obliged to be informed on the content and individual responsibilities as part of this plan.

Every individual assigned with the role will have an alternate that will assume this role if the individual is absent or should they get injured.

Likewise, personnel undertaking any of the above mentioned duties are responsible for informing their representatives in case of their absence in relation to the duties and responsibilities of this Plan.

No person shall be allowed in any case by the senior management to renounce his/her responsibilities without the appropriate appointment of the person concerned.

#### 6.5.2.1 General Manager or Operations Manager – Emergency Controller

The General Manager or Operations Manager is the person in charge of the emergency situation which may occur in or around the Lapseki Project and the resultant intervention.

The person in this position can transfer his/her responsibilities to someone else. However, it must be ensured that the person undertaking these responsibilities will fulfil the tasks as required.

If there is any emergency in or around the Lapseki Gold Mine, the General Manager or the Operations Manager should be notified immediately.

The Operations Manager is responsible for notifying the General Manager of any new dangers that may result in a possible emergency which has not been adequately addressed on this plan.

The main tasks and responsibilities of this staff include the following:

#### During the Incident

- To act as Emergency Controller,
- To ensure that the Rescue Team initiates the intervention,
- To appoint staff to assist during Emergency Control activities,
- To inform department managers about the situation and to refer them to the intervention,
- To designate and allocate both internal and external resources,

- To determine if an emergency has caused a crisis,
- To notify the Company's Senior Management or Representative responsible for the Project Lapseki,
- To notify relevant official authorities,
- To confirm that external emergency services are notified and to coordinate their interventions,
- To ensure that the incident site and the mine site are secured,
- To ensure to make preparation for press inquiries,
- Take continuous notes on incidents and communications during an emergency,
- To ensure that all incidents and communication are documented,
- To announce the end of the emergency,
- To decide on the notification requirements with the community members in coordination with Head of Community Relation Department.

**Post Incident**

- To review the scene,
- Taking statements of eyewitness,
- To ensure that the closest relatives are informed when necessary,
- To notify the Company's Senior Management or Representative responsible for the Lapseki Project,
- To assign the press spokesperson,
- To carry out an investigation after the conclusion of an emergency,
- To appoint persons to serve in the investigation team.

**6.5.2.2 Department Head – Incident Controller**

The head of the department in which the incident is occurred will act quickly with the Rescue Team to the scene. The other department managers must also be available to help with the activities and to be in touch at any time since they are called when they are needed.

The main tasks and responsibilities of the Incident Controller are:

**During the Incident**

- To control the in and out movement of personnel, equipment and resources to the emergency zone,
- To present situation reports Regularly to the Emergency Controller,
- To notify the Emergency Controller of necessary needs,
- To ensure that events are recorded correctly and to document all activities and communications,
- To ensure that all staff available in the field are present,
- To ensure that the incident site is closed to access, except for emergency personnel,
- To define actions to protect the environment in emergency and liaise with the Head of Environment and advice on the type of clean-up operations and the best suitable disposal route,
- To make technical suggestions to General Manager or Operations Manager and the Mining Search and Rescue Teams,
- To stop staff and equipment from working if needed.

**Post Incident**

- To prevent personnel from removing or intervening the equipment or supplies at the scene of the incident,

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- To place a guard at the scene of the incident so that the area is not exposed to external intervention,
- Helping the investigation team to extract the area map and photograph,
- To participate in post-event briefing,
- To ensure that records of missing or damaged equipment are defined and documented.

#### **6.5.2.3 Emergency Response Team Leader**

The ERT Leader is responsible for the overall performance of the ERT. In particular, it is responsible for the following:

- Coordination of the Team,
- Allocation of resources for management of incident and normalization,
- Identify priorities for the ERT.

The team leader must provide regular information to the team and ensure that events are regularly updated.

#### **6.5.2.4 Communication/Control Room Coordinator**

The Communication/Control Room Coordinator is responsible for establishing the Control Room and communicating throughout the incident. Their missions are:

- Providing communication between the ERT at the scene of the incident and the Control Room,
- Control room management and equipment,
- To ensure the safety and integrity of the control room.

#### **6.5.2.5 Security Unit**

Security Unit is listening to the Radio 1. Channel continuously. The Security Unit is the most effective unit to communicate with people outside the minefield and on the mine. Causing a communication glitch, belated emergency announcement, not responding to emergency call by the Security Unit will cause difficulties in providing emergency control.

The main tasks and responsibilities of this staff are:

#### **During the Incident**

- To inform the Head of OHS Department, the permanent supervisor, manager of the department in which the emergency arises, the Community Relations Department manager and the Health Unit if there is injury,
- Notify the OHS Department immediately of any emergency call or communication. The OHS Department will inform the Operations Manager,
- To stop the entry and exit of vehicles and personnel (by closing the mine site) and to ensure that emergency vehicles can pass freely,
- To record events and communications records in the “Emergency Notification Form”,
- Tracking the telephones and radios until the end of the emergency,
- To ensure that telephone lines and wireless network are switched on,
- Not to comment to incoming phones about the Emergency Situation. If the phone is coming from press organizations, transfer the situation to the assigned press spokesperson,
- To notify all the radio channels in operation of the Emergency in line with the request of the OHS Department or the Operations Manager.

#### **After the Incident**

- To classify all emergency communication documents and records,

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- To return communication services and security to normal operation status,
- To participate in the Closing Information Meeting.

#### **6.5.2.6 Head of Community Relations**

Head of Community Relations Department is responsible for managing media and community issues, communicating with surrounding villages and informing the villagers. The duties are;

- To coordinate all press and community relations functions related to the emergency,
- To develop strategies for media related studies,
- To prepare statements for the press spokesperson,
- To define the press strategy, preparing statements for any emergency communication,
- To communicate with Lapseki Mayor, local authorities and ruling members of Şahinli, Kocabaşlar, Yeniceköy, Subaşı, Karaömerler and surrounding villages in case of an emergency,
- To choose and train support teams,
- To disseminate real-time information to the villages,
- To ensure consistent statements about events and returning to normal processes.

#### **6.5.2.7 Head of Human Resources**

The Head of Human Resources Department is responsible for dealing with employees and their relatives. Their missions are:

- To provide employees and their families with the latest emergency information,
- To be responsible for issues that concern employees and their families,
- To address the needs of Emergency Response Team during rescue,
- To establish consulting conditions.

#### **6.5.2.8 Emergency Services Coordinator**

The Emergency Services Coordinator is responsible for the liaison between ERT leader/Incident Controller and site and external emergency response services and is responsible;

- To be in contact with emergency services at the scene of the incident,
- To manage and coordinate all security aspects.

#### **6.5.2.9 Commercial Services Coordinator**

The commercial services coordinator is responsible for all legal and insurance legislation, commercial and risk management issues and will keeping the records of all decisions taken during an emergency.

#### **6.5.2.10 Post-emergency Rehabilitation Coordinator**

Post-emergency Rehabilitation Coordinator is responsible for post-emergency coordination and planning. Their missions are:

- To define short and long term normalization targets,
- To identify the resources needed to realize the objectives,
- To manage resumption of work (trade) and normalization processes.

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#### **6.5.2.11 Press Spokesperson**

The Press Spokesperson is the person designated to meet with the press. Since he/she is a spokesperson for the minefield, he/she will be in contact with the Head of Community Relations for the preparation and submission of notices to be delivered to the media.

#### **6.6 Evacuation Procedures**

Evacuation procedures should be used jointly with other parts of this plan. Evacuation flow charts indicate that emergency response has begun.

For the purposes of this plan, emergency evacuations are divided into two groups. These are Total Evacuation of the Minefield and Evacuation of the Area. Evacuation Procedures for different emergency scenarios are given in Appendix 4.

#### **6.7 Spill Clean Up Plan**

Spill Clean-Up Plan is given in Appendix 5 of this Plan.

#### **6.8 Emergency Assembly Areas**

There are defined Emergency Assembly Areas in Lapseki Mine Field. These locations are defined in the work area plan behind the annexed evacuation flow chart. Emergency Assembly Areas are indicated by large green and white coloured plates bearing the "Emergency Assembly Area". However, this may not be possible in some workplaces that are subject to constant environmental changes. In this case, a distinct geographic area will be designated as the Emergency Assembly Area. The layout showing the locations of the Emergency Assembly Areas are given in Appendix 2.

#### **6.9 Emergency Response Equipment**

Emergency response equipment are important elements of an effective emergency response which are including but not limited to firefighting equipment, spill response equipment, first aid boxes, medical facilities etc. Emergency Response equipment will be checked on a regular basis for their availability, efficiency and maintenance. Lapseki Emergency Response Map and Building Emergency Chats showing the location of emergency response equipment is given in Appendix 3.

### **7 MONITORING**

#### **7.1 Key Performance Indicators**

The effective implementation of this Management Plan will be monitored through the following Key Performance Indicators.

**Table 3: Key Performance Indicators**

No	Key Performance Indicator	Target	Monitoring and Measurement
EAP-LAP-KPI-01	Number of non-compliances	Zero per year	Audit and inspection records Records of emergency drills
EAP-LAP-KPI-02	Number of successful emergency drill	Two per year	Records of emergency drills



## **8 TRAINING**

Department Managers of Lapseki Project are responsible for getting staff and contractors to be informed on the requirements of this plan. Department Managers must also ensure that the staff and contractor employers are aware of the actions described in this plan for the area they work in.

Training involving the relevant aspects of this plan will be provided by the OHS Department to all mining staff. This training will include evacuation, firefighting, general intervention to first aid, spill containment and response, appropriate disposal of waste from emergency response, and other possible emergency situations. The results of the OHS meetings and drills may identify other training topics.

Training will be delivered to all staff including contractors at least on an annual basis.

Emergency drills will be held at least twice a year. Each drill will include a set number of observers who will record the incidents and response of the staff and provide participants with information about the status of the emergency. Contractors will be involved in the emergency drills which would ensure that the contractors are aware of the emergency response measures and increase the efficiency of communication line between TÜMAD and contractors. Contractors will be briefed about their performance after each drill.

## **9 AUDIT**

Daily inspections will be carried out by operational area superintendents / supervisors covering a broad range of operational aspects, including community health safety and security issues as appropriate to activities outside the fence line.

Any contractor activity may be subjected to observation, inspection and auditing by TÜMAD at any time.

The schedule, the frequency, the scope and objectives of the audit as well as the responsible internal inspectors will be indicated in the Audit Program that will be developed and updated by TÜMAD.

The audit/inspection items will include:

- The correct implementation of this Plan and Project Standards,
- Adequacy of emergency response measures and routes,
- Ensure that emergency response team members are up to date,
- Availability of correct and proper emergency response equipment, PPE,
- Ensure that ERT members (or the alternates), workplace physicians/nurses are available on site,
- Appropriate training of all staff including contractors and special training of ERT members.

## **10 REPORTING**

Head of Community Relations will ensure that the following authorities are informed as appropriately:

- Governor
- Gendarmerie
- Police
- Provincial Directorate of Environment and Urbanization (environmental incidents)

TÜMAD will inform Çanakkale Directorate of Environment and Urbanization and submit the report including the date of the accident, location of the accident, type and amount of waste, reasons for the accident, type of waste treatment and rehabilitation of the accident site within 3 working days.

All emergency cases will be reported and investigated according to the Incident Accident Investigation Loss and Reporting Procedure (TMD\_LAP\_ISG\_PRD.007).

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Inspections, incidents and non-compliances shall be documented and administered in accordance with the Record Management Procedures of TÜMAD (TMD\_EYS\_PRD.004).

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## **APPENDIX 1 – EMERGENCY CONTACT NUMBERS AND COMMUNICATION**

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## **APPENDIX 2 – EMERGENCY ASSEMBLY AREAS**

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### **APPENDIX 3 – EMERGENCY RESPONSE EQUIPMENT AND EVACUATION ROUTES**

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## **APPENDIX 4 – EMERGENCY SCENARIOS**

The presented scenarios may not cover every possible emergency situation but they define response actions that can be referred and combined to respond to any other possible emergency scenario when necessary.

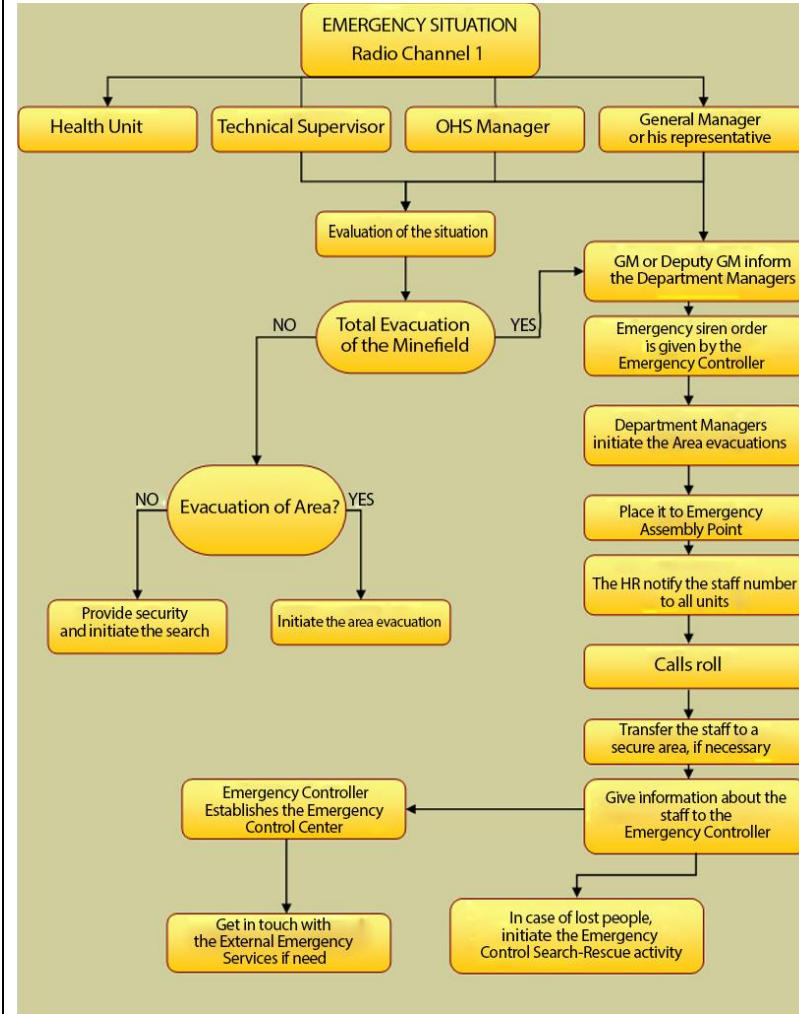
For all scenarios defined in this appendix the Emergency Controller will ensure that the Community Relations Department Head/Deputy is informed on the situation to assess the emergency situation whether it impacts the surrounding communities together with the OHS and Security Departments. TÜMAD keeps key contact numbers of possible affected communities (e.g mukhtars, their helpers, owner of village houses etc.). Considering the level of the emergency situation and the impact on the neighbourhood communities, affected communities will be contacted and when necessary external emergency services will be involved for the evacuation processes.

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**Total Evacuation of the Minefield (large-scale chemical and fuel spillage into the operation area, and the event of an LNG fire)**

Total Minefield Evacuation may be necessary in the event of an emergency as a result of large-scale **chemical and fuel spillage into the operation area, in the event of an LNG fire**.

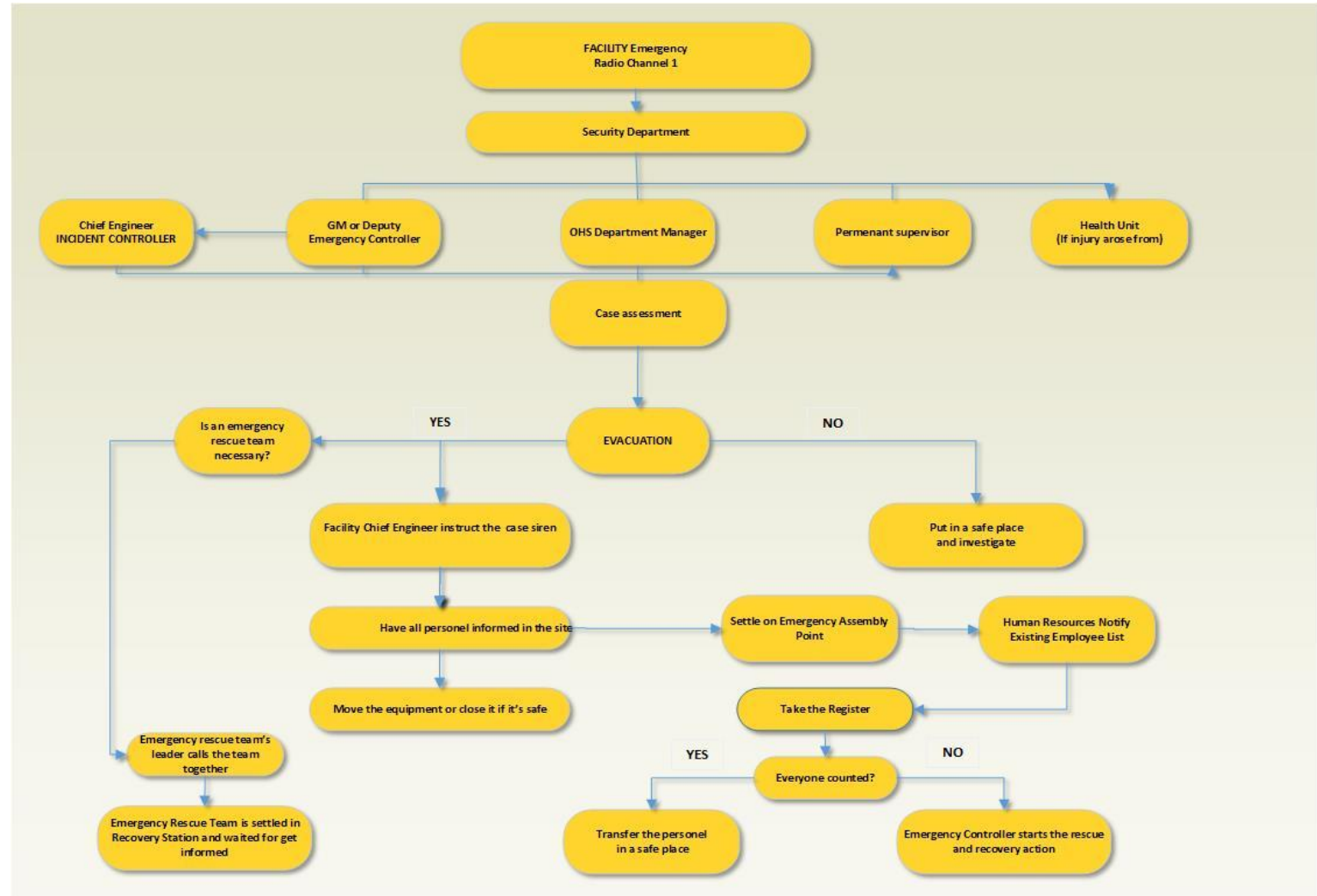
The emergency caller makes an emergency call from channel 1 (because the other channels are likely to be occupied and the channel allocated for emergency is channel 1). In case of a failure in channel 1 etc. he can make an emergency call through its own channel. In all cases, the security department that uses the scanning radio will receive a call. The call recipient Security Department sends the emergency call to the designated authorities. If the person in charge of the Event Coordinator receives a general evacuation or partial evacuation order, he activates the siren system. If there is a communication problem in the siren system, radio, telephone, device usage, messenger etc. are used to reach to the places to be evacuated. All employees who hear the siren voice are obliged to go to the assembly points because the evacuation notice will be with the siren. Fire (contained and conflagration);





**Plant Evacuation on fire, chemical spill, bomb threat and life threatening events**

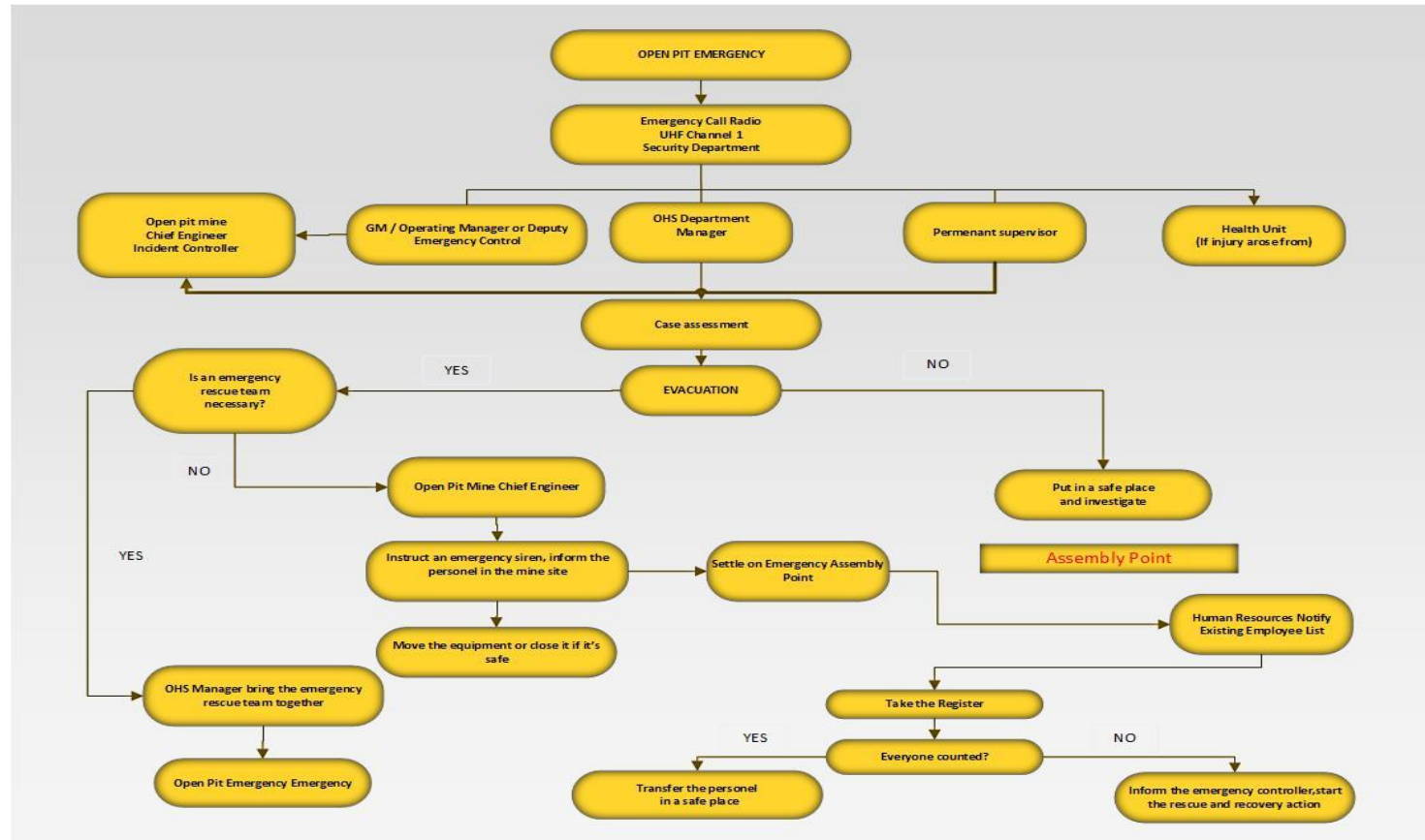
The decision of partial or total evacuation of plant may be taken by the Shift Officer, Plant Engineer, Plant Chief Engineer, Operation Manager or General Manager. Plant evacuation flowchart is given below.



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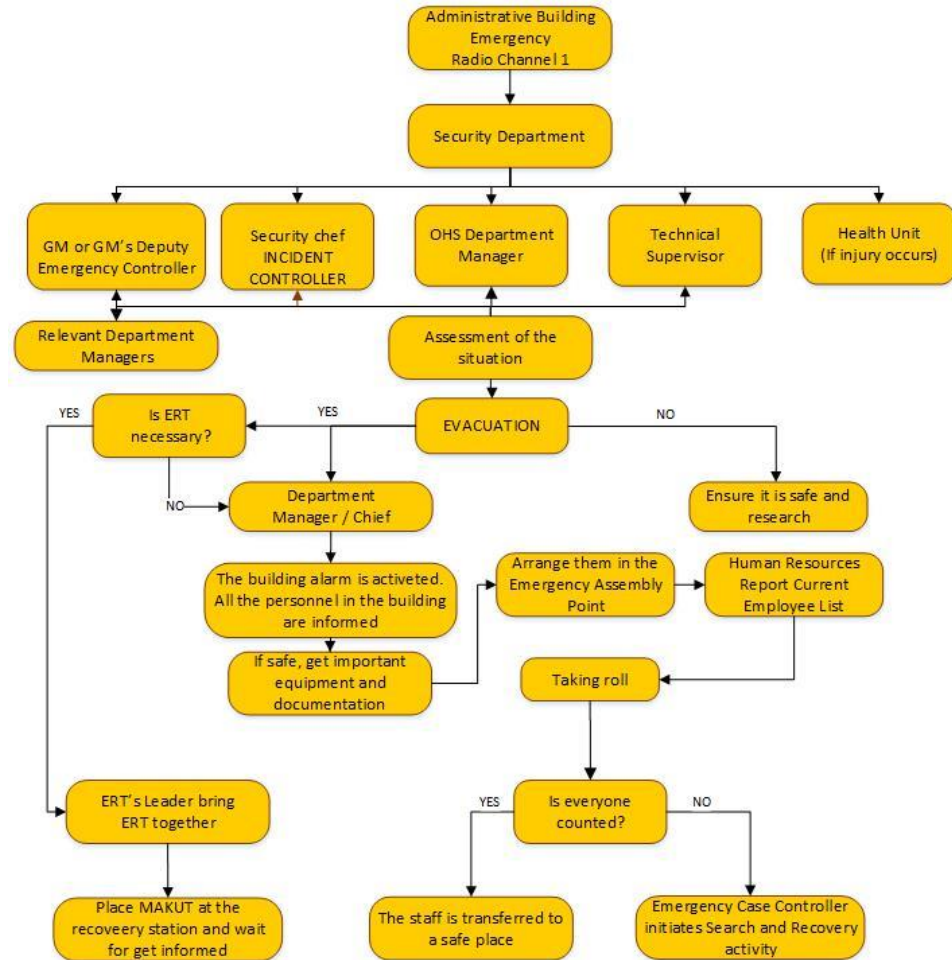
**Slope failure, mudslide and subsidence, including failure of heap leach facilities**

Open Pit Evacuation (pit Wall collapse, improper ignition,) Evacuation from the mine area may result in the collapse of the pit wall, collapse of the ramp, fire or improper ignition. The evacuation decision may be taken by the Open Chief Operating Principal Engineer, the Open Chamber Engineers or the Operations Manager. The General Manager and the Permanent Supervisor and the OHS Unit should be informed at all times.

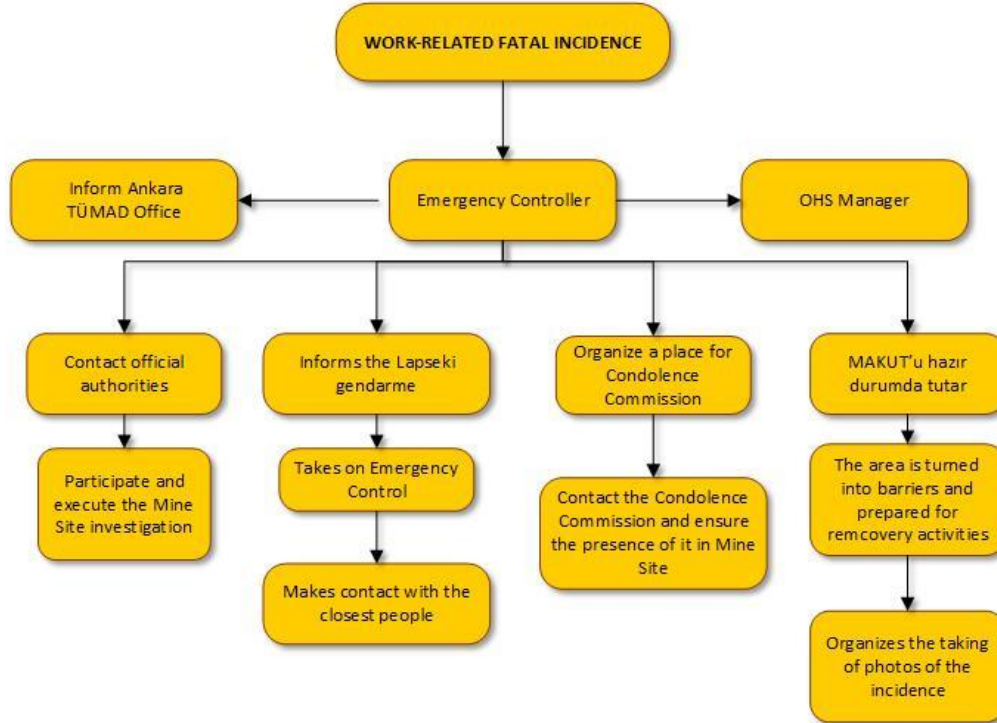


### Evacuation of Office Buildings

The decision of partial or total evacuation of office buildings may be taken by the Security Chief/Manager, OHS Department Manager, Technical Supervisor, Operation Manager or General Manager. The OHS Unit should be informed at all times Office buildings evacuation flowchart is given below.

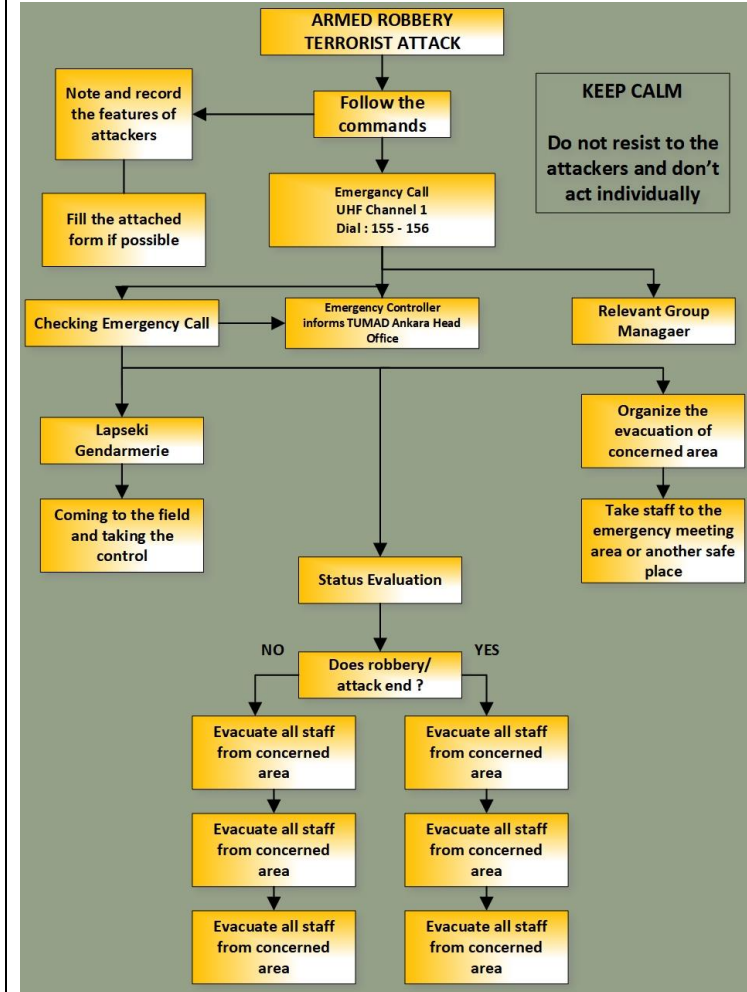


**Fatality due to Work**

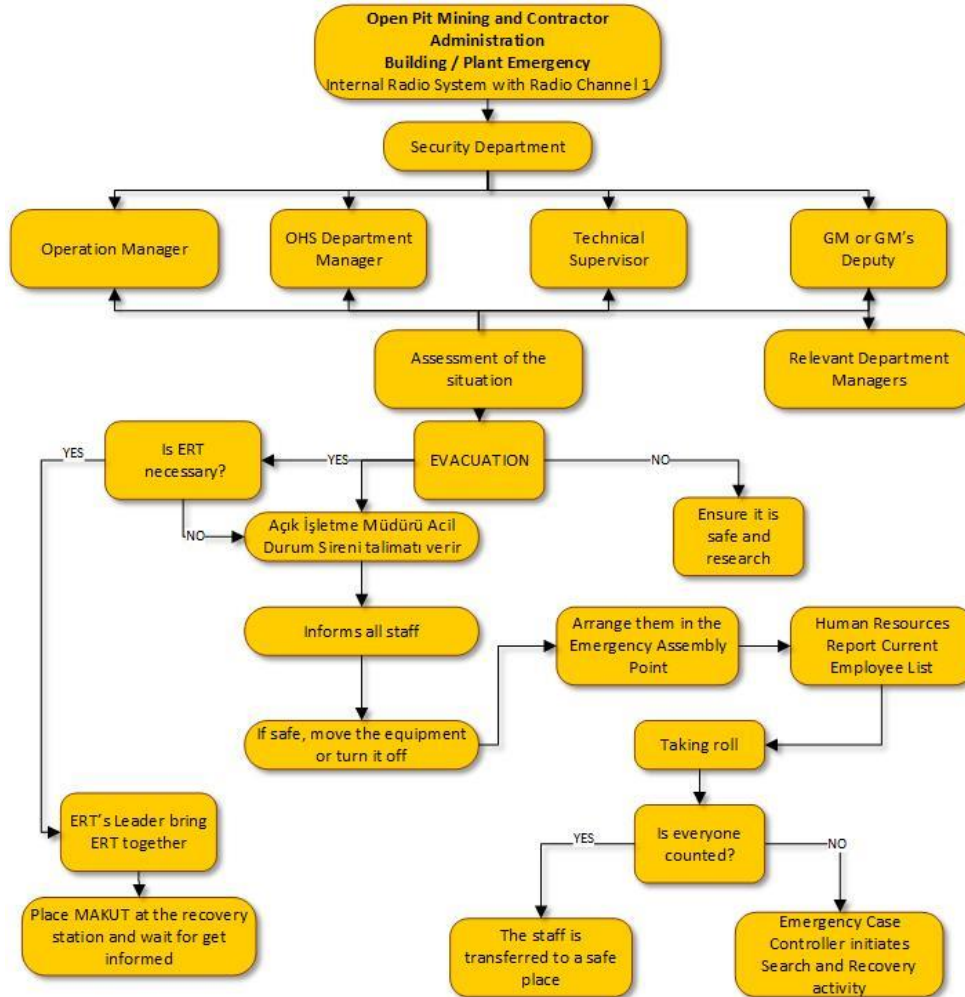


*Official authorities and the gendarmerie will be responsible for the emergency from the moment they are transferred to the Mine Site. Full support should be provided at the stage of the investigation they are going to take*

**Terrorist Attack at Site**



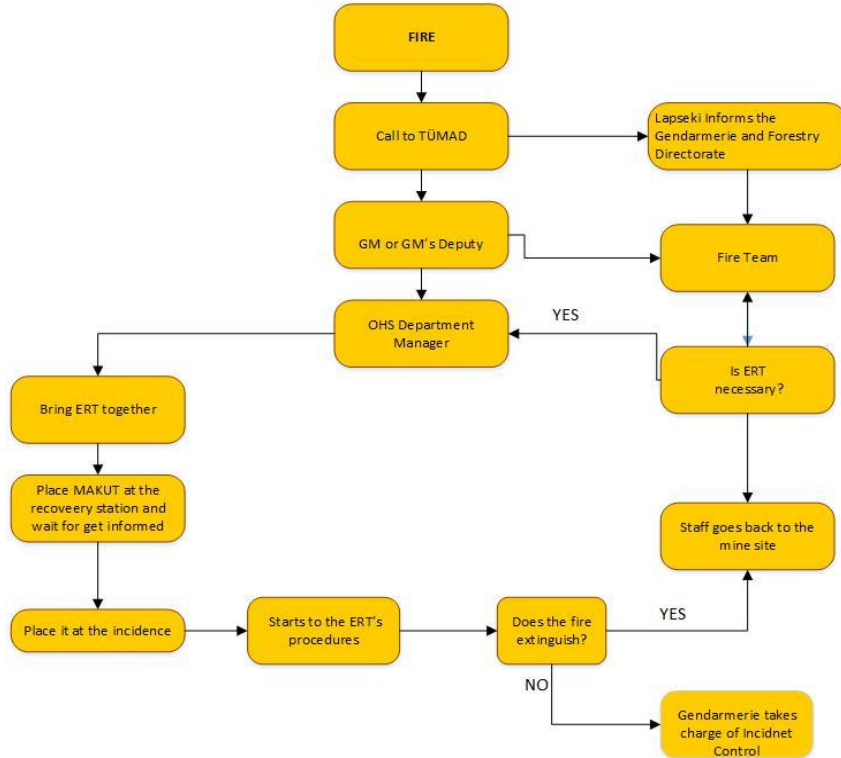
**Evacuation of Open Pits (for Contractors)**



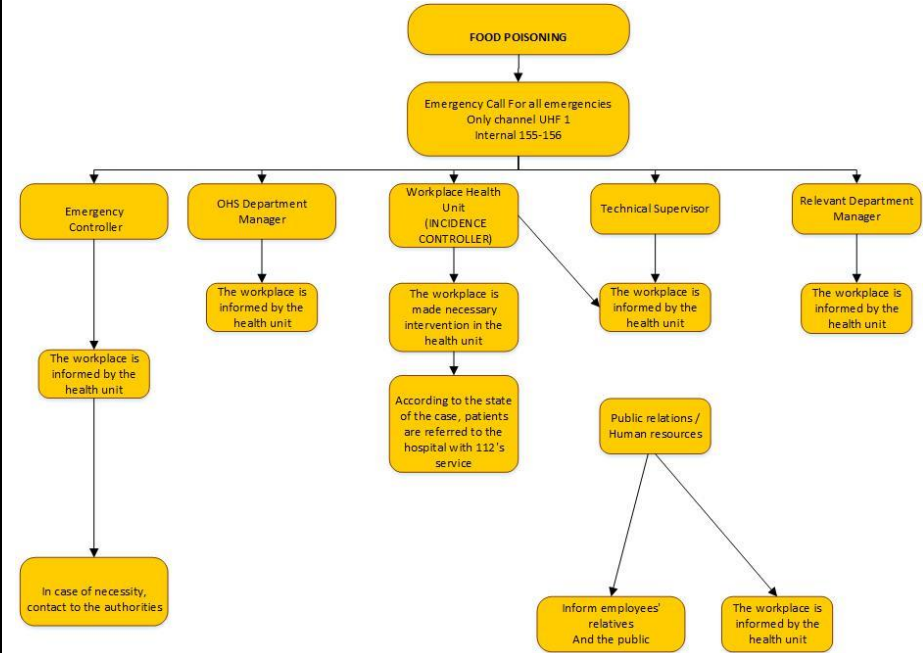
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### Community Emergencies (Fire)



### Food Poisoning



**APPENDIX 5 – SPILL CLEAN UP PLAN**

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## **SPILL CLEAN-UP PLAN**

### **1. PURPOSE**

This plan covers the process of cleaning of a chemical, oil or process sludge occurred in the Lapseki & İvrindi Gold Mines. The main objectives and the rules to protect the environment are as follow:

- minimise the release of spill,
- contain the spill,
- cut off the contamination paths,
- protect surface water, groundwater, soil, air (through vapours),
- appropriately store and dispose clean up materials.

### **2. SCOPE**

This plan covers all spills occurring in the Lapseki & İvrindi Gold Mines.

### **3. REFERENCES**

The standards to be implemented by TÜMAD Madencilik Sanayi ve Ticaret A.Ş. (TÜMAD) within the scope of all activities are as follows.

- EIA Requirements
- Legislation
- Company Undertakings and Requirements of Undertakings
- International Standards and Guides
- TÜMAD policies, procedures and instructions.

### **4. ABBREVIATIONS AND DEFINITIONS**

Oil Spills: Oil spills occurred as a result of the environmental events

Chemical Spills: Chemical spills occurred as a result of the environmental events

Cyanide spills: Cyanide spills occurred as a result of the environmental events

Process Sludge Spills: Process sludge spills occurred as a result of the environmental events

Spill Clean-Up Materials: Materials used for cleaning up oil/chemical spills occurred.

Project(s): Lapseki and İvrindi Golder and Silver Projects

### **5. RELATED DOCUMENTS**

Environmental Policy	(TMD_CEV_POL.002)
Emergency Plan	(TMD_LAP_İSG_PLN.002)
Plant Cyanide Spill Procedure	(TMD_LAP_TES.)
Sodium Cyanide Spill Clean Up Instruction	(TMD_LAP_İSG_TLM.003)

### **6. ROLES AND RESPONSIBILITIES**

This plan is prepared by the Environment Department personnel. It is checked by the Environmental Supervisor and approved and owned by the General Manager.

<b>ROLES</b>	<b>RESPONSIBILITY</b>
<b>TÜMAD General Manager</b>	Approval of the sources necessary for implementation of this management plan.

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<b>IMS &amp; Sustainability Manager</b>	To ensure compliance of this management plant with the Project commitment and standards.
<b>TÜMAD Environment Department</b>	To ensure monitoring, measurement and reporting as defined in the Spill Clean Up Plan, relevant procedure and instructions, To ensure accessibility of the employees of TÜMAD contractor to the plan, To report all dangers, nonconformities and incidents.
<b>Operation Director</b>	To ensure performance of all activities of TÜMAD are. in accordance with the Spill Clean Up Plan and the related procedures and instructions, To ensure the reporting of all dangers, nonconformities and incidents, To ensure for the personnel working in the activities that may cause spills are trained.

## 7. IMPLEMENTATION

### 7.1 Spill Types

The Major types of spill in Mine Site are.

1. Oil spills
2. Chemical spills
3. Cyanide spills
4. Process sludge spills

#### Oil Spills:

Oil, grease and similar hydrocarbon spills must be cleaned up in accordance with the relevant laws and regulations and without causing any harm to the environment and human health. All oil spills occurred in the mine site must be reported. Spill clean-up materials are used in order to clean up this type of spills within the site. The use of these materials is described in detail in the article "Use of Spill Clean-Up Materials" of the plan. For oil spills occurred in the mine site, the relevant department or the environment department intervenes with spill clean-up powder having feature to cause oil decomposition. The area on which powder is poured is stripped and stored in black nylon bags or in blue drums and brought to the waste collection area within the knowledge of the Environment Department. Since soil contaminated with oil is hazardous waste, it is sent to the licensed disposal facilities with the licensed vehicles to be disposed together with other hazardous wastes.

#### Chemical Spills:

Caustic, acid and similar hazardous chemicals are located in the plant area and the customs area in the mine site. When a major chemical spill occurs (greater than the one that can be intervened by one person), the flow chart of the Emergency Management Plan prepared by the Occupational Health and Safety Department is followed. If the spill happens on a small scale; intervention is performed by using the appropriate spill clean-up materials as specified in the Material Safety Data Sheet (MSDS) of the chemical.

It cannot be decided whether the chemical spill happened on a large or small scale only by looking at the spill area. This decision depends on the following pints:

- The content of the chemical.
- Whether the spill is dry or liquid.
- Whether the spill is under control or suitable to spread.
- General weather conditions.

If one person is unable to cope with the spill and / or it cannot be controlled and / or it causes smoke, dust or damage to the environment, spill is large scale.

Soil, cloth, barrels and all similar materials contaminated with any chemicals in the mine area are sent to the licensed disposal facilities with the licensed vehicles for disposal of all materials.

#### **7.2 Instructions**

- **Cyanide Spills :**

For cyanide spills, the intervention methods specified in the Sodium cyanide spill clean-up instruction prepared by the plant are applied.

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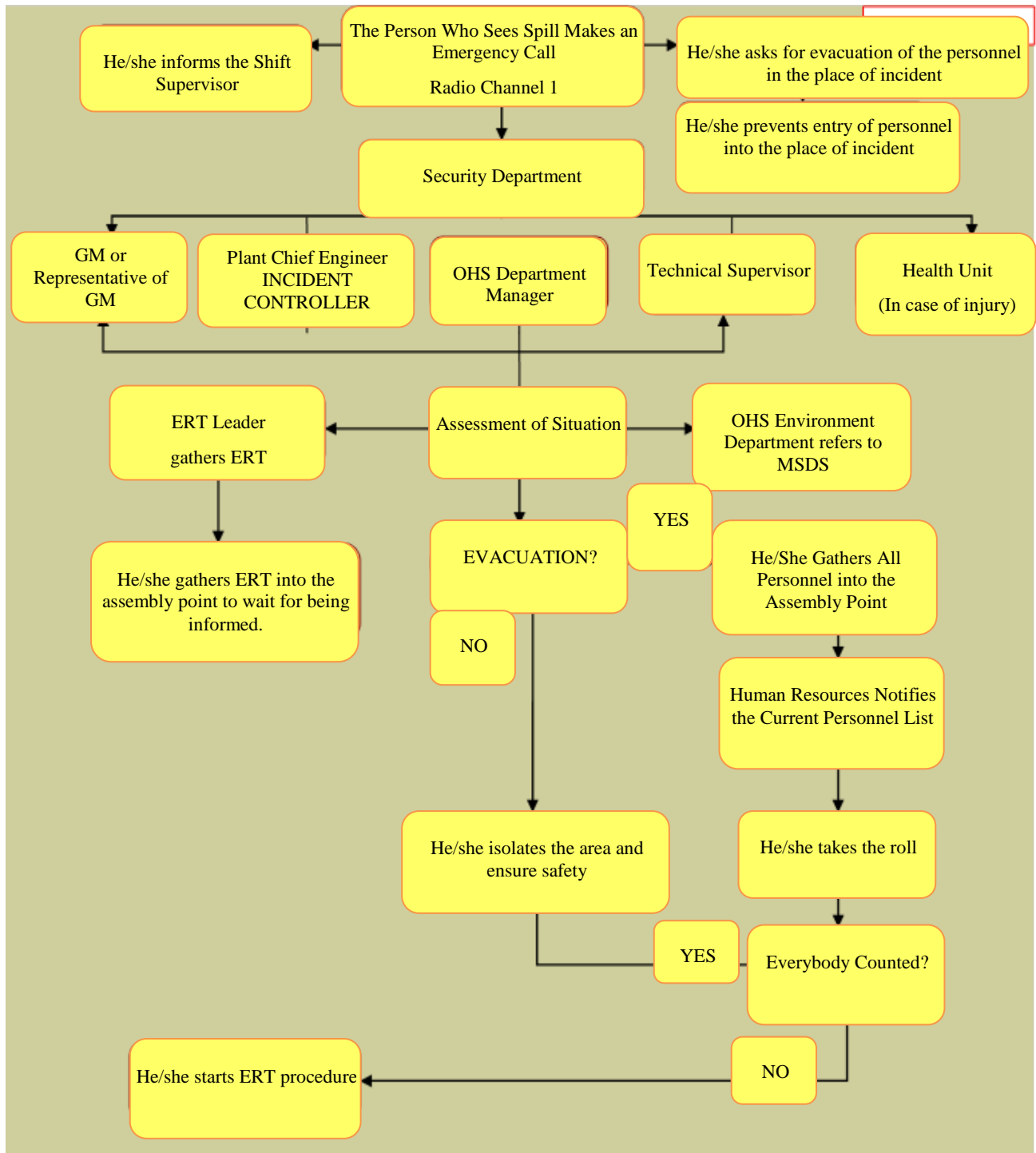


Figure 1 Spill Emergency Response Flowchart

**Regardless of the scale of the spill, The Plant Shift Supervisor MUST BE INFORMED and the Plant Shift Supervisor MUST INFORM the Plant Chief Engineering. The Plant Chief Engineer the will inform the Environmental Supervisor.**

- **In case of liquid cyanide spill on concrete area surrounded by set,** wash the area using a hose and using process water into the clean-up pump. Discharge area of the clean-up pump must be known; the Plant Manager must approve performance of cleaning up by using clean up pump.

- **In case of liquid cyanide spill outside the concrete are surrounded by set**, control the spill by covering it with soil or yellow coloured chemical absorption kit, recover the solution by pump, if possible, neutralize the contaminated area and collect the used soil with a shovel and put it into barrels. Label the barrels as "Contaminated Cyanide" "Contaminated with Cyanide". The materials contaminated with cyanide must be decontaminated before disposal, refer to **MSDS**. After excavation of the area contaminated with cyanide, fill the pit with clean soil.
- **In case of solid cyanide spill**, collect the spill with a shovel. If spill is within an area surrounded by set, collect the spill with a shovel and vacuum it, wash the area using a hose into the clean-up pump (make sure that the clean-up pump discharges into one of the leach adsorption cycle, cyanide storage tank or chemical decomposition cycle). If spill is outside an area surrounded by set, collect the spill with a shovel and vacuum it and then neutralize the spill area. Remove the soil contaminated with cyanide for decontamination and disposal.
- Wash the shovel and vacuum cleaner with neutralizing agent near the clean-up pump within the area surrounded by a set

**NEUTRALIZING AGENT:**

Iron sulfate crystals can be used to neutralize a sodium cyanide solution of 30% by weight.

**Iron sulfate must be added at the following ratios:**

- 400 g for each 1 liter of 30% (by weight) cyanide solution (this is equivalent to 7 tons for each 18kL)
- After iron sulfate is added, it must be mixed with cyanide. Water must be added for solid sodium cyanide.
- Iron Sulfate and cyanide will form a "Prussian" blue colour when they react to form cyanide. This can solidify and be removed later.
- Iron sulfate is present in cyanide depot and in the warehouse area.

Sodium Hypochlorite may also be used but is recommended only for low cyanide levels, so it is used for residual cyanide traces or washing of equipment / personal protective equipment. **As a result, it is ensured that the cyanide spills occurred**

- Are recovered in the Plant, where possible,
  - If recovery of them is not possible, they are treated in the detox unit and sent to DWS,
  - If treatment of them is not possible, neutralization process is performed and they are sent to DWS,
  - The cyanide wastes that cannot be neutralized are put into the appropriate waste containers and delivered to the Environment Department for disposal of them,
  - The cyanide wastes received by the Environment Department are sent to the licensed disposal companies through the licensed transportation companies.
- **Process Sludge Spills :**

In case of process sludge spills that may occur in the plant area, pipelines or in case of cleaning and similar situations, it is ensured that;

- If the spill is in a concrete area and recovery of it is possible, the sludge is taken to the appropriate unit in the plant and the process is continued,
- If it is not possible to take it to the process or to perform recovery of it, it is treated in the detox unit and sent to DWS.

**7.3 Use of Spill Clean Up Materials**

**Oil Spill Clean Up Materials:**

These kits are located in the yellow containers in the relevant sections in the mine site. In these containers;

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Spill Clean Up Powder

Sausages

Absorbent

There are Spill Cleaning Dust, Sausages and Absorbent Towels.

#### **Absorbent Towels**

For spills on water, they are used to absorb oil to separate oil from water. There are approximately 100 absorbent towels in one package. In addition, absorbent towels in roll forms are also used.

The absorbent towels are placed on the spill and kept for 5-10 minutes. If there is a noticeable oiliness, the same process is repeated with another towel. The towels used are placed in black coloured "oily waste" waste containers.



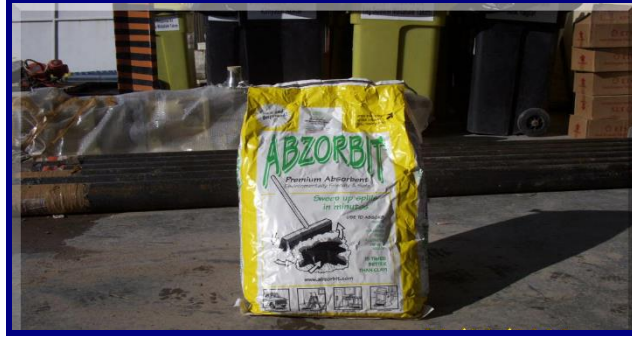
A towel can absorb an amount approximately 17 times its weight.

#### **Spill Clean Up Powder**

Absorbent Spill Clean-Up Powders are in containers of about 3-4 kg packages. These powders are used to absorb oil spills such as petroleum and antifreeze on soil or any ground.

Powder is poured over the contaminated area. Powder is spread well over the soil using a brush or a broom and it is kept for about half an hour. At the end of this time, the powder will absorb the oily substance and the oily area will be cleaned up. Then the upper part of the oily soil is scraped and filled into black nylon bags or blue drums by means of a shovel and brought to the Waste Collection Area within the knowledge of the Environment Department. It is stored in the hazardous waste area.

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**Note:** Spill clean-up powders are not harmful substances. They can be applied without using a glove. They have no irritating properties. However, since each skin has a different sensitivity level, it is recommended by us to wear gloves.

#### **Sausages**

Sausages, which are about 5m in length, are kept in containers. If there is a spread in the contaminated area, these sausages are used as limiter to prevent affecting of more space. The material used must be thrown into a black coloured "oily waste" waste container.



- **Chemical Spill Cleaning Materials**

These materials are kept in red containers and placed in the locations of the mine site where work is performed with chemicals. Within these containers;



Absorbent Towels

Sausages

**Note:** There are clean up powder for chemical spills.

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**Absorbent Towels**

Apart from those for oil, these pads are yellow in colour and have no oil absorption characteristics. There are approximately 100 absorbent towels in one package.

**Sausages**

These sausages are used to prevent affecting of more space in case of a chemical spill. Apart from those for oil, these sausages are yellow in colour and have a length of approximately 5 m and are kept in the relevant containers.



*All pads and sausages used must be thrown into the black containers located next to these kits.*

**8. MONITORING/AUDIT**

Daily Inspections: environmental department perform these inspections in accordance with the activities inside the fence boundary by including a wide range of operation issues whether is a spill that has run out of sight or has not been reported. It is checked by the operation manager that it is complete and complete.

Any incident or non-compliance determined during these inspections shall be recorded and reported according to the documents of the Accident Incident Loss Investigation and Reporting Procedure (TMD\_İSG\_PRD.007)

Legal responsibilities and Management System Responsibilities are periodically inspected by government agencies and inspectors within the framework of Spill Clean-Up Plan.

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**9. TRAINING**

Training will be delivered to all relevant staff including contractors for the implementation of this plan.

**10. REPORTING**

Spill Types	Training	Trainer
Oil spills	Oil Spills training	Environment Department And Oil Supplier
Chemical spills	Chemical spills	Environment Department And Chemical Supplier
Cyanide spills	Cyanide spills	ICMC Auditor, Environment & OHS Departments, Process Team
Process sludge spills	Process sludge spills	Environment & OHS Departments, Process Team

When an accidental or deliberate disposal of wastes and similar incidents occur, TÜMAD will inform Çanakkale/Balıkesir Directorate of Environment and Urbanization and submit the report including the date of the accident, location of the accident, type and amount of waste, reasons for the accident, type of waste treatment and rehabilitation of the accident site within 3 working days.

Evidences of the implementation of the mitigation actions/measures and related results are collected through inspection and auditing activities will be reported in line with the Internal Audit Procedure (TMD\_KAL\_PRD.001).