

Appendix D

Trigger Action Response Plan (Draft)

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Anderson Tailings Impoundment Area Subaerial Tailings Deposition Trial Study Trigger Action Response Plan

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Table of Acronyms and Abbreviations

AND	Anderson TIA Discharge (final discharge point)
ATIA	Anderson Tailings Impoundment Area
BGC	BGC Engineering Inc.
CDA	Canadian Dam Association
EAP	Emergency Action Plan
ECCC	Environment and Climate Change Canada
ENV	Environmental Control Department
GE&T	GeoEngineering and Tailings Department
EOR	Engineer of Record
ERP	Emergency Response Plan
FDP	Final Discharge Point
Hudbay	Hudbay Minerals Inc.
MECC	Manitoba Environment and Climate Change
MB	Manitoba
MBU	Manitoba Business Unit
MDMER	Metal and Diamond Mining Effluent Regulation
OMS	Operation, Maintenance and Surveillance
PR	Provincial Road
RACI	Responsible, Accountable, Consulted, Informed
RP	Responsible Person
TARP	Trigger Action Response Plan

TRIGGER ACTION RESPONSE PLAN

1.0 Introduction

This is the Trigger Action Response Plan (TARP) for the Subaerial Tailing Deposition Trial Study (the Study) at Hudbay's Anderson Tailings Impoundment Area (ATIA) facility. The TARP outlines the following:

- Quick reference flowcharts, responsibility matrix, and contact list (Section 2.0).
- What could lead to emergency and associated triggers (Section 3.0).
- What to do during an emergency (Section 4.0).
- How to maintain this Plan (Section 5.0).
- Supporting documents, maps, and event log template (Section 6.0 and appendices).

The purpose of TARP is to reduce the risk of impact to the environment during the Study or an unusual event or emergency that may result in non-compliance or an unauthorized deposit under the *Metal and Diamond Mining Effluent Regulations (MDMER)* or applicable provincial license / authorization. An unauthorized effluent deposit is defined as any deposit of mining effluent to a fish bearing water body that does not meet the requirements of Schedule 4, the pH is outside of a 6.0 to 9.5 range, or the effluent is acutely lethal in addition to applicable provincial license requirements. An unauthorized airborne deposit or "fugitive dusting" is defined as materials transported outside of the authorized deposition perimeter by wind action.

It is important to note that this TARP is to be used in conjunction with the Operation, Maintenance, and Surveillance (OMS) Manual for the ATIA. In addition, a situation or emergency may require, due to effluent quality concerns, engaging the Effluent Quality Emergency Response Plan as outlined in Hudbay document, ENP-008. A situation or emergency may also require, due to dam stability concerns, engaging the ATIA Emergency Action Plan (EAP) defined in Hudbay document, ENP-110.

2.0 At-a-Glance

This section is intended as a quick reference for users of this plan, summarized in

Figure 2-1, during triggered conditions at the ATIA during the Study.

Notification flowcharts with checklists for key roles in unusual or trigger conditions are provided in:

- Figure 2- for Level 1 conditions, characterized by abnormal conditions that do not affect routine operations. The intent of the response is to monitor and understand the conditions.

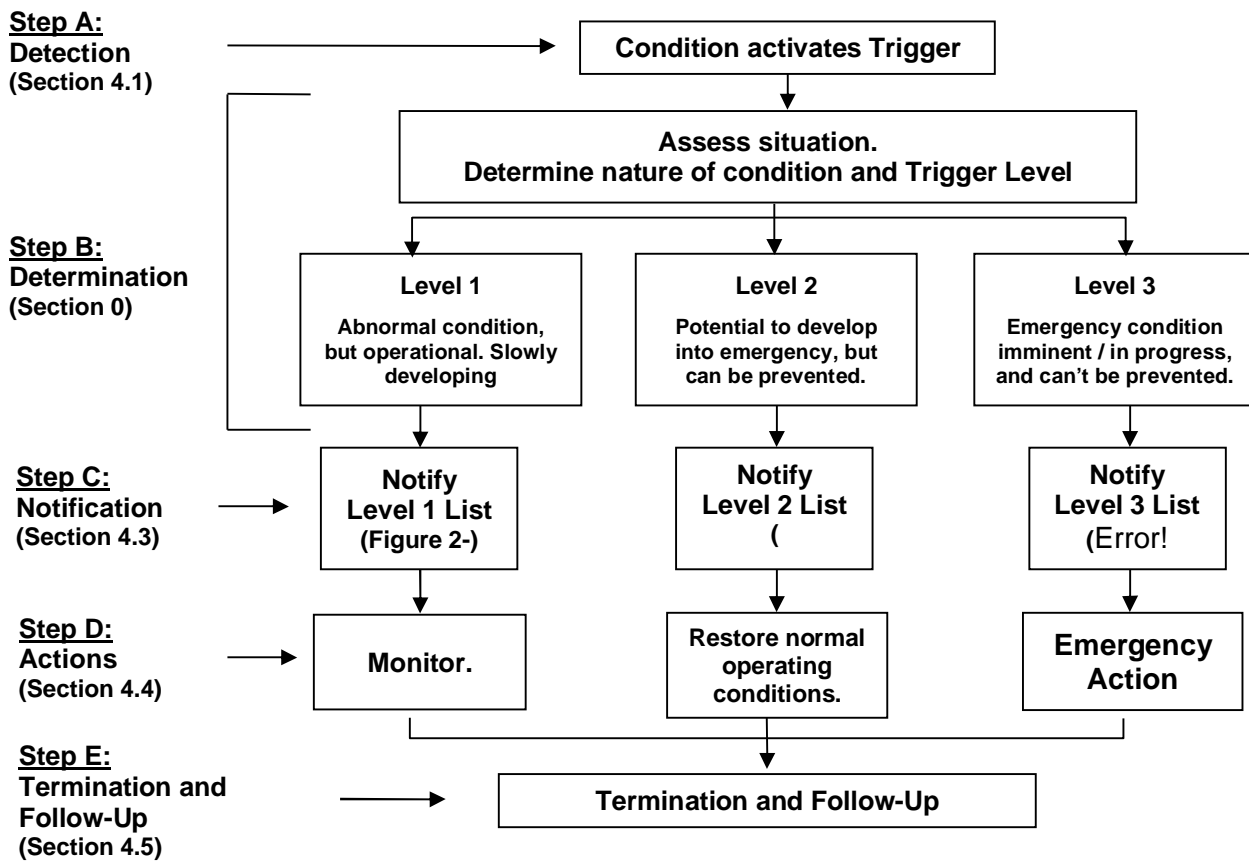
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- Figure 2-3 for Level 2 conditions, characterized by a potential to develop into emergency conditions which can still be prevented. The intent of the response is to restore normal facility conditions and operation.
- **Error! Reference source not found.** for Level 3 conditions, characterized by emergency conditions being imminent or in-progress which cannot be prevented. The response is to engage the relevant emergency response/action plan.

Responsibility assignment for key roles is shown in Table 2-1. Current contact details are given in ENO-689 MBU Dams & Tailings Facilities Contact List, which should be used in conjunction with this plan. Available equipment and locations for the Snow Lake area are provided in Table 2-2.

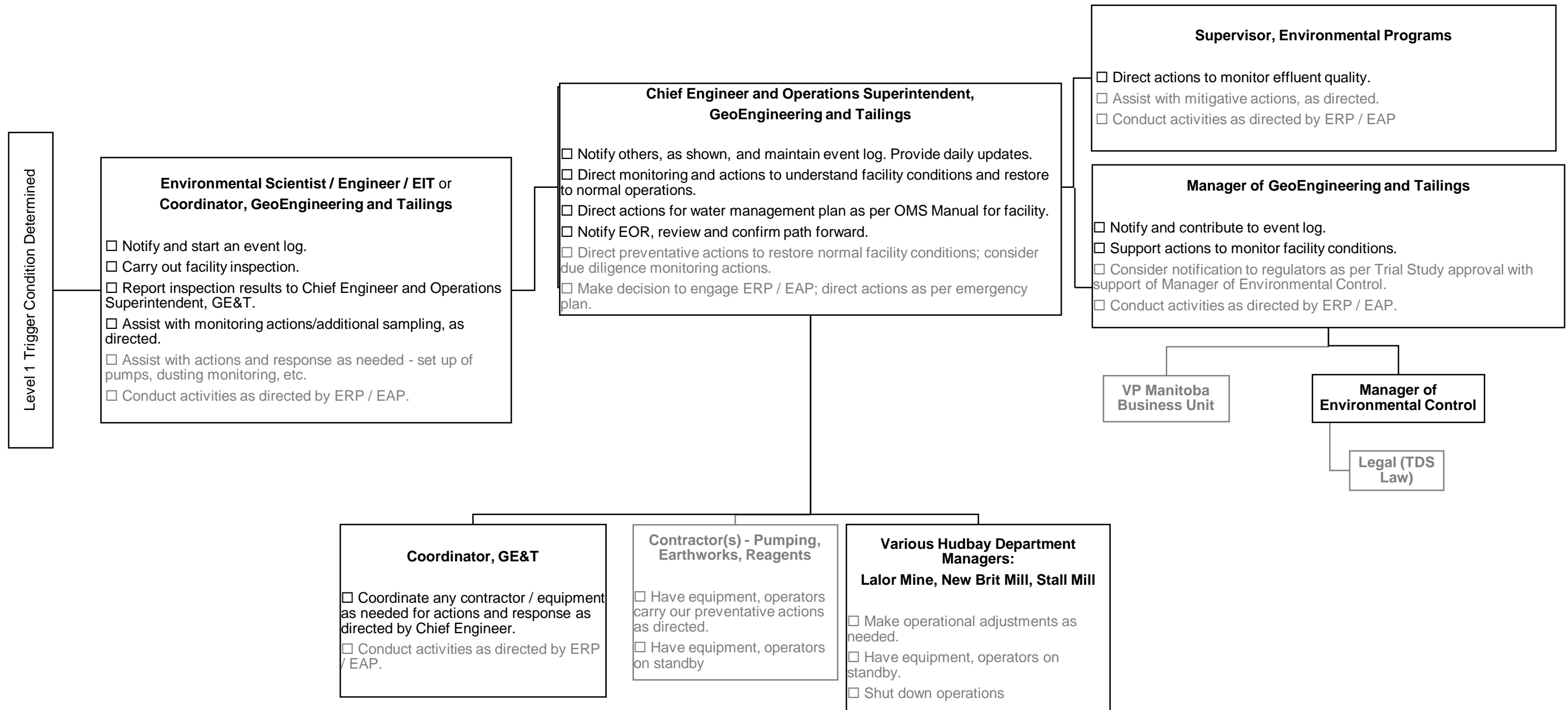
Figure 2-1. Trigger Action Response Plan (TARP) flowchart.



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Figure 2-2. Level 1 trigger condition notification flowchart and checklists.

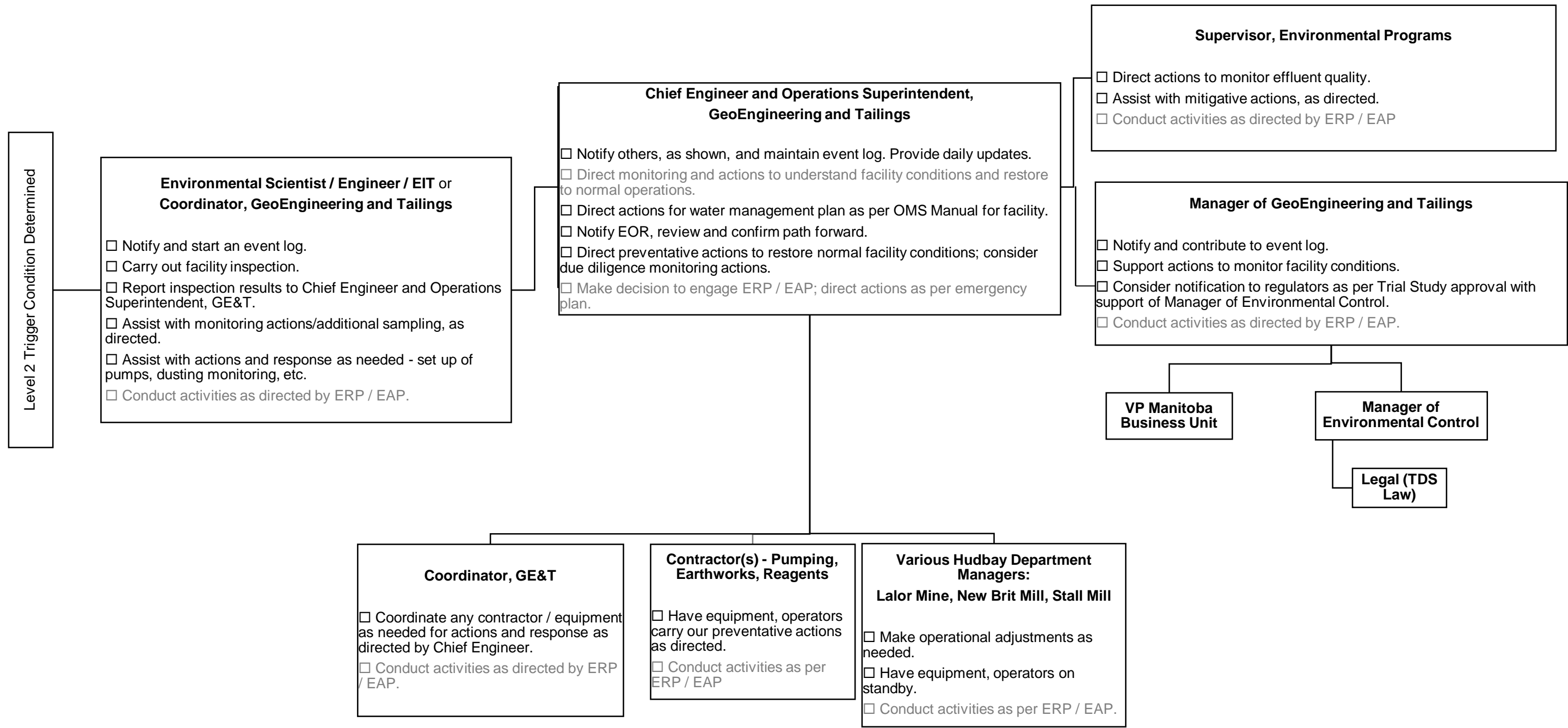
Notes:
 Items not related to Level 1 are shown in grey.
 Black lines denote lines of two-way communication.



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Figure 2-3. Level 2 trigger condition notification flowchart and checklists.

Notes:
 Items not related to Level 2 are shown in grey.
 Black lines denote lines of two-way communication.

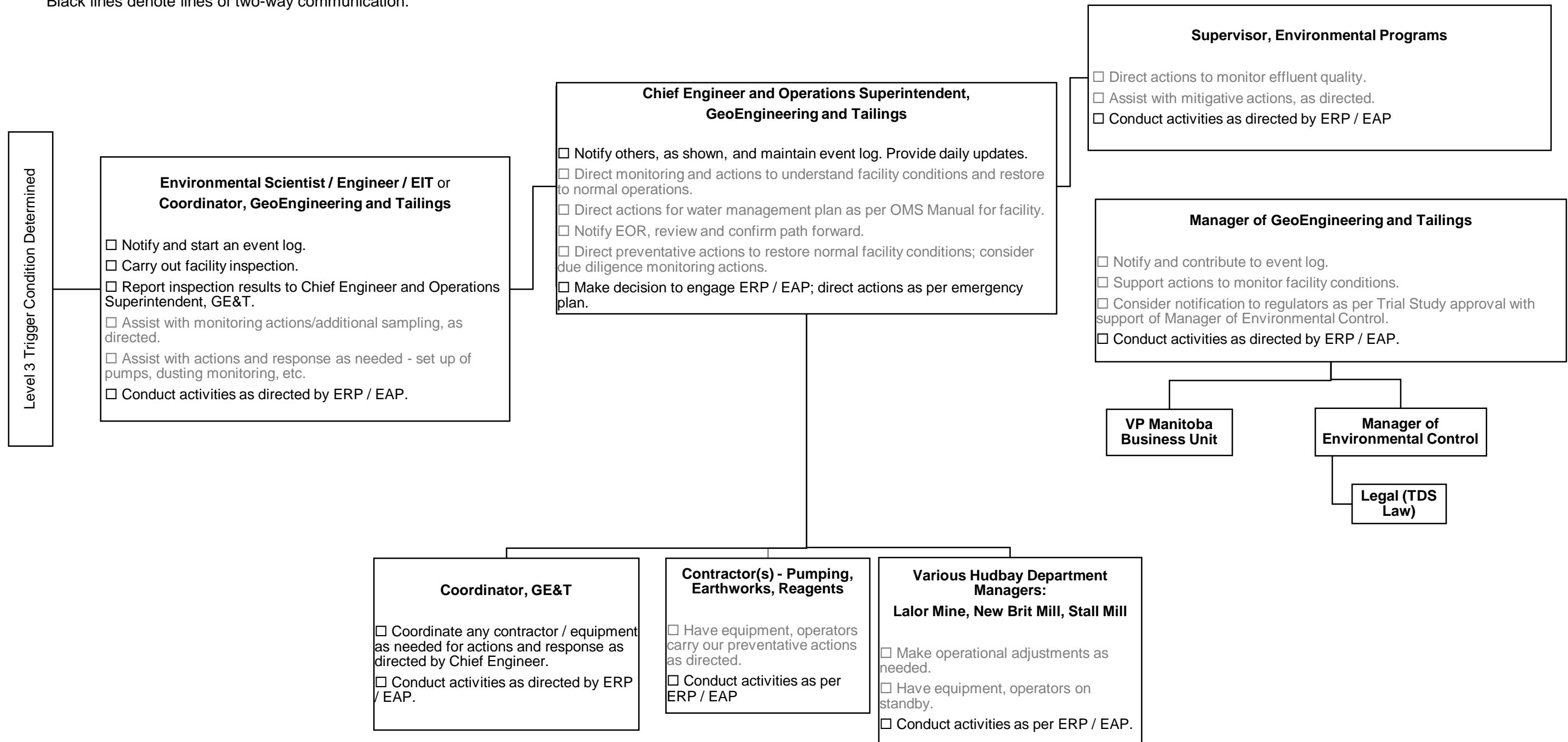


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Figure 2-4. Level 3 Trigger condition notification flowchart and checklists.

Notes:

Items not related to Level 3 are shown in grey.
Black lines denote lines of two-way communication.



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Table 2-1. Contact list and responsibility assignment / RACI matrix.

Role (see ENO-689 for current contact details)	Responsibility Assignment / RACI ⁽¹⁾ Matrix sorted by Sections of this Plan					
	Section 4.1 Detection/ Trigger	Section 0 Determination	Section 4.3 Notification	Section 4.4 Action	Section 4.5 Termination and Follow-Up	Section 5.1 Training, Documentation and Reporting
Internal Parties (Hudbay)						
GE&T Manager of GeoEngineering and Tailings	A	A	A	A	A	A
GE&T Chief Engineer and Operations Superintendent	R	R	R	R	R	R
GE&T Planning and Execution Section Leader	R	I	I	R	I	I
GE&T Coordinator	R	I	I	R	I	I
ENV Manager of Environmental Control	I	C	R	R	I	I
ENV Supervisor, Environmental Programs	R	I	R	R	I	I
ENV Environmental Scientist / Technician	R	C	R	R	I	I
STALL Manager of Stall and New Britannia Mills	I	I	I	C	C	I
STALL Assistant Manager of Stall Mill	I	I	I	C	C	I
STALL Supervisor, Stall Mill Tailings Crew	I	I	I	R	I	I
VP Manitoba Business Unit			I	C	C	I
External Parties (non-Hudbay)						
Engineer of Record for facility		C	I	C	C	C
Legal: TDS Law			I	C	I	
Manitoba Environment and Climate Change			I	I	I	
Earthworks Contractor: <ul style="list-style-type: none"> • Strilkiwski Contracting Ltd. • Bob's Contracting • Sigfusson Northern Ltd. (SNL) • McKeen's Trucking Service Ltd. • RJ's Construction Ltd. 	Contacted on an as-needed basis to provide support, as directed by Hudbay.					
Other Service Providers: <ul style="list-style-type: none"> • Alex's Environmental • Multicrete • M.A. Ironworks • Uni-Jet • United Rentals • VA Plumbing and Heating 						

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1. RACI components are summarized as follows:
 - a. R=Responsible; one or more persons.
 - b. A=Accountable; only one person.
 - c. C=Consulted; one or more persons.
 - d. I=Informed; one or more persons.

Table 2-2. Equipment List and Locations for Trigger Conditions

Equipment Provider	Contact	Equipment	Location
Snow Lake Area			
Hudbay Lalor Surface Operations	1 st : Trevor Salamondra / Dave Andres 204-358-5380 2 nd : Tyler Morin / George Warman 204-271-1671 / 204-271-1471	Loaders Excavators	Lalor Mine Surface Yard
Hudbay Stall Mill Operations	Ashton Crone 204-271-4787	Telehandler Loaders	Stall Mill Site
Hudbay New Britannia Mill Operations	Ashton Crone 204-271-4787	Telehandler Loaders	New Britannia Site
Strilkiwski Contracting Ltd	Gerald Strilkiwski 204-638-9304	Loaders Grader Excavators	Strilkiwski Yard (neighbouring Stall Mill, near Snow Lake, MB)
Bob's Contracting	Snow Lake Office 204-358-9955	Pumps (4", 6")	Snow Lake, MB
Chell's Sled Shed	Chris Chell 204-358-0004	Vacuum Truck (x 2)	Snow Lake, MB
Uni-Jet	Chris Noonan 204-271-1591	Pressure washing truck Vacuum Truck	Flin Flon, MB Winnipeg, MB
United Rentals	Flin Flon Office 204-687-7830	Telehandler 8" pump	Flin Flon, MB
North Fringe	Mike Dust 306-276-9204	8" Pump (x4) Hose / fittings	Nipawin, SK

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3.0 Background

3.1 Purpose, Roles and Responsibilities

The purpose of TARP is to reduce the risk of impact to the environment during the Study or an unusual event or emergency that may result in non-compliance or an unauthorized deposit under the *Metal and Diamond Mining Effluent Regulations (MDMER)* or applicable provincial license / authorization. An unauthorized effluent deposit is defined as any deposit of mining effluent to a fish bearing water body that does not meet the requirements of Schedule 4, the pH is outside of a 6.0 to 9.5 range, or the effluent is acutely lethal in addition to applicable provincial license requirements. An unauthorized airborne deposit or “fugitive dusting” is defined as materials transported outside of the authorized deposition perimeter by wind action.

The TARP, the personnel, and department responsibilities presented here apply only to situations surrounding the Study and ATIA facility. The TARP is enacted when a facility condition activates a defined trigger. Normal department procedures should be followed during any incident until it is determined that the situation is beyond usual circumstances, the control of the personnel on the scene, or the normal departmental procedures have broken down or are unavailable.

It is the responsibility of:

- Vice President, Manitoba Business Unit to ensure the appropriate development and execution of this ERP.
- Senior Stall Mill, GeoEngineering and Tailings, and Environmental Control personnel to implement training and regular review of the TARP.
- All Stall Tailings Crew, GeoEngineering and Tailings, and Environmental Control personnel to familiarize themselves with the content of the TARP.
- All Stall Tailings Crew, GeoEngineering and Tailings, and Environmental Control personnel to be aware of individual responsibilities in the event an emergency situation arises.

The key roles in the TARP are identified on the notification flowcharts in Section 2.0, along with a responsibility matrix and contact list.

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3.2 Facility Conditions with Potential to Cause Adverse Environmental Effects

There are four predominant facility conditions with potential to cause environmental effects by way of deterioration of effluent quality, air quality, or fish habitat.

- 1) Oxidation of Exposed Tailings: Oxidation of sulfide tailings may occur if unsaturated tailings are exposed to atmosphere and neutralizing potential is exhausted. This condition may lead to acid rock drainage where acid is generated from precipitation, pH will decrease, and metal concentration in the effluent will increase.
- 2) Dusting of Exposed Tailings: Unsaturated tailings may become airborne under high wind or freeze-dry conditions. Airborne tailings may decrease air quality and deposit high metal tailings outside of the ATIA footprint.
- 3) Reduction of Retention Volume: Subaerial tailings deposition may decrease the overall volume of water retention in the ATIA. This may lead to inadequate dilution via precipitation or inadequate retention time required to polish effluent for compliant release to environment. This condition may result in deteriorating water quality.
- 4) Geochemical Properties and Pore Water Quality: Geochemical properties of the tailings that may be exposed may be such that there is more likelihood to oxidize and create acid generating conditions. Monitoring of pore water quality will indicate if acid generating conditions may be advancing. Acid generating conditions will result in deteriorating water quality (i.e. depression of pH and increased metal concentrations).

4.0 The Plan

4.1 Detection

This step describes the detection of an unusual event or conditions and provides information to assist the GeoEngineering and Tailings Department in determining the appropriate level for the condition.

Unusual events or conditions may be detected by:

- Field level observations at the facility including visual observations, instrument data, and trends for facility operation.
- Forewarning of conditions that may cause an unusual event or conditions (for example, a severe wind, weather, or extreme precipitation forecast).
- Evaluation of monitoring results (i.e. water quality, pore water quality, air quality).
- Evaluation of modelling results (i.e. trends or predictions indicating water quality deterioration in the facility or downstream).

Once unusual conditions are detected, the next step is to determine the appropriate trigger level.

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4.2 Determination

The Chief Engineer and Operations Superintendent, GE&T or designated alternate is responsible for determining the trigger level. For effluent quality emergencies, the designated alternate is the Manager of GeoEngineering and Tailings.

The Chief Engineer may solicit input from Stall Mill and Environmental Control Management or other parties to determine the appropriate trigger level, which are defined as follows:

- Level 1: Characterized by abnormal conditions that do not affect routine operations. The intent of actions and response is to monitor and understand the conditions.
- Level 2: Characterized by the potential to develop into an emergency as defined in ENP-008 and ENP-110, which can still be prevented. The intent of actions and response is to restore normal operating conditions.
- Level 3: Characterized by an imminent or in-progress emergency condition which cannot be prevented. The intent of actions and response is to enact emergency procedures.

A direct correlation of indicators to trigger levels has been deliberately omitted as the impact on facility condition is dependent on many factors including severity or magnitude, location, weather, and even time of year. Instead, once a condition is detected, the trigger level is determined on a case-by-case basis considering the above definitions. Guidance for determining trigger level is outlined in

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Table 4-. Guidance and triggers will be updated following an adaptive management approach considering new monitoring results and facility conditions as the Study progresses.

Once the trigger level has been determined, the next step is to notify key parties.

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Table 4-1. Guidance for Determining Trigger Level

Facility Condition	Means of Identification	Action(s) to be Taken
Level 1		
Surface Water Quality	Triggers to be identified once baseline conditions and acceptable operating ranges are established. Trends for monitoring or modelling results outside of acceptable operating ranges would trigger a level 1 condition.	Monitoring: water sampling, air quality sampling, snow sampling, etc.
Pore Water Quality	Triggers to be identified once baseline conditions and acceptable operating ranges are established. Trends for monitoring or modelling results outside of acceptable operating ranges would trigger a level 1 condition.	
Oxidation of exposed tailings	Visual observation of orange staining in an increasing area of exposed tailings.	
Air Quality / Dusting	Visual observation of tailings becoming airborne.	
Unusual Condition	Any other monitoring/modelling result or visual observations that are outside of normal facility conditions.	
Level 2		
Surface Water Quality	Triggers to be identified once baseline conditions and acceptable operating ranges are established. Monitoring or modelling results rapidly trending outside of acceptable operating ranges would trigger a level 2 condition.	Preventative, restoring normal conditions: in addition to increased monitoring, additional actions may be considered (i.e. mechanical saturation of tailings, altering deposition point, etc.)
Pore Water Quality	Triggers to be identified once baseline conditions and acceptable operating ranges are established. Monitoring or modelling results rapidly trending outside of acceptable operating ranges would trigger a level 2 condition.	
Oxidation of exposed tailings	Visual observation of orange staining in large area or rapidly increasing area of exposed tailings.	
Air Quality / Dusting	Visual observation of high wind conditions and tailings becoming airborne with moderate risk of traveling outside of facility boundary.	
Unusual Condition	Any other monitoring/modelling result or visual observations rapidly developing that are outside of normal facility conditions.	
Level 3		
Surface Water Quality	Trends for monitoring or modelling results that trigger emergency conditions. Emergency triggers for effluent quality are outlined in ENP-008 and monitored weekly.	Engage relevant Emergency Response Plan or Emergency Action Plan.
Pore Water Quality	Trends for monitoring or modelling results that trigger emergency conditions.	
Unusual Condition	Any unusual conditions that trigger emergency conditions.	

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4.3 Notification

Parties responsible for notifying others are identified on flowcharts and checklists in Section 2.0:

- Figure 2- for Level 1 conditions.

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- Figure 2-3 for Level 2 conditions.
- **Error! Reference source not found.** for Level 3 conditions.

The above listed figures have been developed to align with ENC-528 Internal Notification Protocol for Environmental Operations.

4.4 Action

The Chief Engineer and Operations Superintendent, GE&T or designated alternate is responsible for directing/coordinating actions during trigger conditions.

As the designated alternate, the Manager of GeoEngineering and Tailings, who is notified for all trigger levels, may assist the Chief Engineer when these secondary plans are activated or triggered.

A list of actions that may be taken during trigger conditions is given in Table 4-, sorted by trigger level. In a Level 3 condition, it is required to enact either ENP-008 Effluent Quality Emergency Response Plan or ENP-110 ATIA Emergency Action Plan in order to appropriately respond to the emergency condition. This may include immediate shutdown of the final discharge point, Anderson Discharge.

Once all necessary actions have been taken and the facility condition is restored to normal operation, the trigger condition may be terminated as described in the next section.

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Table 4-2. Potential actions during a trigger condition.

Type of Action (objective)		
Monitoring – Level 1 (Understand conditions)	Preventative – Level 2 (Restore normal operations)	Mitigative – Level 3 (Engage ERP / EAP)
<p>Inspect condition of pond and associated equipment.</p> <p>Evaluate operational trends for the facility and previous sample data for the parameter(s).</p> <p>Increase sampling frequency and/or field checks.</p> <p>Elevate trigger level if needed.</p>	<p>Implement monitoring as needed. Implement investigation with Stall Tailings Crew as needed.</p> <p>Consider taking due diligence samples within facility and/or receiving environment: effluent characterization, acute toxicity testing.</p> <p>Use contractors for additional measures (ex. mechanical saturation of tailings, pump set up and operation).</p> <p>Follow actions for Water Management Plan as directed by GE&T Chief Engineer and Operations Superintendent.</p> <p>Consider stopping subaerial deposition and raising water level to cover exposed tailings, depending on severity.</p> <p>Consider use of alternative water treatment technologies to restore water quality (i.e. mobile plant, use of existing water treatment facility).</p>	<p>Engage the ERP / EAP as needed.</p> <p>Consider stopping subaerial deposition and raising water level to cover exposed tailings.</p> <p>Consider shutting down FDP.</p>

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4.5 Termination and Follow-Up

The Chief Engineer and Operations Superintendent, GE&T or designated alternate is responsible for terminating the TARP. For trigger conditions, the designated alternate is the Manager of GeoEngineering and Tailings.

Criteria for termination will vary depending on the level and nature of conditions, but should include, at minimum:

1. Assessing the facility conditions in its current state to determine whether trigger conditions are still present. This typically includes an evaluation of data by the Chief Engineer and Operations Superintendent, GE&T and may include consultation with Environmental Control personnel.
2. Confirming sufficient capacity to respond should another trigger condition occur after termination. This typically includes taking inventory and estimating time to replenish depleted resources, e.g., materials, equipment, workforce.

Once the Chief Engineer and Operations Superintendent, GE&T or designated alternate deems the criteria for termination have been met, all parties who were notified of the trigger condition shall be similarly notified of termination by following the same flowcharts. Entries in the event log may be used in the event parties not identified on the notification flowcharts were also engaged during the event.

Following termination:

- The Manager of GeoEngineering and Tailings or designate must complete a post-event report to document the event including actions taken, root cause, and lessons learned. This may be done using Intellex and include input from other parties, if needed.
- The Manager of GeoEngineering and Tailings should develop and implement a plan to prevent future occurrences based on lessons learned.
- The Manager of GeoEngineering and Tailings, Chief Engineer and Operations Superintendent, GE&T, and managers of affected Hudbay departments may collectively develop a plan for return to normal facility operation.

5.0 Administrative and Maintenance

5.1 Training

The Manager of GeoEngineering and Tailings or designate must ensure that all parties referenced in the TARP have read the document and received adequate training on the required response.

Upon TARP revision, training led by the Manager of GeoEngineering and Tailings or designate may be required to familiarize affected parties with the changes. Proof of any training session is documented using PWO-019 MBU Training Record.

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5.2 Documentation and Reporting

Should the TARP be activated, there are only two reporting requirements:

- A post-event report by the Manager of GeoEngineering and Tailings or designate; see previous section.
- An event log maintained by the Chief Engineer and Operations Superintendent, GE&T; attached in Appendix .

The notification flowcharts provided in Section 2.0 are meant to serve as guides and are not required to be used or filled out for compliance with this Plan.

As the Accountable Person, the Manager of GeoEngineering and Tailings is responsible for keeping this Plan up to date. This may be achieved through:

- Annual review of the TARP and application of adaptive management as new information and monitoring results are identified.
- Change-driven revision of TARP, such as change of personnel, changes to approvals, or updated maps.

Upon revision, the Manager of GeoEngineering and Tailings is also responsible for distributing to all responsible/affected parties which have been identified as part of the contact list provided in Section 2.0.

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6.0 References

Table 6-1. Hudbay documents.

No.	Title
Plant-Wide, i.e., MBU-Wide	
PWO-019	MBU Training Record
Environment Department	
ENP-008	Effluent Quality Emergency Response Plan
ENP-110	Anderson TIA OMS Manual: Module 10 Emergency Action Plan
ENP-101 through 111	Anderson TIA OMS Manual
ENC-528	Internal Notification Protocol for Environmental Operations
ENO-689	MBU Dams & Tailings Facilities Contact List
ENP-012	ATIA Discharge Management Plan
Other(s)	
SLT-020	Surface Utility Operator Training Manual
SLP-003	Tailings Line Pressure
SLP-022	Tailings Line Maintenance - Anderson Lake
SLP-032	Tailings Line Spill at Stall Mill
SLP-037	Chainsaw Safety Procedure
SLP-039	Capstan Winch Operation
SLO-027	Anderson Tailings Deposition Daily Report
SLO-028	Snow Lake Pipeline Daily Inspection

1. All Hudbay controlled documents are filed on the M-Drive.

Table 6-2. Non-Hudbay documents.

Document Title	Author	Issue Date(s)
Metal and Diamond Mining Effluent Regulation SOR/2002-222	ECCC	2002
Environment Act License No. 3263	MEC	2018

1. All non-Hudbay documents are publicly available online.

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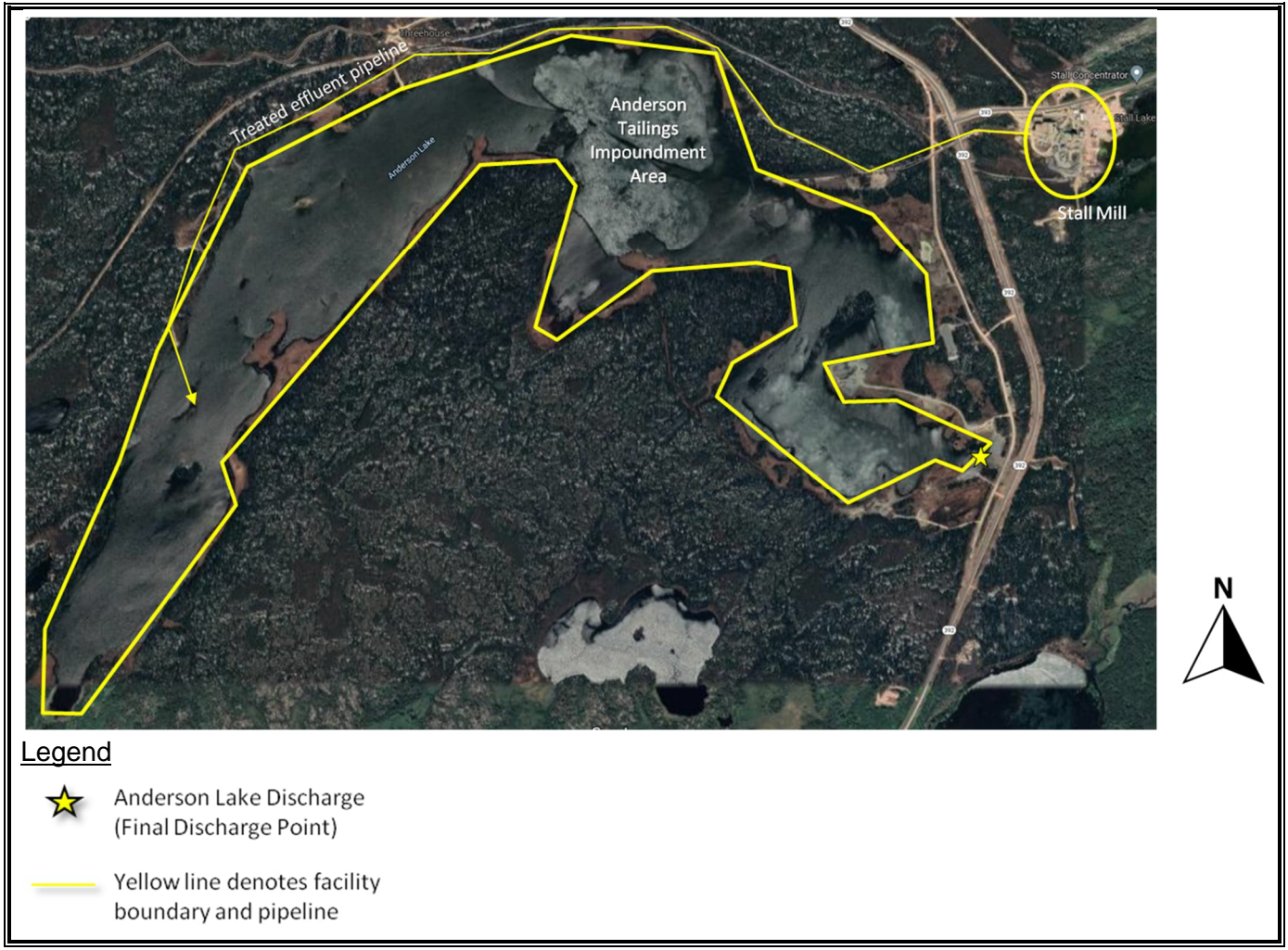
Appendix A

Anderson Tailings Impoundment Area Figure

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Anderson Tailings Impoundment Area



Legend

- ★ Anderson Lake Discharge (Final Discharge Point)
- Yellow line denotes facility boundary and pipeline



**ATIA Subaerial Tailings Deposition Trial Study
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Appendix B Event Log



**ATIA Subaerial Tailings Deposition Trial Study
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TARP EVENT LOG (one per event)				
Name & Job Title:				
Event Start Date & Time:				
Event / Condition Description:				
Triger Level:				
EVENT DETECTION				
When did you detect or learn about the event / condition?				
How did you detect or learn about the event / condition?				
LOG ALL NOTIFICATIONS AND ACTIVITY IN THE TABLE BELOW				
Date	Time	Contact Notified (Name & Title)	Action / Incident Progression	Action Taken By
			-	
			-	
			-	
			-	
			-	
			-	
			-	
			-	
			-	
			-	
			-	
			-	