INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Cyanide Production Summary Audit Report (Repackaging Plant # 2, Warehouse and Incinerators)

Vehrad Transport & Haulage Tema, Ghana

18th, 19th and 21st August 2017

For The International Cyanide Management Code

Name of Operation:	Vehrad Transport & Haulage
Name of Operation Owner:	Vehrad Transport & Haulage
Name of Operation Operator:	Vehrad Transport & Haulage
Name of Responsible Manager:	Mr. Nazih Husseini, Operations Director
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Location detail and description of operation

The Vehrad Cyanide screw feed repackaging Plant (Sparg Plant #2) is located at plot #A/46/30, Tema Heavy Industrial Area, a Vehrad subsidiary site within 5 kms of the main Vehrad yard. The bonded cyanide storage warehouse is located at Plot 16/17, Heavy Industrial Area, Tema, Ghana, which is the main Vehrad site.

The cyanide repackaging facility (Sparg Plant #2) also contains a Ghana Environmental Protection Agency-approved, dual incinerator complex used to incinerate cyanide packaging. The site is working full time on incineration but not sparging sodium cyanide packaging at present. When repackaging is undertaken, there are twelve staff on site. The facility has 24 hour security presence and coverage.

Normally, the facility supports the work of the Sparg #1 cyanide repackaging facility located at the main Vehrad site but Sparg#1 facility is currently under care and maintenance. Consignors deliver their sea containers to the main Vehrad site where they are de-stuffed of cyanide boxes containing cyanide briquettes. These boxes are stored in the Customs bonded Cyanide Warehouse, whilst they are awaiting repackaging into sparge (ISO) tanks at the # 2 repackaging plant for onward transportation in sealed, checked and inspected Vehrad containers to mine sites. Each consignor's cyanide boxes are stored separately in the warehouse and the ISO sparge tanks are filled in client specific batches.

In order to save on container demurrage and provide off-mine storage, all cyanide containers now received from cyanide producers and consignors are de-stuffed and are

stored in a Customs-bonded warehouse solely containing cyanide boxes, whilst they await repackaging into sparge tanks, or re-stuffing into Vehrad containers. These are then transported by Vehrad Transport and Haulage to mine sites in West Africa. Each mine or consignor's cyanide boxes are stored separately in the bonded warehouse.

All waste cyanide packaging (wooden boxes, plastics and polypropylene bags) is taken directly to the incinerator facility and disposed of.

Auditor's Finding

This operation is

X in full compliance
☐ in substantial compliance
☐ not in compliance

with the International Cyanide Management Code.

This operation has not experienced compliance problems during the previous three year audit cycle.

Audit Company: Eagle Environmental

Audit Team Leader: Arend Hoogervorst & Production Auditor E-mail: arend@eagleenv.co.za

Date of Audit: 18th, 19th and 21st August 2017

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.

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

Vehrad Transport & Haulage		3/01/2018
Name of Facility	Signature of Lead Auditor	Date

1. OPERATIONS: Design, construct and operate cyanide production facilities to prevent release of cyanide.

Production Practice1.1: Design and construct cyanide production facilities consistent with sound, accepted engineering practices and quality control/quality assurance procedures.

X in full compliance with

The operation is □ in substantial compliance with Production Practice 1.1

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
The design for the Bulk Bag Repacking, Cyanide Debagging and Tanker Loading facility was prepared by Kempe Engineering, Australia. Sample drawings for the design were sighted and signed off by Engineer Kempe. The Screw Conveyor Drawings were sampled and the steel complies with Australian Standards AS 1163, 1594, 3678 and 3679. The full drawings were audited during the initial certification audit.
A Design Calculations document prepared by Mabani Steel, based upon the design drawings was sighted along with sample Mabani Steel drawings covering the Mezzanine Floor Plan (E05), and Anchor Bolt Plan (A01).
The two incinerators were built from a standard Chinese design for incinerators and these design drawings were sighted. As the drawings were annotated in Chinese, a local registered engineer, Engineer Amer Mikati (Ghana Registration No C1206, and Registered Eng#6431, Member, Chartered Institute of Engineers), verified the drawings' details through sample measurements, visual inspection, thickness testing, an operational specifications audit and a materials specifications review. Furthermore, Engineer Amer Mikati of United Fabrication Limited (Ghana Registration No C1206, and Registered Eng#6431, Member, Chartered Institute of Engineers) has reviewed the drawings and structure and confirmed the "as-built" status of the incinerators and "fit-for-purpose" for incinerating cyanide packaging. Also reviewed was the design pack which included a bulk bag reprocessing conceptual flow diagram; a warehouse process flow diagram; a unit process diagram; a bulk bag re-processing process flow diagram; a fork lift transport of bulk bags schematic; the iso-tainer transport process flow diagram; and the incinerator process flow diagram. The on-site warehouse was modified to accommodate cyanide storage by the installation of ventilation fans, the sealing of floors, and the installation of a ramp, linked to the bunding and containment requirements.
No QA/QC program for the first incinerator construction was available. Therefore, Engineer Amer Mikati of United Fabrication Limited (Ghana Registration No C1206, and Registered Eng#6431, Member, Chartered Institute of Engineers) has reviewed the drawings and structure and confirmed the "as-built" status of the incinerator and "fit-for-purpose" for incinerating cyanide packaging.
A Quality Assurance/Quality Control Program was used during construction of the second incinerator and a "fit-for-purpose" quality assurance certificate was issued by the

Consulting Engineer. The materials of construction were mild steel and the construction engineer was aware that the equipment was to be used in conjunction with sodium cyanide.
The Repackaging Facility equipment has 3 emergency stop buttons:- 2 at ground level, and one on top of the gantry. If power fails, the equipment will automatically shut down. Both incinerators have an emergency shutdown procedure in case of circumstances requiring this. The process is a batch feed process and emergency responses would be based upon the status of the incinerated batch and so feeding would stop until the problem has been corrected.
No certificate for modifications to the storage warehouse was available. The Bonded warehouse was modified to accommodate cyanide storage by the installation of ventilation fans, the sealing of floors, the installation of a ramp linked to bunding and containment requirements. An email was sighted from engineer, Abdallah Ashkar, dated 9 January 2011, describing requirements for the cyanide warehouse. The design drawings numbered 1-10, dated June 2012, covering the site plan, fence wall & details, ground plan, roof framing plan, roof plan, section and details, elevations, foundation plan and details, ground floor plan and detail, columns, and roof beam framing plan were sighted.
The Repackaging Plant is located on an impervious concrete base inside a building. The incinerators are located on an impervious concrete base and the route from the gate to the repackaging plant building and the area adjoining the incinerators is all concrete based.
The Cyanide Bonded Storage Warehouse has a designed depression acting as a bund and the floor is made of concrete and all cracks have been repaired. Spillages would also be cleaned in situ. There are no solution pipelines or liquids in the repackaging facility. (Dry) Spills within the containment area will be cleaned up according to Spill Procedures.

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

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 1.2**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
Twenty five operating procedures have been developed for Sparg#2 repackaging plant. The procedures cover pre-, post and basic operation, the cyanide repackaging plant and warehouse management, guidelines for vital components, inspections, a manual of authority, decontamination of equipment, the buddy system, a change management procedure and a process flow diagram. Procedure SW 22 is the procedure that covers the operation of the incinerators and the procedure to burn the cyanide packaging.
The procedures also include relevant pre-work inspections and appropriate PPE and abnormal situations such as overfilling, power outages, blockages, damage to bags and broken or damaged handles, residues in bag and hopper and dealing with other abnormal and emergency situations.

Repackaging plant #1 (currently under care and maintenance) and the Cyanide Bonded Storage Warehouse have twenty eight combined operating and reference procedures covering normal, abnormal and emergency situations. The procedures include pre-, post and basic operation, cyanide repackaging plant and warehouse management, stuffing and de-stuffing of containers, guidelines for vital components, inspections, manual of authority, decontamination of equipment, buddy system, change management procedure and a process flow diagram.

The Plant Maintenance Plan describes the maintenance and inspections to be carried out monthly using detailed checklists. The Incinerators Maintenance Plan includes pre-start weekly, monthly, and yearly inspections. A Cyanide Repackaging Plant and Warehouse Storage Management procedure is in place to minimise cyanide gas generation. A separate plant inspection procedure and checklist includes specific details on equipment, pre-operational and operational activities. The storage warehouse inspection regime for the roof and ventilation equipment and condition of the concrete floor is also covered by a written procedure.

The site has 3 portable PGM 1170 personal HCN gas monitors which have been calibrated (calibration certificates sighted), 7 new Gastox portable HCN monitors (calibrated to 30 Nov 2017) and one portable 3M EVM gas and particulate monitor. EVM Monitor Calibration is recommended by the manufacturer annually (sighted calibration certificate for Oct 2016-Oct 2017) and Gastox gas Monitors recommended for calibration six monthly.

Under normal operating conditions, the repackaging facility process is a dry process. However, washings from the containment area (decontamination water and floor washings) will be cleaned up and disposed of using an evaporation tank. In the case of the Storage Warehouse**,** small, dry spillages will be dealt with according to the Cyanide Repackaging Plant and Warehouse Storage Management procedure. Should there be large quantities, these will be disposed of via the mines in terms of the Emergency Response, Deployment Plan And Guide or disposed of in the incinerators.

With respect to hydrogen cyanide gas management, in the repackaging facility**,** no cyanide is stored in the repackaging facility building but the building has been specifically modified to encourage adequate ventilation and air circulation. In the storage warehouse, large scale extractor fans are installed to ensure adequate air circulation in the building. Both the repackaging facility and the storage warehouse have procedures and physical facilities to prevent moisture from affecting the solid cyanide during storage and processing. The storage warehous**e** is always locked and monitored by security guards and customs officers as it is a bonded customs warehouse. The repackaging facility is an area within walls, within the main site and access is controlled by a security guard with no persons permitted in the facility without authorisation and appropriate PPE.

A Change Management Plan is in place and was used to consider the changed cyanide risk of introducing a sparging facility and the additional storage of cyanide. Vehrad uses the ADKAR model – **A**wareness of the need for change, **D**esire to support and participate in the change, **K**nowledge of how to change, **A**bility to implement change, and **R**einforcement to sustain change. This will also be used to address any future changes.

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

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 1.3**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
In the repackaging facility, inspections for the sparge tanks have been developed. There are no pipes or valves involved in the process but inspection routines are in place for the hoppers, ISO tank valves hatches and mechanisms, and related bag and box handling facilities in the repackaging plant. Inspections are undertaken pre-start, monthly and annually and before every repackaging exercise (sighted completed inspection sheets). The storage warehouse is inspected in terms of the Plant Inspection Procedure and Checklist. The two facilities are inspected daily, before operations commence and after completion. Inspection documentation identifies all items to be observed, date of the inspection, the name of the inspector, and any observed deficiencies and corrective actions are documented and records retained.

2. WORKER SAFETY: Protect workers' health and safety from exposure to cyanide.

Production Practice 2.1: Develop and implement procedures to protect plant personnel from exposure to cyanide.

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 2.1**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
Twenty five operating procedures have been developed for Sparg#2 repackaging plant. The procedures cover pre-, post and basic operation, the cyanide repackaging plant and warehouse management, guidelines for vital components, inspections, a manual of authority, decontamination of equipment, the buddy system, a change management procedure and a process flow diagram. Procedure SW 22 is the procedure that covers the operation of the incinerators and the procedure to burn the cyanide packaging.
The procedures also include relevant pre-work inspections and appropriate PPE and abnormal situations such as overfilling, power outages, blockages, damage to bags and broken or damaged handles, residues in bag and hopper and dealing with other abnormal and emergency situations.

Repackaging plant #1 (currently under care and maintenance) and the Cyanide Bonded Storage Warehouse have twenty eight combined operating and reference procedures covering normal, abnormal and emergency situations. The procedures include pre-, post and basic operation, cyanide repackaging plant and warehouse management, stuffing and de-stuffing of containers, guidelines for vital components, inspections, manual of authority, decontamination of equipment, buddy system, change management procedure and a process flow diagram.

The Plant Maintenance Plan describes the maintenance and inspections to be carried out monthly using detailed checklists. The Incinerators Maintenance Plan includes pre-start weekly, monthly, and yearly inspections. A Cyanide Repackaging Plant and Warehouse Storage Management procedure is in place to minimise cyanide gas generation. A separate plant inspection procedure and checklist includes specific details on equipment, pre-operational and operational activities. The storage warehouse inspection regime for the roof and ventilation equipment and condition of the concrete floor is also covered by a written procedure.

The site has 3 portable PGM 1170 personal HCN gas monitors which have been calibrated (calibration certificates sighted), 7 new Gastox portable HCN monitors (calibrated to 30 Nov 2017) and one portable 3M EVM gas and particulate monitor. EVM Monitor Calibration is recommended by the manufacturer annually (sighted calibration certificate for Oct 2016-Oct 2017) and Gastox gas Monitors recommended for calibration six monthly.

Under normal operating conditions, the repackaging facility process is a dry process. However, washings from the containment area (decontamination water and floor washings) will be cleaned up and disposed of using an evaporation tank. In the case of the Storage Warehouse, small, dry spillages will be dealt with according to the Cyanide Repackaging Plant and Warehouse Storage Management procedure. Should there be large quantities, these will be disposed of via the mines in terms of the Emergency Response, Deployment Plan And Guide or disposed of in the incinerators.

With respect to hydrogen cyanide gas management, in the repackaging facility, no cyanide is stored in the repackaging facility building but the building has been specifically modified to encourage adequate ventilation and air circulation. In the storage warehouse, large scale extractor fans are installed to ensure adequate air circulation in the building. Both the repackaging facility and the storage warehouse have procedures and physical facilities to prevent moisture from affecting the solid cyanide during storage and processing. The storage warehouse is always locked and monitored by security guards and customs officers as it is a bonded customs warehouse. The repackaging facility is an area within walls, within the main site and access is controlled by a security guard with no persons permitted in the facility without authorisation and appropriate PPE.

Existing policy covers consulting with the workforce through risk assessment, PTOs, change management, and health and safety meetings. No specific documented examples raised during this period. The Company nurse operates a wellness program and staff are given medical examinations and screening annually.

A Change Management Plan is in place and was used to consider the changed cyanide risk of introducing a sparging facility and the additional storage of cyanide. Vehrad uses the ADKAR model – **A**wareness of the need for change, **D**esire to support and participate

in the change, **K**nowledge of how to change, Ability to implement change, and **R**einforcement to sustain change. This will also be used to address any future changes.
Signage was confirmed during the site inspection including PPE requirements, warning signs and appropriate prohibitions such as no smoking, eating and drinking signs noted at entrance to site with other reinforcing signs throughout the sites.

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

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 2.2**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
The Facility has its own Emergency Response Deployment Plan and Guide to respond to cyanide exposures. A safety shower and eye wash is located outside the building housing the repackaging facility. Dry powder fire extinguishers are located inside the building. Fire extinguishers are checked during the monthly ER inspections. Safety showers are checked on the monthly maintenance checklist and plant inspection checklist. A potable water supply is readily available. Oxygen is available via an "oxygen concentrator" (Perfecto2 Invacare) and an Oxy-viva oxygen bottle. Emergency communication is via the man down alarm and cell phones. Antidote is stored in a fridge for transport with the patient to Tema General hospital. Cyanide first aid equipment is inspected monthly. Cyanide antidote is stored in a fridge according to the manufacturer's specifications. The Company nurse manages the schedule for replacement of the antidote from a French supplier. Inspections are undertaken according to requirements of the ER Equipment Inspection List. English is the working language of the site. MSDSs are included in the Emergency Response Plan and procedures, a copy of which is located in the warehouse. Operators go through the shower and decontaminate their PPE. Visitors and contractors are not permitted in the area during repackaging. A trained nurse and ten trained first-aiders are also available on site. 17 safety officers were trained by a medical doctor, Dr. Amegbletor Cyril, on 21 July 2016. John Esson, the ex-Obuasi gold mine trainer, trained 18 Vehrad staff in first aid on 1 March 2017. The communication focus has changed from annual seminars to using flyers and small group discussions to raise awareness because attendees were not passing information back to their community members and colleagues.
Attendance registers for cyanide awareness alerts at hospitals were sighted for Tamale Teaching Hospital (8 nursing staff and interns on 4th May 2017), and Tema Port Hospital (9 Medical officers and nursing staff on 22 June 2017). There was a leaflet distribution and cyanide awareness discussion at Tema General Hospital on 12 May 2016, attended by three doctors and on 5th September 2015, attended by two doctors and one nurse. A spill and cyanide gassing drill was undertaken at # 2 plant on 5 July 2014. The report indicated that no changes to the training procedures were necessary. Counselling was undertaken to deal with speed of response and use of PPE.

On 10 January 2017, a cyanide spill drill was undertaken at Sparg #2 and the scenario involved a cyanide briquette bag strap failing on a fork lift truck. The evaluation indicated good responses from staff and effective and safe clean-up. There is an Accident Investigation Procedure covering the warehouse and No1 and No 2 repackaging facilities. No incidents have occurred.

3. MONITORING: Ensure that process controls are protective of the environment.

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

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 3.1**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
At the Sparg#2 repackaging facility, no water is used in the facilities that can escape from containment and it is in such small quantities that it cannot affect surface or ground water. However, a background sample was taken of surface water downstream of the No 2 site on 10th October 2016 which showed <0.01ppm Free, WAD or Total cyanide levels (Sighted SGS Laboratories Ghana Analytical Report).
At the main site where the warehouse is, wash water drains to storage tanks and containers which use an evaporation disposal method. Any spillage in the warehouse is contained and cleaned up. There is no direct discharge to surface water and all discharge goes to an effluent and hydrocarbon, three compartment, linked, containment sump which is emptied whenever one compartment is full.
The repackaging facility has extraction fans with filtration equipment. The hopper is enclosed to ensure any dust is kept within the hopper and facility. Annual Air Emission Testing was carried out by SGS on incinerator No 1 on 2nd October 2016 - results comply with Ghana EPA Standard Emission Limits (GEPA-1). Annual Air Emission Testing was carried out by SGS on incinerator No 2 on 23rd April 2017 also indicated that results comply with Ghana EPA Standard Emission Limits (GEPA-1).
Monitoring is established, based upon the risks identified and the results noted. This is under continuous review by the site and the authorities and will be adjusted if changing circumstances arise.

4. TRAINING: Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.

Production Practice 4.1: Train employees to operate the plant in a manner that minimizes the potential for cyanide exposures and releases.

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 4.1**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
Workers at the #2 repackaging facility and warehouse have been trained in cyanide awareness and hazards and cyanide emergency response. PPE training is included in Cyanide Awareness Training. Training for the process and procedures was conducted on an "on the job" basis and PTOs (Planned Task Observations) were conducted to check compliance. PTOs undertake were sighted and reviewed. Three trainers used are appropriately qualified and experienced. Training is based upon operating procedures. Training records are kept in employees individual "passports" which are kept on site, not with individual employees.

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

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 4.2**

□ not in compliance with

□ not subject to

Summarize the basis for this Finding/Deficiencies Identified:
Training was given to all operators in Sparg#2 and the warehouse on the Repackaging Plant Emergency Response Plan which covers both cyanide releases and worker exposures. A Spill and cyanide gassing drill was undertaken at # 2 plant on 5 July 2014. No changes to training procedures were noted as being necessary. Counselling was undertaken to deal with speed of response and use of PPE. On 10 January 2017, a cyanide spill drill was undertaken at Sparg #2 and the scenario involved a cyanide briquette bag strap failing on a fork lift truck. The evaluation indicated good responses from staff and effective and safe clean-up. Training records are kept in the form of individual "Passports to Operate" (kept on site, not with employees) as well as training course attendance lists. All records are kept permanently.

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

Production Practice 5.1: Prepare detailed emergency response plans for potential cyanide releases.

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 5.1**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
The Emergency Response Plan Deployment and Guide covers the repackaging plant and storage warehouse and some 20 possible scenarios. The scenarios considered in the Plan include:- roof collapse and impact of rain on stored cyanide; release during loading whilst repackaging; releases during fires and explosions; evacuation plans, and assessment, mitigation and investigation to prevent future releases.

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

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 5.2**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
Communication focus has changed from annual seminars to using flyers and small focus groups to raise awareness because attendees were not passing information back to their community members and colleagues. The site engages with key stakeholders such as the Ghana EPA, Police and Fire Service through meetings and visits. Where appropriate, staff will visit hospitals and clinics. Representatives of the Ghana Police and Fire Brigade who visited the site during the audit confirmed these practices.

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

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 5.3**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
The Plan designates primary, secondary and alternate emergency response coordinators with explicit authority to commit the resources necessary to implement the Plan. All repackaging and warehouse operators are trained as emergency response team members and their training is included in the Training Matrix and the Training Plan. Duties and responsibilities and a list of emergency response equipment is also included in the Plan. Regular inspection of equipment is undertaken.

Production Practice 5.4: Develop procedures for internal and external emergency notification and reporting.

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 5.4**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
The Plan includes procedures and contact information for notifying management, regulatory agencies, outside response providers and medical facilities for any emergency.

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

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 5.5**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
The Plan describes specific, appropriate remediation measures, such as disposal and neutralization of solutions and solids, decontamination of soils and other contaminated media and management and disposal of spill clean-up debris. The Plan prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water but this is unlikely as there is no surface water likely to be affected.

Production Practice 5.6: Periodically evaluate response procedures and capabilities and revise them as needed.

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 5.6**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
The Plan includes provisions for reviewing and evaluating its adequacy on an annual basis or after any actual event or after lessons learned during a mock drill.