

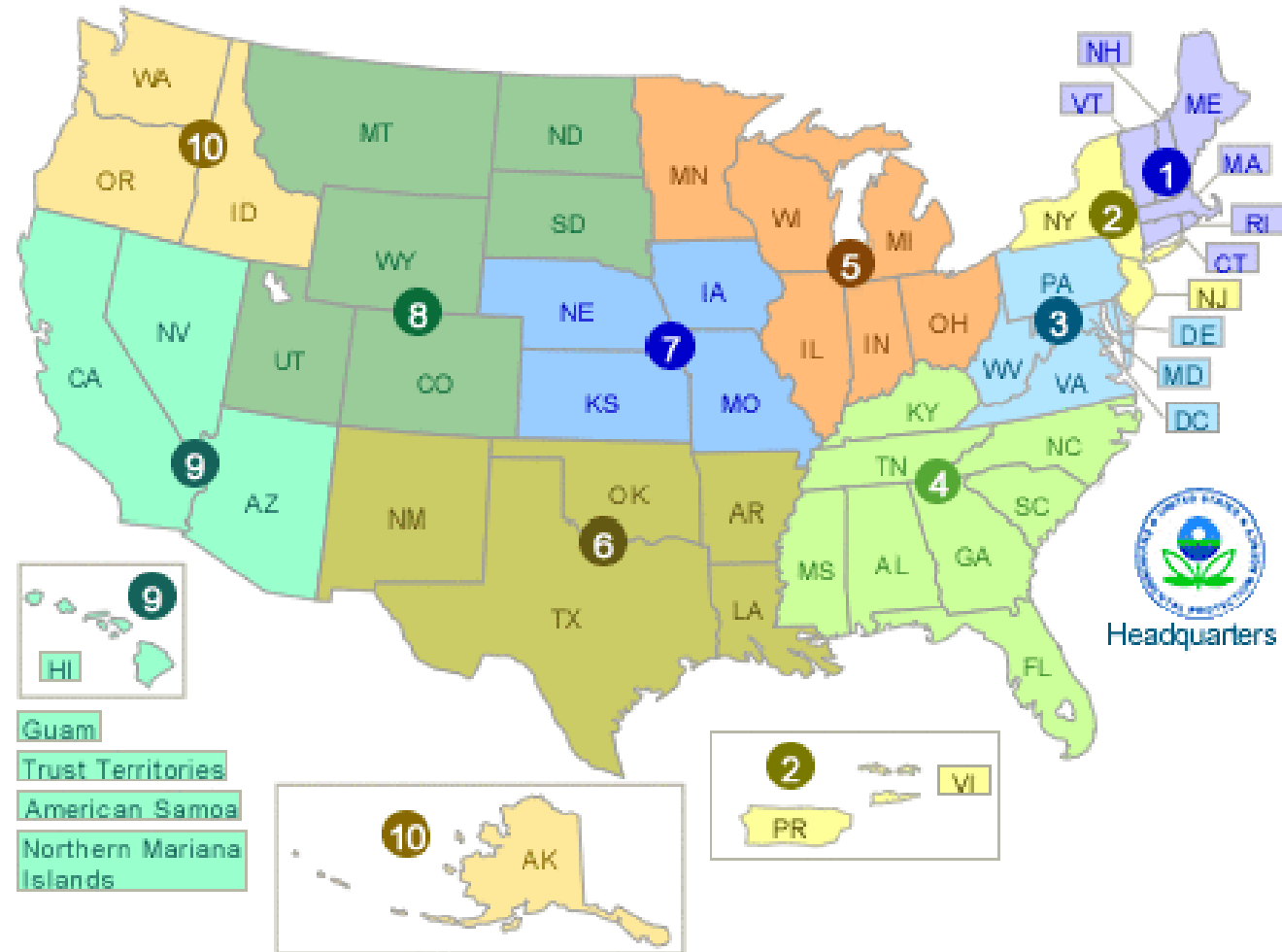


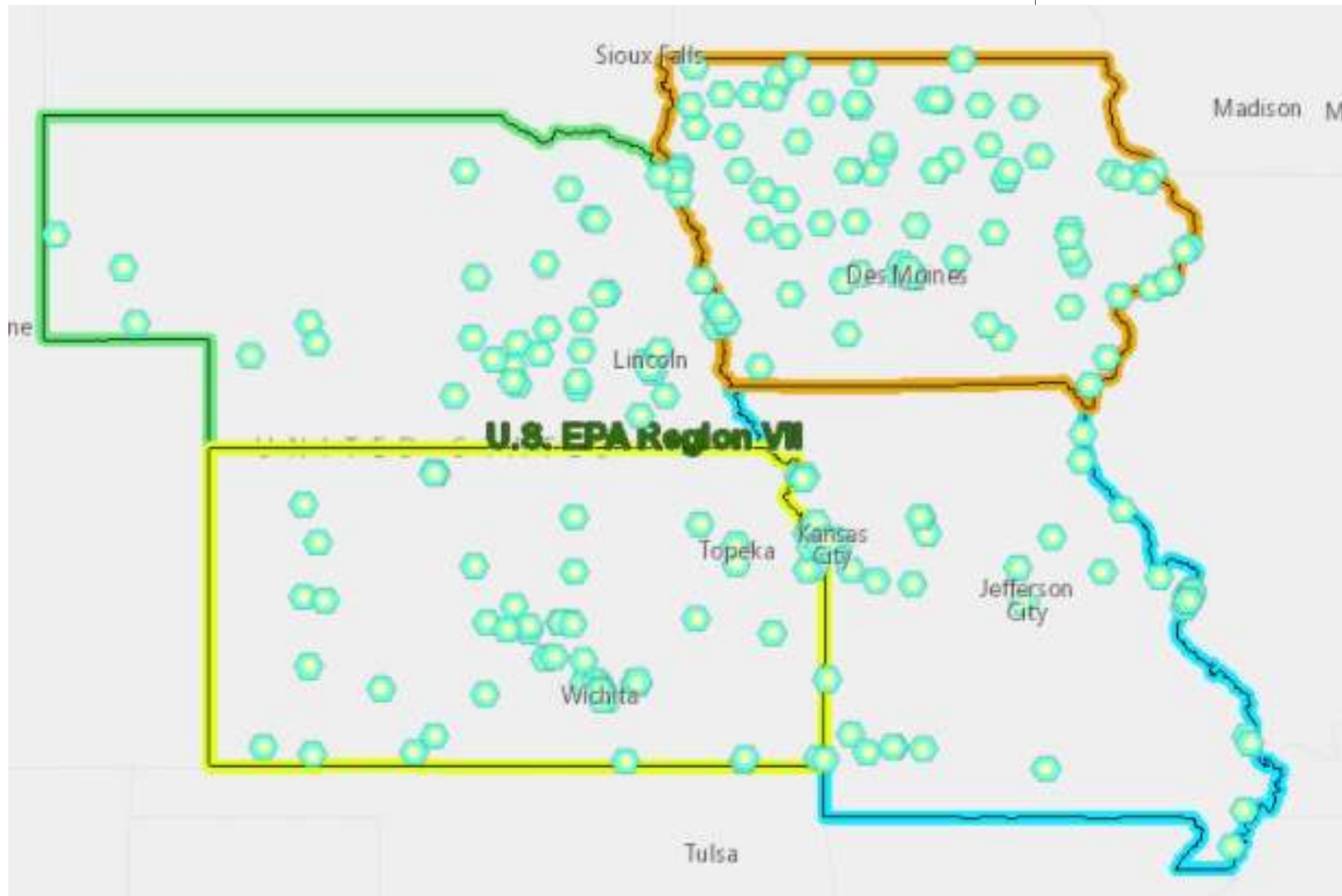
R7 Facility Response Plans

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EPA REGION 7

EPA Regions





Region 7 FRPs

Region 7 - FRPs

- ▶ 250 FRPs
 - ▶ Oil terminals, refineries, bulk distributors, ethanol plants, etc.
 - ▶ KS-64, IA-95, MO-50, NE-41
 - ▶ Substantial Harm – 188
 - ▶ Significant & Substantial Harm – 62

EPA Region 7 - FRPs

- ▶ EPA Region 7 On-Scene Coordinators
 - ▶ Currently 19 OSCs in Region 7
 - ▶ Each FRP has an assigned OSC
 - ▶ Serve as Inspector and Compliance Assistance contact

EPA Region 7 - FRPs

- ▶ R7 – Attempt to keep FRPs on a 5-year review/inspection schedule
- ▶ Review Sig & Sub FRPs every 5 years
- ▶ All FRPs are subject to Unannounced Exercises (GIUEs) – 3 years between successful GIUE

What to Expect: FRP Inspection

- ▶ Plan review – conducted by inspector in advance of field inspection
 - ▶ Discuss plan deficiencies, questions, etc.
- ▶ Inspection – evaluates plan compared to implementation
 - ▶ Qualified Individual Interview
 - ▶ Review of Facility
 - ▶ Discharge Scenarios
 - ▶ Response Procedures/Equipment
 - ▶ Facility deployment responsibilities/OSRO

What to Expect: FRP Inspection

- ▶ FRP-Required Records
 - ▶ Inspections, Trainings, Exercises
 - ▶ Reviewed for completeness – required to maintain for 5 years

What to Expect: FRP Inspection

- ▶ Common deficiencies

- ▶ FRP

- ▶ Inadequate Vulnerability Analysis, Discharge Scenario discussion

- ▶ No signed contract with OSRO

- ▶ Inspection

- ▶ Incomplete records (inspections, trainings, exercises)

What to Expect: GIUE

- ▶ Unannounced Exercise
 - ▶ Respond to small-case discharge (2,100 gallons) that has reached off-site
 - ▶ Functional exercise – deploy personnel, equipment, contractors
 - ▶ Evaluation:
 - ▶ Notifications
 - ▶ NRC and other required notifications
 - ▶ Initial response action (1 hour)
 - ▶ Initiate recovery (2 hours)

What to Expect: GIUE

- ▶ GIUE still includes plan review and records review
- ▶ Common deficiencies
 - ▶ Timely arrival of contractor equipment
 - ▶ Issues deploying response equipment/tactics

Resources

- ▶ EPA Oil Program Website:
 - ▶ www.epa.gov/oil-spills-prevention-and-preparedness-regulations
 - ▶ Great resource for FRP and SPCCC guidance and information

Resources

Region 7 Contacts:

SPCC

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Questions



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