







How to Submit FRP Reconsideration Requests in Region 8

- Send signed letter R8_FRP@epa.gov
- Provide supporting documentation or work with us to schedule an inspection to verify
- Request for Information or a Decision (~45 days)
- Maintain FRP until decision is made



Examples – Facility Modifications

- The Station no longer has any truck loading racks and associated tanks. The tanks located at the Station are "breakout tanks" and exclusively "transportation related" by definition from 40 CFR 112, appendix A section ii, and as such, meet the exemption from EPA FRP jurisdiction, as outlined in the MOU between the Secretary of Transportation and Administrator of the EPA.
- Facility is requesting a formal reconsideration of the FRP status as the overall storage capacity has decreased from 31 storage tanks with a capacity of 1,432,200 gallons to 21 storage tanks with a capacity of 970,200 gallons. Six (6) 1,100 bbl tanks have been removed from the facility and are utilized at a well production pad. Four (4) 1,100 bbl tanks are permanently out of service and remain onsite. A total of 10 storage tanks were removed from the facility or permanently removed from service. The following notates which tanks were removed from location and which are permanently out of service. The permanently out of service tanks are blind flanged and labeled as permanently out of service.
- **Attachment A includes photos/videos of the disconnected tanks.**



Often Need Videos/Photos, Engineering Analysis and Surveys, or On-Site Inspection

- WOTUS Jurisdiction Changes
- Flow Pathway Changes
- Engineering Controls
- Out-of-Service Tanks/Truck Racks

- Include ample supporting evidence to expedite complete review and approval


