



1

---

---

---

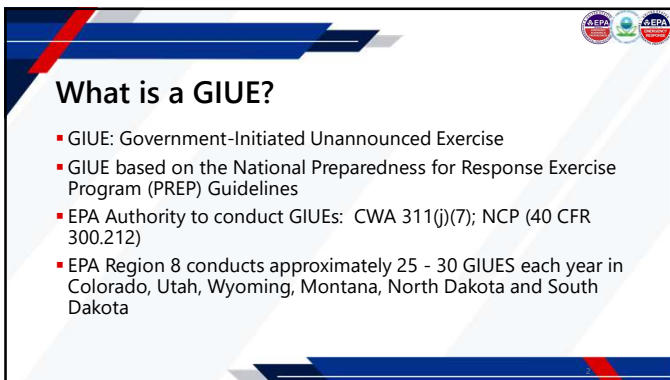
---

---

---

---

---



2

---

---

---

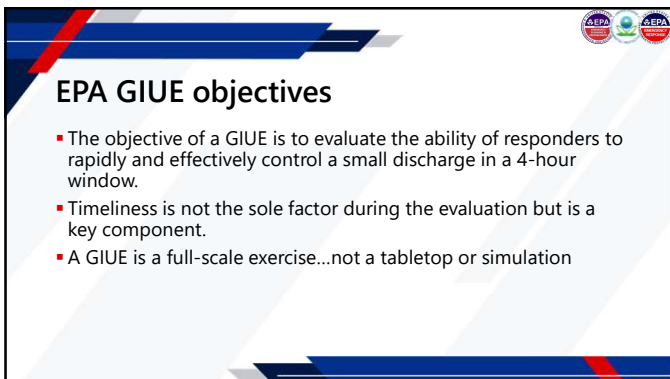
---

---

---

---

---



3

---

---

---

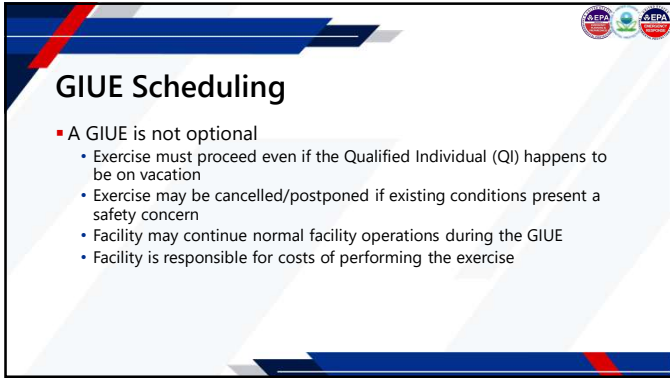
---

---

---

---

---



### GIUE Scheduling

- A GIUE is not optional
  - Exercise must proceed even if the Qualified Individual (QI) happens to be on vacation
  - Exercise may be cancelled/postponed if existing conditions present a safety concern
  - Facility may continue normal facility operations during the GIUE
  - Facility is responsible for costs of performing the exercise

4

---

---

---

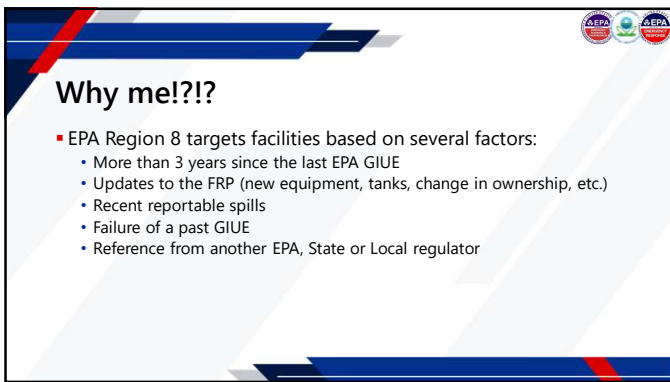
---

---

---

---

---



### Why me?!?

- EPA Region 8 targets facilities based on several factors:
  - More than 3 years since the last EPA GIUE
  - Updates to the FRP (new equipment, tanks, change in ownership, etc.)
  - Recent reportable spills
  - Failure of a past GIUE
  - Reference from another EPA, State or Local regulator

5

---

---

---

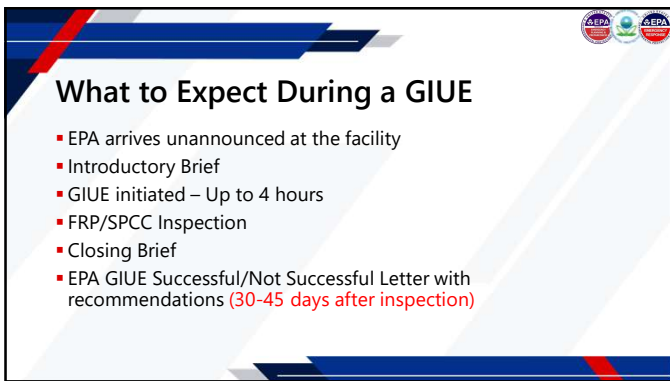
---

---

---

---

---



### What to Expect During a GIUE

- EPA arrives unannounced at the facility
- Introductory Brief
- GIUE initiated – Up to 4 hours
- FRP/SPCC Inspection
- Closing Brief
- EPA GIUE Successful/Not Successful Letter with recommendations (30-45 days after inspection)

6

---

---

---

---

---


---

---

---

### EPA Planning Process for GIUEs

- Inspectors review the relevant Facility Response Plan
- Select a plausible small discharge scenario from FRP
- Verify a flow pathway to nearest WOTUS
- Formulate the exercise scenario and ground-truth it before arrival at facility



7

---

---

---

---

---

---

---

---

### GIUE – Intro Briefing

- EPA Team and facility management convene in conference room; a Notice of Inspection (NOI) will be signed by Qualified Individual (QI) or a facility representative (See Handout 5-1)
- Facility can include whomever they'd like in the briefing, including via teleconference
- EPA Team will explain the GIUE, inspection process and expectations
- Don't hesitate to ask questions!

8

---

---

---

---

---


---

---

---

### EPA GIUE Spill Scenario

- Small discharge of 2,100 gallons that escapes containment and reaches water
- EPA will specify:
  - Tank or source (not exactly what happened)
  - Type of product
  - Volume discharged
  - Weather conditions, if different from time of the exercise



9

---

---

---

---


---

---

---

---

**EPA GIUE Spill Scenario**

- "Tank 101 had a complete failure. There is 2,100 gallons of diesel that has entered the Colorado River (WOTUS)."
- Facility has up to 4 hours to complete the GIUE. The clock starts with the scenario or the call. 
- Don't hesitate to ask questions before, during, or after the GIUE!

10

---

---

---

---

---

---

---

---

**GIUE timeframes**

- There are four key time frames that EPA will evaluate:
  - Prompt Notifications
  - Containment Boom and means of deployment on-site within one hour followed by successful deployment of the boom
  - Oil recovery equipment (i.e., skimmer package) on-site within two hours
  - GIUE completed with four hours

11

---

---

---

---

---


---

---

---

**Proper Notifications**

- During a GIUE, notifications are conducted... *not simulated*
  - Notifications should be made promptly! National Response Center (NRC) within 15 mins
  - State Spill Line
  - Local agencies, etc.
  - Document who you called and time you called them



12

---

---

---




---

---

---

---

---

### During the GIUE – Command Post

- Are proper notifications conducted in a timely fashion?
  - Are the ERAP and/or FRP being used?
- Has the spill response team and/or OSRO been activated?
  - When was response team/OSRO activated? When did they arrive? Can they deploy equipment?
- Are communications with response personnel and other facility personnel effective?

13

---

---

---




---

---

---


---

---

### Common Notification Issues

- Staff can't find the FRP or list of notifications
- National Response Center (NRC) should be one of the first calls
- Response contractors are not available
- Lack of clarity over who calls who
- Balancing notifications with implementation of response plan



14

---

---

---




---

---

---

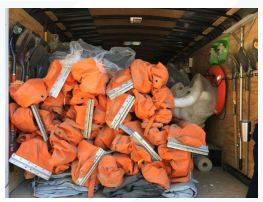
---

---

### Boom or alternative containment device and Personnel On-Site within One Hour

- Sufficient boom or alternative containment device and personnel on-site within one hour
- Generally achieved with properly maintained spill response trailer and trained personnel



15

---

---

---

---

---

---

---

---

### Containment Boom Deployment

- 1,000 feet of boom
- Must be **containment boom**, not made of absorbent materials
- At inland facilities, boom may be deployed in dry ditches if there is no water



16

---

---

---

---

---

---

---

---

### Don't Be Fooled – Know The Difference

Containment Boom	Sorbent
 <ul style="list-style-type: none"><li>• Consists of a float and skirt</li><li>• Is impermeable</li><li>• Required to stop the spread of oil</li></ul>	 <ul style="list-style-type: none"><li>• Floats on top of the water; no skirt</li><li>• Absorbs oil</li><li>• Incapable of stopping/diverting oil</li></ul>

17

---

---

---

---

---


---

---

---

### Common Issues - Boom

- Trailer and equipment poorly maintained
- Can't find the key to the trailer
- Trailer is too large and requires a semi- and CDL to drive
- Wrong type of boom
- Boom segments don't connect



18

---

---

---

---

---

---

---

---

## Slide 18

---


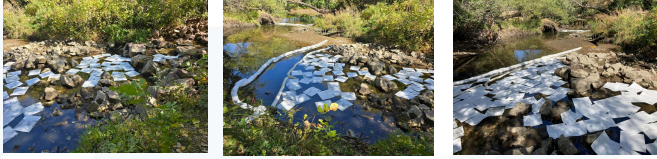
### **SJT1** Added one more

Swackhammer, J-Troy, 2024-02-22T21:25:08.077

### **JH2** Add Energy Transfer Epping photo? Newfield photo? Trailer needed certified driver, full of dead flies

Horak, Jerica, 2025-02-10T20:37:18.651

### Is This Boom Effective?



19

---

---

---

---

---




---

---

---

### Containment Boom Alternatives

- "As appropriate" in FRP rule provides inland plan holders flexibility – added to PREP Guidelines in 2016 SPT
- Alternative strategy may be more appropriate where spill pathway could be a dry drainage pathway or tributary
- Alternatives include: underflow dams, temporary containment, dams (soil, etc.), inflatable diaphragms (culvert plugs)



20

---

---

---

---

---



---

---

---

### Oil Recovery within Two Hours

- Can be met with fully equipped response trailer
- Functioning skimmer
- Vacuum truck



21

---

---

---

---

---

---

---

---

## Slide 20

---

**SJT1** Added some language to clarify.

Swackhammer, J-Troy, 2024-02-22T21:23:46.571

**JH2** Emphasis

Horak, Jerica, 2025-02-18T20:14:30.012

**Provisions for Storage of Recovered Oil**

- Oil storage capacity for recovered oily material equivalent to **twice the effective daily recovery capacity** required on-scene, or 4,200 gallons per day



22

---

---

---

---

---

---

---

---

**Common Issues – Oil Recovery**

- Equipment doesn't work
- Response trailer doesn't have the proper equipment (i.e. hoses, pumps, etc.)
- Incompatible hose connectors
- Personnel don't know how to deploy equipment
- Vacuum trucks more than 2 hours away



23

---

---

---

---

---


---

---

---

**Complete GIUE within 4 hours**

- Boom and oil recovery equipment safely and correctly deployed
- Generally, GIUE will be less than 4 hours



24

---

---

---

---

---

---

---

---

### Common Boom Deployment Problems

- Can facility personnel and/or OSRO deploy the boom?
  - Do they have the required equipment?
  - Do they have **access** to boom deployment sites and anchor points? Can vac truck access control point?
- Is the boom properly deployed?
  - Proper anchoring, proper flotation, proper tension
  - No twists or gaps
- Is the boom maintained in a way to allow for rapid deployment?
- Does the facility have the appropriate hardware needed to link boom sections and stake the boom?

25

---

---

---

---

---

---

---

---

### Boom Deployment Problems

26

---

---

---

---

---

---

---

---

### Ineffective Boom

27

---

---

---

---

---

---

---

---

## Slide 27

---

**JH1** New slide for example of example boom? Fire Dept booming river  
- Steve has example


Horak, Jerica, 2025-02-10T20:43:17.776

**JH1 0** Add durango fire booming video examples

Horak, Jerica, 2025-02-18T20:17:25.750

**Properly Conducting the GIUE**

- Did Facility identify the spill trajectory initially and throughout the exercise?
- Were risks to the environment, business, and public services determined?
- Did the QI identify the resources needed to respond?



28

---

---

---

---

---

---

---

---

**Common Issues –GIUE Completion**

- “This could never happen.” Facility unfamiliar with FRP and spill trajectories
- Facility approach GIUE without sense of urgency... too accustomed to tabletops, not drills
- Staff unfamiliar with FRP, including potential downstream impacts and spill response tactics
- Under-trained and unprepared personnel
- QI response: “OSRO will handle it.”

29

---

---

---

---

---

---

---

---

**Common Issues – GIUE Completion**

- Facility not conducting drills per PREP Guidelines – not practicing the FRP
- Facility too dependent on OSRO and OSRO not familiar with the facility and FRP
- Unable to successfully deploy boom and establish collection

30

---

---

---

---

---

---

---

---

**Unsuccessful GIUE**

- The plan holder could not properly implement its response plan.
- Response resources were not available or not in operating condition.
- Response personnel were not adequately trained in implementing the response plan.

33

---

---

---

---

---

---

---

---

**GIUE Completion - Inspection**

- FRP/SPCC Inspection completed after the GIUE
- Conduct walk through facility
- Qualified Individual (QI) Interview



34

---

---

---

---

---

---

---

---

**Closing Conference**

- Reconvene in conference room Facility can include remote staff members/participants
- Discuss additional information needs (i.e., training and exercise records)
- De-brief on GIUE and any next steps
- EPA will provide a successful/unsuccesful GIUE letter to facility within 45 days.

35

---

---

---

---

---

---

---

---