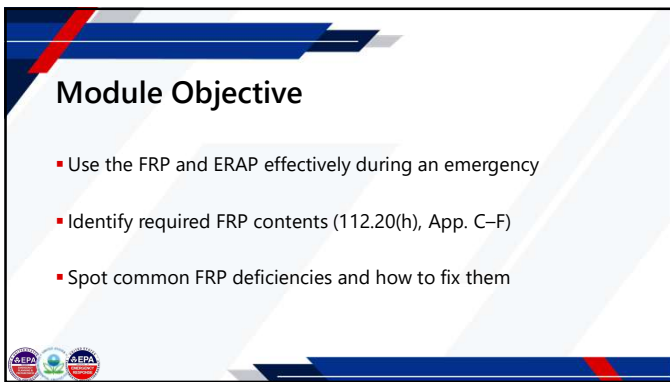
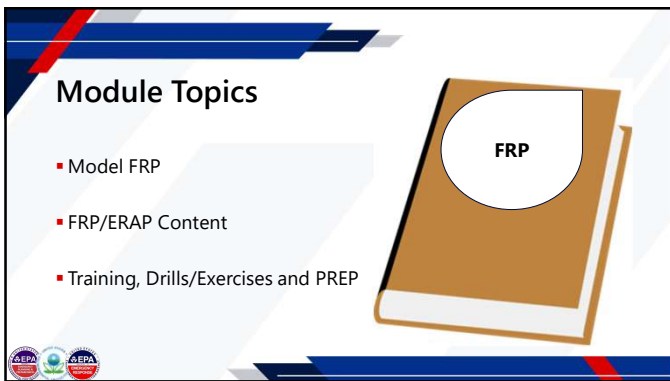




1




2



3

112.20(h): A response plan...


Shall follow the format of the model facility-specific response plan included in Appendix F.



4

Response Plan Cover Sheet

- General Information
- Include your FRP ID (FRP-8-SD-00000)
- Attachment C-II—Certification of the Applicability of Substantial Harm Criteria
- Certification
- Signed by responsible person



5

Common Deficiencies

- Missing Harm Determination and Certification (Attachment C-II form)
- Missing Signature

APPLICABILITY OF SUBSTANTIAL HARM CRITERIA

Does the facility handle oil, toxic, or other hazardous liquids and then the facility have a total oil storage capacity of 10,000 or more gallons? Yes No

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located in a watershed (as indicated on the appropriate map) that is subject to Attachment C II of the FRP as a component of the State's Risk Reduction Strategy? Yes No

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located in a watershed (as indicated on the appropriate map) that is subject to Attachment C II of the FRP as a component of the State's Risk Reduction Strategy? Yes No

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility implemented a response plan as well as a spill prevention plan in response to the applicable state or federal Contingency Plan? Yes No


Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located in a watershed (as indicated on the appropriate map) that is subject to Attachment C II of the FRP as a component of the State's Risk Reduction Strategy? Yes No

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility implemented a response plan as well as a spill prevention plan in response to the applicable state or federal Contingency Plan? Yes No

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information contained in this document and the facts on the basis of which individuals responsible for the information contained herein have been identified and are being held responsible for the information contained herein. I declare under penalty of perjury that the information is true, accurate, and complete.


Signature: _____



6

1.0 Model FRP Contents (40 CFR §112, App. F)


1.1 Emergency Response Action Plan (ERAP)	1.2 Facility Information	1.3 Emergency Response Information	1.4 Hazard Evaluation
1.5 Discharge Scenarios	1.6 Discharge Detection Systems	1.7 Plan Implementation	1.8 Self-Inspection, Drills/Exercises, and Response Training
1.9 Diagrams	1.10. Security	Response Plan Cover Sheet	



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1.1 Emergency Response Action Plan (ERAP) Required Contents (40 CFR §112, App. F)


1.2.5 Qualified Individual Information - partial	1.3.1 Emergency Notification Phone List - partial	1.3.1. Spill Response Notification Form - partial	1.3.2 Response Equipment List and Location - complete	1.3.3 Response Equipment Testing and Deployment - complete
1.3.3. Facility Response Team - partial	1.3.5 Evacuation Plan - condensed	1.7 Immediate Actions - Plan Implementation - complete	1.9. Facility Diagrams - complete	



8

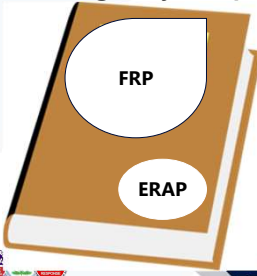
Open Discussion

- How quickly can you access your ERAP?
- Does your ERAP contain all the required sections?
- Is your plan available to everyone at your facility?



9

Emergency Response Action Plan



- Sections shall be co-located
- Easy access during an emergency
- "contain only as much information as is necessary to combat the discharge and be arranged so response actions are not delayed"

40 CFR 112.20(h)(1) and Appendix F 1.1

10

1.2.5 Qualified Individual Information

Name	Position	Home and Work Addresses	Emergency Phone number	Specific Response Training Experience

11

1.3.1 Emergency Notification Phone List

Reporter's Name: _____

Date: _____

Facility Name: _____

Owner Name: _____

Facility Identification Number: _____

Date and Time of Each NRC Notification: _____

Organization	Phone Number
1. National Response Center (NRC)	1-800-424-8802
2. Qualified Individual:	
3. Company Response Team:	
4. Federal On-Scene Coordinator (OSC):	(303) 293-1788 and (800) 227-8917
5. Local Response Team (Fire Dept / Cooperatives):	
6. Fire Marshall:	
7. State Emergency Response Commission (SERC):	
8. State Police:	
9. Local Emergency Planning Committee (LEPC):	
10. Local Water Supply System:	
11. Weather Report:	
12. Local Television/Radio Station for Evacuation Notification:	
13. Hospitals:	

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1.3.1 SPILL RESPONSE NOTIFICATION FORM

Spill Response Notification Form

Reporter's Last Name: _____
 First: _____
 M.I.: _____
 Position: _____
 Phone Numbers:
 Day (): _____
 Evening (): _____
 Company: _____
 Organization Type: _____
 Address: _____
 City: _____
 State: _____
 Zip: _____

Were Materials Discharged? ... (Y/N) Confidential? ... (Y/N)
 Meeting Federal Obligations to Report? ... (Y/N) Drill Called ...
 Calling for Responsible Party? ... (Y/N) Time Called: _____


- Incident description
- Material
- Response action
- Impact
- Additional information
- Caller notifications



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1.3.2 Response Equipment List

Common Deficiency



1.3.2 Response Equipment List

Skimmer/Pumper: Operational status: _____


Type/Model/Year	Number	Capacity (gal/min)	Efficiency (Effective Recovery Rate)	Storage Location	Date Fuel Last Changed

Booms: Operational status: _____

Type/Model/Year	Number	Size (length ft.)	Containment Area	Storage Location

Booms: Operational status: _____

Type and Year Purchased	Amount	Absorbent Capacity (gal)	Storage Location (s)



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1.3.3 Response Equipment Testing and Deployment Log



- Last inspection or response equipment test date
- Inspection frequency
- Deployment frequency
- Last deployment drill date
- Oil spill removal organization certification (if applicable)



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1.3.4 Facility Response Team

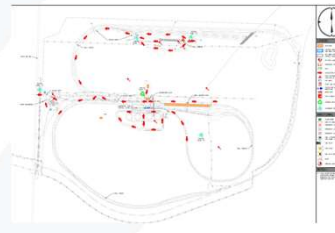
Date of Last Update:

Name	Phone Number	Response time	Responsibility during response action	Response training type/date




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1.3.5 Evacuation Plans



Evacuation routes must be shown on a diagram


Consideration must be given to the 13 factors listed in the "Evacuation Plans section," as appropriate.



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1.7.1 Immediate Actions

1. Stop the product flow	Act quickly to secure pumps, close valves, etc.
2. Warn personnel	Enforce safety and security measures.
3. Shut off ignition sources	Motors, electrical circuits, open flames, etc.
4. Initiate containment	Around the tank and/or in the water with oil boom.
5. Notify NRC	1-800-424-8802
6. Notify OSC	
7. Notify, as appropriate	



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1.9 Diagrams



- (1) Site Plan Diagram
- (2) Site Drainage Plan Diagram
- (3) Site Evacuation Plan Diagram



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1.2 Facility Information (40 CFR §112, App. F)



- Facility Name and Location
- Latitude and Longitude
- *Wellhead Protection Area*
- Owner/Operator
- Qualified Individual (QI)
- *Date of Storage Start-up*
- Current Operation-Brief Description
- *Date(s) and Type(s) of Substantial Expansions*



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1.3 Emergency Response Information (40 CFR §112, App. F)


- 1.3.1 Notification
- 1.3.2 Facility Response Equipment List
- 1.3.3 Response Equipment Testing and Deployment Drill Log
- 1.3.4 Personnel
- 1.3.5 Evacuation Plans
- 1.3.6 Qualified Individual's Duties



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1.3.6 Qualified Individual Duties



- 10 minimum requirements located in 112.20(h)(3)(ix)
- How detailed is your plan?



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1.4 Hazard Evaluation (40 CFR §112, App. F)

- 1.4.1 Hazard Identification
- 1.4.2 Vulnerability Analysis – use the *planning distance*
- 1.4.3 Analysis of the Potential for an Oil Discharge
- 1.4.4 Facility Reportable Oil Spill History

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1.4 Hazard Evaluation (40 CFR §112, App. F)

Hazard Identification

How Many Storage Tanks? _____
Date of Last Check: _____




Tank No.	Substance Stored (Oil and Hazardous Substance)	Quantity Stored (gallons)	Tank Type/Year	Maximum Capacity (gallons)	Failure/Cause


* Tank = any container that stores oil.

Vulnerability Analysis - Identify vulnerable receptors along entire spill pathway

Planning Distance Calculation

$$d = v \times t \times c$$



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1.4 Hazard Evaluation (40 CFR §112, App. F)

Analysis of the Potential for an Oil Discharge

Oil Discharge History

Horizontal range of a potential discharge

Other Factors (Unstable Soil, Earthquake Zone, etc.)

Planning Distance

Tank Age

Vulnerability to Natural Disaster

25

1.5 Discharge Scenarios (40 CFR §112, App. F)

1.5.1 Small and Medium Discharges

- **Small:** 2,100 gals
- **Medium:** 36,000 gallons or 10% of largest tank at facility, whichever is less

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Worst Case Discharge (WCD)

Calculate volume using:

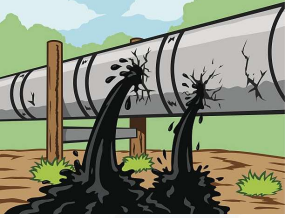

- Appendix D – discharge planning volume
- Largest container
- All containers without adequate secondary containment
- Permanently manifolded containers count as one
- For each oil type that is 10% or more of the aggregate

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Discharge Scenarios

Must account for all operations such as:


- Loading and unloading of surface transportation
- Facility maintenance
- Facility piping
- Pumping stations and sumps
- Oil storage tanks
- Vehicle refueling
- Age and condition

28

For each scenario, address factors that affect response efforts, including:

- Size of the discharge
- Proximity to downgradient wells, waterways, and drinking water intakes
- Likelihood that the discharge will travel offsite
- Location of the material discharged
- Material discharged
- Weather or aquatic conditions
- Available remediation equipment
- Probability of a chain reaction of failures; and
- Direction of discharge pathway





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Factors that Affect Response Efforts: Examples

- Proximity to fish and wildlife and sensitive environments;

A facility's immediate surroundings and discharge pathway will impact response priorities

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1.6 Discharge Detection System (40 CFR §112, App. F)

- By personnel or automated
- System testing
- Contingencies if system inoperable

31

Putting it all Together

32

1.7 Plan Implementation (40 CFR §112, App. F)

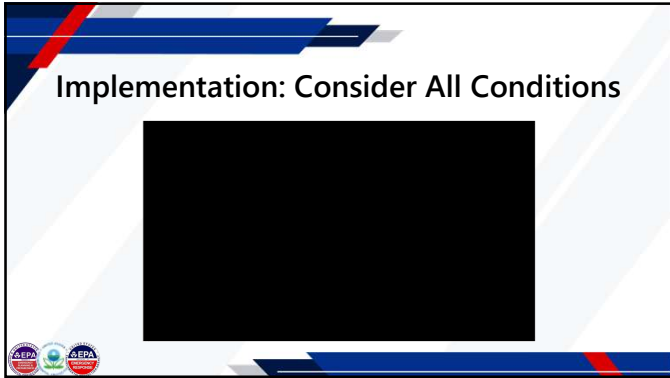
1.5.1 Small and Medium Discharges

- Emergency plans for spill response
- Additional response training
- Additional contracted help
- Access to response equipment/experts; and
- Ability to implement the plan

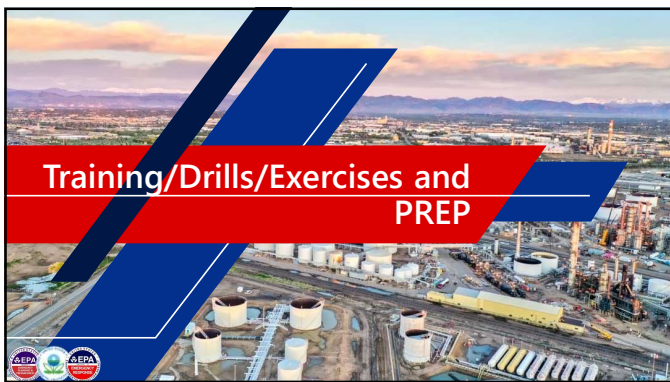
1.5.2 Worst Case Discharge (WCD)

- How do you scale up for the WCD?
- Where are the contractor or company resources coming from?
- How long will it take?
- What do you do in the meantime?

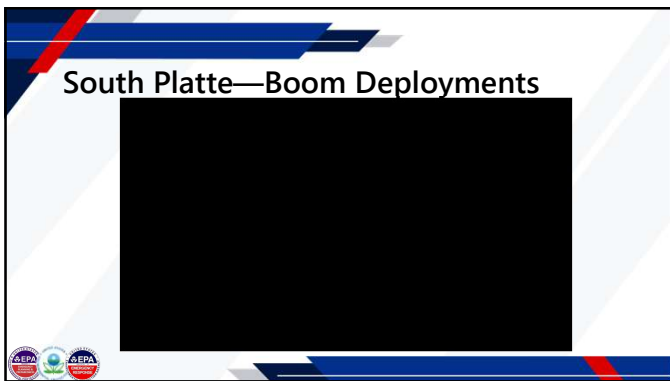
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35



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What kind of response do you want?



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Effective Training Programs

- Teach how to do a skill or task
- Methodical
- Observable & Measurable
- Evaluated




38

Regulatory Requirements




- 40 CFR
 - 112.7(f)
 - 112.20(h)(8)(ii)-(iv)
 - 112.21



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Requirements in the SPCC Rule


- General facility and equipment operation & maintenance
- Discharge procedures
- Laws and regulations
- Contents of SPCC
- Annual Discharge Prevention Meeting
 - Discharges, failures, malfunctions or near misses
 - New tech or developments



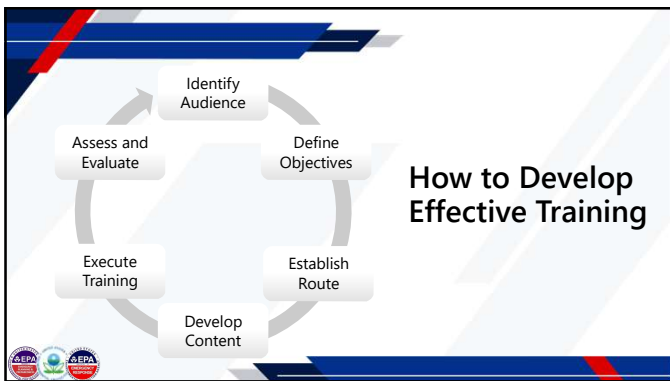
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Requirements in the FRP Rule

- Based on USCG Training Elements for Oil Spill Response (33 CFR 154 Appendix D)
- **Functional** and include drills and exercises
- **Specific** to individual task/jobs
- Lesson plans
- Evaluation procedures
- Records maintained for 5-years



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Documenting Training

- Maintain records for 5-Years
- Appendix F training logs
- Lesson plans
- Signed by trainer



How do you document your training?




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Available Trainings



- HAZWOPER
- Incident Command System (ICS)
- Boom Deployment and other spill control methods
- [Cold Weather Oil Spill Response Training](#)
- [Fastwater Spill Response Training](#)

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What is an Exercise

- A specific task done to practice or test a skill
 - Methodical
 - Observable & Measurable
 - Evaluated
- Required
- Follows the same development process as training

45

What is PREP

- National Preparedness for Response Exercise Program
- Guidelines
- Voluntary
- Evolving

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What are some types of exercises that your facility conducts?

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Plan Holder Exercises

- QI Notification
- IMT Exercise
 - Appendix F 1.8.2(B) calls them spill management team tabletop exercise (TTX)
- Equipment Deployment
- Unannounced
 - Plan holder
 - Government initiated
- Emergency Procedures

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Exercise Frequency Per Triannual Cycle


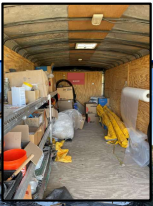

- Quarterly QI notifications
 - Annual after hours
- Annual IMT Exercises
 - Once per cycle at WCD
- Annual plan holder-initiated unannounced exercises
 - Optional emergency procedures
- Semiannual facility owned equipment deployment
- Annual OSRO owned equipment deployment



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Evaluating OSRO Capacity


- Classified OSRO vs unclassified
- Verify capacity (Appendix E calculations)
- Exercise/Train with them



50

15 Core Components

- Don't need to exercise all of them every time
- Must hit all of them within the tri-annual cycle
- Must identify which component is being exercised



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15 Core Components (continued)

- Notifications
- Staff Mobilization
- Ability to Operate Within the Response Management System Described in the Plan
- Source Control
- Containment
- Mitigation
- Assessment
- Protection
- Disposal
- Communications
- Transportation
- Personnel Support
- Equipment Maintenance and Support
- Procurement
- Documentation



 Appendix A 2016 PREP Guidelines

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Documenting Exercises




- Include:
 - Type
 - Date and time
 - Description
 - Objectives met
 - Core components exercised
 - Lessons learned
- Must be in writing and signed
- Maintain for 5-yrs




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Area Exercises



- Discussion-Based**
 - IMT, TTX, Workshops and Seminars
- Operations-Based**
 - Functional or Full-Scale
 - Equipment deployments
- Cycle**
 - Coordinated by Area Committee
 - Government, Industry partnership
 - 4-year
 - Participation gives you credit for facility exercises



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