

FRP Contents, Review and Common Deficiencies

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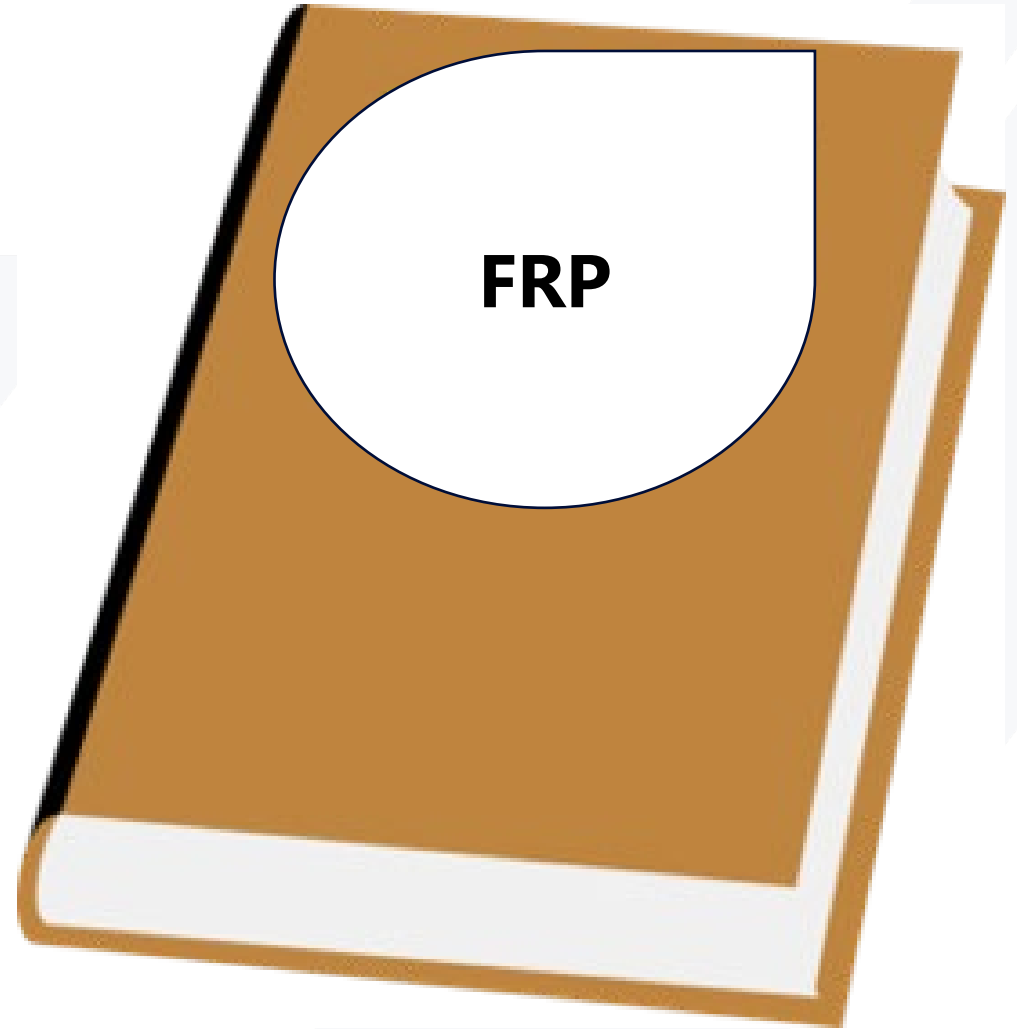


Module Objective

- Use the FRP and ERAP effectively during an emergency
- Identify required FRP contents (112.20(h), App. C–F)
- Spot common FRP deficiencies and how to fix them

Module Topics

- Model FRP
- FRP/ERAP Content
- Training, Drills/Exercises and PREP



112.20(h): A response plan...

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

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



Common Deficiencies

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

APPLICABILITY OF SUBSTANTIAL HARM CRITERIA

Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

Yes No

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground storage tank area?

Yes No

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III of 40 CFR 112 or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments see Appendices I, II and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (See Appendix E section 10 for availability) and the applicable Area 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 at a distance (as calculated using the appropriate formula in Attachment C-III of 40 CFR 112 or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake?

Yes No

Does the facility have total oil storage greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last five (5) years?

Yes No

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining information, I believe that the submitted information is true, accurate, and complete.

Signature: _____

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



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

Open Discussion



How quickly can you access your ERAP?

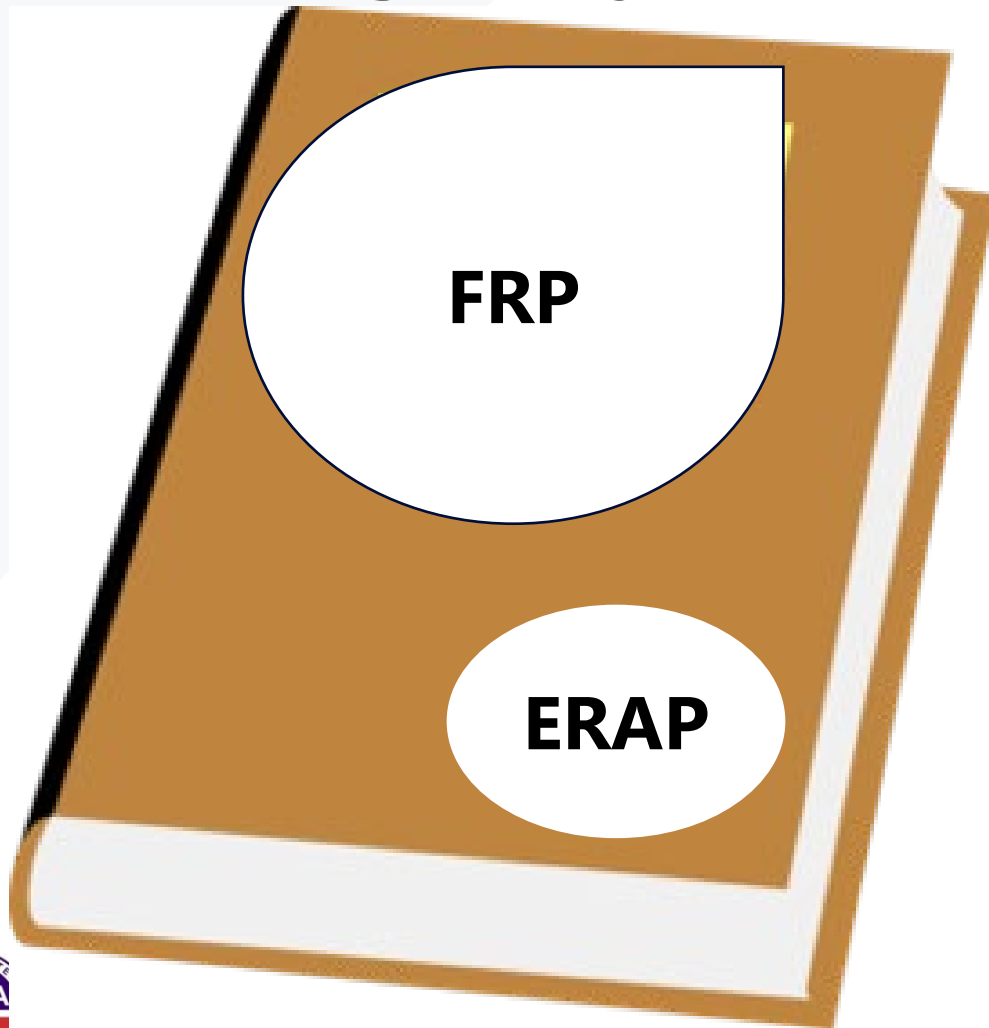


Does your ERAP contain all the required sections?



Is your plan available to everyone at your facility?

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

1.2.5 Qualified Individual Information

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

1.3.1 Emergency Notification Phone List

Reporter's Name:

Owner Name:

Date:

Facility Identification Number:

Facility Name:

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:	

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) Date Called: ___

Calling for Responsible Party? ___ (Y/N) Time Called: ___

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



1.3.2 Response Equipment List

Common Deficiency



1.3.2 Response Equipment List

Skimmer/Pumps: Operational status:

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

Boom: Operational Status: _____

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

Sorbents: Operational Status: _____

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

1.3.3 Response Equipment Testing and Deployment Log



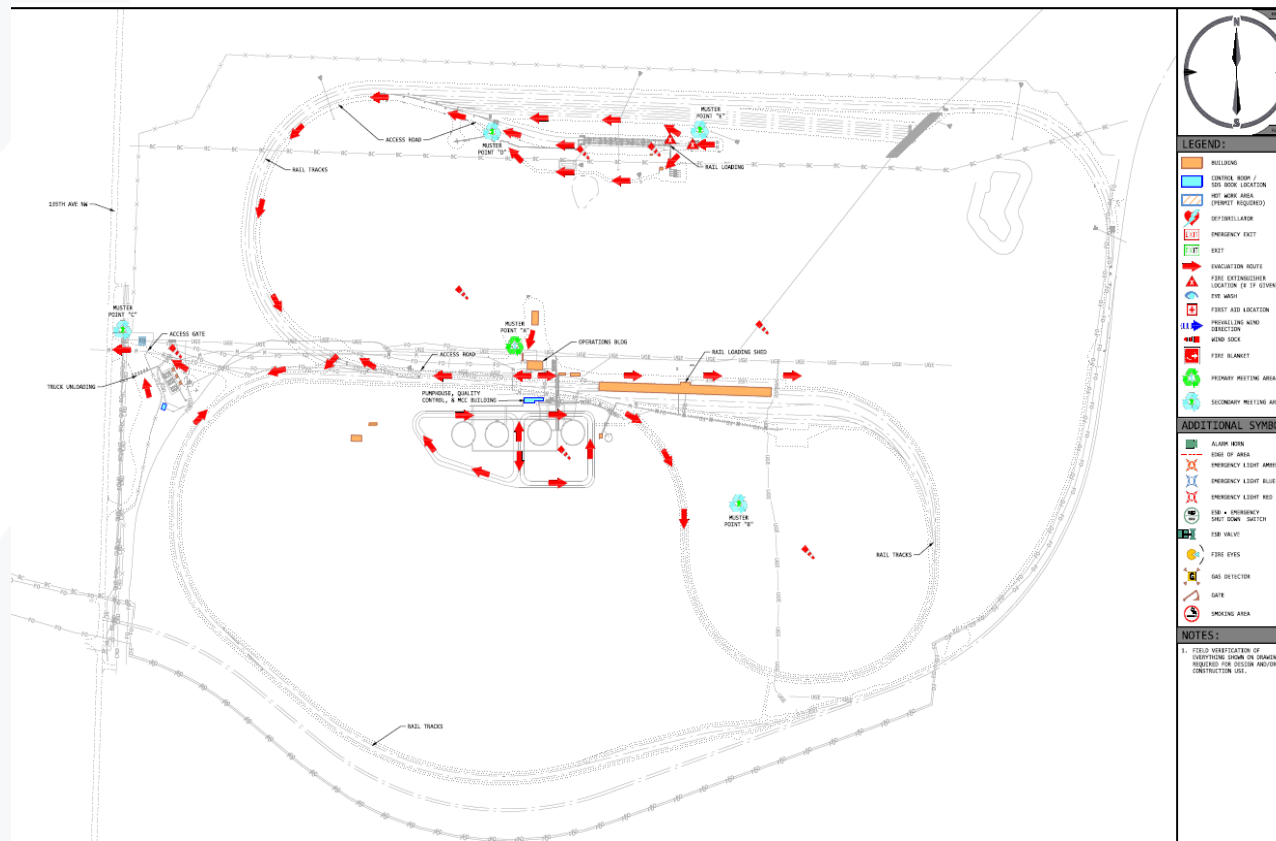
- Last Inspection or response equipment test date
- Inspection frequency
- Deployment frequency
- Last deployment drill date
- Oil spill removal organization certification (if applicable)

1.3.4 Facility Response Team

Date of Last Update:

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

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:

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	



1.9 Diagrams

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

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*



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



1.3.6 Qualified Individual Duties

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

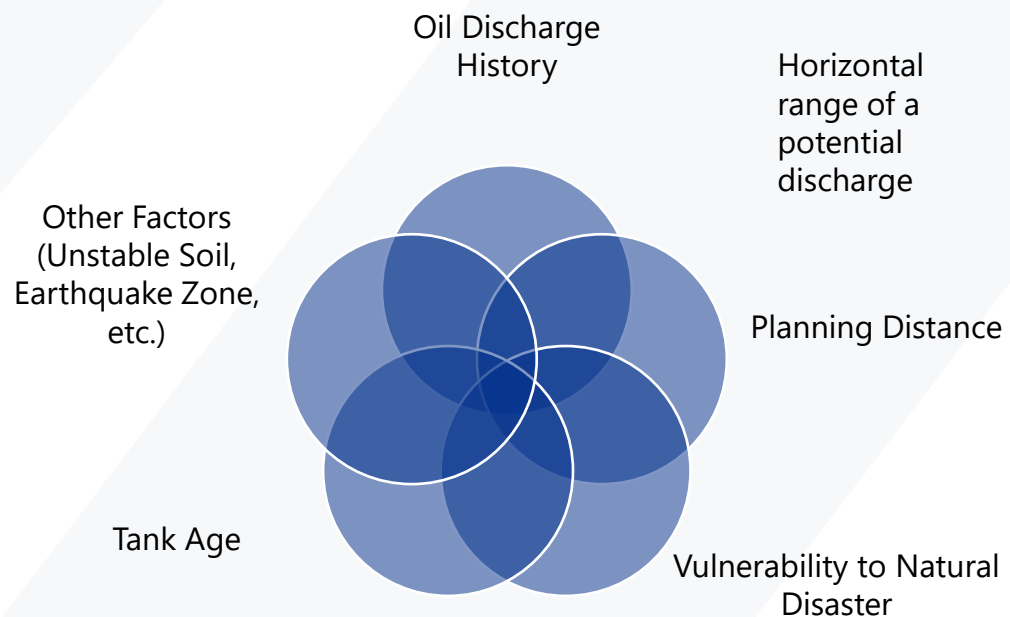
1.4 Hazard Evaluation (40 CFR §112, App. F)

- 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



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

Analysis of the Potential for an Oil Discharge



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



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



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



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

Factors that Affect Response Efforts: Examples

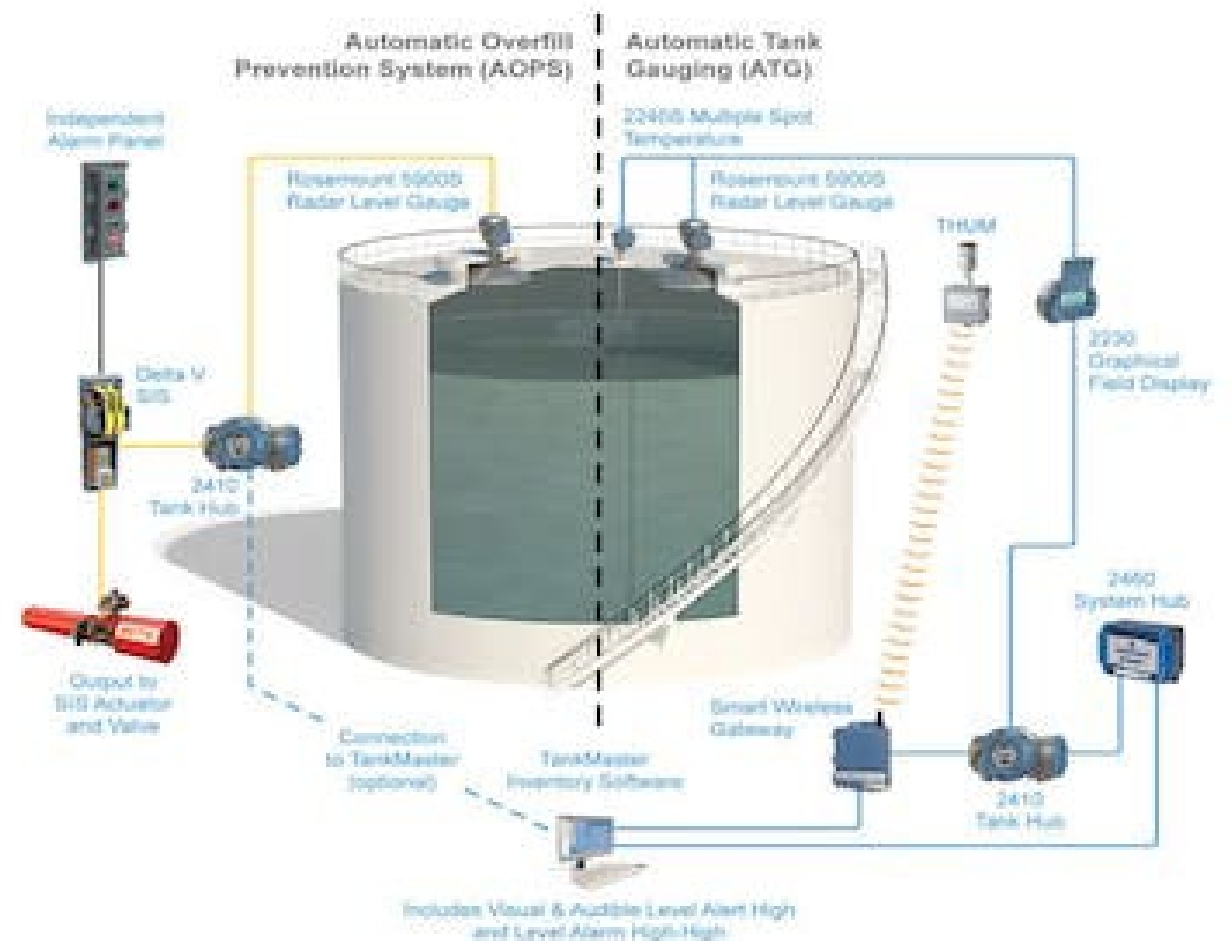
- Proximity to fish and wildlife and sensitive environments;

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



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

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



Putting it all Together

Attachment C-II – Certification of the Applicability of Substantial Harm Criteria

Attachment C-III – Calculation of Planning Distance

Appendix D to Part 112 – Determination of a Worst-case Discharge Planning Volume

Attachments E-1 (petroleum) and E-2 (AFVO) Worksheet to Plan Volume of Response Resources for Worst Case Discharge

Plan Implementation

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

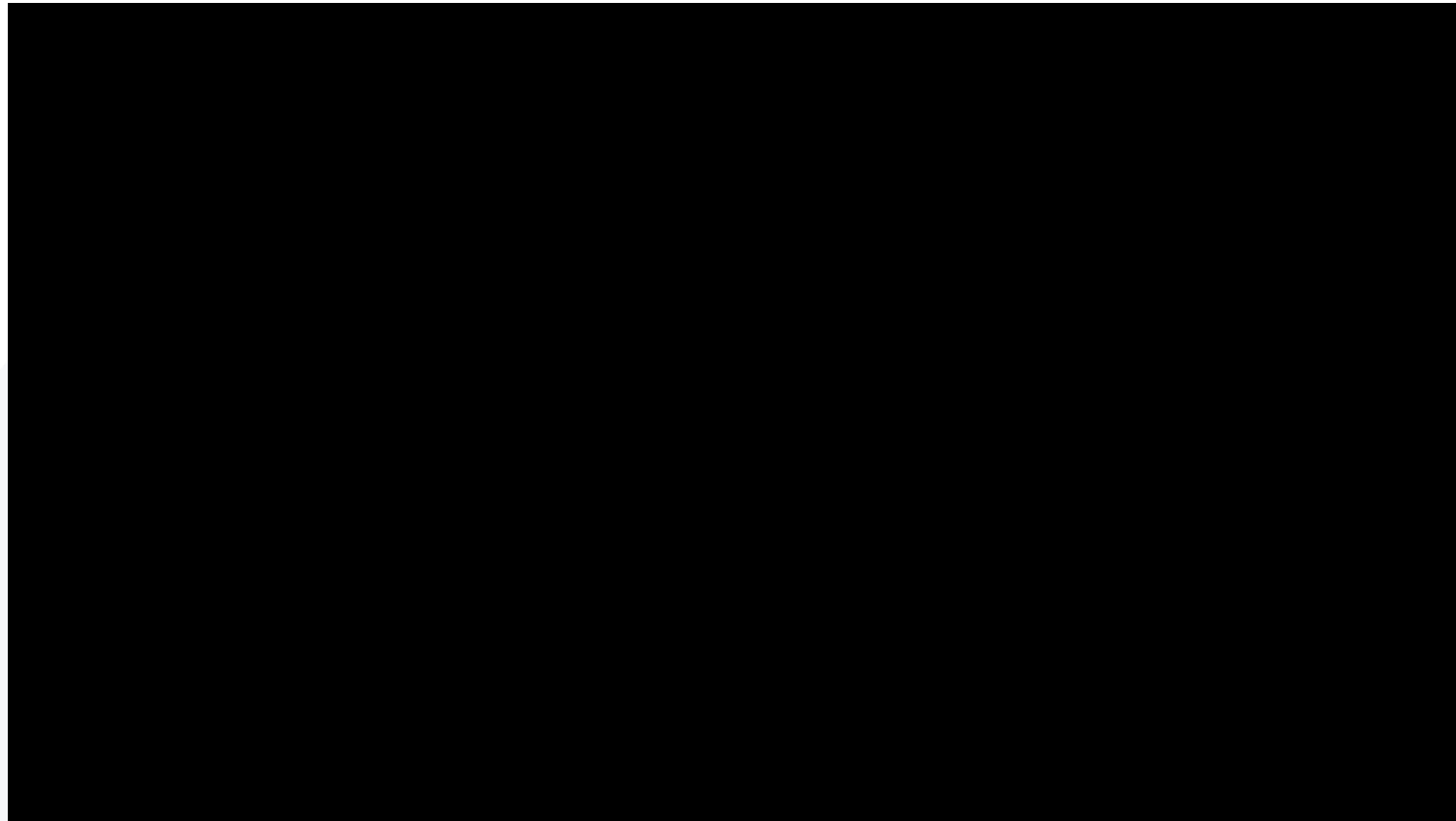
1.5.1 Small and Medium Discharges

- 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?

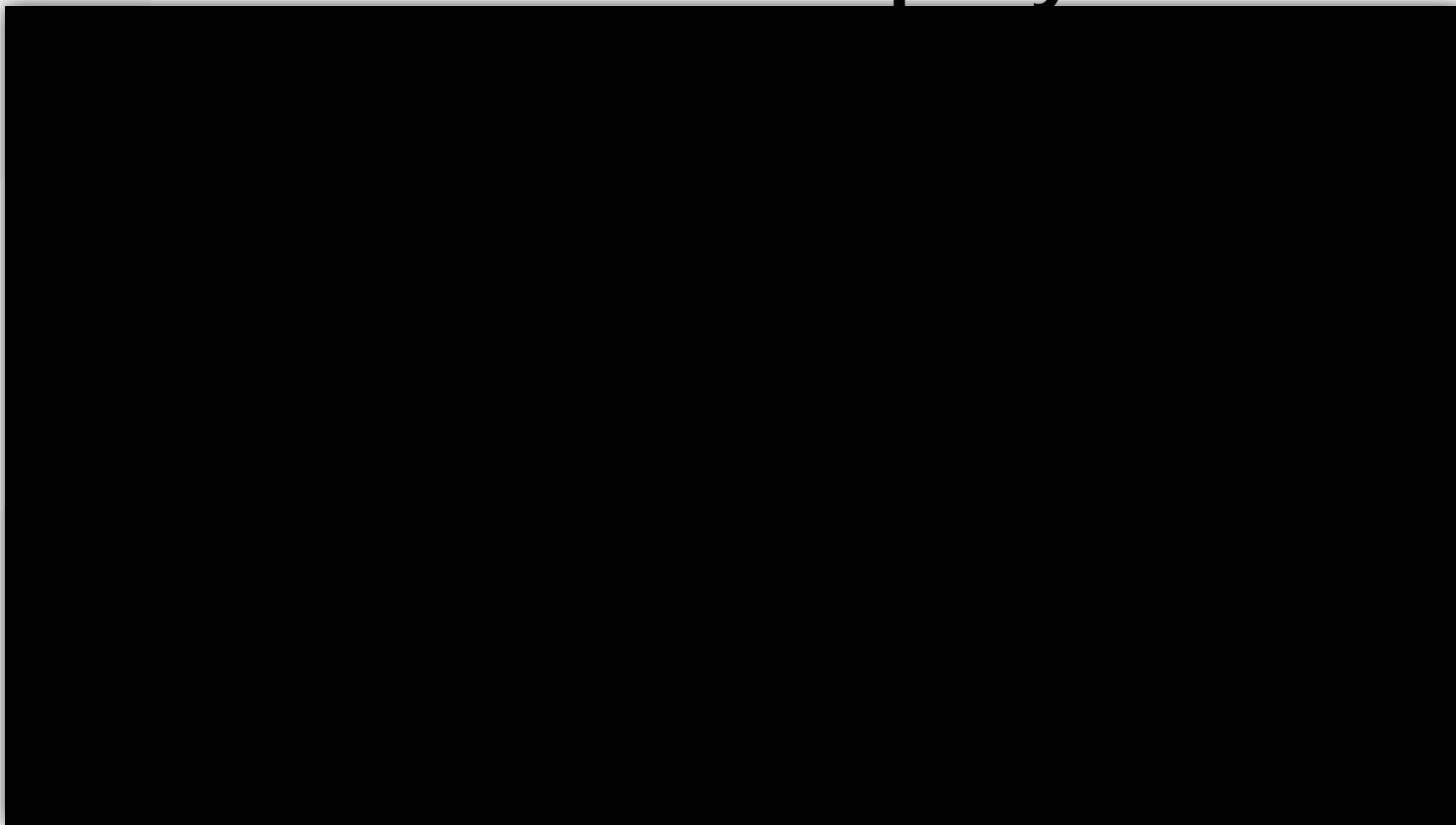
Implementation: Consider All Conditions



Training/Drills/Exercises and PREP



South Platte—Boom Deployments



What kind of response do you want?



Effective Training Programs

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



Regulatory Requirements



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

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

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

Documenting Training

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

How do you document your training?

1.8.3.1 Personnel Response Training Logs

Expand Table

PERSONNEL RESPONSE TRAINING LOG

Name	Response training/date and number of hours	Prevention training/date and number of hours

1.8.3.2 Discharge Prevention Meetings Logs

Discharge Prevention Meeting Log

Date: _____

Attendees: _____

Expand Table

Subject/issue identified	Required action	Implementation date

Available Trainings

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



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



What is PREP

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



What are some types of exercises that your facility conducts?



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

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



Evaluating OSRO Capacity

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



15 Core Components

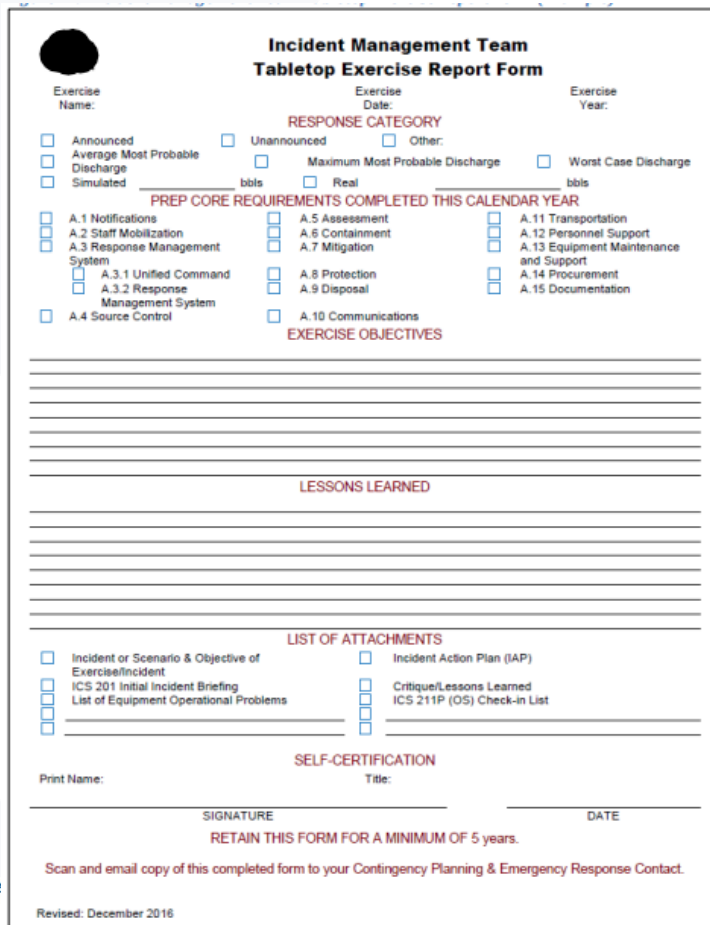
- Don't need to exercise all of them every time
- Must hit all of them within the tri-annual cycle
- Must identify which component is being exercised



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

Documenting Exercises



The form is titled "Incident Management Team Tabletop Exercise Report Form". It includes fields for "Exercise Name:", "Exercise Date:", and "Exercise Year:". A "RESPONSE CATEGORY" section has checkboxes for "Announced", "Unannounced", "Other", "Average Most Probable Discharge", "Maximum Most Probable Discharge", and "Worst Case Discharge". A "PREP CORE REQUIREMENTS COMPLETED THIS CALENDAR YEAR" section lists 15 items (A.1 to A.15) with checkboxes. An "EXERCISE OBJECTIVES" section has several blank lines. A "LESSONS LEARNED" section has several blank lines. A "LIST OF ATTACHMENTS" section has checkboxes for "Incident or Scenario & Objective of Exercise/Incident", "Incident Action Plan (IAP)", "ICS 201 Initial Incident Briefing", "Critique/Lessons Learned", "List of Equipment Operational Problems", and "ICS 211P (OS) Check-in List". A "SELF-CERTIFICATION" section has fields for "Print Name:" and "Title:". At the bottom, there are lines for "SIGNATURE" and "DATE", and a note: "RETAIN THIS FORM FOR A MINIMUM OF 5 years." Below that is the instruction: "Scan and email copy of this completed form to your Contingency Planning & Emergency Response Contact." and "Revised: December 2016".

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

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

QUESTIONS?

