

# SPCC/FRP Inspection Process



# Records Reviews

- Verify SPCC/FRP/ERAP is available to response personnel
- Equipment Inspection Logs
- Drainage logs
- Discharge Prevention Meeting Logs
- Drill, exercise and equipment deployment logs
- Integrity testing (API 653, STI SP001)
- Training records
- PREP program implementation



# Field Inspection

- Verify plan accuracy
- Secondary containment adequacy (Appendix F 1.8.1.3)
- Facility components are in good working order
- Hazard evaluation and vulnerability analysis accurate
- Facility diagrams are accurate



# Response Equipment (Appendix F 1.8.1.2)



- Verify equipment listed in plan is accurate
- Verify testing/deployment records are accurate and up to date
- If fully OSRO dependent, how do you ensure OSRO knows where to deploy and with what equipment?

# Common Observations

- Leaks from valves and connection points
- Improperly braced or supported piping
- Discrepancies with diagrams and facility layout (piping and drainages)
- Missing inspection documentation
- Out of date notification lists



# Post-Inspection/Drill Follow Up

- The inspector will debrief with the QI, facility personnel, and/or OSROs
- The facility will receive a letter documenting the inspections/drill including any findings and recommendations.
- 45 days from time of notice to apply recommendations

# Recap

- ***Records Reviews:***
  - FRP/ERAP/SPCC
  - Inspection records, Exercise Logs, (Printout/electronic link)
- **Field Inspection** (Response Equipment/Facility walk through/layout verification)
- **Post-Inspection Exit Meeting**
- **Post-Inspection/Drill Letter**

# Bonus: FRP Review and Approval Process

- Plan submittal
  - Requested, or revised FRP received
- Technical review
- Deficiency notice
- Facility correction window
  - 45 days to address deficiencies and resubmit (or as specified in the notice).
- Follow-up review
  - EPA reviews the revised FRP; additional clarifications requested if needed.
- Issue approval letter



**QUESTIONS?**

