

Compliance Management International

EPA FRP & SPCC Inspections and Exercises: How Prepared is Your Facility?

for

NISTM - Aboveground Storage Tank Conference
November 7, 2013

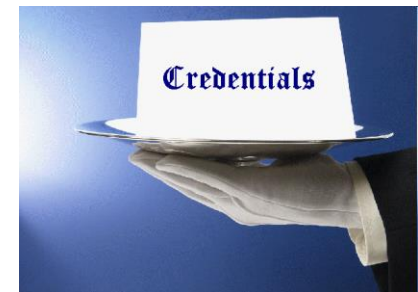
Presented By:

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Credentials

- ◆ 19 Plus years working knowledge of EPA Oil Program
 - EPA Contractor (Regions 2, 3, 4)
 - Emergency Planning Consultant
- ◆ Industry Sectors
 - Logistics
 - Utilities
 - Oil and Gas



Presentation Objectives

- ◆ Insight in preparation for an EPA FRP/SPCC Inspection
- ◆ Typical EPA inspection and agency initiated unannounced exercise protocols



EPA Inspection Activities and Tips

Activities:

- ◆ Team of 2 to 4 inspectors
- ◆ Interviews with Qualified Individual(s)
- ◆ Walk-through inspection
- ◆ Verify accuracy of FRP to facility operations
- ◆ Evaluate facility FRP measures to respond to a WCD
- ◆ Inspect condition of spill equipment and/or of OSROs



Tips:

- ◆ Be courteous and non-adversarial
- ◆ Show only areas that the inspector wishes to observe
- ◆ Assure current status of Plans

EPA Unannounced Exercise Activities

- ◆ Exercise duration
- ◆ Evaluate notification procedures
- ◆ OSRO Capabilities
- ◆ Equipment and deployment operations
- ◆ GIUE (Government Initiated Unannounced Exercise) Checklist
- ◆ Debriefing
- ◆ Written critique



Preparing for an Inspection/ Unannounced Exercise

- ◆ Inspection Notifications
- ◆ Accurate Plans
- ◆ Facility personnel familiarity with Plans
- ◆ Prepare and exercise with contracted OSROs
- ◆ Readily Available Copies
- ◆ Availability of accurate documentation
- ◆ PREP Exercise Program Documentation



Exercise Tips

- ◆ Conduct all required notifications
- ◆ Assure operation of response equipment
- ◆ Record and photograph your facility exercise activities
- ◆ Familiarity with OSROs



EPA's Top 5 During Inspections

Top 5 Areas Evaluated:

- ◆ Knowledge of facility personnel
- ◆ Housekeeping
- ◆ Records
- ◆ Accuracy of FRP/SPCC
- ◆ OSRO response time



Successful Inspections/ Exercise

- ◆ Cooperation
- ◆ Clear indication facility is prepared to respond
- ◆ Knowledge of facility personnel
- ◆ Fully implemented FRP/SPCC Plans
- ◆ Proper filing, availability and current records



EPA's Most Popular Findings

Findings:

- ◆ Poorly written FRP, but well prepared
- ◆ Well written FRP, but has not been implemented
- ◆ Compliance to oil industry standards
- ◆ It won't happen here syndrome
- ◆ Impacts of worse-case discharge
- ◆ Community Impacts
- ◆ Poor record keeping
- ◆ Ignoring required PREP or equivalent exercises

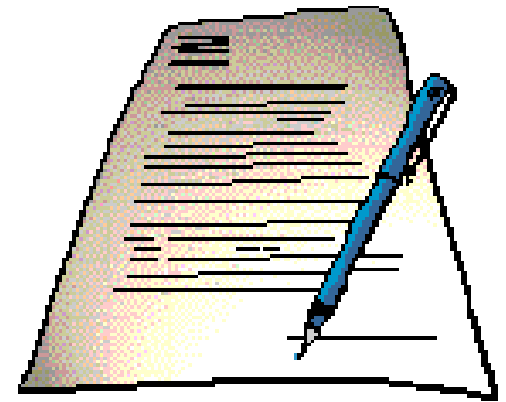
Poorly Written Plans

- ◆ Lack of spill history
- ◆ No spill flow volumes and/or directions indicated on a site plan
- ◆ A description of containment and/or diversionary structures missing
- ◆ Impracticality demonstration
- ◆ Inadequate discussion of the spill prevention and control measures



Post Inspection/Exercise

- ◆ Written letter response
- ◆ Completed GIUE Checklist
- ◆ Exercise documents
- ◆ Follow-up inspection/exercise



Avoiding Fines/Penalties

- ◆ **COMMUNICATION!**
 - Contact EPA
 - Describe compliance plans
 - Schedule
 - Meet scheduled deadlines

- ◆ Follow-up inspection/exercise



Facility's Expectations of OSROs



- ◆ Timely Response
- ◆ Equipment
- ◆ Equipment operating condition
- ◆ Knowledge of facility and boom deployment locations
- ◆ Ability to effectively contain and control the spill
- ◆ Annual equipment deployment drills conducted

Resources

- ◆ **EPA Region 3 FRP Coordinator** – Linda Zeigler-Rice
- ◆ **EPA Region 3 Informational Outreach Flyer - Oil Spill Removal Organization (OSRO)** – What are your Roles and Responsibilities as an OSRO Contractor?
- ◆ **EPA Region 3 Informational Outreach Flyer - Facility Response Plan Government Initiated Unannounced Exercise Program**
- ◆ **EPA Region 3 – Government - Initiated Unannounced Exercise - Verification Checklist**
- ◆ **EPA Region 5 – FRP Seminar Presentation - Alexander C. Tzallas, FRP Coordinator (Slides 6, 18 and 19)**





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