

Note to reviewer:	The plan review checklist incorporates required plan elements in 40 CFR 112.20, 112.21 Appendices D, E and F. Indicate the adequacy of addressing plan requirements as follows: adequately addressed (YES); deficient or not addressed (NO); or not applicable (N/A). This guidance applies to the other FRP checklists as well.
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Facility Response Plan - Plan Review Checklist

Facility Information			
Oil Db ID			
FRP ID			
Facility Name			
Facility Address			
Harm Designation		Substantial Harm	
		Significant and Substantial Harm	
Activity Information			
Activity Type	FRP Plan Review		
Reason for Review (check one)		Initial Plan Submittal (new FRP)	
		5-year Review	
		Plan Amendment (note type)	Note (type of amendment):
		Other (note other reason)	Note (describe other reason):
Activity Date			
EPA Inspector			
Plan Version Reviewed			



Note to reviewer:	For the following sections, check "Yes" or "No" to indicate whether each content requirement is addressed in the plan. If the question/requirement is not applicable, check "N/A".
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A. Response Plan Cover Sheet and Format				Review			Citations and other relevant guidance		
				YES	NO	N/A	40 CFR 112	Appendices	Other
Note to reviewer:	The following requirements are addressed in 40 CFR 112.20(h)(11) and Appendix F, Section 2.0.								
General Information									
Does the Response Plan Cover Sheet include the following?							112.20(h)(11)	App. F, Sec 2.1 & Attachment F-1	---
Owner/operator of facility									
Facility name									
Facility address (street address, city, state, zip code)									
Facility telephone number									
Latitude									
Longitude									
Dun & Bradstreet number									
North American Industrial Classification System (NAICS) code									
Largest aboveground oil storage tank (AST) capacity (gallons)									
Maximum oil storage capacity (gallons)									
Number of aboveground oil storage tanks									
Worst case discharge amount (gallons)									
Facility distance to navigable waters marked in Attachment F-1									
Applicability of Substantial Harm Criteria									
Does the Response Plan Cover Sheet include the following?							112.20(h)(11)	App. F, Sec 2.2 & Attachment F-1	---
Attachment F-1 with an answer to each applicability question									
Documentation of reliability and analytical soundness of alternate, comparable to Attachment C-III formulas, if applicable									
Certification									
Is the plan holder certification included, with signature, title and date?							112.20(h)(11)	App. F, Sec 2.3 & Attachment F-1	---



A. Response Plan Cover Sheet and Format	Review			Citations and other relevant guidance					
	YES	NO	N/A	40 CFR 112	Appendices	Other			
Response Plan Format									
Does the response plan follow the format in 40 CFR 112, Appendix F?				112.20(h)	---	---			
If the response plan does not follow the format in Appendix F, is a cross-reference section included?									
If a cross-reference section is included, is it complete?									
Reviewer notes on Response Plan Cover Sheet and Format:									

B. Emergency Response Action Plan (ERAP)		Review			Citations and other relevant guidance		
		YES	NO	N/A	40 CFR 112	Appendices	Other
Note to reviewer:	Section 40 CFR 112.20(h)(1) and Appendix F, Section 1.1, require that each of the items listed below be compiled in an Emergency Response Action Plan to be maintained in a separate section in the front of the FRP or as a separate document accompanying the FRP. The information can be compiled from other sections of the FRP.						
Is an ERAP included in the FRP?					112.20(h)(1)	App. F, Sec. 1.1	---
Are the following items included in the Emergency Response Action Plan?					112.20(h)(1)		
Qualified Individual (QI) Information					112.20(h)(1)(i)		
Emergency Notification Phone List					112.20(h)(1)(ii)		
Spill Response Notification Form					112.20(h)(1)(iii)		
Response Equipment List and Location					112.20(h)(1)(iv)		
Response Equipment Testing and Deployment (<i>Note: OK to reference App F., Section 1.3.3 narrative in main plan</i>)					112.20(h)(1)(iv)		
Facility Response Team					112.20(h)(1)(v)		
Evacuation Plan					112.20(h)(1)(vi)		
Immediate Actions (<i>Note: Need complete set of immediate actions from main plan outlined in App. F, Sec. 1.7.1, Plan Implementation</i>)					112.20(h)(1)(vii)		
Facility Diagram(s) (<i>Note: Need complete set of diagrams from App. F, Sec. 1.9 from main plan</i>)					112.20(h)(1)(viii)		
Reviewer notes on ERAP:							



C. Facility Information		Review			Citations and other relevant guidance				
		YES	NO	N/A	40 CFR 112	Appendices	Other		
Note to reviewer:	The following requirements are addressed in 40 CFR 112.20(h)(2) and Appendix F, Section 1.2.								
Are the following items included in the Facility Information section?		112.20(h)(2)				App. F, Sec. 1.2	---		
Facility name									App. F, Sec. 1.2.1
Street address									App. F, Sec. 1.2.2
City, county, state, and zip code									App. F, Sec. 1.2.3
Phone number									App. F, Sec. 1.2.4
Latitude and Longitude									App. F, Sec. 1.2.5
Indication of whether facility is located in or drains into a wellhead protection area									App. F, Sec. 1.2.6
Owner/operator (both names included, if different; owner address included, if different)									App. F, Sec. 1.2.7
QI Information (information for all individuals if more than one QI listed)									App. F, Sec. 1.2.8
Name, position, work street address, emergency phone number (<i>mobile phone number</i>)									App. F, Sec. 1.2 Introduction
Description of specific response training experience									
Oil storage start-up date									
Facility operations description including NAICS code									
Dates and types of substantial expansion									
Facility Information Form Complete (<i>Note: Home address of QI is PII, so not needed.</i>)									
Reviewer notes on Facility Information:									



D. Emergency Response Information: Notification		Review			Citations and other relevant guidance		
		YES	NO	N/A	40 CFR 112	Appendices	Other
Note to reviewer:	The following requirements are addressed in 40 CFR 112.20(h)(1) and (3) and Appendix F, Section 1.3.						
Emergency Notification Phone List							
Does the Emergency Notification Phone List include the following?				112.20(h)(1)(i), 112.20(h)(3) (i) & 112.20(h) (3)(iii)	App. F, Secs. 1.3(A)(1) & 1.3.1	---	
National Response Center (NRC) phone number							
QI phone numbers (day and evening; <i>Note: mobile number sufficient</i>)							
Company response team phone numbers (day and evening; <i>Note: mobile numbers sufficient</i>)							
Federal On-Scene Coordinator (OSC) and/or Regional Response Center (RRC) phone numbers (day and evening; <i>Note: mobile numbers sufficient</i>)							
Local response team (fire dept./cooperatives) phone numbers							
Fire Marshall phone numbers (day and evening; <i>Note: mobile numbers sufficient</i>)							
State Emergency Response Committee (SERC) phone numbers (day and evening; <i>Note: mobile numbers sufficient</i>)							
State Police phone number							
Local Emergency Planning Committee (LEPC) phone number							
Local water supply system phone numbers (day and evening)							
Weather report phone number							
Local television/radio station phone number(s) for evacuation notification							
Hospital phone number(s)							
Spill response contractor(s)							
Wastewater treatment facility system name(s) and phone number(s) (<i>particularly if facility discharges to POTW</i>)					---	Recommended to meet requirements of 112.20(h)(3)(iii)	
Factories/utilities with water intakes							
Trustees of sensitive areas							



D. Emergency Response Information: Notification	Review			Citations and other relevant guidance		
	YES	NO	N/A	40 CFR 112	Appendices	Other
Spill Response Notification Form (information to report to the National Response Center)						
Does the Spill Response Notification Form include fields for the following?				112.20(h)(3)(iv)	App. F, Secs. 1.3(A)(2) & 1.3.1	---
Reporter's name, position and phone numbers (day and evening; <i>Note: mobile number sufficient</i>)						
Company information (name, type, street address, city, state and zip code)						
Indication of whether materials were discharged (Y/N)						
Indication of whether notification is required to meet federal obligation to report (Y/N)						
Indication of whether notification is being made on behalf of Responsible Party (Y/N) and time called						
Incident description, including: source and/or cause of incident; date/time of incident; incident address/location, nearest city, distance from city, direction from city, and township, range or borough identifier; container type and tank oil storage capacity; facility oil storage capacity; and facility latitude/longitude						
Material description, including CHRIS code, discharged quantity (with units), whether material discharged to water, and amount discharged to water (with units)						
Description of response actions taken to correct, control or mitigate incident						
Impact description, including number of injuries and deaths; evacuation status and number evacuated; property damage; environmental medium/media affected; and description of environmental affects						
Caller notifications, including EPA, USCG and state notifications						
Reviewer notes on Emergency Response Notification:						



E. Emergency Response Information: Response Equipment		Review			Citations and other relevant guidance		
		YES	NO	N/A	40 CFR 112	Appendices	Other
Note to reviewer:	The following requirements are addressed in 40 CFR 112.20(h)(3)(vi) and Appendix F, Sections 1.3(A)(3) and 1.3.2. The PREP Guidelines, Section 2.3.6.6.1 allow for alternatives to the 1,000-foot boom minimum requirement and alternatives to containment boom for inland plan holders. For specific equipment, identify if the equipment is provided by the Facility, OSRO or CO-OP by checking the appropriate letters F, O, or C						
Does the plan include a list and location of the facility's response equipment and a description of the amount of oil that the emergency response equipment can handle (when appropriate) and any limitations (e.g., associated with launching sites)?					112.20(h)(3)(vi)	App. F, Sec. 1.3(A)(3) & 1.3.2	---
Are the following items included in the Facility Response Equipment List?							
Skimmers/pumps, including operational status, type/model/year, number or quantity, capacity, daily effective recovery rate, storage location, and date fuel last changed.	F						
	O						
	C						
Type of containment boom, including operational status, model, year, number of segments, length of segments (ft), containment area, and storage location (if alternatives to containment boom are described, see questions below)	F						
	O						
	C						
Sorbents, including type, year purchased, amount, absorption capacity, and storage location	F						
	O						
	C						
Hand tools, including operational status, type, quantity, and storage location	F						
	O						
	C						
Communication equipment, including operational status, type and year, quantity, and storage location	F						
	O						
	C						
Fire fighting and personnel protective equipment (PPE), including operational status, type and year, quantity, and storage location	F						
	O						
	C						
Other equipment:							
Boats and motors, including operational status, type, year, quantity and storage location	F						
	O						
	C						
Other heavy equipment, cranes, dozers, etc., including operational status, type and year, quantity and storage location	F						
	O						
	C						

E. Emergency Response Information: Response Equipment	Review			Citations and other relevant guidance		
	YES	NO	N/A	40 CFR 112	Appendices	Other
Boom Length Alternatives for Inland Planholders: Does the plan and/or equipment list identify an alternate length of containment boom that is less than 1,000 feet for the small discharge planning level?				112.20(h)(3) (vi)	---	PREP Guidelines, Sec. 2.3.6.6.1
If so, does the plan/list provide a rationale for using the alternative length of containment boom and whether additional containment boom may be need for the small discharge planning level?						
Boom Alternatives for Inland Planholders: Does the plan and/or equipment list include alternatives to containment boom (e.g., containment dam, underflow dam, culvert plugs) for the small discharge planning level?						
If so, does the plan/list provide a rationale and installation procedures for these alternatives for the small discharge planning level?						
Reviewer notes on Response Equipment <i>(for boom alternatives, please describe if planholder needs to provide additional details on boom lengths, underflow dam design specifications and installation procedures, and locations for use of underflow dams, containment dams and culvert plugs)</i>						

F. Emergency Response Information: Response Equipment Testing/Deployment		Review			Citations and other relevant guidance		
		YES	NO	N/A	40 CFR 112	Appendices	Other
Note to reviewer:	40 CFR 112.20(h)(8)(i) provides requirements for maintaining a checklist and record of response equipment inspections. Appendix F, Section 1.3(A) (4) provides requirements for response equipment testing and deployment exercises. This includes the requirement that facilities without facility-owned response equipment must ensure that the OSRO identified in the response plan to provide this equipment certifies that requirements for testing and deployment exercises have been met. Appendix F, Section 1.3.3, provides a response equipment testing and deployment drill log.						
Are the following items included in the Response Equipment Testing and Deployment section?					112.20(h)(8)(i) & 112.20(h)(8)(ii)	App. F, Secs. 1.3(A)(4) & 1.3.3	PREP Guidelines, 2.3.6.5 Shared Credit for OSRO Equipment Deployment Exercises
Date of last inspection or equipment test							
Inspection frequency							
Date of last deployment							
Deployment frequency							
OSRO Shared Credit certification (if applicable) (<i>Note: This would apply if the planholder is using the Shared Credit certificate approach to meet the annual EDE requirement under PREP.</i>)							
Reviewer notes on Response Equipment Testing/Deployment:							



G. Emergency Response Information: Personnel		Review			Citations and other relevant guidance		
		YES	NO	N/A	40 CFR 112	Appendices	Other
Note to reviewer:	40 CFR 112.20(h)(3)(i)-(iii) and (v) and Appendix F, Section 1.3(A)(5) provide requirements for identifying and providing information regarding emergency response personnel, emergency response contractors, and the facility response team. Appendix F, Section 1.3.4, provides forms for recording this information. <i>Emergency Response Personnel</i> are personnel whose duties involve responding to emergencies, including oil discharges, even when they are not present at the site. The <i>Facility Response Team</i> is composed of Emergency Response Personnel and Emergency Response Contractors who are responsible for responding immediately to incidents. Contractors providing facility response team services may be different than contractors providing oil spill response services.						
Emergency Response Personnel Information (covers personnel employed by the facility)							
Does the Emergency Response Personnel Information section include the following?				112.20(h)(3)(i), 112.20(h)(3)(iii) & 112.20(h)(3)(v)	App. F, Secs. 1.3(A)(5) & 1.3.4	---	
Date of last update							
Response personnel name(s)							
Facility response team title/position							
Response personnel phone numbers (work/mobile)							
Response personnel response time							
Response personnel responsibility during response action							
Response personnel training (type and date)							
Emergency Response Contractor Information (both primary and secondary contractors)							
Does the Emergency Response Contractor Information section include the following?				112.20(h)(3)(i), 112.20(h)(3)(ii), 112.20(h)(3)(iii) & 112.20(h)(3)(v)	App. F, Secs. 1.3(A)(5) & 1.3.4	---	
Date of last update							
Response contractor name(s)							
Response contractor phone numbers							
Response contractor response time							
Response contractor responsibility during response action							
Evidence of contracts and/or arrangements to ensure availability of response resources							
Does the facility have more than one OSRO or CO-OP listed in the plan?							
If yes, is required information included for each OSRO or CO-OP?							



G. Emergency Response Information: Personnel	Review			Citations and other relevant guidance		
	YES	NO	N/A	40 CFR 112	Appendices	Other
Facility Response Team Information (composed of both facility emergency response personnel and emergency response contractors that are first to respond)						
Does the Facility Response Team Information section include the following?				112.20(h)(3)(i), 112.20(h)(3)(iii) & 112.20(h)(3)(v)	App. F, Secs. 1.3(A)(5) & 1.3.4	---
Date of last update						
Response team member name(s), including QI, company personnel and contractor team members						
Response team member job function						
Response team member response time						
Response team member phone/pager number (day/evening)						
Reviewer notes on Emergency Response Personnel:						



H. Emergency Response Information: Evacuation Plans		Review			Citations and other relevant guidance		
		YES	NO	N/A	40 CFR 112	Appendices	Other
Note to reviewer:	40 CFR 112.20(h)(3)(vii) and (viii) and Appendix F, Sections 1.3(A)(6) and 1.3.5, describe the requirements for developing and documenting evacuation plans in the facility response plan.						
Does the Facility Evacuation Plan include consideration of the following 13 factors?					112.20(h)(3)(vii)	App. F, Secs. 1.3(A)(6) & 1.3.5.1	---
Location of stored materials							
Hazard imposed by discharged materials							
Discharge flow direction							
Prevailing wind directions and speed							
Water currents, tides, or wave conditions (if applicable)							
Arrival route of emergency response personnel and response equipment							
Evacuation routes							
Alternative routes of evacuation							
Transportation of injured personnel to nearest emergency medical facility							
Location of alarm/notification systems							
Centralized check-in area for roll call							
Mitigation command center location							
Location of shelter at facility							
Does the response plan include a diagram of evacuation routes?					112.20(h)(3)(viii)		
Does the response plan reference community evacuation plans?					112.20(h)(1)(vi) in ERAP & 112.20(h)(3)(vii)	App. F, Secs. 1.3(A)(6) & 1.3.5.3	
Reviewer notes on Evacuation Plans:							



I. Emergency Response Information: Qualified Individual's Duties		Review			Citations and other relevant guidance		
		YES	NO	N/A	40 CFR 112	Appendices	Other
Note to reviewer:	The following requirements are addressed in 40 CFR 112.20(h)(3)(ix) and Appendix F, Section 1.3.6						
Does the description of the Qualified Individual's 10 Duties include the following?					112.20(h)(3)(ix)	App. F, Secs. 1.3(A)(7) & 1.3.6	---
Activate internal alarms and hazard communication systems					112.20(h)(3)(ix)(A)		
Notify response personnel					112.20(h)(3)(ix)(B)		
Identify character, exact source, amount, and extent of the release					112.20(h)(3)(ix)(C)		
Notify and provide information to appropriate Federal, State and local authorities					112.20(h)(3)(ix)(D)		
Assess interaction of discharged substance with water and/or other substances stored at facility and notify on-scene response personnel of assessment					112.20(h)(3)(ix)(E)		
Assess possible hazards to human health and the environment, <i>including effects of gas releases and firefighting runoff</i>					112.20(h)(3)(ix)(F)		
Assess and implement prompt removal actions					112.20(h)(3)(ix)(G)		
Coordinate rescue and response actions					112.20(h)(3)(ix)(H)		
Access company funding to initiate cleanup activities					112.20(h)(3)(ix)(I)		
Direct cleanup activities until properly relieved of this responsibility					112.20(h)(3)(ix)(J)		
Does the facility have a Regional QI listed in the plan?							
If Yes, does the response plan describe the role of the on-site QI or agent/representative and when the Regional QI will take over?							
Reviewer notes on Qualified Individual's Duties:							



J. Hazard Evaluation: Hazard Identification		Review			Citations and other relevant guidance		
		YES	NO	N/A	40 CFR 112	Appendices	Other
Note to reviewer:	Hazard identification is one element of the hazard evaluation required per 40 CFR 112.20(h)(4). Requirements for completing and documenting the hazard identification are provided in Appendix F, Section 1.4.1.						
Does the Hazard Evaluation section include the following?					112.20(h)(4)	App. F, Sec. 1.4.1	---
List of each tank at the facility, with a separate and distinct identifier and indication of whether the tank is an aboveground or belowground tank							
For each tank at the facility that stores oil or CWA hazardous substances (HS):							
Tank number							
Substance(s) stored (including CWA Hazardous Substances listed in 40 CFR 116)							
Quantity(ies) stored (gallons)							
Tank type/year of construction							
Maximum capacity (gallons)							
Failure/cause history							
For each surface impoundment (SI) that stores oil or CWA HS:							
SI number							
Substance(s) stored							
Quantity(ies) stored							
Surface area/year of construction							
Maximum capacity							
Failure/cause history							
Labeled schematic drawing							
Description of transfers (loading and unloading) and volume of material (should include oil and CWA HS operations)							
Description of daily operations that present a risk of discharge of oil or release of CWA HS (venting, piping repair or replacement, valve maintenance, etc)							
Secondary containment volume(s) associated with each tank and/or transfer point							
Normal daily throughput of the facility							
Reviewer notes on Hazard Identification:							

K. Hazard Evaluation: Vulnerability Analysis		Review			Citations and other relevant guidance					
		YES	NO	N/A	40 CFR 112	Appendices	Other			
Note to reviewer:	Vulnerability analysis is one element of the hazard evaluation required per 40 CFR 112.20(h)(4). Appendix F, Section 1.4.2 provides specific requirements for completing and documenting the vulnerability analysis. Attachment C-III to Appendix C to this part provides a method that owners or operators shall use to determine appropriate distances from the facility to fish and wildlife and sensitive environments. Owners or operators can use an alternative formula that is considered acceptable by the Regional Administrator (RA). If an alternative formula is used, documentation of the reliability and analytical soundness of the formula must be attached to the Response Plan Cover Sheet.									
Is the planning distance used in Vulnerability Analysis based on methods in Attachment C-III to Appendix C of 40 CFR 112?					112.20(h)(4)	App. F, Sec. 1.4.2	---			
If not, is the alternative formula to determine planning distances comparable to those in Attachment C-III and acceptable to the RA?										
If an alternative formula is used, is documentation of reliability and analytical soundness attached to the Response Plan Cover Sheet?										
What is the planning distance (miles)? (Note: For tidally-influenced waterbodies, include ebb and flood tide distances.)										
Does the Vulnerability Analysis discuss the vulnerability of the following?										
Water intakes (drinking, cooling or other)										
Schools (particularly those directly in the WCD pathway)										
Medical facilities (e.g., hospitals and nursing homes, particularly those directly in the WCD pathway)										
Residential areas (particularly those directly in the WCD pathway)										
Businesses (particularly those directly in the WCD pathway)										
Wetlands or other sensitive environments										
Fish and wildlife										
Lakes and streams										
Endangered flora and fauna										
Recreational areas										
Transportation routes (air, land and water)										
Utilities										
Other areas of economic importance, including beaches, marinas, and other sensitive environments (aquatic and unique habitats)										
Did the planholder consult the relevant ACP/GRP in indentifying FWSE?					112.20(g)(1) & 112.20(h)(4)	App. E, Sec. 4.5 & 5.7 - Tie-in to Q. Plan Implementation in this checklist	---			
Reviewer notes on Vulnerability Analysis:										



L. Hazard Evaluation: Analysis of the Potential for an Oil Discharge		Review			Citations and other relevant guidance		
		YES	NO	N/A	40 CFR 112	Appendices	Other
Note to reviewer:	Analysis of the potential for an oil discharge is one element of the hazard evaluation required per 40 CFR 112.20(h)(4). Requirements for completing and documenting the analysis of the potential for an oil discharge are provided in Appendix F, Section 1.4.3.						
Does the Analysis of the Potential for an Oil Discharge include the following?					112.20(h)(4)	App. F, Sec. 1.4.3.	---
Oil discharge history							
Horizontal range of potential discharge							
Vulnerability to natural disaster (e.g., earthquakes, floods, hurricanes)							
Age of tanks at the facility							
Review notes on Analysis of Potential for an Oil Discharge:							



M. Hazard Evaluation: Facility Reportable Oil Spill History		Review			Citations and other relevant guidance		
		YES	NO	N/A	40 CFR 112	Appendices	Other
Note to reviewer:	The hazard evaluation required per 40 CFR 112.20(h)(4) requires a discussion of the facility's known or reasonably identifiable history of oil discharges reportable under 40 CFR 110 (Discharge of Oil) for the entire life of the facility. Requirements for describing the reportable oil spill history are provided in Appendix F, Section 1.4.4.						
Does the Facility Reportable Oil Spill History Description include the following?					112.20(h)(4)	App. F, Sec. 1.4.4	---
Date of discharge(s)							
List of discharge causes							
Material(s) discharged							
Amount discharged (gallons)							
Amount of discharge that reached navigable waters (if applicable)							
Effectiveness and capacity of secondary containment							
Clean-up actions taken							
Steps taken to reduce possibility of recurrence							
Total oil storage capacity of tank(s) or impoundment(s) from which material discharged							
Enforcement actions							
Effectiveness of monitoring equipment							
Description(s) of how each oil discharge was detected							
Reviewer notes on Facility Reportable Oil Spill History Description:							



N. Discharge Scenarios: Small and Medium Discharges		Review			Citations and other relevant guidance		
		YES	NO	N/A	40 CFR 112	Appendices	Other
Note to reviewer:	40 CFR 112.20(h)(5)(ii)-(iii) require that the response plan include discussion of response planning scenarios for small and medium discharges. Small discharges are defined as discharges of 2,100 gallons or less. Medium discharges are defined as greater than 2,100 gallons and less than or equal to 36,000 gallons or 10 percent of the capacity of the largest tank at the facility, whichever is less. Appendix F, Section 1.5.1 describes operational and other factors to be considered.						
Small Discharges							
Do the planning scenarios for small discharges in the Discharge Scenarios section account for the following?				112.20(h)(5)(ii)	App. F, Sec. 1.5.1.1	---	
Loading and unloading operations of surface transportation							
Facility maintenance activities							
Facility piping							
Pumping stations and sumps							
Oil storage tanks							
Vehicle refueling operations							
Age and condition of facility and components							
If regulated by USCG also, average most probable discharge considered in calculation							
Do the planning scenarios for small discharges consider the following factors that affect response efforts?					App. F, Sec. 1.5.1.2		
Size of the discharge							
Proximity to downgradient wells, waterways, and drinking water intakes							
Proximity to fish and wildlife and sensitive environments							
Likelihood that the discharge will travel off site (i.e., topography, drainage)							
Location of the material discharged (i.e., on a concrete pad or directly on the soil)							
Material discharged							
Weather or aquatic conditions (i.e., river flow)							
Available remediation equipment							
Probability of a chain reaction of failures (scale-up to medium or WCD planning levels)							
Direction of discharge pathway							



N. Discharge Scenarios: Small and Medium Discharges	Review			Citations and other relevant guidance				
	YES	NO	N/A	40 CFR 112	Appendices	Other		
Medium Discharges								
Do the planning scenarios for medium discharges in the Discharge Scenarios section account for the following?				112.20(h)(5)(iii)	App. F, Sec. 1.5.1.1	---		
Loading and unloading operations								
Facility maintenance activities								
Facility piping								
Pumping stations and sumps								
Oil storage location								
Vehicle refueling operations								
Age and condition of facility components								
Medium discharge volume for non-transportation component								
If regulated by USCG also, consideration of maximum most probable discharge considered for MTR facilities (50,400 gallons or 10% of USCG WCD)								
Do the planning scenarios for medium discharges consider the following factors that affect response efforts:					App. F, Sec. 1.5.1.2			
Size of the discharge								
Proximity to downgradient wells, waterways, and drinking water intakes								
Proximity to fish and wildlife and sensitive environments								
Likelihood that the discharge will travel off site (i.e., topography, drainage)								
Location of the material discharged (i.e., on a concrete pad or directly on the soil)								
Material discharged								
Weather or aquatic conditions (i.e., river flow)								
Available remediation equipment								
Probability of a chain reaction of failures (scale-up to WCD planning levels)								
Direction of discharge pathway								
Reviewer notes on Small and Medium Discharge Scenarios:								

O. Discharge Scenarios: Worst Case Discharge		Review			Citations and other relevant guidance			
		YES	NO	N/A	40 CFR 112	Appendices	Other	
Note to reviewer:	40 CFR 112.20(h)(5)(i) requires that the response plan include discussion of response planning scenarios for a worst case discharge, where the worst case discharge amount is calculated by the facility using the appropriate worksheet from 40 CFR 112, Appendix D, or as specified by the RA. Appendix F, Section 1.5.2 describes operational and other factors to be considered, including all of the factors listed for small and medium discharges in Appendix F, Section 1.5.1.							
Is the Facility Specific Worst Case Discharge (WCD) Scenario included? <i>(Note: Facility may have more than one WCD scenario.)</i>					112.20(h)(5)(i)	App. F, Sec. 1.5.2 (reference to App. F, Sec. 1.5.1.1)	---	
Do the planning scenarios for the WCD in the Discharge Scenarios section account for the following?								
Loading and unloading operations								
Facility maintenance activities								
Facility piping								
Pumping stations and sumps								
Oil storage location								
Vehicle refueling operations						Appendix D		
Age and condition of facility components								
Correct WCD calculation provided for specific type of facility (onshore or production facility)						Appendix E, Sec. 7.2.1		
Correct WCD calculation for complexes								
WCD for each oil group above 10% of the aggregate oil storage capacity for facility <i>(Note: Check for Attachment E-1 sheets for each oil group in Section Q below)</i>						App. F, Sec. 1.5.2 (reference to App. F, Sec. 1.5.1.2)		
Do the planning scenarios for the WCD consider the following factors that affect response efforts?								
Size of the discharge								
Proximity to downgradient wells, waterways, and drinking water intakes								
Proximity to fish and wildlife and sensitive environments								
Likelihood that the discharge will travel off site (i.e., topography, drainage)								
Location of the material discharged (i.e., on a concrete pad or directly on the soil)								
Material discharged								
Weather or aquatic conditions (i.e., river flow)								
Available remediation equipment								
Probability of a chain reaction of failures at the WCD planning level (e.g., multiple WCD incidents simultaneously)								
Direction of discharge pathway								
Review notes on Worst Case Discharge:								

P. Discharge Detection Systems		Review			Citations and other relevant guidance		
		YES	NO	N/A	40 CFR 112	Appendices	Other
Note to reviewer:	40 CFR 112.20(h)(6) requires that the response plan describe the procedures and equipment used to detect discharges. Appendix F, Section 1.6, provides requirements for describing discharge detection systems.						
Discharge Detection by Personnel							
Does the Discharge Detection Systems section include the following:					112.20(h)(6)	App. F, Sec. 1.6.1	---
Description of procedures and personnel for detection of a discharge of oil or release of CWA HS							
Description of facility inspections							
Description of initial response actions							
References to relevant Emergency Response Information in Sec. 1.3.1							
Automated Discharge Detection							
Does the response plan describe automated detection systems?					112.20(h)(6)	App. F, Sec. 1.6.2	---
Does the Discharge Detection Systems section include the following:							
Description of automatic discharge detection equipment, including overfill alarms and secondary containment sensors, etc.							
Description of alarm verification procedures and subsequent actions							
Review notes on Discharge Detection Systems:							

Q. Plan Implementation		Review			Citations and other relevant guidance		
		YES	NO	N/A	40 CFR 112	Appendices	Other
Note to reviewer:	40 CFR 112.20(h)(7) requires that the response plan describe the plan implementation procedures. Appendix F, Section 1.7, provides requirements for describing plan implementation procedures for the range of discharge scenarios identified in the Discharge Scenarios section of the response plan. This section also references Appendix E for the determination of adequate response capabilities, including fire fighting resources.						
Identification of response resources for small, medium, and worst case discharges							
Does the Plan Implementation section include the following?					112.20(h)(7)	Appendix E, App. F, Sec. 1.7 Intro, 1.7.1, 1.8.2 and 1.8.3	---
Description of response actions by facility personnel or by contracted resources for each discharge scenario							
Description of the response resources for small, medium and WCD discharge scenarios, including response strategies (e.g., tactical planning)							
Description to demonstrate accessibility to the response personnel and equipment for identified discharge scenarios							
Attachment E-1 (or E-2 for AFVO) completed for each WCD oil group above 10% of the aggregate oil storage capacity of the facility							
Emergency plans for spill response							
Additional response training							
Additional contracted help (particularly for persistent oil discharge scenarios or facilities without adequate secondary containment consistent with the Attachment E-1 or E-2 calculations)							
Access to additional response equipment/experts							
Explanation provided on ability to implement plan, including response training and drills/exercises							
Recommended form detailing immediate action for small, medium and worst case discharges (sec. 1.7.1.2A) (stop the product flow, warn personnel, shut off ignition sources, initiate containment, notify NRC, notify OSC, notify (as appropriate))							
Sufficient quantities of containment boom for collection, containment and protection of fish and wildlife and sensitive environments for medium and WCD planning levels identified consistent with the relevant ACP/GRP						App. E, Secs. 4.5 and 5.7	PREP Guidelines, Section 2.3.6.6.1 Oil Response Systems, 4. Booming Systems
Temporary storage of recovered material						App. E, Secs. 3.3.3, 4.6, 5.5, 9.6 & 12.2	
For inland planholders using alternatives lengths of containment boom or alternatives to containment boom, is the narrative sufficient to assess viability and appropriateness of the alternatives? Describe further in Reviewer notes section below. (Refer back to Section E, Response Equipment List above for alternative boom lengths or alternatives to containment boom for inland planholders.)						---	

Q. Plan Implementation	Review			Citations and other relevant guidance					
	YES	NO	N/A	40 CFR 112	Appendices	Other			
Identification of fire fighting capability, including an individual located at the facility to work with the fire department?				112.20(h)(7)	App. E, Sec. 7.4 (Petroleum) and 10.4 (AFVO)	---			
Does the narrative discuss the requirement that this individual verify sufficient well-trained fire fighting resources are available within a reasonable response time to a WCD scenario?									
Does plan discuss fire fighting foam (e.g., AFFF) capabilities and amount on site and/or available from outside parties?									
Disposal Plan									
Does the Plan Implementation section include the following:				112.20(h)(7)	App. F, Sec. 1.7.2 (Disposal plans from the SPCC plan may be inserted here.)	---			
Description of procedures for recovering, reusing, decontaminating or disposing of materials									
Plan addresses permits required to transport or dispose of recovered materials									
Materials addressed in Disposal Plan, including: recovered product, contaminated soil, contaminated equipment and materials (including drums tank parts, valves and shovels), personnel protective equipment, decontamination solutions, absorbents, and spent chemicals									
Plan prepared in accordance with any federal, state, and/or local regulations									
Containment and Drainage Planning									
Does the Plan Implementation section include a plan to contain/control a discharge through drainage?				112.20(h)(7)	App. F, Sec. 1.7.3 (Planholder may use containment and drainage plans from the SPCC plan.)	---			
Does the containment and drainage plan describe the following?									
Available volume of containment									
Drainage route from oil storage and transfer areas									
Construction materials used in drainage troughs									
Type and number of valves and separators in drainage system									
Sump pump capacities									
Containment capacities of weirs and booms and their location									
Other cleanup materials									
Reference to inspection and monitoring requirements for drainage in facility's SPCC plan									
Reviewer notes on Plan Implementation:									

R. Self-Inspection, Drills/Exercises, and Response Training		Review			Citations and other relevant guidance			
		YES	NO	N/A	40 CFR 112	Appendices	Other	
Note to reviewer:	40 CFR 112.20(h)(8) requires that the response plan include documentation and descriptions of facility self-inspections, drills and exercises to be carried out under the response plan, response training programs, and logs of discharge prevention meetings, training, and drills/exercises. 40 CFR 112.21 provides requirements for developing a facility response training and a drill/exercise program. Appendix F, Section 1.8, provides additional information, including checklists and logs. FRP records and logs must be maintained for 5 years.							
Facility Self-Inspection								
Does the Self-Inspection, Drills/Exercises and Response Training section include the following?					112.20(h)(8)(i)	App. F, Sec. 1.8	---	
Written procedures for facility self-inspection contained or cross-referenced in Plan from SPCC plan						App. F, Sec. 1.8.1		
Records of tank inspections with dates (tank leaks, tank foundations, tank piping) contained or cross-referenced in Plan from the SPCC plan						App. F, Sec. 1.8.1.1		
Records of secondary containment inspections with dates (dike or berm system, secondary containment, retention and drainage ponds) contained or cross-referenced in the Plan from the SPCC plan						App. F, Sec. 1.8.1.3		
Records of response equipment inspection, including a response equipment checklist, contained or cross-referenced in Plan						App. F, Sec. 1.8.1.2		
From equipment list from Section 1.3.2 of the Plan, does the response equipment checklist include the following?						App. F, Sec. 1.8.1.2		
Equipment inventory (item and quantity)								
Storage location (time to access and respond)								
Accessibility (time to access and respond)								
Operational status/condition								
Actual use/testing (last test date and frequency of testing)								
Shelf life (present age, expected replacement date)								
Response equipment testing/deployment log								



R. Self-Inspection, Drills/Exercises, and Response Training	Review			Citations and other relevant guidance					
	YES	NO	N/A	40 CFR 112	Appendices	Other			
Facility Drills/Exercises									
Does the Self-Inspection, Drills/Exercises and Response Training section include a description of facility drills/exercises?				112.20(h)(8)(ii), 112.21(a) & 112.21(c)	App. F, Sec. 1.8.2	---			
Is the drill/exercise program based on National Preparedness for Response Exercise Program (PREP) guidelines?						PREP Guidelines, 2.3 Plan Holder Exercises			
If the facility drill/exercise program is not based on the PREP guidelines, has the facility's exercise program been approved by the EPA RA?						PREP Guidelines, Section 4.0			
Does the facility drill/exercise program include the following:									
QI notification drill (quarterly)									
Incident management team tabletop exercise (annual)									
Equipment deployment exercise (semi-annual for facility-owned equipment at the small discharge planning level; annual for OSRO-dependent facilities at this planning level)									
Unannounced exercise (annual)									
Area exercises (has facility participated in any?)									
Does the Self-Inspection, Drills/Exercises and Response Training section describe the evaluation procedures for the drill/exercise program?									
Does the response plan include a Qualified Individual notification drill log?					App. F, Sec. 1.8.2.1				
Does the QI notification drill log include fields for date, company, qualified individual, other contacted, emergency scenario, evaluation?					App. F, Sec. 1.8.2.2				
Does the response plan include a incident management team tabletop drill log?									
Does the incident management team tabletop drill log include fields for date, company, QI, participants, emergency scenario, evaluation, changes to be implemented, time table for implementation?									
Response Training									
Does the Self-Inspection, Drills/Exercises and Response Training section include the following:				112.20(h)(8)(iii), 112.21(a) & 112.21(b)	App. F, Sec. 1.8.3	---			
Description of response training program (including topics such as response proceduress, job task for personnel, and lessons plans)									
Personnel response training logs (name, response training date/and number of hours, prevention training date/and number of hours)									
Discharge prevention meeting logs (date, attendees)									
Reviewer notes on Self-Inspection, Training, and Meeting Logs:									



S. Diagrams		Review			Citations and other relevant guidance		
		YES	NO	N/A	40 CFR 112	Appendices	Other
Note to reviewer:	The following requirements are addressed in 40 CFR 112.20(h)(9) and Appendix F, Section 1.9						
Site Plan Diagram							
Does the Diagrams section include a Site Plan Diagram?					112.20(h)(9)	App. F, Sec. 1.9(1)	---
Does the Site Plan Diagram include the following:							
Entire facility to scale							
Above and below-ground bulk oil storage tanks							
Contents and capacities of bulk oil storage tanks							
Contents and capacities of drum storage areas							
Contents and capacities of surface impoundments							
Process buildings							
Transfer areas							
Location and capacity of secondary containment systems							
Location of hazardous materials, including materials stored and capacity of storage							
Location of communications and emergency response equipment							
Location of electrical equipment which contains oil							
If the facility is a complex facility, the interface(s) between EPA and other regulating agencies							
Site Drainage Plan Diagram							
Does the Diagrams section include a Site Drainage Plan Diagram?					112.20(h)(9)	App. F, Sec. 1.9(2)	---
Does the Site Plan Drainage Diagram include the following:							
Major sanitary and storm sewers, manholes, and drains							
Weirs and shut-off valves							
Surface water receiving streams							
Fire fighting water sources							
Other utilities							
Response personnel ingress and egress							
Response equipment transportation routes							
Direction of flow from discharge points							

S. Diagrams	Review			Citations and other relevant guidance					
	YES	NO	N/A	40 CFR 112	Appendices	Other			
Site Evacuation Plan Diagram									
Does the Diagrams section include a Site Evacuation Plan Diagram? (<i>Note: 112.20(h)(9) does not reference a site evacuation plan, but App. F, Section 1.9(3) states that the Plan shall include the following diagrams: Site Plan Diagram, Site Drainage Diagram and the Site Evacuation Diagram.</i>)				112.20(h)(9)	App. F, Sec. 1.9(3)	---			
Does the Site Evacuation Plan Diagram include the following:									
Site plan diagram with evacuation routes									
Location of evacuation regrouping areas									
Reviewer notes on Diagrams:									

T. Site Security	Review			Citations and other relevant guidance					
	YES	NO	N/A	40 CFR 112	Appendices	Other			
Note to reviewer:	The following requirements are addressed in 40 CFR 112.20(h)(10) and Appendix F, Section 1.10								
Does the response plan include a Site Security section describing facility security systems?				112.20(h)(10)	App. F, Sec. 1.10	---			
Does the description of facility security systems include descriptions of emergency cut-off locations, enclosures, guards and their duties, lighting, valve and pump locks, and pipeline connection caps?									
Reviewer notes on Site Security:									



Please use the following space to describe any additional concerns with the Plan requiring follow-up with or clarification by the planholder.	
Reviewed by:	
Date:	

<u>INSPECTION ACKNOWLEDGMENT</u>	
I performed an FRP review for the facility specified above.	
INSPECTOR/FRP COORDINATOR SIGNATURE:	DATE:
SUPERVISOR REVIEW/SIGNATURE:	DATE: