EPA has reviewed inspection data from its regional offices to get an idea of the most common Facility Response Plan and [SPCC (Spill Prevention, Control and Countermeasures) Plan](https://isienvironmental.com/spcc-plan-blog/) deficiencies.  The goal of the review was to help EPA determine how clear their rules were to help companies comply with the regulations.  [[Check out the SPCC Plan deficiencies here.](https://isienvironmental.com/spcc-plan-deficiencies-blog/)]

**What is a Facility Response Plan (aka, an FRP)?**

Facility response plans are required per 40 CFR 112.  If you have over 42,000 gallons of oils and are transferring them over water to/from vessels, or if you have over 1,000,000 gallons and meet certain criteria, you are required to have a Facility Response Plan.  Both the SPCC Plan and Facility Response Plan are from the Federal Water Pollution Control Act.

**EPA's Review**

The data was reviewed for companies who also had both Facility Response Plans and SPCC Plans, with a preference for companies with higher oil storage capacity.  The Facility Response Plans facilities had an average aggregate oil storage capacity of 69,000 to 857 million gallons of oil, with a worse case scenario discharge planning volume of 94,000 to 20 million gallons.  EPA found an average of 4 issues per plan.

**Top 4 Facility Response Plan Deficiencies (in Order)**

1. Diagrams (1.9) – 31 of the 55 had this deficiency
   * This includes site plans, evacuation plans and drainage diagrams.
2. Discharge Scenarios (1.5)
   * This includes discussion and plans for worse-case discharge.
3. Vulnerability Analysis; Hazard Evaluation (1.4. 2 and 1.4)
   * This would be spill history and analysis of discharge potential.
4. Plan Implementation  (1.7)
   * This would be a description of containment and drainage planning, disposal plans and response resources.

**Other Issues Found**

* Lack of details about response equipment. (1.3, 1.3.2)
* Companies didn't include key information from their Emergency Response Action Plans (ERAPs) (1.1)
* Not conducting required preparedness drills and exercises (1.8)
* Not training personnel on appropriate oil spill response measures.

Do you have any of these issues with your own Facility Response Plan?   Are you required to have an FRP?  We can help!  We can review your plan for compliance to these issues, prepare updates, or provide the required training or scenarios you need to conduct to your employees.  [Contact us today](https://isienvironmental.com/contact-us/)!