



US EPA FRPs/GIUEs

Fall 2023 RRT5 Meeting

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Top FRP Plan Issues During GIUEs



- Personnel do not know the plan (often written by a consultant)
- Plans follow the Integrated Contingency Plan (ICP) format and do not contain a detailed regulatory cross-reference.
- There should be 3 discharge scenarios in the plan (small, medium, worst-case). All scenarios should reach water and be facility-specific



Top FRP Plan Issues During GIUEs



- Vulnerability analysis does not use the right formula or cite sources of inputs.
- The FRP is a response plan, not War and Peace. Provide the required information, make the plan useful, and know the plan.

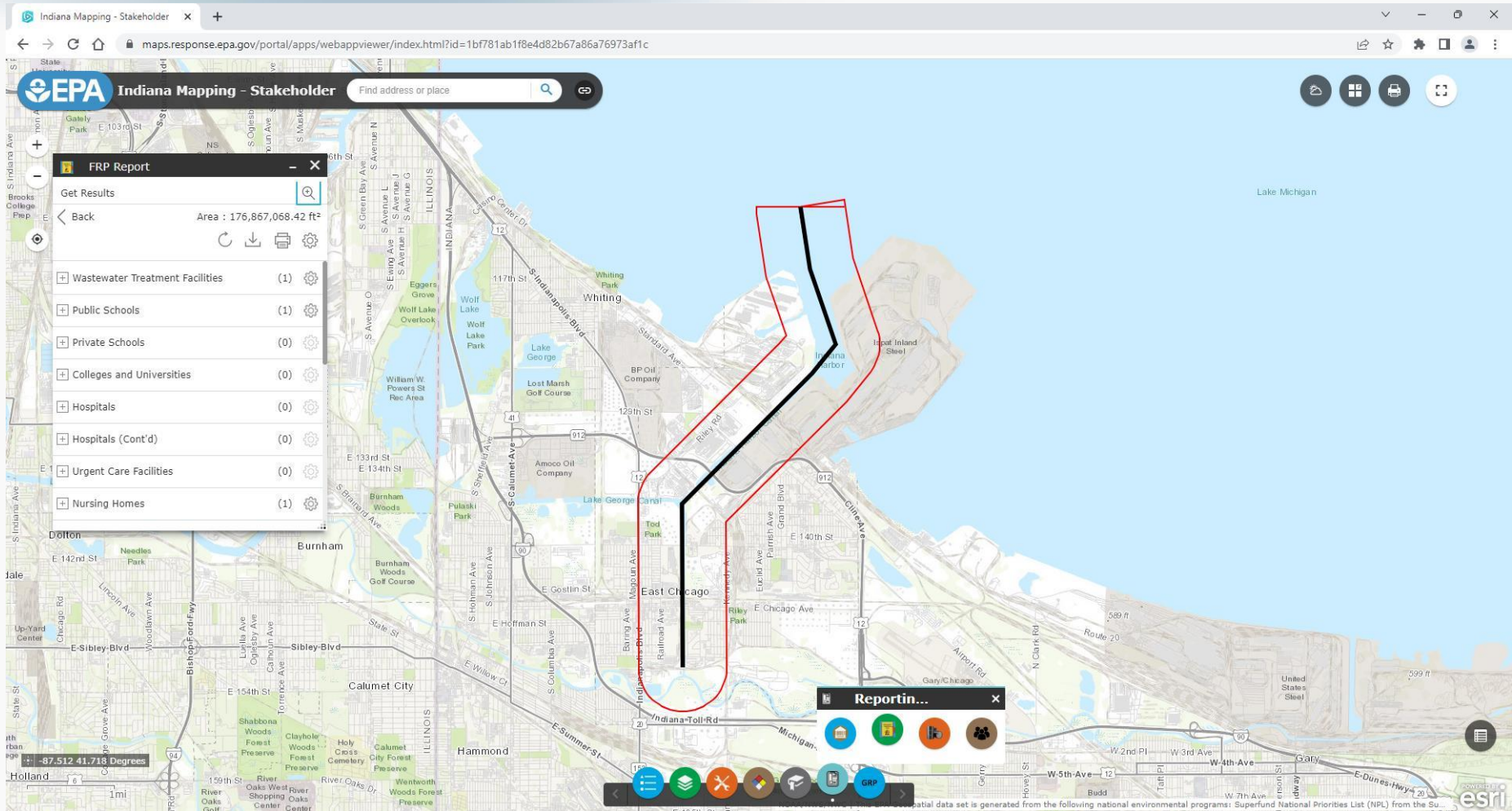
Top FRP Field Issues During GIUEs



- OSROs are not able to make the required time frames for the GIUE (1 hour for containment boom/means to deploy, 2 hours for recovery equipment)
 - This has become a major issue since COVID
- Some facilities haven't done adequate tactical site planning.
 - Ex. No access to boom locations or they don't know where to launch boats
- What's in the plan doesn't match what is seen in the field (ex. drainage pathway, etc)



EPA R5 Interactive Mapping



The Region 5 State Viewers (government and stakeholder versions) can be found at: <https://rrt5.org/InteractiveMapping.aspx>

EPA R5 Interactive Mapping



Summary

Name	Count	Area(ft ²)	Length(ft)
Wastewater Treatment Facilities	1	N/A	N/A
Public Schools	1	N/A	N/A
Private Schools	0	N/A	N/A
Colleges and Universities	0	N/A	N/A
Hospitals	0	N/A	N/A
Hospitals (Cont'd)	0	N/A	N/A
Urgent Care Facilities	0	N/A	N/A
Nursing Homes	1	N/A	N/A
Water Intakes	4	N/A	N/A
Water Intakes (Cont'd)	4	N/A	N/A
Port Facilities	26	N/A	N/A
Airports	0	N/A	N/A
Navigable Waterway Network Lines	1	N/A	6,859.40
Major Port Facilities	1	N/A	N/A
PAD-US Protected Areas Database	9	263,154.19	N/A
Special Designated Areas	0	0	N/A
Special Designated Areas (Cont'd)	0	0	N/A
Other Environmentally Sensitive Areas	1	24,626,195.67	N/A
Other Environmentally Sensitive Areas (Cont'd)	1	24,626,195.67	N/A
ISA - Sensitive Species	17	163,080,149.33	N/A
USFWS - Sensitive Species	0	N/A	0

ISA - Sensitive Species

#	SPEC_GROUP	SPECIES_LI	Area(ft ²)
1	Multiple Species Groupings	Terrestrial/Upland Invertebrates, Vascular Plants (Unknown), Aquatic/Riparian Vascular Plants, Terrestrial/Upland Vascular Plants	86,691,638.15
2	Multiple Species Groupings	Vascular Plants (Unknown), Aquatic/Riparian Vascular Plants, Aquatic/Riparian Fish, Terrestrial/Upland Vascular Plants	38,399,842.52
3	Multiple Species Groupings	Terrestrial/Upland Invertebrates, Vascular Plants (Unknown), Aquatic/Riparian Vascular Plants, Aquatic/Riparian Birds, Terrestrial/Upland Vascular Plants	16,010,566.17
4	Multiple Species Groupings	Terrestrial/Upland Invertebrates, Vascular Plants (Unknown), Aquatic/Riparian Vascular Plants, Aquatic/Riparian Mammals, Terrestrial/Upland Vascular Plants	6,892,139.79
5	Multiple Species Groupings	Vascular Plants (Unknown), Aquatic/Riparian Vascular Plants, Aquatic/Riparian Birds, Aquatic/Riparian Fish, Terrestrial/Upland Vascular Plants	6,824,638.88

Other Environmentally Sensitive Areas (Cont'd)

#	Name	City	Category	Waterbody	Location	Comments	Area(ft ²)
1	Grand Calumet River AOC	Gary, E Chicago, Hammond	Area of Concern	Grand Calumet River, Lake Michigan	Grand Calumet River originates on east side of Gary, IN. AOC extends to NW side of East Chicago, on teh IN/IL border	Email: isom.kristen@epa.gov	24,626,195.67



- For full plan requirement information see:
40 CFR 112.20 Appendix F
 - EPA R5's FRP checklist follows this format

Electronic Plan Submission



- All plans need to be submitted as a single pdf
- EPA is transitioning away from paper and flash drives
- For electronic plans smaller than 25 MB, you can email them directly as a single pdf
 - EPA cannot receive .zip files via email
- For electronic plans larger than 25 MB, EPA can send a file transfer link
 - The EPA file transfer system is called GoAnywhere. No account is needed. Email Alex or Kristina for a link.