



About

Dispersants are chemical agents used to break up oil into smaller droplets throughout the water column. Dispersants are applied to surface oil floating on water, or below the surface closer to an uncontrolled release of crude oil from a well blowout source. This series of fact sheets details monitoring requirements and how to apply the collected data to inform the use of dispersants under **Subpart J of the National Contingency Plan (NCP)**.

Description of the Requirement

Immediate Reporting

The responsible party must **immediately report** to the On-Scene Coordinator (OSC) and Regional Response Team (RRT):

- Any deviation of more than 10 percent from the mean hourly dispersant use rate for *subsurface application*, based on the dispersant volume authorized for 24 hours use, and the reason for the deviation.
- Ecological receptors of importance, and any other ecological receptors as designated by the OSC or the National Resource Trustees, including threatened or endangered species, based on dispersed plume trajectory modeling and acute toxicity level of concern information.

Refer to the regulatory requirement in the Code of Federal Regulations (CFR): **40 CFR 300.913(e)**.

Daily Reporting

The responsible party must **report daily** to the OSC the water column sampling data and analyses for the ambient background, baseline, and dispersed oil plume identified the regulatory requirements in **40 CFR 300.913(b)**. This includes daily reporting of the following information:

- For each application platform (e.g., aircraft, vessel, subsurface wand), the amount of dispersant used for each one-hour period in the 24-hour reporting period, and the total amount of dispersant used for the previous 24-hour reporting period.
- All collected data and analysis of those data within a time frame necessary to make operational decisions (e.g., within 24 hours of collection), including documented observations, photographs, video, and any other information related to dispersant use, unless the OSC authorizes an alternate time frame.
- For analyses that take more than 24 hours, provide such data and results as available, but no later than five days after sample collection, unless the OSC authorizes alternate time frame.
- Estimates of the daily transport of dispersed and non-dispersed oil, and associated volatile petroleum hydrocarbons and dispersants, using available technology (as described in the regulatory requirement at **40 CFR 300.913(c)**).

Refer to the regulatory requirement in the Code of Federal Regulations (CFR): **40 CFR 300.913(f)**.

Reporting to the RRT

The responsible party must also report to the applicable RRT(s) all information that is reported immediately and daily to the OSC. Refer to the regulatory requirement at **40 CFR 300.913(g)**.

Purpose of Reporting Dispersant Use Data

Dispersant use data inform operational decisions during a response, allowing the OSC and other decision makers to consider the impacts of dispersant application in real-time. Data collected can be compared to established action levels or specific ecological levels of concern for the incident. These should be revisited repeatedly throughout the incident to help the OSC determine whether and when dispersants should be applied, continued, continued with modifications, or ceased. To that end, certain critical information is reported immediately whereas other parameters are reported daily.

Considering Reported Dispersant Use Data

Immediate Reporting

- Inconsistent dispersant application rates can confound the interpretation of sampling data because of variation in the dispersant-to-oil ratio.
- Where sensitive species are at risk of exposure to dispersants or oil, it is critical to know immediately so that interventions can occur. Threatened, endangered, or other sensitive species may be adversely affected, and responders need to quickly take actions to protect them.

Daily Reporting

- Dispersant use information is useful to response planners as they coordinate response activities and implement monitoring based on the amount of dispersant used, water column data, and the expected transport of oil and dispersed oil.

Additional Resources

NCP Product Schedule

Lists dispersant products and data submitted to EPA as required by Subpart J of the NCP.

NCP Product Schedule Technical Notebook

A compilation of product bulletins summarizing data requirements and test results for dispersant products listed in EPA's NCP Product Schedule. The Technical Notebook includes information on dispersant application methods, toxicity and effectiveness data, and physical properties.

Oil Spill Emergency Response – Monitoring the Use of Dispersants Fact Sheets

- Water Column Sampling
- Characterization of Ecological Receptors – Habitats

▶ Decision Points for Responders

If responders report inconsistent dispersant application rates, the OSC should follow up to ensure that the interpretation of the data is correct and to make adjustments as needed. If a sensitive ecological receptor has been or has potentially been exposed, the OSC should follow up with subject matter experts to determine if mitigating actions are needed including potential adjustments to the dispersant application. If the OSC does not receive daily water sampling and data analyses, they should contact the responsible party to resolve the issue.

Legal Disclaimer

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