

Region V Regional Response Team

Science and Technology Committee October 20-21, 2009

Decanting oil/water mixtures

Discussion of whether decanting water out from under collected oil is appropriate and allowed. The decant water issue comes up when there is a lack of storage for oil/water mixes. This is frequent and expected in offshore oil spill response, so ocean response often includes decanting water back to the ocean ahead of the skimming devices.

In Region V adequate storage of collected oil/water mixtures is viewed as an expected part of a response, and an expected part of response planning. So facility plans should include provision for obtaining adequate storage, and responses should use that preplanned storage and arrange for ad hoc storage if preplanned storage volume was inadequate.

Sometimes, despite planning and good faith ad hoc effort to procure oil/water storage, a point is reached where there is no more storage available and recovery will have to stop. At that point choice is made whether to stop oil recovery or allow decanting of water from under the collected oil/water mix. In every such instance the need to decant will be viewed as a failure of planning or failure of adequate response.

Stepwise-

1. Facility and government planners include oil/water mixture storage, transport, treatment in facility, port, and sub-area plans. Plans should include which OSC has authority in that area to allow non-permitted discharges
2. During response planned storage is utilized
3. During response need for additional storage is considered early in the response
4. Ad hoc storage (trailers, local tanks, Lancer barges, etc) is arranged before it is needed
5. Consultation of SEOC or FEOC and facility responder done as storage is depleted. Decision made whether to stop oil recovery or allow decant.
6. Options for decant water identified, logistics worked out. In order of general preference decanting through carbon, to sanitary sewer with proper notice to POTW, decanting to land or a storm pond with controls, decanting to water ahead of the skimmers.
7. Approval with conditions may be granted by the appropriate OSC or by emergency permitting if needed or by a "no-action" decision by the water permitting authority
8. As much separation time as possible should be allowed in the storage vessels
9. Discharge and receiving water should be sampled for documentation
10. Downstream notifications should be considered
11. Follow-up enforcement should be considered for the discharge made necessary by failure to adequately prepare
12. Attempts to line up ad hoc storage continues during any discharge

Action Steps

Coast Guard look at whether some of the Lancer barges in the Ready Resources Inventory can be staged in Region V.

Each state examines current authorizations for allowing non-permitted discharges of decant water. Ohio has a general permit. Minnesota EOP authorizes State OSC to allow an emergency discharge. States should send their pertinent language to Steve Lee and Sheila Calovich.