



## When Can You Use Oil Treatment Products?

### What are chemical countermeasures (CCMs)?

CCMs are defined as any element, compound, or mixture that coagulates, disperses, dissolves, emulsifies, foams, neutralizes, precipitates, reduces, solubilizes, oxidizes, concentrates, congeals, entraps, fixes, makes the oil (or derivative of) more rigid or viscous, reduces the harmful effects or otherwise helps remove the oil from the environment. This includes biological additives, dispersing agents, surface washing agents, surface collecting agents, burning agents, and any other miscellaneous oil spill control agents including soaps or detergents.

The **Region 5 Regional Response Team (RRT5)** recognizes the major role of local government responders in mitigating threats from spills of oil and petroleum products. This fact sheet describes the process where CCMs are proposed for use on responses, such as fuel spills that may affect navigable waters or groundwater. These may include surface waters and conduits to them, including road ditches and storm drains.

### Which ones can be used?

For spills that have the potential to reach navigable waters, either directly or by runoff, the CCM must be listed on the **Product Schedule** found at **Subpart J** of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The Product Schedule **Q&A** can answer many typical questions, and you can also verify that a product is on the Schedule by calling USEPA at 202-260-2342.

### When can they be used?

Free product should first be recovered and/or

removed to the extent practical. Provisions must be made to contain and recover runoff from the treated area. Only the minimum amount of CCM required should be used. Caution must be used when applying CCMs into a closed conduit, such as a sanitary sewer or storm sewer. These products, regardless of manufacturer's claims, do not simply disappear from the environment. Failure to contain and recover all products, including CCMs used in response, may result in government enforcement action against all parties, including local response agencies.

### When is approval necessary?

Product Schedule listing does NOT imply or confer pre-approval for use. It means only that the agent has met the performance testing requirements set forth in the NCP. Authorization is required for use in ALL cases where navigable waters may be affected including marinas/docks. Authorization for local government responders is not required in cases where there is immediate risk to health & human safety, or it is certain that no runoff can reach navigable waters (all runoff shall be contained) and all mechanical recovery means have been exhausted. An example of this might be treatment of a road surface to reduce risks to health or human safety.

### Who can give approval?

The NCP at Subpart J requires authorization from the US EPA or USCG On-Scene Coordinator (OSC), with concurrence from the RRT5 and other affected agencies. In cases where use of CCMs is necessary to prevent or substantially reduce an immediate hazard to human life, the Incident Commander may

authorize use of the listed product without RRT5 concurrence for the emergency phase of the operation.

### How do I request approval?

During a spill event call the **National Response Center** (NRC) at 800-424-8802. The NRC will take your spill report and forward the information and your request for OSC approval to the appropriate Regional Response Center.

### State Emergency Contact Information:

Illinois: 800-782-7860  
Indiana: 888-233-7745  
Michigan: 800-292-4706  
Minnesota: 800-422-0798  
Ohio: 800-282-9378  
Wisconsin: 800-943-0003



### What information is needed to consider approval?

Be prepared to provide all of this information to the OSC when you request approval to use any CCM:

- Exact location of spill
- Type and amount of material spilled
- Justification for CCM use
- Potential environmental impacts
- Name of countermeasure proposed
- Product MSDS
- Rate and method of application
- Estimated volume proposed
- Monitoring strategy
- Material recovery strategy

### Where can I find additional information?

- NCP, 40 CFR Part 300 Subpart J.
- Access the NCP Product Schedule at: <http://www.epa.gov/emergencies/docs/oil/ncp/schedule.pdf>

