Section 9411

Decanting Response Tool

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9411.1 Introduction

When oil is spilled on the water, mechanical recovery of the oil is the principal approved method of responding. However, the mechanical recovery process and associated systems necessarily involve placing vessels and machinery in a floating oil environment. Incidental returns of oil into the response area, such as oil that falls back into the recovery area from vessels and machinery that are immersed and working in the oil, are an inevitable part of the mechanical recovery process. Similarly, separation or "decanting" of water from recovered oil and return of excess water into the response area can be vital to the efficient mechanical recovery of spilled oil because it allows maximum use of limited storage capacity, thereby increasing recovery operations.

This practice is currently recognized as a necessary and routine part of response operations that is appropriately addressed in Area Contingency Plans. (See National Contingency Plan Revisions, 59 F.R. 47401, Sept. 15, 1994.) In addition, some activities, such as those associated with oil recovery vessels, small boats and equipment cleaning operations may result in incidental discharges. These activities may be necessary to facilitate response operations on a continuing basis, and all of these activities are considered to be "incidental discharges."

9411.2 Decanting Policy

This policy addresses "incidental discharges" associated with spill response activities. "Incidental discharge" means the release of oil and/or oily water within the response area in or proximate to the area in which oil recovery activities are taking place during and attendant to oil spill response activities. Incidental discharges include, but are not limited to, the decanting of oily water, oil and oily water returns associated with runoff from vessels and equipment operating in an oiled environment and the wash down of vessels, facilities and equipment used in the response. "Incidental discharges" as addressed by this policy, do not require additional permits and do not constitute a prohibited discharge. See 33 CFR 153.301, 40 CFR 300, RCW 90.56.320(1), WAC 173-201A-110, ORS 468b.305 (2)(b).

9411.2.1 Criteria

During spill response operations, mechanical recovery of oil is often restricted by a number of factors, including the recovery system's oil/water recovery rate, the type of recovery system employed and the amount of tank space available on the recovery unit to hold recovered oil/water mixtures. In addition, the longer oil remains on or in the water, the more it mixes to form an emulsified mousse or

highly mixed oil/water liquid, which sometimes contains as much as 70% water and 30% oil, thus consuming significantly more storage space. Decanting is the process of draining off recovered water from portable tanks, internal tanks, collections wells or other storage containers to increase the available storage capacity of recovered oil. When decanting is conducted properly most of the petroleum can be removed from the water.

The overriding goal of mechanical recovery is the expeditious recovery of oil from water. In many cases, the separation of oil and water and discharge of excess water is necessary for skimming operations to be effective in maximizing the amount of oil recovered and in minimizing overall environmental damages. Expeditious review and approval, as appropriate, of such requests is necessary to ensure a rapid and efficient recovery operation. In addition, such incidental discharges associated with mechanical recovery operations should not be considered prohibited discharges. Such actions should be considered and in appropriate circumstances pre-authorized by the FOSC and/or SOSC because the discharged water will be much less harmful to the environment than allowing the oil to remain in the water and be subject to spreading and weathering. Therefore, the Area Committee adopts the following policy in order to provide for an expeditious decanting approval process and provide clear guidance to the Unified Command, response contractors and other members of the spill response community.

9411.2.2 Oils Pre-Approved for Decanting and Associated Conditions

Pre-approval for on water decanting is authorized when pumping recovered oil and water ashore is not practical during the first 24 hours after initial spill discovery. Decanting authorization is granted for the oil products listed below.

- All crude oils;
- Vacuum gas oils;
- Atmospheric gas oils;
- Recycle oils not containing distillates;
- Bunker fuels;
- No. 6 fuel oils;
- Cutter stocks; and
- Coker gas oils.

Decanting of the listed oils is pre-approved if the following conditions are met:

- Pre-Approval is for the first 24 hours after spill discovery. Decanting requests for all the remaining operational periods will need to be completed and submitted to Unified Command. The RP must fill out the NWACP decanting request and seek Unified Command approval prior to any additional decanting approvals from the second operational period on;

- The Incident Commander must be notified within one hour of decanting being initiated and must then immediately notify the Unified Command;
- The RP assures the Unified Command that they are quickly obtaining adequate oil storage and skimming capacity within the first 24 hours and the responding Primary Response Contractors (PRCs) are expeditiously getting sufficient storage and skimming capacity on site to alleviate the need for prolonged decanting.

The following criteria found in the current Decanting Authorization Form must be complied with:

- All decanting should be done in a designated "Response Area" within a collection area, vessel collection well, recovery belt, weir area, or directly in front of a recovery system;
- Vessels employing sweep booms with recovery pumps in the apex of the boom shall decant forward of the recovery pumps;
- Vessels not equipped with an oil/water separator should allow retention time for oil held in internal or portable tanks before decanting commences;
- Containment boom needs to be deployed around the collection area, where feasible, to prevent loss of decanted oil or entrainment;
- Visual monitoring of the decanting shall be maintained at all times so that discharge of oil in the decanted water is detected promptly;
- Where feasible decant ahead of an operating skimmer recovery system, so decanting could occur ahead of a skimming system instead of just inside an enclosed boomed area;
- Unified Command can revoke the pre-approval at any time if above conditions are not met.
- Shore-side container decanting (i.e., vacuum truck, portable tanks, etc.) is not authorized for Pre-approval under this policy. Decanting in areas where vacuum trucks, portable tanks, or other collection systems are used for shore cleanup will be subject to filling out the decanting form in the NWACP prior to authorization and must comply with the same rules as vessels.

9411.2.2.1 Oils Requiring Approval by Unified Command Prior to Decanting

During a response, when decanting has not been pre-approved for lighter oils, which are not listed above, it will be necessary for response contractors or the responsible party to request from the Unified Command written authority to decant while recovering oil so that response operations do not cease or become impaired. The Unified Command will consider each request for decanting of lighter oils on a case-by-case basis. Prior to approving decanting, the Unified Command should evaluate the potential effects of weather including the wind and wave conditions, the quantity of oil spilled and the type of oil as well as available storage. The Unified Command should also take into account that recovery

operations as enhanced by decanting will actually reduce the overall quantity of pollutants in a more timely and effective manner to facilitate cleanup operations. The following criteria should be considered by the FOSC and/or SOSC in determining whether to approve decanting unless circumstances dictate otherwise:

- All decanting should be done in a designated "Response Area" within a collection area, vessel collection well, recovery belt, weir area, or directly in front of a recovery system.
- Vessels employing sweep booms with recovery pumps in the apex of the boom should decant forward of the recovery pump.
- All vessels, motor vehicles and other equipment not equipped with an oil/water separator should allow retention time for oil held in internal or portable tanks before decanting commences.
- When deemed necessary by the FOSC and/or SOSC or the response contractor a containment boom will be deployed around the collection area to minimize loss of decanted oil or entrainment.
- Visual monitoring of the decanting area shall be maintained so that discharge of oil in the decanted water is detected promptly.

The response contractor or responsible party will seek approval from the FOSC and/or SOSC prior to decanting by presenting the Unified Command with a brief description of the area for which decanting approval is sought, the decanting process proposed, the prevailing conditions (wind, weather, etc.) and protective measures proposed to be implemented. The FOSC and/or SOSC will review such requests promptly and render a decision as quickly as possible. FOSC authorization is required in all cases and in addition SOSC authorization is required for decanting activities in state waters.

The FOSC and/or SOSC will review and provide directions and authorization as appropriate to requests to wash down vessels, facilities and equipment to facilitate response activities.

Other activities related to possible oil discharges associated with an oil spill event such as actions to save a vessel or protect human life which may include such actions as pumping bilges on a sinking vessel are not covered by this policy.

9411.3 Oil Spill Decanting Authorization Form

The federal and state OSCs, under authority of RCW 90.56.320(1) and WAC 173-201A-110 (In Washington), or ORS 468B.305 (in Oregon), hereby approve the use of decanting as a means of expediting the recovery of oil during the following spill cleanup operation:
Date(s) Approval Effective:
Name of spill Incident:
Federally Defined Response Area:
Name of Requester:
Location and Description of Proposed Decanting Operation: (continue on reverse, if necessary)
The decanting operation must meet the following conditions: 1. All decanting should be done in a designated "Response Area" within a collection area, vessel collection well, recovery belt, weir area, or directly in front of a recovery system. 2. Vessels employing sweep booms with recovery pumps in the apex of the boom shall decant forward of the recovery pumps. 3. Vessels not equipped with an oil/water separator should allow retention time form oil held in internal or portable tanks before decanting commences. 4. Containment boom must / need not (circle one) be deployed around the collection area to prevent loss of decanted oil or entrainment. 5. Visual monitoring of the decanting shall be maintained at all times so that discharge of oil in the decanted water is detected promptly 6. Decanting in areas where vacuum trucks, portable tanks, or other collection systems are used for shore cleanup will be subject to the same rules as vessels. 7. Additional conditions: (continue on reverse if necessary)
SIGNATURE: Date: Federal OSC
SIGNATURE: Date: State OSC
NOTE: When verbal authorization is given, a copy of this form must be immediately expedited to the requester (must be a person of authority in the cleanup organization) to ensure that the conditions and limitations are clearly understood by all parties.

This form also available online here.

9411.4 Decision Memo

Decision Memo
Decanting Approval Plan

Name of Spill Incident: **Name of Requester:**
Federally Defined response Area: **Product Spilled:**
Effective date(s) of approval: **Current Storage Capacity on site:**

The Federal and State OSC's, under the authority of RCW 90.56.320(l) and WAC 173-201A-110 (in Washington) or ORS 468B.305 (in Oregon), hereby approve the use of decanting as a means of expediting the recovery of oil during the above mentioned spill clean-up operation. The following approval provides authority to conduct decanting of oil so that response operations do not cease or become impaired. FOSC authorization is required in all cases, and SOSC authorization is required for decanting within state waters. The OSC should acknowledge that recovery operations enhanced by decanting will actually reduce the overall quantity of pollutants in a more timely and effective manner to facilitate cleanup operations.

The following criteria should be followed in order for decanting to proceed in an efficient manner:

1) All decanting should be done in a designated "response area" within a collection area, vessel collection well, recovery belt, weir area, or directly in front of a recovery system.

2) Vessels employing sweep booms with recovery pumps in the apex of the boom should decant forward of the recovery pump.

3) All vessels, motor vehicles and other equipment not equipped with an oil/water separator would allow retention time for oil held in internal or portable tanks before decanting commences.

4) A containment boom must / need not (circle one) be deployed around the collection area to minimize loss of the decanted oil or entrainment.

5) Visual monitoring of the decanting area shall be maintained so that discharge of oil in the decanted water is detected promptly.

6) Tanks used for decanting will be tested prior to use to ensure there are no contaminates from previous activities and that the water is safe to discharge back into the environment.

7) Additional conditions:

Approval: (check one) Yes_____ No_____
Environmental Unit (Planning) _____
FOSC_____
SOSC_____
Reason for disapproval: