



Section 9411

Decanting Response Tool



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Decanting Response Tool

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 requires placing vessels and machinery in a floating oil environment, which can lead to incidental returns of oil and excess water into the response area. The process of decanting, or separating excess returned oil from water, can play a vital role in the efficient mechanical recovery of spilled oil because it allows maximum use of limited storage capacity, thereby increasing recovery operations.

Decanting 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 Federal Register 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 near the area where oil recovery activities are taking place. 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 Code of Federal Regulations 153.301, 40 Code of Federal Regulations 300, Revised Code of Washington 90.56.320(1), Washington Administrative Code 173-201A-110, Oregon Revised Statutes 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 percent water and 30 percent oil, thus consuming significantly more storage space. Decanting is the process of draining off recovered water from portable tanks, internal tanks, collection 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 effectively recover oil and minimize 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 Federal On-Scene Coordinator (FOSC) and/or State On-Scene Coordinator (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 responsible party

(RP) must fill out the Northwest Area Contingency Plan 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 are expeditiously getting sufficient storage and skimming capacity on site to alleviate the need for prolonged decanting.
- Conditions listed in the Decanting Memo are 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 Northwest Area Contingency Plan prior to authorization.

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 RP 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 response contractor or RP 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.

Unified Command can revoke the approval at any time if the approved conditions are not being met. This policy does not cover 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.

9411.3 Decision Memo

Decanting Approval Plan and Memo

- Name of Spill Incident:**
- Oil Type(s):**
- Federally Defined Response Area:**
- Effective date(s)/time of approval:**

The Federal and State On-Scene Coordinators (OSCs) hereby approve the use of decanting as a means of expediting the recovery and treatment of oil and reducing the overall quantity of pollutants in a more timely and effective manner to facilitate cleanup operations. This memo describes the area for which decanting approval is given; the decanting process to be used; the prevailing conditions and protective measures proposed to be implemented.

Authorities: 40 CFR 122.3, RCW 90.56.320(I), ORS 468B.305 (2)(b)

Unified Command can revoke the approval at any time if the approved conditions are not met.

Signatures

Federal On-Scene Coordinator

State On-Scene Coordinator

Reason for disapproval:

Decanting Approval Plan and Memo

All decanting will be conducted during a defined period of time, within the federally defined response area.

Description of Proposed Decanting Operations:

Describe relevant considerations such as weather, oil type and volume of oil spilled, as applicable

Describe why the available storage limits effective mechanical recovery

Availability of adequate storage:

Storage kind/type	Volume	Onsite or ETA

Describe why decanting is necessary during vessel or other decontamination operations

Describe why decanting is necessary during treatment operations

Other incidental discharges (describe)

The decanting operations must meet the following conditions, as applicable:

- Vessels employing sweep booms with recovery pumps in the apex of the boom should decant forward of the recovery pump.
- All equipment not equipped with an oil/water separator must allow retention time for oil held in internal or portable tanks before decanting commences. Retention time to be no less than .
- A containment boom must / need not (circle one) be deployed around the collection area to minimize loss of the 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 and decanting stopped if observed.

- Tanks used for decanting will be tested prior to use to ensure there are no contaminants from previous activities and that the water is safe to discharge back into the environment.
- Tanks used to separate and treat liquids and solids will contain baffles to speed up oil/water separation and prevent remixing.
- Additional conditions:

Submitted By:

Environmental Unit Leader _____

Operations Section Chief _____