
Central Texas Coastal
Area Contingency Plan
(CTCACP)

Surface Washing Agent Preauthorization
Consultation

Annex JJ
August 2026

Record of Changes

Change Number	Change Description	Part Number	Change Date	Name
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				

Table of Contents

1000 Introduction.....	3
1100 Purpose	3
1200 Background	3
1300 Area Characterization.....	3
2000 Minimum Requirements for Preauthorized Use.....	4
3000 Summary of Preauthorized Areas	4
4000 Resources at Risk	7
4100 Introduction	7
4200 Geographic Region Covered.....	7
4300 Habitat Shoreline.....	7
4400 Physical Environment	7
4500 Essential Fish Habitat	8
4600 Biological Resources at Risk - Birds	8
4700 Aquatic Resources	8
4710 Fish.....	8
4720 Invertebrates.....	8
4730 Marine Mammals	9
4740 Reptiles	9
4800 Human-Use Resources	9
5000 Surface Washing Agent Consultation Correspondence	9

List of Figures

Figure 1 Upper Houston Ship Channel (including Barbour’s Cut Preapproval Areas	5
Figure 2 Bayport Ship Channel Preapproval Area	5
Figure 3 Texas City Ship Channel and Galveston Preapproval Areas	6
Figure 4 Freeport Preapproval Area	6

List of Tables

Table 1 Surface and Bottom Observations.....	9
--	---

1000 Introduction

1100 Purpose

This document was prepared to assist the Federal On-Scene Coordinator (FOSC) with utilizing surface washing agents (SWA) with preauthorization in the Central Texas Coastal Zone. This preauthorization is only for the use of these agents on vessel hulls and hard structures in these areas.

1200 Background

SWAs are chemicals that are used to enhance oil removal from hard surfaces. They generally contain a mixture of a non-polar solvent and a surfactant. The solvent dissolves into the highly viscous or weathered oil to create a less viscous and somewhat uniform liquid oil or oily mixture. The surfactant reduces the interfacial tension between the liquid oil and the surface the oil has adhered to. Depending on environmental conditions and the combination of solvents and surfactants, the removed oil will either float or disperse. The latter may have a negative environmental impact, making SWAs with the "*lift and float*" characteristics generally preferable.

SWAs cannot be used unless they are listed on the NCP Product Schedule. SWA use is preauthorized by RRT-6 for "*lift and float*" products only for locations pre-identified within the Area Contingency Plan. For the most up-to-date policy, procedures and checklists when using SWAs within the RRT-6 coastal zone please refer to RRT-6 Surface Washing Agents (SWAs) Policy located in the RRT-6 Subpart J Compendium, [Annex 4](#) of the RRT-6 RCP. The policy provides guidance for an incident where the FOSC does not have prior authorization, guidance for utilizing a preauthorization, monitoring forms, and After Use reports.

In 2014, Central Texas Coastal Zone Area Committee obtained preauthorization for the use of SWAs in five port locations (Figures 1-4). Part 5000 provides the correspondences amongst the agencies during the consultation process for establishing this preauthorization. During the process, it was determined that no specific areas within the boundary require additional restrictions. However, coordination through the Incident Command System Environmental Unit or resource coordinators engaged in the response would ensure proper safety precautions are utilized. For example, if there is an adjacent fringing marsh habitat, additional containment boom might be recommended. Alternatively, isolation distances from sensitive habitat would be created. Given the complexities of oil spill cleanup, the workgroup desired to maintain a degree of flexibility and develop restrictions and/ or additional safety precautions on a case-by-case basis. It was also determined that riprap would be considered a hard structure suitable for the use of surface washing agents only if there is consensus from the Environmental Unit and resource agency personnel engaged in the response.

1300 Area Characterization

The five preapproved areas are located within industrial area with relatively few natural resources that are considered highly sensitive with respect to the use of surface washing agents. The shorelines in the proposed preapproval area are dominated by hard man-made structures (including riprap) with some smaller isolated marshes, mixed sand and gravel beaches, and scarps. Part 4000 provides Resources at Risk (RAR) analysis for the proposed area. Identified in the RAR are threatened/endangered species (piping plovers) that reside or frequent the area to feed.

2000 Minimum Requirements for Preauthorized Use

In addition to the requirements in the RRT6 Policy, the following outlines the minimum requirements that the FOSC must consider when approving the use of surface washing agents.

- Ensure public safety. This has not been an issue in past responses since the public is generally excluded from cleanup areas. Regardless, ensuring public health and safety is the basic premise for any response action.
- The location where surface washing agents are to be used is within the preauthorized zone (Figure 1).
- Consultation with the Environmental Unit or natural resource protection managers to determine if any additional restrictions or additional safety precautions are required in the proposed operation. Such consultation would also be required for any cleaning of riprap to evaluate if response trade-off is appropriate.
- Ensure that the spill management team develops an approved plan that includes worker safety precautions. This plan should be submitted in writing to the FOSC and should be incorporated into the Incident Action Plan.
- Surface washing agents are not intended to be used in or near sea grass areas.
- In consideration of the safety of workers assigned to the application of surface washing agents, and in consideration of the protection of the environment, it is preferred that surface washing agents are applied during daylight hours.

3000 Summary of Preauthorized Areas

As previously stated, this document was prepared to assist the FOSC utilize RRT6 surface washing agent preauthorization for the cleanup of vessel hulls and hard structures in port and industrial areas of the five preapproved areas.



Figure 1 Upper Houston Ship Channel (including Barbour's Cut) Preapproval



Figure 2 Bayport Ship Channel Preapproval Area



Figure 3 Texas City Ship Channel and Galveston Channel Preapproval Areas

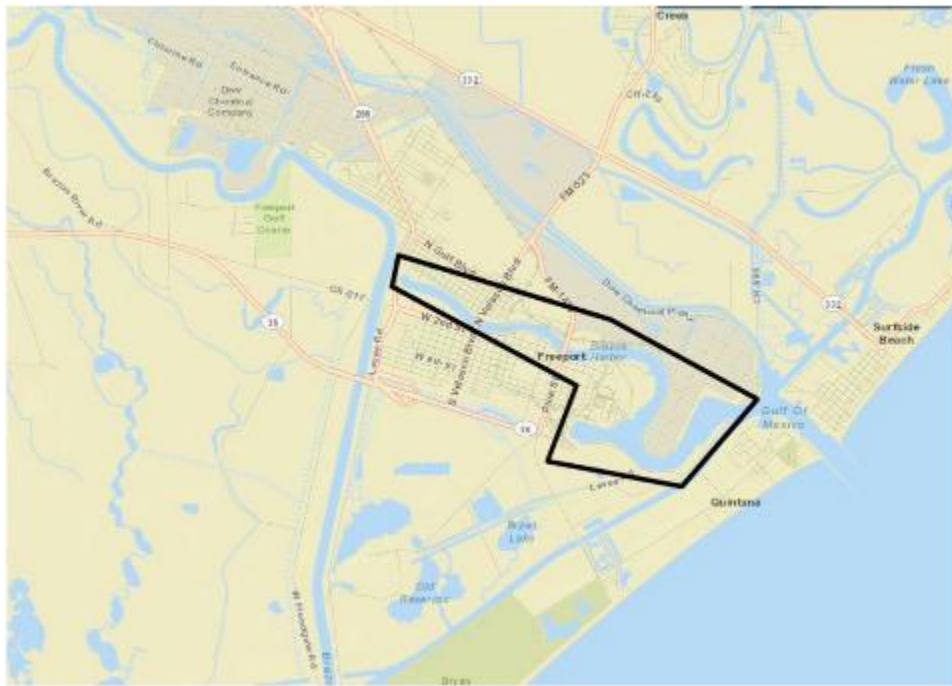


Figure 4 Freeport Preapproved Area

4000 Resources at Risk

4100 Introduction

This information was prepared in January-March 2014 as part of the request process for the preapproval use of surface washing agents within the five specific port areas within the Central Texas Coastal ACP planning area. The ESI shorelines, essential fish habitat, and species information for the proposed area was compiled from the latest data collected by Texas General Land Office, Texas Parks and Wildlife Department and the USFWS to ensure the most up-to-date information was available for this project.

4200 Geographic Region Covered

The area consists of five specified areas within the CTCACP planning area (see Figures 1-4).

4300 Habitat Shoreline

The shorelines along the Inner Harbor are predominantly armored with sheltered man-made structures, riprap and other erosion control structures. Sections of unarmored shoreline area are wetlands characterized as estuarine; intertidal; unconsolidated; excavated shores that have naturalized to tidal flats, scarps, beaches of varying grain sizes and fringe salt water marshes.

4400 Physical Environment

Tidal movement within the five preapproved areas is minimal. Although considered minimal, tidal movement is a predominate factor for the flushing

4500 Essential Fish Habitat

The five preapproved areas are located within the Essential Fish Habitat (EFH) designated areas for red drum, reef fish, shrimp, stone crab, and coastal migratory pelagic fish (NOAA, 2005). EFH consists of areas of higher species densities, based on the NOAA atlas and functional relationships analysis for these species. None of these five areas are considered a habitat area of particular concern (HAPC) or an EFH area protected from fishing.

4600 Biological Resources at Risk - Birds

The five identified areas falls within the range of the federally listed endangered whooping crane. This species migrates annually to the area and is present from October to May. The federally threatened piping plover may be present from August through May, in and around beaches and tidal flats of the area. The recently delisted brown pelican resides in the area throughout its life stage. The recent delisting marks the beginning of a five-year monitoring project to evaluate its population status.

In addition to threatened/endangered birds, the area also includes a number of species characterized as diving birds, gulls and terns, migratory song birds, raptors, shore birds, wading birds and waterfowl. The absence of a species from the list does not necessary imply that the species is not present at the given location. Many species are considered ubiquitous. The aforementioned categories are intended to capture multiple species that populate similar habitats. Individual species listed in the table are based on breeding location or are known to occur in high concentrations in the area.

Use of SWAs should have no significant direct effects on birds beyond those normally associated with use of flushing techniques on shorelines. Normal procedures are to contain and recover any floating oil that is released. Use of SWAs that disperse the treated oil into the water column could increase the exposure of water-column resources in areas of restricted water flow, which could result in acute toxic effects to fish in these areas and a reduction in prey species for diving birds.

4700 Aquatic Resources

4710 Fish

Fish known to be present in near the five preapproved areas are: Atlantic croaker, red drum, black drum, gulf menhaden, hardhead catfish, sand sea trout, spotted sea trout, ladyfish, pinfish, pigfish, sheepshead, crevalle, snook, and stripped mullet. Fish management plan for red drum indicate the Inner Harbor contains suitable habitat for the entire life stage of this organism including the channel bottom, wetland habitats and bay bottom.

4720 Invertebrates

Several invertebrates are common along preapproved areas including blue crabs, brown shrimp, white shrimp, and encrusting organisms such as barnacles and American oysters. Blue crabs may be spawning during April through July with larvae and juveniles present from May through August.

Use of SWAs that result in most of the oil being dispersed into the water column could result in acute toxicity to fish and shellfish, particularly the larval and juvenile life stages. Product that lift and float the oil might have a slightly increased risk to fish and shellfish compared to normal

flushing techniques because of the added toxicity of the SWA product. However, at the recommended application rate (one gallon per 100 square feet) dilution to non-toxic levels is expected to be rapid.

4730 Marine Mammals

Bottlenose dolphin may be present throughout the year within the five preapproved areas. The endangered West Indian Manatee in the preapproved areas is also documented. Although a resident population is not thought to exist in the proposed area, environmental conditions may be suitable to attract such species. Any effects of spilled oil are likely to be temporary (eye, nose, skin irritation). Use of SWAs is not likely to cause any significant additional impacts.

4740 Reptiles

Threatened and endangered sea turtles identified in the proposed preapproved area include Green sea turtles, Hawksbill sea turtle, Kemp's Ridley sea turtle, and Loggerhead. Any effects of spilled oil are likely to be temporary (eye, nose, skin irritation). Use of SWAs is not likely to cause any significant additional impacts.

4800 Human-Use Resources

Commercial ship traffic moves through these port areas. Water intakes are numerous along the ship channel. Use of SWAs that lift and disperse could increase the amount oil that mixes into the water column, which would increase the risk of oil entering water intakes. Only lift and float products should be used where there is a risk to water intakes, and oil containment and recovery efforts should be closely monitored. The Texas Coastal Oil Spill Planning and Response Toolkit should be utilized to identify water intakes, and other applicable human-use resources.

5000 Surface Washing Agent Consultation Correspondence

The various pieces of correspondence capturing the Surface Washing Agent consultations for establishing a preauthorization site at the five preapproved areas may be located in Section 3100 of Annex C of the Central Texas Coastal Area Contingency Plan.