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Southeast Texas (SETX)  
and  
Southwest Louisiana (SWLA)  
Area Contingency Plan

Texas Decanting Plan

Annex 6c  
July 2021

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**Southeast Texas and Southwest Louisiana Area Contingency Plan**

**Record of Changes**

<b>Change Number</b>	<b>Change Description</b>	<b>Section Number</b>	<b>Change Date</b>	<b>Name</b>
1	Renamed Appendix 20 to Annex 6c and removed Reference to Vol 2	All	30 July 2021	Todd Peterson, CGD 8
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## 1000 Introduction

When oil is spilled on the water, mechanical recovery of the oil is the principle 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. 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.”

## 2000 Decanting Policy

This policy addresses “incidental discharges” associated with spill response activities.

“Incidental discharge” is defined as the release of oil and/or oily water within or proximate to the response area or the area in which oil recovery activities are taking place during and attendant to the oil spill response activities. Incidental discharge includes, but is 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 and 40 CFR 300.

## 2100 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, 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 be effective in maximizing the amount of oil recovered and in minimizing overall environmental damages. Expeditious review and approval, 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 decanting. In appropriate circumstances, the FOSC can pre-authorize incidental discharges because the discharges will be much less harmful to the environment than allowing the oil to remain in the water and be subject to spreading and weathering.

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Therefore, the SETX and SWLA ACP adopts the following policy in order to provide for an expeditious decanting approval process and provide clear guidance to the Unified Command (UC), response contractors, and other members of the spill response community.

### **2200 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 oil
- Atmospheric gas oils
- Recycle oils not containing distillates
- Bunker fuels
- No. 6 fuel oils
- Crude oils
- Cutter stocks
- Coker gas oils.

Decanting of the listed oils is preapproved 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 the Unified Command. The RP must fill out the SETX and SWLA decanting request and seek Unified Command approval prior to any additional decanting approvals from the second operational period on;
- The Unified Command must be notified within one hour of decanting being initiated; and
- 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 Contractor (PRCs) is expeditiously getting sufficient storage and skimming capacity, if available (worst case discharges may exceed these resources throughout the region) to alleviate the need for prolonged decanting.

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

- All decanting shall 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 system;
- Vessels not equipped with an oil/water separator should allow retention of oil in internal or portable tanks before decanting commences;
- Containment boom shall to be deployed around the collection area, to prevent loss of decanted oil or entrainment;
- Visual monitoring of the decanting shall be maintained at all times so discharges of oil in the decanted water are detected promptly;

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- Where feasible, decant ahead of an operating skimmer recovery system so decanting occurs inside an enclosed boomed area; and
- Unified Command can revoke the pre-approval at any time if the 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 completing the decanting form contained in this policy prior to authorization and compliance with the same rules as vessels.

### 2300 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 the 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 Unified Command in determining whether to approve decanting:

- All decanting shall 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 vessels, 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 UC 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; and
- 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.

The response contractor or responsible party will seek approval from the UC prior to decanting by presenting the UC 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 UC will review such requests promptly and render a

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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.

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.

### 3000 Oil Spill Decanting Authorization Form

**Table 1 Oil Spill Decanting Authorization Form**

The federal and state OSCs, hereby approve the use of decanting as a means of expediting the recovery of oil during the following spill cleanup operations
Date(s) Approval Effective:
Name of Spill Incident:
Federally Defined Response Area:
Name of Requester:

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Location and description of proposed decanting operation: (continue on additional pages if necessary):

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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 for 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 a vessel on the condition that the container is clean.
  
7. Additional Comments:

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 response organization) to ensure that the conditions and limitations are clearly understood by all parties.

## 4000 Decanting Use Decision Memo

Name of Spill Incident:	Name of Requestor:
Federally defined response area:	Product Spilled:
Effective date(s) of approval:	
Current storage capacity on site:	
<p>The Federal and State OSC's hereby approve the use of decanting as a means of expediting the recovery of oil during the above mentioned spill response 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 clean-up operations.</p>	
<p>The following criteria should be followed in order for decanting to proceed in an efficient manner:</p> <ol style="list-style-type: none"> <li>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.</li> <li>2) Vessels employing sweep booms with recovery pumps in the apex of the boom should decant forward of the recovery pump.</li> <li>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.</li> <li>4) A containment boom must / need not (circle one) be deployed around the collection area to minimize loss of the decanted oil or entrainment.</li> <li>5) Visual monitoring of the decanting area shall be maintained so that discharges of oil in the decanted water are detected promptly.</li> <li>6) 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.</li> <li>7) Settling times for oil water separation on board skimmers is estimated to be:</li> <li>8) Additional conditions:</li> </ol>	
<p>Approval: (Check one) <span style="margin-left: 200px;">Yes _____</span> <span style="margin-left: 100px;">No _____</span></p>	
<p>Environmental Unit Leader (Planning) _____</p>	
<p>FOSC _____</p>	
<p>SOSC _____</p>	
<p>Reason for disapproval: _____</p>	

**Figure 1 Sample Decanting Use Decision Memo**