

Alternative Dispersant

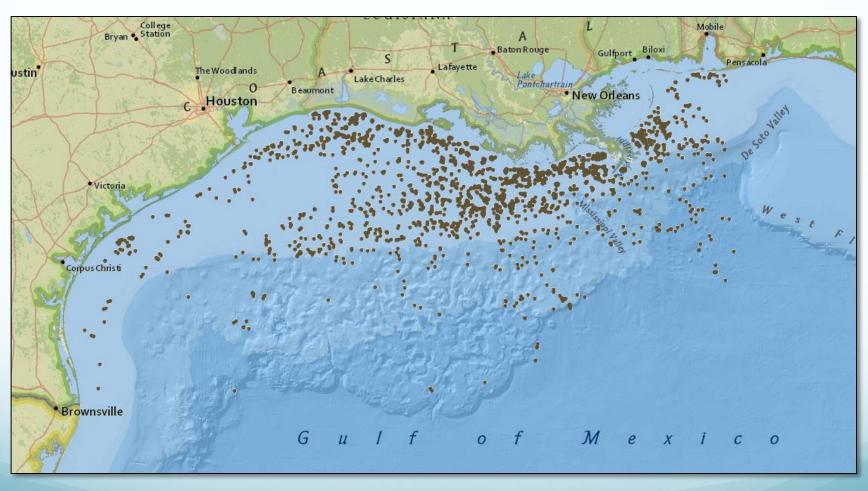
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RRT IV

March 1, 2016

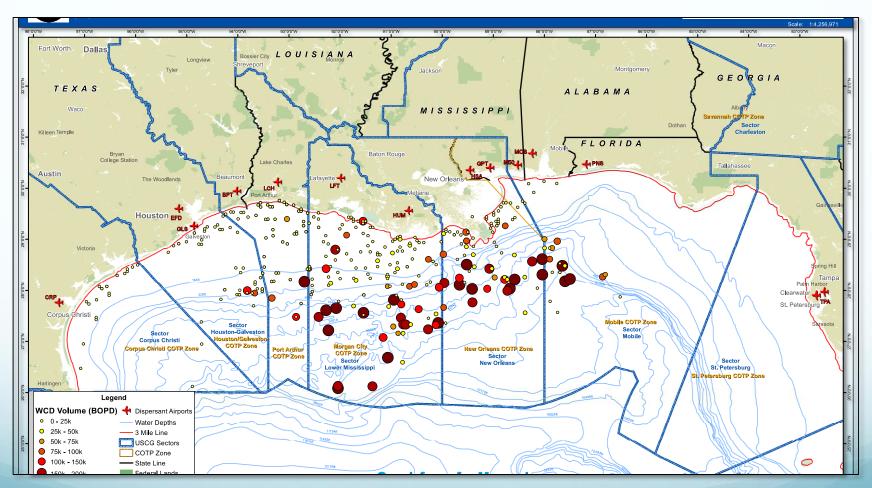


Current E&P Threats By Location





Current E&P Threats By Location and Volume





Net Trade-off Analysis (NTA)

- Compares various response techniques, e.g., mechanical recovery, insitu burning, dispersant use or no actions
- Determines <u>best option</u> to reduce the impact of spill oil
- Ensures <u>maximum</u> environmental protection
- Promotes <u>quickest</u> overall ecosystem recovery*
- Used by FOSCs, RRT VI on many occasions and around the world to yield the greatest benefit with the least impact



Impacts





Dispersant Use

- Dispersants remain a primary tool to avoid these types of impacts
- Dispersants are an authorized* countermeasure that can be used by the FOSC
- In some instances, mechanical countermeasures or insitu burning is not a viable response measure
 - Due to time/urgency
 - Amount of product released
 - Natural resource trade off
 - Potential Harm

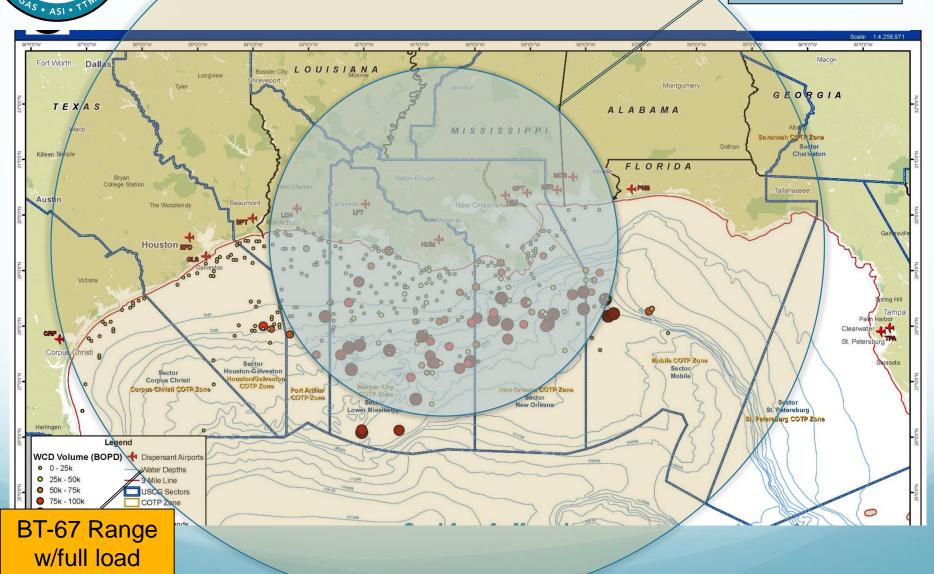


- Airborne Delivery Capabilities via Contract with Airborne Support, Inc. (ASI)
- (1) Spotter & (3)Spray Aircraft
- 16K gallons/day application capacity
- 64K gallons of Corexit 9500A colocated at facility





1-Hour BT-67 Range w/full load



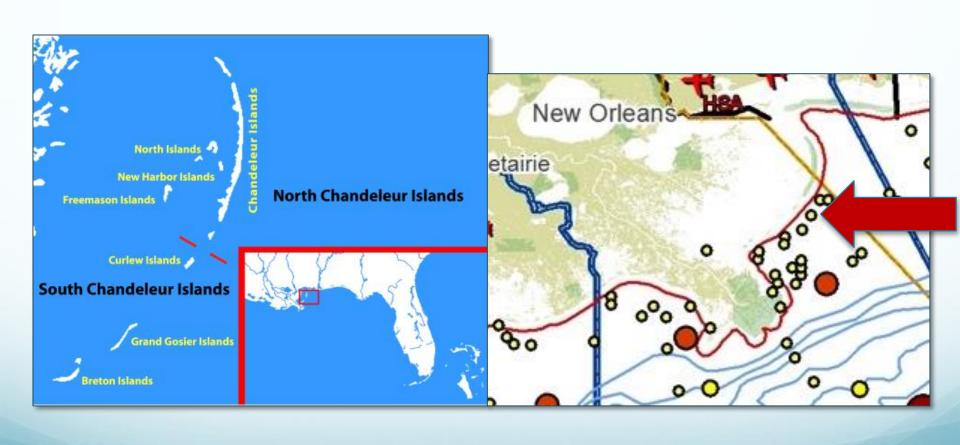


Dispersant Use "Indemnification" Issue

- NALCO, the major dispersant manufacturer of Corexit 9500, requires an indemnification prior to product use by responsible party
- Spill Cooperatives (CGA, HWCG, MWCC, etc.) are required to sign an indemnification with Nalco to restock dispersant stockpiles
- Federal Government does NOT sign indemnification agreements



Breton Island Spill Scenario 2015





Scenario Script 2015

- Dispersant use is asked about by the FOSC and consults the NOAA SSC – SSC recommends use
- FOSC initiates RRT VI call for "authorization" for dispersant use...RRT Concurs
- Spill is of unknown origin and <u>suspected</u> RP unwilling to sign Nalco Indemnification
- USCG contracts ASI to use aerial dispersants
- ASI with CGA requests that the USCG sign NALCO indemnification agreement
- USCG is unable to sign and no dispersant(s) is/are available for use – CGA unable to release dispersant
- Shoreline Impact results



Goals

- Use of an alternative dispersant to Nalco Corexit products
- Have an inventory of equally effective dispersant
- Alternative(s) selected and stocked in limited quantities available for aerial and subsea use
- Educate RRT VI & IV and FOSCs alternative dispersant solutions
- FOSC is free to use dispersants without an indemnification from the manufacturer or cooperatives



Product Selection Criteria

- EPA Subpart J Product Schedule
- Effective on Louisiana light sweet crude
- Additional Testing (e.g., EXDET, OHMSET, others)
- Manufacturing capacity and product turnaround
- No Indemnification requirement for product use



Dispersant Testing Status

	Toxicity (C50 values in ppm) W/No 2 Fuel oil		Effectiveness (%)		
Dispersant	Menidia (96-hr)	Mysidopsis (48-hr)	Prudhoe Bay Crude Oil	South Louisiana Crude Oil	Average of Crude Oils
BIODISPERS	5.95	2.66	51.00	63.00	57.00
COREXIT® EC9500A	2.61	3.40	<mark>45.30</mark>	<mark>54.70</mark>	50.00
FINASOL OSR 52	<mark>5.40</mark>	<mark>2.37</mark>	<mark>32.50</mark>	<mark>71.60</mark>	52.10
Accell Clean ® DWD	8.05	1.32	58.70	96.03	77.36
JD-2000™	3.59	2.19	60.40	77.80	69.10
Marine D-Blue Clean	32.00	18.00	45.00	55.59	50.30
SUPERSPERSE™ WAO2500	3.70	2.53	77.84	87.56	82.70

Source: EPA Product Schedule



Dispersant Effectiveness (EXDET)

Dispersant	Replicate	1	2	3	4	Average
Accel-DWG	Fresh	69.6	76.9	77.9	75.7	75.0
	21.4%	79.9	86.8	81.5	83.1	82.8
	28.2%	72.7	52.1	72.8	81.7	69.8
Corexit 9500	28.2%	84.5	76.8			80.7

S.L Ross, 2015



Dispersant Effectiveness (MESO Scale Wave Tank)



S.L Ross, 2015



Dispersant Effectiveness (MESO Scale Wave Tank)

Dispersant	Fresh	21.4%	28.1%
Accel-DWG	98.8	87.7	38.6
Corexit 9500	99.1	98.2	97.6
Control	19.1		

S.L Ross, 2015



Dispersant Toxicity (NCP Tests)

Material Tested	Species	LC50 (ppm)
ACCELL CLEAN® DWD	Menidia beryllina Mysidopsis bahia	6.58 96-hr 1.55 48-hr
No. 2 Fuel Oil	Menidia beryllina Mysidopsis bahia	38.0 96-hr 3.61 48-hr
ACCELL CLEAN® DWD & No. 2 Fuel Oil (1:10)	Menidia beryllina Mysidopsis bahia	4.21 96-hr 2.21 48-hr
Reference Toxicant (Sodium Dodecyl Sulfate – SDS)	Menidia beryllina Mysidopsis bahia	2.43 96-hr 5.95 48-hr

Environmental Enterprises USA (EE USA) Toxicity Data for Accell Clean® DWD (2015)



Dispersant Toxicity (NCP Tests)

Material Tested	Species	LC50 (ppm)
ACCELL CLEAN® DWD	Menidia beryllina Mysidopsis bahia	5.66 96-hr 2.07 48-hr
No. 2 Fuel Oil	Menidia beryllina Mysidopsis bahia	11.10 96-hr 1.68 48-hr
ACCELL CLEAN® DWD & No. 2 Fuel Oil (1:10)	Menidia beryllina Mysidopsis bahia	8.05 96-hr 1.32 48-hr
Reference Toxicant (DDS)	Menidia beryllina Mysidopsis bahia	6.60 96-hr 30.80 48-hr

Retrieved from http://www2.epa.gov/emergency-response/accell-cleanr-dwd



Accell Clean ® DWD

- Changes the "Script" for 2016
- Listed on EPA Subpart J Product Schedule (2011)
- Very effective on Louisiana light sweet crude (E&P GOM crude)
- Similar toxicity with no. 2 fuel oil to Corexit*
- Positive efficacy test results, e.g., EXDET, S.L. Ross Mesoscale, BSEE 2013 test, 2015 BSEE test results pends
- 30K gallons/day manufacturing capacity
- No Indemnification for product use
- Protein-based dispersant

^{*} When mixed with no. 2 fuel oil



CGA Actions

- Agreement finalized between Advanced BioCatalytics, Corp. (ABC) and CGA for up to 30K gallons/day
- CGA to renegotiate for up to 60K/day
 - Manufacturer to identify additional blending facilities (Houston)
- CGA has stocked 5,000 gallons at Airborne Support in Houma, LA.



Scenario Script 2016

- Spill is of unknown origin or RP does not take responsibility
- Dispersant use is asked about by the FOSC and consults the NOAA SSC – SSC recommends use
- FOSC initiates RRT VI call for "authorization" for dispersant (Accell Clean ® DWD) use...RRT concurs
- USCG contracts ASI to use aerial dispersants
- ASI executes the FOSC's request



Environmental Impact to Sensitive Areas is Averted





Questions?