Summary of EPA's Dispersant Monitoring and Assessment Directive for Subsurface Dispersant Application

Note: This monitoring and assessment plan for full-scale subsea application of dispersants will not be implemented until initial testing demonstrates the effectiveness of subsurface dispersant application.

Purpose: This directive requires BP to implement a monitoring and assessment plan for subsurface and surface applications of dispersants as part of the BP oil spill response. It also requires BP to include a more thorough oil analysis which will allow EPA to determine whether the plume is toxic to aquatic life.

The Plan is broken down into three parts:

Part 1: Determines if subsea dispersant operation is chemically dispersing the oil plume. To calculate dispersion effectiveness BP will collect data on the percent of oil, water and dispersant.

Part 2: Involves robust sampling to detect and delineate the dispersed plume. This sampling and monitoring plan will be a sustained and more comprehensive plan. It will address the fate of the plume and effects on rotifers from the dispersed plume and the dispersants.

Part 3: Outlines the operational procedures for subsurface injection of the dispersant and includes parameters such as the types of dispersant to be used, the rate of dispersant injection and how the pumping rate will be monitored.

Criteria to Shutdown Subsurface Dispersant Application:
This plan also defines the evaluation criteria for determining whether application of subsea dispersants should be shut down.
These criteria include:

1) a significant reduction of dissolved oxygen,
2) the results of rotifer toxicity tests and,
3) the evaluation of the conditions above in addition to other factors including shoreline, surface water, and other human health and ecological impacts.

Quality Assurance and Sampling Plan Requirements:
This monitoring and assessment plan requires that data collection management and analysis follows accepted standards to ensure that data is of the highest quality. Additionally, the plan outlines the criteria that must be included in all sampling and monitoring plans to ensure consistency and accuracy in the sampling process. All data will be given to the US Coast Guard and EPA within 24 hours of the information being received.