

April 22, 2015

Comments Regarding Proposed Revisions to the National Oil and Hazardous Substances Pollution Contingency Plan; Subpart J Product Schedule Listing Requirements

Docket ID: EPA-HQ-OPA-2006-0090

Dear EPA,

On behalf of the Pacific States/British Columbia Oil Spill Task Force (Task Force), I am submitting this letter in support of EPA's proposed amendments to the requirements in Subpart J of the National Oil and Hazardous Substances Pollution Contingency Plan, regarding the use of dispersants, other chemical and biological agents, and other spill mitigating substances when responding to oil discharges into waters of the United States.

The Task Force consists of a coalition of West Coast states (AK, CA, HI, OR, WA) and British Columbia that share a common goal of protecting the region's natural resources and communities from the impacts of oil spills.

The Task Force members support EPA's pursuit of:

- Expanding the science-based knowledge of the effect of dispersants on human health and the environment; including arctic water conditions in efficacy testing requirements.
- Developing more robust evaluation criteria for which substances are safe to use and which should be removed from use.
- Monitoring and collecting data on effectiveness and impacts of dispersant use during a spill.
- Requiring review of preauthorization plans at least every five years or after use of dispersants. Providing regular review ensures the most current science is being applied.
- Updating regulatory requirements and guidance for the safe, targeted use of dispersants to achieve spill abatement objectives while minimize human and environmental impacts.
- Supporting timely decision-making; if dispersant use is to be seen as an effective realistic option, the decision-making process must be swift. There is substantial planning, training and preparation work that goes into viable dispersant use – beyond just having the dispersants on-hand.

We support EPA's efforts to ensure the best available science on dispersant effectiveness and biological toxicity is readily available for state and local oil spill responders, who must weigh the use of dispersants with many considerations. The proposed amendments to Subpart J will help oil spill response managers make well-informed decisions on when to use dispersants or choose other mitigating options.

With best regards,



Sarah Brace, Executive Coordinator,
Pacific States/British Columbia Oil Spill Task Force

