

## **Preauthorization Conditions**

1. **Product Information** – This preauthorization applies only those products that have been listed on the NCP Product Schedule (effective 10/05). The purpose of this condition is to make sure that adequate information on product composition and toxicity are available to buyers. The Product Schedule must be reviewed to ensure that no new solidifiers have been added that would cause concern if used in the environment and hence would not be authorized for use under this pre-authorization policy.
2. **Amount of Oil to be Treated** – Solidifiers in loose form may be used on any oil type under 500 gallons (this is the treatment volume, not the total spill volume). No restriction is noted for solidifier used in contained form (booms, pillows, socks) as long as complete recovery is accomplished.
3. **Amount of Product Approved for Application** – No more than 1,000 pounds of loose solidifier product can be applied in response to a single treatment event under this preauthorization. This limit was based on an application ratio of 1:4 and the treatment volume limit of 500 gallons, as supported by manufacture's application rate guidance. Application of additional amounts requires a request to the CRRT. Again, no limitation is designated for solidifiers used in contained form (booms, pillows, socks) as long as complete recovery is accomplished.
4. **Application/Recovery Requirements** –
  - a. **On Water** (includes rivers, streams, creeks, lakes, ponds, wetlands, open ocean, marine and coastal waters, etc.). In all cases, the application of loose solidifier material must be continuously monitored to ensure material is completely contained and recovered. Recovery must be conducted as soon as the product is no longer effectively removing oil.
    - i. Apply loose product only directly onto contained oil. No loose product will be applied to flowing waterbodies unless the oil is physically contained, such by hard boom or inside a lock or other effective containment structure. The product will be applied in a manner that prevents loss from wind drift, overspray, and spillage. If environmental conditions such as wind, currents, weather, prohibit effective containment and recovery of the applied solidifier and treated oil, then pre-authorization does not apply.
    - ii. Product contained in booms, pillows, pads, etc. can be deployed in flowing waters as long as they are monitored and replaced prior to failure of containment systems as per sorbents.
    - iii. The loose product will be applied only by staff that have been trained in the proper application of the product. The intent is to prevent misuse and over application.
    - iv. No loose product will be applied directly onto wildlife (e.g., birds, mammals, reptiles) or in areas where wildlife or fish/shellfish

habitat may be affected or in areas that may affect cultural, archaeological, or historic properties. Pre-authorization for use of loose solidifier material does not apply for specially managed waters or lands including designated marine sanctuaries, preserves, or national parks without consultation with the proper resource manager and authority for the property.

- v. All product and treated oil will be recovered.
  - b. On Land
    - i. Only apply loose product directly onto oil or to create a barrier ahead of flowing oil. No loose product will be applied to drainages in an attempt to wash it towards oil downstream.
    - ii. Solidifier booms and pillows can be placed in drainages to intercept oil. However, all materials will be monitored and replaced to prevent failure of containment systems.
  - c. Waste Disposal
    - i. All recovered wastes will be disposed of properly.
5. **Monitoring Requirements** – During operational use of the loose form solidifier product, monitor the effectiveness and effects of the application, including:
- a. The product:oil ratio needed to solidify the oil. When the amount needed to solidify the oil exceeds the recommended application rate by a factor of 2, determine whether further treatment is warranted.
  - b. The properties of the treated oil (firm mass, sticky, non-sticky, etc.).
  - c. The efficiency of treated oil recovery.
  - d. The degree of damage to substrate and vegetation during application and recovery.
6. **Reporting Requirements** – As part of the response documentation, the responsible party or responding organization must maintain records of the following information:
- a. Amount of loose solidifier used
  - b. Type and amount of oil treated
  - c. Weight and/or volume of treated oil recovered
  - d. Evaluation of effectiveness of the application

Any use that results in problems, including: non effectiveness, inability to contain and recover solidifier and treated oil, or any observed impacts to wildlife, aquatic resources, or sensitive habitat must be reported as soon as feasible to the RRTIV.