



Section 9423

Surface Washing Agent Authorization Process and Decision Support Tools

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Part A Description of Surface Washing Agent Approval Zone in RRT Region 10 and Approval Process

There is one type of surface washing agent zone (case-by-case) in Regional Response Team (RRT) Region 10 (which includes the Captain of the Port zone for Sector Puget Sound and for Sector Columbia River), please [see Chapter 4000, Section 4624](#) for details on surface washing agent use policy.

Part B Typical/Recommended Timing and Work Flow for Surface Washing Agent Authorization Process

The typical surface washing agent use review and authorization process is anticipated to follow these general steps. Key members for this process may need to be involved remotely, depending upon the timing of the request and deployment schedules. (*Note:* these are not prescriptive steps, rather recommended “good practices”).

Each spill response is unique, and the exact steps used in this process and their timing may vary between responses).

- Unified Command (UC) establishes an Objective to consider the use of dispersants.
- Planning Section Chief (PSC) will inform (directly or by delegation) the Environmental Unit Leader (ENVL) of the need to start **(a)** evaluating the use of surface washing agents and **(b)** the development of the Surface Washing Agent Support Decision Support Tools.
- If appropriate to consider use of surface washing agents, mobilize necessary resources.
- PSC should, in coordination with the ENVL, establish a timeline for completion of the Surface Washing Agent Support tools which coordinates with a schedule for setting a time to **(a)** brief the FOSC/UC about the completed Surface Washing Agent Decision Support Tools, and **(b)** a meeting/conference call for the FOSC/UC to brief the RRT10 members on the Surface Washing Agent Decision Support Tools and for the UC to make their request to the appropriate RRT10 members for the use of surface washing agents.

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- ENVL will then establish a group of technical experts (which will likely include the NOAA SSC or one or more of their team members, as well as resource trustees, agency reps, and industry/consultant technical experts, and other reps as appropriate) to evaluate whether the use of surface washing agents is feasible and appropriate for the specific incident, and to complete the Surface Washing Agent Decision Support Tools.
- ENVL will also ensure (either directly or through delegation) critical coordination with Operations Section Chief and Operations members, Safety Officer, Liaison Officer, Information Officer and other key personnel as appropriate.
- It is anticipated that the ENVL and the team convened to complete the Surface Washing Agent Decision Support Tools will in most cases use the same Surface Washing Agent Use review process and develop the same Surface Washing Agent Decision Support Tools when evaluating surface washing agent use in Case-by-Case Areas.

Part C Decision Support Tools Summary for the Development of a Surface Washing Agent Use Recommendation

There are 5 key tools in this Section which are designed to be utilized as appropriate to help aid the authorization decision process (Table 9423.1). Other tools, documents and information may be used during a specific incident to support the surface washing agent decision and/or application process

Engagement with Tribes, Local government, public and others

Robust engagement and coordination with potentially affected tribes and local governments, as well as members of the public and other key stakeholders, are a critical part of any Surface Washing Agent use consideration and decision. There are tools and guidelines for helping ensure this engagement and coordination takes place at the appropriate times during the evaluation and use of surface washing agents, some of which are in the Liaison Manual and Joint Information Center (JIC) Manuals as well as other areas of the Northwest Area Contingency Plan (NWACP). The Unified Command for each response, and the RRT10 are committed to ensuring this coordination occurs early in the process and that robust and thorough mechanisms are established to allow these critical communications to take place effectively.

Table 9406.1 Decision Support Tools Summary for the Development of a Dispersant Use Recommendation

Tools	Purpose	Who is Responsible
1: FOSC Surface Washing Agent Standard Conditions Checklist	The purpose of this checklist is to provide confirmation to the RRT from the FOSC/UC about standard/necessary conditions and other activities that will take place or be initiated before a surface washing agent application operation would take place.	FOSC/UC

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Tools	Purpose	Who is Responsible
2: Environmental Unit Recommendation Memo to the FOSC/UC	The purpose of this tool is to provide incident specific information on whether surface washing agents are appropriate for use, tradeoffs in their use, recommended constraints on application, and to document concerns of trustee agencies. Audience is RRT and UC.	EU
3: RRT10 Record of Surface Washing Agent Decision	The purpose of this tool is to provide a formal record of the decision the RRT makes regarding authorizing the use of surface washing agents	PSC
4: Surface Washing Agent Operations Plan (to be completed in the Operations Section)	Written by Operations Section, must incorporate constraints from EU Memo, approved and delivered through Planning Cycle and Incident Action Plan (IAP) production. The Operations Surface Washing Agent Plan will be completed by members of the Operations Section, with input from the EU and other Incident Management Team (IMT) members as appropriate.	Operations Section
5: Tribal and other Trustee Technical Coordination Master List	The purpose of this tool is to identify at the start of the Surface Washing Agent Recommendation process a comprehensive list of Tribes, Trustees and other key technical members who need to be engaged in the technical discussion.	EU
6: After Action Report Guidelines	FOSC and their staff are responsible for generating a report. The target audience for this report is RRT10 and this report will be available to the public and other interested parties.	FOSC/UC

Tool 1 FOSC Dispersant Standard Conditions Checklist

This checklist is to be completed for all surface washing agent applications.

Purpose

The purpose of this checklist is to provide confirmation to the RRT from the FOSC/UC about standard procedures and other activities that will take place or be initiated before a surface washing agent application would take place. This information is to help inform the RRT, to provide information on conditions that must and will be met by the FOSC/UC before a surface washing agent application would commence. Additional information may be added to this checklist as appropriate or applicable for the RRT.

Who Could Fill Out This Form

To be designated by the FOSC/UC. Could be an EU member; Operations member; UC member; other suitable member of the IMT identified by the FOSC.

Cleaning Agent Process and Decision Support Tools

TOOL 1: FOSC Cleaning Agent Standard Conditions Checklist

Form Completed (Date/Time/Name/Title)

FOSC Name/Signature: _____

Y	N	
		Necessity: Available technical information or experience suggests that the spilled product cannot be solely cleaned by conventional methods.
		National Contingency Plan (NCP): The cleaning agent to be used is listed in the current NCP Product Schedule; considered appropriate for oil type and conditions.
		Operational Considerations – Summary Statement: A. Environmental Conditions: Environmental conditions will not be adversely impacted by the product used. B. Application Control: The cleaning agent operation provides reasonable control over the application zone able to effectively direct the product platform in carrying out the cleaning agent operation, including the avoidance of wildlife that may be in the area.
		Wildlife Observation: An aerial wildlife surveillance specialist(s), designated by the appropriate Trustee agency(s), is available to observe and will be deployed prior to surface washing agent application, minimum of Tier I.
		Endangered Species Act and Essential Fish Habitat Consultations: Have been initiated in accordance with applicable guidance. Guidelines/conversation measures/Best Management Practices will be incorporated into operations plan as appropriate.
		Consultations with Tribes, local government and other key stakeholders (including National Historic Preservation Act Section 106 if applicable): Initiated in accordance with applicable guidance, been communicated to UC, incorporated into recommendations.
		Safety and Communications Plans: A thorough, specific Cleaning Agent Operations Safety and Communications Plans have been/will be completed prior to any cleaning agent test or application.
		Cleaning Agent Operations Plan: The Cleaning Agent Operations Plan is under development by the Planning Section with input from the Operations Section. The expected completion date is:
		Other: Any additional specific information/condition requested by or relevant to RRT10 (remove if not used).

Tool 2 Environmental Unit Recommendation Memo to the FOSC/UC

Section 1 UC Signature Page for Dispersant Recommendation Memo

Incident Name and Location:	
Forwarded to RRT10 (Date/Time):	

The FOSC and Unified Command have determined that the use of surface washing agents (**IS/IS NOT**) a recommended response measure for the _____ Incident.

	DATE/TIME
<u>Federal On-Scene Coordinator</u> Name (Print): Signature:	
<u>State On-Scene Coordinator</u> Name (Print): Signature:	
<u>Responsible Party Incident Commander</u> Name (Print): Signature:	
<u>Local On-Scene Coordinator</u> (as present/appropriate) Name (Print): Signature:	
<u>Tribal On-Scene Coordinator(s)</u> (as present/appropriate) Name(Print): Signature:	

Section 2 Environmental Unit Dispersant Use Recommendation Memo

This memo has been developed by the EU in accordance with NCP and Northwest Area Contingency Plan dispersant use policy, in coordination with other IMT members and key members. The memo provides the FOSC and Unified Command with a recommendation on appropriate action regarding surface washing agent application for this incident.

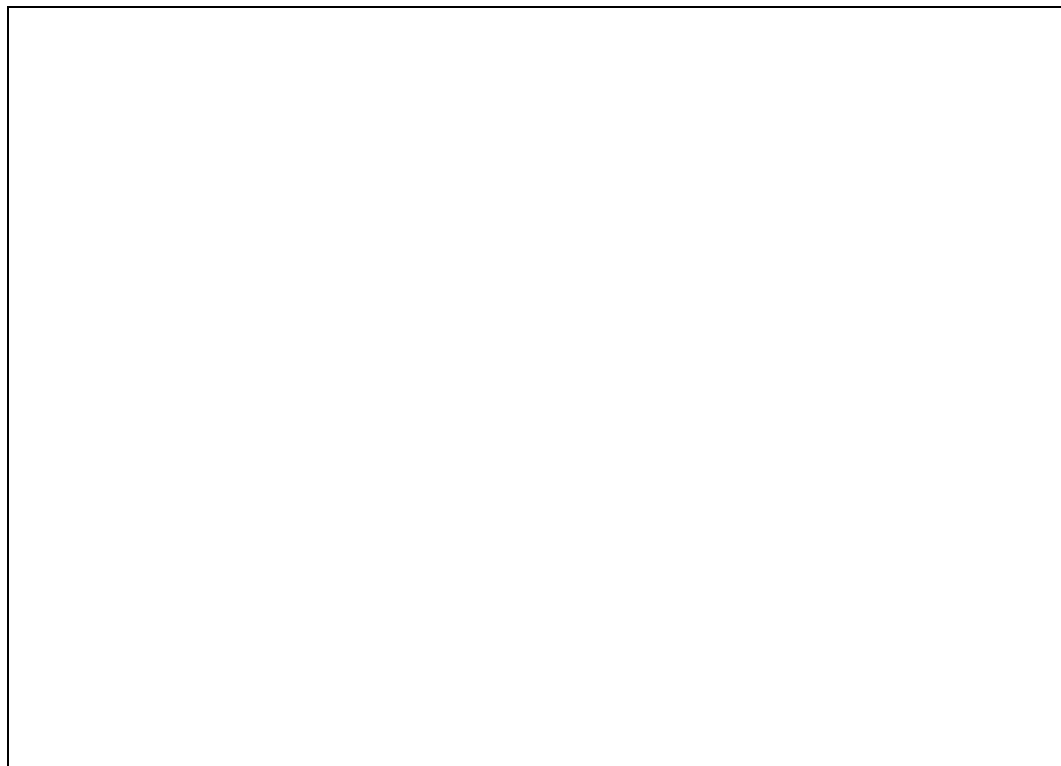
The Environmental Unit **Does** **Does Not** recommend authorizing the use of surface washing agents at this time. (Differing opinions are captured on attached memo as applicable).

This document provides information that went into the tradeoff discussions and other input that lead to the EU's recommendation on the use/no use of surface washing agents for this incident.

As appropriate, this document may also include recommendations on whether to start with a trial use before deciding on a thorough application.

Section 2 Overview of the Incident (relevant to proposed surface washing agent use)

Please see attached forms and incident status information (which *may* include copies of the ICS forms 201, 202, 209, Trajectory Maps, weather forecast, and/or any other applicable status and incident information)



Section 3 Spill-Specific Information Highlights for the RRT10 Decision Process

Spilled Product Type(s) (details such as properties, SDS, ADIOS run, and/or other information *may* be attached:

Approximate Time Window for Surface Washing Agent Application:
(source of information: ADIOS? Expert Opinion? Etc.)

Summary of Proposed Surface Washing Agent Action:

(As applicable, attach a map, highlight targeted slick area proposed for agent application and provide any other information to help describe proposed application specifics and action area. Describe key information (as available) such as:

- *Distance from shore, water depth(s) of agent application area, setback area from shore or other sensitive habitats as appropriate, etc.*
- *Predicted oil movement and how surface washing agent use will help mitigate that.*

<p>Surface washing agent proposed for use:</p>
<p>Rationale for Recommendation: The following information is provided for consideration by the UC and RRT and as rationale for the EU recommendation.</p>
<p>Environmental Considerations, Adequacy of Mechanical Recover and Other Measures: This section summarizes the evaluation of available information by technical specialists within the EU and other contributors as applicable regarding the potential use of surface washing agents as a response tool for this incident in the proposed action area, as well as the environmental tradeoffs between applying a surface washing agent versus relying on mechanical recovery and protection strategies. Considerations may include:</p>
<p>A: Resources at Risk <i>(Description of the potentially impacted resources at risk for this incident (attach ICS-232 and/or other information as appropriate)</i></p>
<p>B: Adequacy of Mechanical Recovery <i>(Consideration points about adequacy of mechanical response equipment alone: including magnitude of the spill, availability, weather conditions, and timelines of equipment to protect potential resources at risk.</i></p>
<p>C: Environmental Tradeoffs <i>(Description of the potential environmental trade-offs of surface washing agent use, e.g., whether some species or their habitat will benefit from surface washing agent application use while others will be negatively impacted.)</i></p>
<p>D: Other Issues as Applicable:</p>

Tribal Coordination Input (as applicable):

Describe which tribes and specifically which members of each tribe (and their title) were coordinated with on a technical level during the development of these Surface Washing Agent Application Decision Support Tools. Describe specific concerns and requested/recommended actions to take to ensure tribal concerns are appropriately addressed. (Continue on additional sheets as needed). Describe how tribal priorities and concerns identified will be addressed in the recommendation decision and/or Surface Washing Agent Application Operations Plan, as appropriate.

Endangered Species Act and Essential Fish Habitat Consultations:

Endangered Species Act (ESA) Section 7 consultations have been initiated with the US Fish and Wildlife Service and NOAA's National Marine Fisheries Service at the following date/time:

A Summary of ESA and EFH recommendations/conservation measures/BMPs and/or guidelines for this operation are listed below (or attached other applicable documentation). (The NWACP Emergency Consultation form may also be attached).

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This memo was developed and reviewed by:		
ICS Role	Signature	Name (Print)
Environmental Unit Leader (Developed)		
Planning Section Chief (Reviewed)		
Operations Section Chief (Contributor, Reviewed)		
Safety Officer (Contributor, Reviewed)		
Information Officer (Informed)		
Liaison Officer (Informed)		
List of Attachments (list is not mandatory)		
▪ SDS of Spilled Oil		Attached Y/N
▪ Trajectory forecast maps		Attached Y/N
▪ Weather forecast		Attached Y/N
▪ SDS of Surface Washing Product		Attached Y/N
▪ Current ICS-232		Attached Y/N
▪ Map, including overflight information and potential trial application site		Attached Y/N
▪ Other		

Signature Page for Technical Specialists and Other Contributors:

The following is a list of technical specialists and other members that contributed to the EU recommendation. In order that all views can be considered by the UC/RRT, each technical specialist may provide a statement in support of his/her opinion to be included in the recommendation package.

Name and Agency/Organization (Print)	Signature	Recommendation

Tool 3 Region 10 Response Team Record of Dispersant Decision

Incident Name and Location

Date and time of RRT 10 Consultation:

In accordance with Subpart J of the National Contingency Plan (NCP), RRT 10 has addressed the desirability of using appropriate surface washing agents through the area planning process and has established Case-by-Case Approval Zones for the use of dispersants. It is RRT 10 policy that any surface washing agent application requires concurrence from the EPA and state representatives to the RRT with jurisdiction over the waters threatened by the release or discharge. The decision to use surface washing agents must be made in consultation with the United States Department of Commerce and United States Department of the Interior representatives to the RRT and tribal governments with off-reservation treaty rights in the navigable waters threatened by a release or discharge of oil.

For purposes of this record of decision, the designated FOSC has completed a Surface Washing Agent Decision Memo (attached), formally recommends the use/recommends against the use of surface washing agents and requests a surface washing agent use decision from the appropriate members of RRT 10.

RRT 10 was convened on this date with these agencies in attendance:

1. *List all agencies and state whether decision makers or monitoring role.*

The following decision(s) was made (Note the RRT should add any pertinent rationale for the decision).

- RRT 10 does not concur with the use of surface washing agents for this incident.
- RRT 10 concurs with the use of surface washing agents as outlined in the attached plan.
- RRT 10 concurs with the use of surface washing agents with the following modifications to the dispersant plan.

Regional Response Team 10 Signature Page

Signatures will be obtained once the decision is made. This document will be retained to record the decision.

	Signature	Name and Title (Print)
EPA Co-Chair (Concurrence)		
State Representative to the RRT (Concurrence)		
Department of the Interior (Consultation)		
Department of Commerce (Consultation)		

Tool 4 Surface Washing Agent Operational Plan

Name of the Incident: _____

Date: _____

Introduction

This plan should be submitted as an addendum to the Environmental Unit Surface Washing Agent Memo Package. The plan outlines the operations to apply a surface washing agent to (describe the scenario, volume spilled, product type, and geographic area).

The plan contains:

- Details of the surface washing agent product (see attached SDS for the cleaning agent);
- The operational application process (vessel application or surface application);
- Equipment and personnel needed to implement the plan;
- Safety considerations of the application;
- A description of the intended area for application;
- Best Management Practices to minimize impacts to threatened or endangered species; and
- A description of the monitoring process.

Objectives of the Dispersant Operational Plan

The plan has the following objectives:

- Apply the product within the Surface Washing Agent Use Area as approved by Unified Command;
- Describe the Daily Application Methodology; and
- Monitor the effectiveness.

Safety

Operations staff must coordinate early in the response with Safety to ensure Site Safety Plans cover all aspects of the response including the surface washing agent operations. See site safety plan, and applicable 204s for surface washing agent operations safety messages.

Application tracking/frequency photographs, videos, and observation logs will be recorded and submitted daily.

Proposed Surface Washing Agent Application Area

The attached map (developed by the Environmental Unit) shows the approved surface washing agent application area.

Map (developed by the EU), should include a legend, north arrows, incident location and indicate the limits of potential application of dispersant.

Best Management Practices to Protect and Minimize Response Impacts to Threatened and Endangered Species

- Watch for and report all distressed or dead marine mammals to the Wildlife Unit;
- No flights below 500 feet over sighted marine mammals;
- No flights below 500 feet over wildlife refuges/management areas;
- Vessels restricted from getting closer than 200 yards to whales (by regulation);
- Vessels restricted from getting closer than 100 yards to pinnipeds (seals, sea lions) (recommendation);
- No application of dispersants within 3 nautical miles of observed whales;
- No application of dispersants within 3 nautical miles of observed pinnipeds; and
- Aerial survey by a NOAA NMFS wildlife observer for whales and other marine mammals required prior to and during any dispersant application.

Surface Washing Agent Implementation and Monitoring

In accordance with the RRT10 guidelines, the following steps are the minimum requirements which must be addressed prior to the consideration and implementation for the use of surface washing agents in the application area:

- Conventional methods (including warm-water flushing) have been attempted, but failed to meet the cleanup objectives.
- Only approved surface washing agents on the NCP Product Schedule should be considered for oil spill cleanup and recovery operations.
- Consultation with the FOSC or SOSC and natural resource protection managers to determine if any additional restrictions or additional safety precautions are required in the proposed operations.
- Cleanup areas requiring the use of surface washing agents shall be boomed off. Boom shall be placed as appropriate to both prevent potential oil and/or surface washing agents from escaping the cleaning area, and to establish a perimeter to prevent potential fish, marine mammals, and other marine life from entering the cleanup site.
- An observer shall be posted to ensure the safety of all responders involved in the surface washing agent operations. Additionally, the observer shall ensure the use of surface washing agents will not pose harm to the surrounding environment, including to marine life and/or sensitive shoreline. Trained observers will report any potential harmful impacts immediately to the FOSC or designated representative.
- Surface washing agents are not intended to be used in or near sea grass areas or on environmental riprap.
- In consideration of the safety of workers assigned to the application of surface washing agents, and in consideration of the protection of the environment, it is preferred that surface washing agents are applied during daylight hours only.
- Ensure that the cleanup contract organization develops an approved work plan that is included in the site safety plan.
- It is a requirement that the FOSC ensure all provisions of this plan are met

and to notify RRT10 of any changes.

Aerial and Wildlife Operations

The Aircraft TYPE (tail number) operating from XXX airfield will commence operations on DATE with NAME NOAA as the wildlife observer.

The wildlife observers performing aerial observations will be personnel from NOAA. The observers will notify the surface washing agent team should they observe wildlife that must be avoided. Wildlife observers and wildlife aircraft pilots will attend operational briefings.

Surface Washing Agent Checklist

- The product to be used is on the NCP Product Schedule.
- Check SDS to confirm the proper product is being utilized.
- Provide visual monitoring to ensure that the surface washing agent is being applied as recommended by the manufacturer.

Technique 1

See attachment

- Apply agent on sorbent pad then wipe
- Apply agent on soiled surface then wipe with pad
- Other: apply agent on brush then scrub vessel.

Technique 2

See attachment. *Only to be used if technique 1 is unsuccessful; must be approved by FOSC/SOSC.*

- Apply agent, flush with high pressure ambient or hot water
- Apply agent then steam clean
- High pressure or hot water wash to remove bulk of oil, then apply agent, then low pressure wash to remove residual stain
- Other
- Evaluate effectiveness
 - Can the flushing pressure and temperature be reduced without loss of effectiveness?
 - What fraction of the treated (removed) oil is recovered?
- REMINDERS
 - Photographic documentation is recommended but not required.
 - If subsurface plumes are observed, water sampling should be requested.
 - If sampling is being conducted, record oil concentrations in the water adjacent to the treated areas.

Best Management Practices to Protect and Minimize Response Impacts to Threatened and Endangered Species

The following BMPS should be considered during surface washing agent applications:

- Watch for and report all distressed or dead marine mammals to the Wildlife Unit.

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- Restrict use to certain tidal elevations so that the oil/water effluent does not drain across sensitive low-tide habitats (damage can result from exposure to oil, oiled sediments, and hot water).
- Protect nearby sensitive environments (salmon spawning streams, shellfish beds, submerged aquatic vegetation, nursery areas, etc.) from the effects of increased oil runoff by the proper deployment of booms, sorbents, etc.: monitor for effectiveness of protection measures.
- Ensure safety of responders by maintaining proper span of control under experienced crew bosses.

Surface Washing Agent Response Information

Daily Aerial/Vessel Dispersant Application Plan (DADAP)					
Date:	Time:	Location or ID:			
Dispersant Staging Airport Supervisor (Name and Phone #)					
Spill Site Information:					
Spill Location:	Latitude	Longitude	Spill Size (bbls)		
Water Body:					
Spill Site Weather					
Wind (knts)	Direction	Visibility	Sunset	Seas (ft)	
Attach Weather Report					
Communications					
Primary (VHF)		Sat Phone #:			
Secondary (VHF)		Marine Radio			
Emergency (VFH)					
Aircraft Information					
Type	Tail #	Call Sign	Airport ETA	PIC/Crew	Passengers
Vessel Information					
Name	Port	Purpose	Captain	Other	

Activity Schedule, Staging Base Briefing, and Staging Base Information

Daily Activity Schedule at Staging Base	
Date:	
Surface Washing Agent Group Staging Base Supervisor:	
Time	Activity
Daily Operational Briefing Agenda	
Safety	Per safety plan (new info?)
Weather	Review weather report
Communications	See DADAP
Dosage	5 gpa?
Approach Info	
Oil Spill Location and Description	Oil is moving (direction/approach)
Operations Procedure Changes CALL	
Review Flight Schedule	
Reporting Requirements and Procedures	
Photographic and Videos	Every flight
Observation Logs	Every flight
Attachments	
Safety Data Sheet for the Surface Washing Product ICS Form 232 Resources at Risk FOSSC Surface Washing Agent Authorization Checklist	

Tool 5 Tribal and other Trustee Technical Coordination Master List

The purpose of this tool is to gather a comprehensive list of all the Tribal, agency resource trustee and other key representatives who should be coordinated with and engaged on a technical level for input into the overall tradeoff discussion which is part of the Environmental Unit Recommendation process. This list is designed to be completed at the time of an incident, and will most likely be different during each incident. This form should be completed by the EU.

Organization Name (e.g. Tribe, Federal/State/County agency, etc.)	POC Name and Contact Info	Comments

Tool 6 After Action Report Guidelines

A Surface Washing Agent Use After Action Report is completed at the direction of the FOSC within a timeframe designated by the Unified Command to document how surface washing agents were used during the response and to communicate lessons learned for future surface washing agent use to pertinent stakeholders. Each Surface Washing Agent Use After Action Report should characterize the site, surface washing agent effectiveness, oil behavior, and any other relevant information specific to the incident and the surface washing agent operation including known or observed environmental impacts. The Surface Washing Agent Application After-Action Report shall focus on the following elements of the Environmental Unit Recommendation Memo and shall include the elements identified in the Report Outline below:

1. An overview of the incident and current operating period.
2. A description of how the surface washing agent application(s) were conducted including the volume of surface washing agent used, estimate of oil treated, estimated surface washing agent to oil ratio, surface washing agent application platforms, etc.
3. Description of how other surface washing agent monitoring was conducted and the results, if applicable.
4. Description of any known or observed adverse environmental effects associated with the surface washing agent application, such as impacts to fish and/or wildlife (e.g. disturbance, unintentional overspray).