

US EPA ARCHIVE DOCUMENT

**Dispersant Monitoring and Assessment Directive
for Subsurface Dispersant Application – Addendum 1
May 14, 2010**

This is an addendum (Addendum 1) to the Dispersant Monitoring and Assessment Directive issued on May 10, 2010, by the U.S. Coast Guard (USCG) and the Environmental Protection Agency (EPA) to BP. The requirements in this Addendum 1 apply to Part 2 of the May 10, 2010 Directive and are in addition to the requirements of that Directive. BP shall commence Part 2 requirements before subsurface application of dispersant is initiated and continue the Part 2 requirements and this Addendum 1 until cancelled or modified by the USCG and EPA.

Additional Requirements:

1. Sampling of dispersant/oil and oil-only waters must be continued per the Directive, and in addition, baseline data of waters without direct application of dispersant or oil shall also be collected by BP.
2. BP shall allow EPA/NOAA scientists flexibility within the sampling plan to direct the collection of additional data based on field observations (at times and locations of their choice). For example, EPA may request to recast the station if the CDOM fluorometer indicates a large increase in signal after data review. EPA/NOAA staff must be allowed to be in constant communication with staff on shore.
3. BP shall use Turner Designs C3 fluorometer (e.g., SMART protocol) to distinguish between oil impacted surface waters and those not impacted by oil.
4. BP shall use a CTD rosette package equipped with CDOM fluorometer and a 2-way communication wire to ensure that EPA/NOAA scientists can view profile data as the rosette package is deployed to 1500 meters. In addition, the CTD rosette package must be capable of collecting discrete samples in the water column using the live feed data stream. The requirement must be met within 7 days for the RV Brooks McCall. All other vessels must immediately meet this requirement.
5. BP shall deploy LISST from the vessel for continuous sampling of surface waters during transits, in order to provide particle size counts information which potentially distinguishes between dispersed and non-dispersed oil.
6. Discrete water samples shall be taken by BP at predetermined depths as specified or directed by EPA/NOAA scientists for UV fluorescences.
7. BP shall provide 48 hour advanced notice for departure and trip duration timelines to the FOSC and the EPA RRT Co-chair.
8. Data reporting shall be conducted by BP on a daily basis. This reporting shall include a sample tracking table. Data reporting shall be provided by BP to the FOSC and the EPA RRT Co-chair.