

exception of certain excluded offshore areas that are identified in the Plan. The Plan also allows ISB to be employed inshore of three nautical miles, but specific approval is required from the State agency having jurisdiction over air quality under the Clean Air Act. No burns were reported to have been conducted inside three nautical miles of the coast.

The RRT VI ISB Plan provides pre-approval in accordance with the National Contingency Plan (NCP). The Plan provides for ISB to be used as a first response option for spills occurring greater than three nautical miles offshore, however, the plan does note that ISB is intended to augment, not replace, other spill response methods. The Plan specifies air monitoring for particulates that are less than 10 microns (PM-10) in size, with a concentration of 150 ug/m³ or more of these particulates as the upper limit of allowable airborne concentration to ensure adequate protection of public health. ISB conducted within three nautical miles of populations must be monitored and meet this concentration standard to protect human health. Worker safety and health in terms of particulate or heat exposure are also addressed as a part of the RRT VI ISB Plan.

Burn agents are sometimes used to facilitate and enhance the effectiveness of ISB. They are defined by the NCP as those additives that, through physical or chemical means, improve the combustibility of the materials to which they are applied. Their acceptability is determined by the National Products Schedule, which is maintained by EPA. Neither the RRT VI ISB Plan nor the BP Oil Spill Response Plan (OSRP) identifies burning agents for use in ISB applications.

The use of ISB for this incident, coupled with dispersant applications, significantly reduced the amount of oil that might otherwise have impacted near-shore habitats and environmentally sensitive areas (ESAs). Of the estimated 206 million gallons reportedly released, approximately

Office as well as fire booms located in Alaska. The BP OSRP catalogs quantities of fire booms in Louisiana and in Florida, in addition to fire booms available from the Marine Spill Response Corporation (MSRC) "for purchase" from unspecified locations. Additionally, the Region IV ISB Plan lists slightly different quantities of fire booms from similar locations as those in the Region VI ISB Plan. Fortunately, the diversity of ISB equipment inventory did not appear to affect the effectiveness of the ISB operations for this incident. More than 2,000 feet of fire boom were ultimately used during this response, involving five different boom types, far in excess of that which was in stock in the Gulf, but made available by cascading the equipment to the incident.

The use of ISB for this incident, coupled with dispersant applications, significantly reduced the amount of oil that might otherwise have impacted near-shore habitats and environmentally sensitive areas (ESAs). Of the estimated 206 million gallons reportedly released, approximately 5 percent (10 million gallons) was reported to have been removed by ISB operations. In comparison, mechanical recovery removed approximately 3 percent (6 million gallons) and approximately 8 percent (16 million gallons) was dispersed. Some residual oil remained following burn operations and efforts to recover it were unsuccessful. The amount of residual oil is unknown.