

DATE, 2024

U.S. Environmental Protection Agency
EPA Administrator Michael S. Regan, Mail code 1101A
1200 Pennsylvania Ave. NW
Washington, DC 20460
Regan.Michael@epa.gov

Requesting EPA to Remove the Discontinued Dispersants Corexit™ EC9527A and EC9500A
from the NCP Product Schedule Pursuant to 40 CFR § 300.970

Dear Administrator Regan,

I am writing as a concerned citizen to request that the Environmental Protection Agency (EPA) remove oil dispersants Corexit 9527A and Corexit 9500A from the NCP Product Schedule under rule 40 CFR § 300.970, effective immediately.

[PERSONALIZE LETTER: Explain in 3-4 sentences WHO you are and why YOU care about this issue. Do you live at or near a coast? Does your family take vacations or recreate at a coast? Have YOU experienced harm to health during an oil spill response where Corexit dispersants were used? If so, describe briefly how this changed your quality of life.]

The grounds for my request are that the manufacturer of Corexit dispersants has provided statements to the EPA that are misleading, inaccurate, outdated, or incorrect regarding product use to control oil spills and, further, that the manufacturer has failed to provide new or relevant information concerning the impacts or potential impacts of the product to human health or the environment.

During the 2010 BP Deepwater Horizon oil disaster, the federal government allowed use of unprecedented amounts—nearly two million gallons—of these Corexit dispersants in the deep sea and on the sea surface for nearly three months (or four, counting the spraying in coastal waters). It turned out that crude oil and dispersant combined was much more toxic to people and animals than the oil alone, contrary to what was expected by EPA and communicated to the public.

The post BP disaster science and human experience with respiratory and skin contact with Corexit dispersants was compiled by the ALERT Project and the Government Accountability

Project. Instead of considering individual studies separately, this record reveals the whole picture of long-term harm caused by these products—and it is extensive. This weight of evidence is the new and relevant information not previously considered collectively by EPA.

For example, key studies compiled show that these Corexit dispersants are potent respiratory and skin sensitizers that cause chronic breathing difficulties and reoccurring skin rashes; potent carcinogens that trigger multiple cancer pathways; potent neurotoxins that cause brain damage such as central sensitization (hypersensitivities to smells, sounds, and light, often associated with migraines); and potent teratogens that disrupt development of fetuses. These dispersants also cause specific damage to the blood, respiratory, and cardiovascular systems, the peripheral nervous system, causing numbness and pain in the hands and/or feet, and the central nervous system, affecting memory, emotions, behavior, and loss of tolerance to chemicals, sound, and light.

Additional concerns call for an expedited decision. The manufacturer of Corexit dispersants stopped making and selling these products in November 2022, and it stopped supporting the technical material required for product registration in July 2023. Yet the rules governing dispersant use that went into effect in December 2023 allow for use of products that are currently listed on the NCP Product Schedule, including these Corexit dispersants, until December 2025 when a new Product Schedule is published (300.955). These Corexit dispersants are currently stockpiled and available for use in every coastal state. This means that, if there is another big oil spill between now and December 12, 2025, history could repeat—Corexit dispersants could be used again with the same deadly consequences as occurred after the BP oil disaster response. Only this time, the EPA would likely be liable for the health consequences of these discontinued products, given that EPA is the authorizing entity.

I incorporate by reference the petition to EPA that was filed by the ALERT Project and the Government Accountability Project in August 2024 with my request. Please ban these extremely toxic Corexit dispersants, effective immediately.

Sincerely,

NAME

City, State

email address