

LIST OF LISTS

- CAS = Chemical Abstracts Service number
- EHS = Extremely Hazardous Substance
- TPQ = Threshold Planning Quantity
- RQ = *Reportable Quantity*
- CAA = Clean Air Act
- TQ = Threshold Quantity
- *Amounts in POUNDS*

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LIST OF LISTS

Hydrofluoric Acid, CAS = 7664-39-3

- Section 302 (EHS) TPQ = _____
- Section 304 EHS RQ = _____
- CERCLA RQ = _____
- Section 313 = _____
- RCRA Code = _____
- CAA 112(r) TQ = _____

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CHEMICAL LISTS - STATE

- NREPA Part 31
Water Resources Protection
- Part 5 Rules
Spillage of Oil & Polluting Materials
- Table 1: Polluting Materials (Pg. C-9)
TRQ = Threshold Reporting Quantity

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POLLUTING MATERIALS LIST

Look up: Hydrofluoric Acid

- TRQ = _____

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EXAMPLE:

Hydrofluoric Acid Release

When is a release of hydrofluoric acid subject to reporting?



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SARA Title III Section 304

Hydrofluoric Acid Release

- CERCLA Hazardous substance
- Extremely Hazardous Substance (EHS)
- _____ lbs Hydrofluoric Acid released to the environment and migrates beyond facility boundaries.

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BOTTOM LINE

If there is a release,
IMMEDIATELY notify:

- LOCAL – 911
- STATE – PEAS
- FEDERAL – NRC



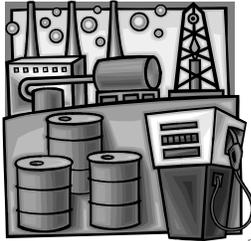
Then assess the situation and
make additional notifications
as required.

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RELEASE EXAMPLE

WHEN IS A RELEASE
OF GASOLINE
REPORTABLE UNDER
NREPA Part 201

?



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**EXAMPLE
GASOLINE RELEASE**

- 1.- Identify the hazardous ingredients, weight %, and corresponding Reportable Quantities. (The RQ depends on the regulation!)
- 2.- Calculate the weight (pounds per gallon) of the gasoline.
- 3.- Calculate the smallest reportable release.

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GASOLINE RELEASE

1. Identify hazardous ingredients
 - MSDS – Look for hazardous substances
 - Benzene
 - Weight % on MSDS =
- Look up Benzene on List of Lists
- CERCLA RQ for Benzene = _____

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GASOLINE RELEASE

2. Calculate weight of gasoline

Specific Gravity (relative density) on MSDS :

_____ (use highest value)

x 8.34 lb/gal (weight of water)

= Weight of Gasoline in lb/gal

_____ x _____ lb/gal = _____ lb/gal

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GASOLINE RELEASE

3. Calculate smallest reportable release (based on Part 201 & Benzene)

10 lbs (RQ Benzene)

÷ 6.3 lb/gal gasoline

÷ weight % Benzene

= Gal of gasoline

1% Benzene → _____ gal gasoline

5% Benzene → _____ gal gasoline

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GASOLINE RELEASE

1. Identify hazardous ingredients

- From MSDS
- Methyl tert-butyl ether (MTBE)
- Weight % on MSDS = _____
- Look up MTBE on List of Lists
- CERCLA RQ for MTBE = _____

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GASOLINE RELEASE

3. Calculate smallest reportable release (based on Part 201 & MTBE)

1000 lbs (RQ MTBE)
 ÷ 6.3 lb/gal gasoline
 ÷ weight % MTBE
 = Gal of gasoline

10% MTBE → _____ gal gasoline
 16% MTBE → _____ gal gasoline

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REMEMBER

- A SINGLE RELEASE MIGHT BE REPORTABLE UNDER MULTIPLE REGULATIONS
- TERMS MIGHT BE DEFINED DIFFERENTLY UNDER DIFFERENT REGULATIONS

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REPORTABLE RELEASE

- Different ingredients → different reportable release amounts.
- Use the ingredient that results in the smallest reportable release.

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REPORTABLE RELEASE

- Different regulations → different reportable release amounts.
- If it reaches water, any amount of gasoline is reportable per the CWA & NREPA Part 31 (Part 5 rules).

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IMPORTANT !

ALL RELEASES MUST BE CLEANED UP – even if not reportable.



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