

# Release Reporting

## RELEASE NOTIFICATION REQUIREMENTS IN MICHIGAN

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SARA Title III  
Program  
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## RELEASE NOTIFICATION REQUIREMENTS TABLE 11/10/2011

[www.michigan.gov/chemrelease](http://www.michigan.gov/chemrelease)

- *WHAT*
- *WHEN*
- *TO WHOM &*
- *HOW* releases must be reported in State & Federal Regulations that apply in MI.

## WHAT IS A RELEASE?

SPILL  
LEAK  
PUMP  
POUR  
EMIT  
EMPTY



DISCHARGE  
INJECT  
ESCAPE  
LEACH  
DUMP  
DISPOSE

## ACT & REGULATION

- FEDERAL = **CFR**  
Code of Federal Regulations
- STATE = **PA**  
Public Act
- OTHER REQUIREMENTS



## REPORTING CRITERIA

SUBSTANCE  
AMOUNT  
MEDIUM  
IMPACT  
SOURCE



## SARA Title III Section 304 (Pg 6-4)

### Reporting Criteria

- Release of
- **CERCLA** Hazardous substance
  - Extremely Hazardous Substance (**EHS**)



# Release Reporting

## EPA'S LIST OF LISTS

- CERCLA - Hazardous
- SARA Title III  
EHS  
Toxic (section 313)
- CAA - Extremely Hazardous  
Air Pollutant - section 112(r)  
Appendix B – Updated May 2010



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## 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

Look up:

Ammonia  
CAS =  
7664-41-7



## LIST OF LISTS Ammonia

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 (Appendix C)  
Spillage of Oil & Polluting Materials
- Table 1: Polluting Materials (Pg. C-8)  
TRQ = Threshold Reporting Quantity

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## POLLUTING MATERIALS LIST

Look up: Ammonia

TRQ = \_\_\_\_\_

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# Release Reporting

## EXAMPLE 1

### Ammonia Release

When is a release of ammonia subject to reporting?



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## SARA Title III Section 304 (Pg. 6-4)

### Ammonia Release

- CERCLA Hazardous substance
- Extremely Hazardous Substance (EHS)

\_\_\_\_\_ lbs Ammonia released to the environment that migrates beyond facility boundaries.

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## REGULATIONS THAT REFERENCE CERCLA

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## REPORTING CRITERIA

A SINGLE RELEASE MIGHT BE REPORTABLE (ENFORCEABLE) UNDER MULTIPLE REGULATIONS.



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## NREPA Part 31 (Pg. 6-7)

### Ammonia Release

Polluting Materials (Part 5 Rules, Table 1)

\_\_\_\_\_ Ammonia released to water or sewage system



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## REPORTING CRITERIA

- DIFFERENT REGULATIONS CAN HAVE DIFFERENT REPORTABLE QUANTITIES FOR THE SAME CHEMICAL.



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# Release Reporting

## INITIAL NOTIFICATION – WHEN ?

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## INITIAL NOTIFICATION \* Worst Case \*

IMMEDIATE  
MEANS  
WITHIN **15 MINUTES**  
AFTER  
DISCOVERY OF THE  
RELEASE

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## INITIAL NOTIFICATION – TO WHOM ?

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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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## REMEMBER TO KISS !

**THERE ARE NO  
PENALTIES  
FOR OVER-  
REPORTING !**



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## INITIAL NOTIFICATION

**DOCUMENT  
IT**



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# Release Reporting

## WRITTEN FOLLOW-UP REPORT

### REQUIRED BY REGULATION

- Specified Form
- Specified Information

DEQ general form:

"Spill or Release Report" (Pg. 6-13)

Also use to document initial notification



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## WRITTEN FOLLOW-UP REPORT

EPA's NEW INTERPRETATION:  
AS SOON AS PRACTICABLE  
MEANS  
WITHIN **30 DAYS** (not 7)  
AFTER  
DISCOVERY OF THE RELEASE

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## NOTES

PHONE NUMBERS  
CONTACTS



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## EXAMPLE 2

A textile company had a release of 860 gallons of sodium hydroxide solution to the soil. Of this, 15% reached the river.

The MSDS is in your handouts.



## EXAMPLE 2

### 1.a. Notify

- 911
- PEAS
- NRC

### 1.b. Respond

### 2. Follow-up

- Investigate
- Calculate
- Report



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## EXAMPLE 2

### Calculate Release

1. Identify the hazardous ingredients and weight % in the sodium hydroxide solution.
2. Calculate the weight of the released sodium hydroxide solution.
3. Calculate the weight of the released hazardous ingredients.
4. Compare to Reportable Quantity (RO). (The RO depends on the regulation.)

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# Release Reporting

## 1. Identify hazardous ingredients and weight % in sodium hydroxide solution

CAS = \_\_\_\_\_  
Weight % = \_\_\_\_\_



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## 2. How many pounds of sodium hydroxide solution were released to the soil?

Formula to convert gallons to pounds on pg 6-15

860 gal of NaOH Solution  
X  
Specific Gravity on MSDS: \_\_\_\_\_  
X  
Weight of water: \_\_\_\_\_  
=  
NaOH Solution Released: \_\_\_\_\_

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## 3(a). How many pounds of sodium hydroxide were released to the soil?

\_\_\_\_\_ NaOH solution  
X  
\_\_\_\_\_ NaOH concentration  
=  
\_\_\_\_\_ NaOH



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## 3(b). How many pounds of sodium hydroxide reached the river?

\_\_\_\_\_ lbs NaOH released to soil  
X  
\_\_\_\_\_ % reached the river  
=  
\_\_\_\_\_ lbs NaOH reached the river

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## 4. Compare to the RQ

Sodium Hydroxide  
CAS No. = 1310-73-2  
Released to soil = \_\_\_\_\_  
Released to river = \_\_\_\_\_  
CERCLA RQ = \_\_\_\_\_  
SARA EHS RQ = \_\_\_\_\_  
SARA Toxic? \_\_\_\_\_  
Part 5 Rules TRQ = \_\_\_\_\_

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## 5. What regulations apply to this release of sodium hydroxide solution?

- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

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# Release Reporting

## EXAMPLE 2

### *Post script*

This company reported the release 2 days after it was discovered. The proposed penalty for late reporting and violating the NPDES permit regulations was \$38,540.

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## IMPORTANT !

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



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