

# Release Reporting

**RELEASE NOTIFICATION  
REQUIREMENTS IN  
MICHIGAN**

Susan Parker  
Michigan  
SARA Title III  
Program  
Jan 2009



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**RELEASE NOTIFICATION  
REQUIREMENTS TABLE  
12/2/2008**

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

- **WHAT**
- **WHEN**
- **TO WHOM &**
- **HOW RELEASES MUST BE REPORTED**

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**WHAT IS A RELEASE?**

SPILL	DISCHARGE
LEAK	INJECT
PUMP	ESCAPE
POUR	LEACH
EMIT	DUMP
EMPTY	DISPOSE



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# Release Reporting

## ACT & REGULATION

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



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## REPORTING CRITERIA

- SUBSTANCE
- AMOUNT
- MEDIUM
- IMPACT
- SOURCE



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## SARA Title III Section 304

Reporting Criteria

Release of

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



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# 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 10/06**



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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:

Hydrofluoric Acid  
CAS = 7664-39-3



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# Release Reporting

**LIST OF LISTS**  
**Hydrofluoric Acid**

Section 302 (EHS) TPO = \_\_\_\_\_

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-9)  
TRQ = Threshold Reporting Quantity

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**POLLUTING MATERIALS LIST**

Look up: Hydrofluoric Acid

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

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# Release Reporting

**EXAMPLE:**  
**Hydrofluoric Acid Release**

When is a release of hydrofluoric acid subject to reporting?



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**SARA Title III**  
**Section 304 (Pg. 6-4)**  
**Hydrofluoric Acid Release**

- CERCLA Hazardous substance
- Extremely Hazardous Substance (EHS)

**100 lbs Hydrofluoric Acid released to the environment and migrates beyond facility boundaries.**

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**REGULATIONS THAT REFERENCE CERCLA**

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# Release Reporting

**REPORTING CRITERIA**

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



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**NREPA Part 31 (Pg. 6-7)**  
**Hydrofluoric Acid Release**

**Polluting Materials (Part 5 Rules, Table 1)**

**10 lbs Hydrofluoric Acid 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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# Release Reporting

## 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

MDEQ general form:

"Spill or Release Report" (Pg. 6-12)

Also use to document initial notification



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## WRITTEN FOLLOW-UP REPORT

AS SOON AS PRACTICABLE  
MEANS  
WITHIN **7 DAYS**  
AFTER  
DISCOVERY OF THE  
RELEASE

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## NOTES

PHONE NUMBERS  
CONTACTS



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# Release Reporting

## RELEASE EXAMPLE 1

A facility accidentally released 100 gal of chlorine bleach into a drain that emptied into a lake.



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## EXAMPLE

### 1. Notify

- 911
- PEAS
- NRC

### 2. Respond

### 3. Follow-up

- Investigate
- Calculate
- Report



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## EXAMPLE 1 Calculate Release

1. Identify the hazardous ingredients and weight % in Chlorine Bleach
2. Calculate the weight of the released Chlorine Bleach.
3. Calculate the weight of the released hazardous ingredients.
4. Compare to Reportable Quantity (RQ).  
(The RQ depends on the regulation.)

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# Release Reporting

## 1. Identify hazardous ingredients in Chlorine Bleach

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



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## 2. Calculate weight of Chlorine Bleach

100 gal of Chlorine Bleach  
x  
Specific Gravity (relative density) on MSDS: \_\_\_\_\_  
x  
Weight of water: \_\_\_\_\_  
=  
Chlorine Bleach released: \_\_\_\_\_

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## 3. Calculate the weight of the released hazardous ingredients

Sodium Hypochlorite = 15% of 1009 lbs

0.15 x 1009 lbs =  
\_\_\_\_\_ lbs



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# Release Reporting

## 4. Compare to the RQ

Sodium Hypochlorite

CAS = \_\_\_\_\_

Released amount = \_\_\_\_\_

CERCLA RQ = \_\_\_\_\_

SARA EHS RQ = \_\_\_\_\_

SARA Toxic? \_\_\_\_\_

Part 5 Rules TRQ = \_\_\_\_\_

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## What Regulations Apply to the Release of Chlorine Bleach?

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## IMPORTANT !

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



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