

## AGRICHEMICAL RELEASE REPORTING



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SARA Title III  
Program  
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## WHAT IS A RELEASE?

- **SPILL, LEAK, PUMP, POUR, EMIT, EMPTY, DISCHARGE, INJECT, ESCAPE, LEACH, DUMP, DISPOSE**
- **LAND APPLICATION OR USE OF A SUBSTANCE THAT IS CONSISTENT WITH GENERALLY ACCEPTED AGRICULTURAL MANAGEMENT PRACTICES IS **NOT** A RELEASE.**

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# Agrichemical Release Reporting

## IF THERE IS A RELEASE...

***Immediately*** (within 15 minutes)  
call:

- **Local** – 911
- **State** – MDA Hotline
  - Or PEAS if water impacted
- **Federal** – NRC
- Phone Numbers on **Page 8** – Emergency Planning for the Farm



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## REPORT ALL RELEASES

Will this result in over-reporting?

- Probably

Then why do it?

- There are no penalties for over-reporting.
- It simplifies an otherwise complicated requirement (CYA).
- For safety's sake.

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# Agrichemical Release Reporting

## WHY REPORT ALL RELEASES? [www.michigan.gov/deqrelease](http://www.michigan.gov/deqrelease)

**key topics**

- Administrative Hearings
- Michigan Initiative
- Community Right to Know
- Environmental Assistance
- Environmental Education
- Environmental Incentives
- Emergency Planning
- Release Reporting
- Cleanup
- Financial Incentives
- Environmental Reports
- Grants and Loans
- Regulatory Services
- Rules
- Standards of Environmental
- Data
- Methods and Procedures

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### Spill-Release Reporting

[Spill/Release Reporting](#)  
Chemical releases in Michigan are potentially reportable under one or more of twenty-six different state and federal regulations. Determining which regulations apply to a specific release can be an overwhelming task. The "Release Notification Requirements in Michigan" table was compiled by the Michigan Department of Environmental Quality (MDEQ) Environmental Assistance Division to help owners and operators of facilities in Michigan, including vehicles and farms, determine their potential ... > [More](#)

### Information

- [Concentrated Animal Feeding Operations \(CAFO\)](#)
- [Release Reporting - Workshop Presentation](#)
- [Vehicle-Related Releases](#) PDF
- [Continuous Release Reporting](#)
- [Release Calculations](#) PDF
- [Federally Permitted Release](#)
- [Release Notification Requirements in Michigan Table](#) PDF
- [Release Reporting Forms](#)
- [Pollution Emergency Alerting System Information](#)

MI Bus  
Depart  
Online  
Survey  
RSS Fe  
DEQ Ou  
DEQ Cal  
DEQ Mil  
DEQ Wh  
DEQ Pul  
DEQ Lav  
DEQ Ac  
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Beach

## RELEASE NOTIFICATION REQUIREMENTS TABLE October 27, 2009

- **WHAT**
- **WHEN**
- **TO WHOM &**
- **HOW** releases must be reported in State & Federal Regulations that apply in MI.
- Does NOT include release reporting requirements in permits, contingency plans, local ordinances, etc.

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## WHY REPORT ALL RELEASES?

- **28 State & Federal regulations have requirements to report releases.**

This includes:

- Releases of **variable amounts of fuels and hazardous substances** to the environment,
- And fuels from Above Ground Storage Tanks to secondary containment.



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## WHY REPORT ALL RELEASES?

- A single release might be **reportable** under multiple regulations.
- Failure to report a release might be **enforceable** under multiple regulations.



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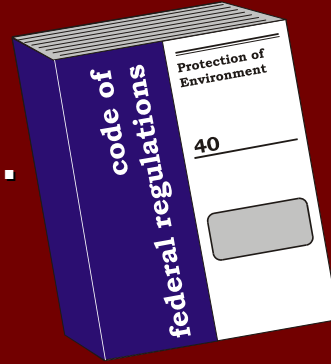
# Agrichemical Release Reporting

## WHY REPORT ALL RELEASES?

Let's look at 2 federal regulations:

- CERCLA
- SARA Title III

First some background....



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## BACKGROUND

- **Comprehensive Environmental Response, Compensation and Liability Act of 1980**
  - Cleanup hazardous waste disposal sites
  - Emergency response for **hazardous substances released** into the environment
- CERCLA = Superfund**

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# Agrichemical Release Reporting

**December 3, 1984 in Bhopal, India**  
**Union Carbide chemical plant**  
**Methyl isocyanate release**  
**4,000 deaths**  
**40,000 maimed & seriously injured**  
**Plants defoliated**  
**Livestock died**



## BACKGROUND

- **Superfund Amendments and Reauthorization Act of 1986 (SARA)**
- **SARA Title III = Emergency Planning and Community Right-to-Know Act (EPCRA)**

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# Agrichemical Release Reporting

## BACKGROUND

**CERCLA section 103**

➤ **≈770 Hazardous Substances**

**SARA Title III section 304**

➤ **355 Extremely Hazardous Substances (EHS)**

Each substance has a reportable quantity (**RQ**) for release reporting.

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## LIST OF LISTS

EPA PUBLICATION

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

Look under "Related Links"

**CERCLA Hazardous Substances**

**SARA Title III EHSs**

**RQs for Releases**



# Agrichemical Release Reporting

## LIST OF LISTS

U.S. ENVIRONMENTAL PROTECTION AGENCY

### Emergency Management

[Contact Us](#)   Search:  All EPA  Emergency Management

You are here: [EPA Home](#) » [Emergency Management](#) » [EPCRA Requirements](#) » [List of Lists Database](#) » Search

Home

Our Programs

Our Partners

Information Sources

## List of Lists Database Search Tool

Search by Chemical Name: (complete name not required)

Search by CAS Number:

Search by Program:  CERCLA  EPCRA  RCRA  RMP  TRI

## LIST OF LISTS

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[Contact Us](#)   Search:  All EPA  Emergency Management

You are here: [EPA Home](#) » [Emergency Management](#) » [EPCRA Requirements](#) » [List of Lists Database](#) » Search Results

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## List of Lists Database Search Results

1 - 4 of 4 results for (Chemical Name equal to \*AMMONIA\*)

[Revise Your Search](#)

Results Ordered by Relevance

View List of Lists by  
 CAS Number  
 EPA Program  
 Chemical Name

Chemical Name	CAS Number	EPCRA TPQ Sec. 302	EPCRA Sec. 304	CERCLA RQ Sec. 103	TRI Sec.
<input type="checkbox"/> <a href="#">Ammonia</a>	7664-41-7	500	100	100	313
<input type="checkbox"/> <a href="#">Ammonia (anhydrous)</a>	7664-41-7	500	100	100	X
<input type="checkbox"/> <a href="#">Ammonia (conc 20% or greater)</a>	7664-41-7			1000	X
<input type="checkbox"/> <a href="#">Cupric sulfate, ammoniated</a>	10380-29-7			100	313c

RQ = Reportable Quantity in pounds

## CERCLA section 103

Release into the environment of a CERCLA hazardous substance ... in a quantity equal to or greater than its corresponding reportable quantity in any 24-hour period.

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## SARA Title III section 304

Release of a CERCLA hazardous substance or Extremely Hazardous Substance (EHS) ... in a quantity equal to or greater than its corresponding reportable quantity in any 24-hr period that migrates beyond the facility boundaries.

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# Agrichemical Release Reporting

## WHO MUST REPORT TO WHOM?

**SARA Title III**– Owner or Operator to

- **Local** Emergency Planning Committee (**LEPC**) and
- **State** Emergency Response Commission (by calling **PEAS** or **MDA**)

**CERCLA** – Person in charge to

- **National** Response Center (**NRC**)

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## Examples of Reportable Releases

**Anhydrous Ammonia** – 100 lbs (18 gals)

**Guthion 2L** - ½ gal

**Dimethoate 4E** – 2.5 gal

**Counter 20CR** – 480 lbs

**Sevin 4F** – 25 gal

**Fuel** – any amount if potential to impact ground or surface water

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# Agrichemical Release Reporting

## IF THERE IS A RELEASE

Follow the instructions on page 4 of the Farm Bulletin.



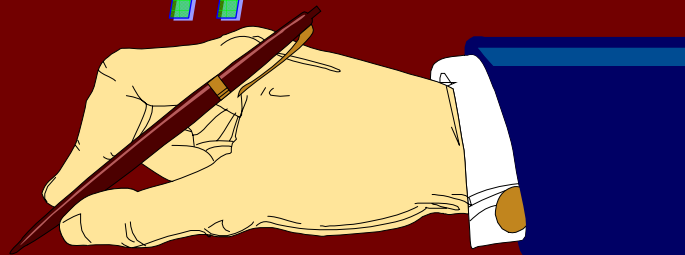
This assures compliance with initial reporting for all 28 regulations in the Table.

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## INITIAL NOTIFICATION

# DOCUMENT

# IT



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# Agrichemical Release Reporting

## Written Follow-Up Report Due within 7 days

MDEQ general form:

**"Spill or Release Report"**

Pg 19 in Farm Bulletin

Also use this form to document  
Initial Notification



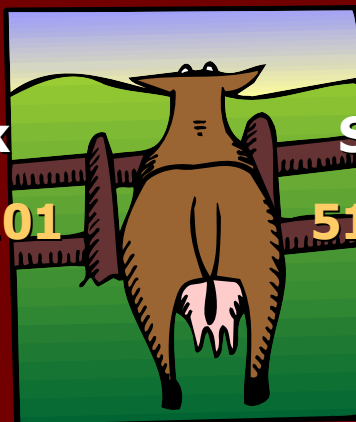
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## BOTTOM LINE Report the release, then

Call:

Jack Knorek

800-405-0101



Or call:

Susan Parker

517-373-8481

To determine if a FU report is required.

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# Agrichemical Release Reporting

## IMPORTANT !

**ALL RELEASES  
MUST BE  
CLEANED UP**

**– even if not  
reportable.**



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## ANHYDROUS AMMONIA RELEASE

**For each of the following situations,  
Who must report a release of 100 lbs  
of ammonia under**

**CERCLA sect 103 or**

**SARA Title III sect 304?**

**Hint: see slide 19**



# Agrichemical Release Reporting

## Release from **tank** at an Ag Co-op



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## Release from **supplier hose** used to fill Tanker Truck



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# Agrichemical Release Reporting

## Release from **Tanker Truck** (1) Owned by Supplier or (2) Independently Owned



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## Release from **nurse tank** while ammonia being applied on Farm by Supplier



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# Agrichemical Release Reporting

Release from **nurse tank** owned by Supplier, being applied by Farmer



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Release from **Farm Tank** while being filled by Tanker Truck



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## Release from Tanker Truck Hose while filling Farm Tank



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## Who Must Report...

**If the release from the Tanker Truck's hose is due to a problem (faulty valve) with the Farm Tank?**

- **The Tanker Truck driver is responsible for reporting.**
- **How can Tanker Truck drivers protect themselves from NH<sub>3</sub> releases that are not in their control?**

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## **Anhydrous Ammonia Farm Tank Requirements**

**Farm Tanks with storage capacity  $\geq$  500 gals (2750 lbs) must have:**

- **Air Permit**
- **Inspection & Maintenance Program**
- **Emergency Response Plan developed and approved by the local fire dept or county emergency response agency**

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## **Anhydrous Ammonia additional Requirements**

**Farmers that ever have  $\geq$  91 gals (500 lbs) of anhydrous ammonia on site (even if only during application) must:**

- **Notify the Michigan SARA Title III Program and the Local Emergency Planning Committee (LEPC)**
- **Have an Emergency Response Plan developed by the farmer and the LEPC (see Extension Bulletin E-2575)**

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## Contacts for Help

- Release Reporting & Clean-up: **Jack Knorek**, MDA @ 800-405-0101
- Release Reporting & SARA Title III: **Susan Parker**, MI SARA Title III Program @ 517-373-8481
- SARA Title III & Plans: **Your LEPC** (contact info online or call Susan Parker)
- Air Permits: **Environmental Assistance Center** @ 800-662-9278

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