

# Continuous Release Reporting Form

## SECTION II: SOURCE INFORMATION

CR-ERNS Number:

### Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

*For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet.*

Name of Source:

1. Indicate whether the release from this source is either:

Continuous without interruption **OR**  routine, anticipated, intermittent & incidental to

*Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.*

2. Provide a brief statement describing the basis for stating that the release is continuous and stable in quantity and rate. If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate given the **note** above.

3. Identify below how you established the pattern or release and calculated release estimates.

Release data  Knowledge of Operating Procedures  Engineering estimate  Best Professional judgment

Other -

# INSTRUCTIONS

## SECTION II: SOURCE INFORMATION

### (Part A)

#### **CR-ERNS Number:**

If you are reporting a release of a CERCLA hazardous substance(s), you will be assigned a CR-ERNS number when you make this initial telephone call to the NRC (1-800-424-8802). This CR-ERNS number will become the identifier for your facility. Your CR-ERNS number will never change; it is the number that identifies you in the CR-ERNS database.

**General overview** - When completing your written reports, you must take into consideration all sources of the release from your facility. For example, if the aggregate amount of a particular hazardous substance released within 24 hours from your facility equals or exceeds an RQ, then each source of the particular release must be identified, even if some release amounts from individual sources do not equal or exceed the RQ. The purpose of requiring information on the source(s) of the release is to provide EPA with sufficient information to evaluate the risk associated with the continuous release. Providing this information accurately in the initial written and first anniversary follow-up report will minimize future requests by EPA for additional information or clarification.

In this section of the written report, you should identify and describe separately each continuous release source. If the continuous release of the same hazardous substance comes from two or more sources (e.g., two stacks), then information should be reported separately for each of the sources. For example, if a stack is one of several sources of a hazardous substance release at your facility, you must provide information on that stack including: the stack height; the identity of the hazardous substance(s) being released from the stack; the quantity released; and the frequency of the release from the stack. If you have a release of a particular hazardous substance from three stacks, you should report each stack separately and provide the required information specified for each stack.

Although the continuous release reporting regulation allows multiple concurrent releases of the same CERCLA hazardous substance to be considered as if they were one continuous release, aggregate reporting of such releases from different sources complicates risk analyses. Area sources are most readily aggregated for purposes of continuous release reporting and risk evaluation when the frequency of the release from each source is the same. Similarly, aggregated stack releases are most readily evaluated if the frequency of the release from each stack is the same and the stack configurations (e.g., stack height, diameter, throughput) are the same. If you elect to aggregate releases across facilities, be certain to identify information about each source of the release from all of your facilities. Also, note that if you aggregate your releases, EPA may request clarifying information about the releases from each of the individual sources.

**Identification of sources** - In Section II, you must identify (i.e., name) and describe each continuous release source. There are several ways to name release sources. It is important to: (1) provide a name that clearly identifies the source (e.g., centrifugal processor A, rather than Unit A); and (2) avoid giving two or more sources the same name. It is also important to remember when naming your sources that EPA, at any time, may contact you with questions regarding releases from one of your named sources. It would be prudent, therefore, to name the sources at your facility in a manner that will be easy for you and other employees to identify them. For example, if your plant has four stacks, two wastepiles, and twenty-four valves, you may name the sources as follows: Stack #1; Stack #2; Stack #3; Stack #4; Wastepile #1; Wastepile #2; and Valves in Building #2. Note that the "Valves in Building #2" are aggregated in this example and reported as a single source.

**Required information** - Section II, Source Information, contains three Parts (A, B, and C). You must provide the information required in each of these Parts for each continuous release source. Be sure to place the name of the source on all pages associated with that specific source. There is one exception to this rule. If the release from any individual source will affect more than one environmental medium (e.g., a wastepile releasing to air and ground water) it must be modeled separately. Therefore, any source that affects two different media should be treated as two separate sources for purposes of reporting. This is desirable because EPA must analyze each release pathway separately to properly evaluate the risks posed by the continuous release. In addition, because the hazardous substance releases to each medium may differ in frequency and quantity, it is useful to distinguish the releases for purposes of risk evaluation.

#### **Part A - Basis for Asserting the Release is Continuous and Stable in Quantity and Rate:**

You must first identify the source of the release (include the name of the source in all subsequent parts), then briefly describe the basis for stating that the release is continuous and stable in quantity and rate. Your description of the basis for stating that the hazardous substance release is continuous and stable in quantity and rate should include whether the release is continuous without interruption, or is a routine, anticipated, intermittent release. It should also include information on when the release is expected to occur (i.e., evidence of predictability of the release). One example of a release that may be predictable and regular is fugitive emissions from valves that occur at different rates over the course of a production cycle as the pressure inside the system changes. Although the rate of such fugitive emissions may not be strictly uniform, it may be predictable in the sense that the rate and amount of the release vary in a similar manner each time the process is operated or decompression occurs.

Your description should also identify the activity that results in the release (e.g., batch process, operating procedure, loading/unloading, maintenance activity, filling of storage tanks). If the release occurs because of a malfunction, this should be explained fully. Note that only certain releases due to malfunctions can qualify as a continuous release. Please refer to the discussion in the preamble of the continuous release final rule at 55 FR 30171, Jul. 24, 1990.

Finally, your description should include information on how you established the pattern of the release and calculated release estimates (e.g., engineering estimates, your best professional judgment, past release data).

For each source identified, provide the following information:

- (1) Indicate whether the release is continuous without interruption or abatement or routine, anticipated, and intermittent.
- (2) Identify the activity or activities that cause the release from the source.
- (3) If the release results from a malfunction, describe the malfunction and explain why the release should be considered continuous and stable in quantity and rate.
- (4) Identify how you established the pattern of the release and calculated release estimates.