

**RENEWAL OF INFORMATION COLLECTION REQUEST FOR THE
CONTINUOUS RELEASE REPORTING REQUIREMENTS**

Including Analysis for Use of Continuous Release Reporting Forms

OMB Submission

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1. IDENTIFICATION OF THE INFORMATION COLLECTION

1a. Title of the Information Collection

Continuous Release Reporting Regulations (CRRR) Under CERCLA 1980 (Renewal)
EPA No. 1445.12, OMB No. 2050-0086.

1b. Short Characterization/Abstract

This information collection request (ICR) addresses the reporting and record keeping activities required to comply with EPA's continuous release reporting regulations (CRRR; 40 CFR 302.8) implementing section 103(f)(2) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA). The CRRR clarifies the types of releases that qualify for reporting under CERCLA section 103(f)(2) and establishes the reporting requirements applicable to qualifying releases. Responsibility for information collection activities of the CRRR reside in the Office of Emergency Management (OEM) in the Office of Solid Waste and Emergency Response (OSWER). This ICR renews the collection activity previously approved under OMB No. 2050-0086 and applies to the period July 1, 2015 through June 30, 2018.¹ Estimates of the burden placed on industry and the government to comply with the release notification requirements are presented on an annual basis.

The analysis also includes estimates for the burden and cost impacts of using continuous release reporting forms on both the industry and government in order to comply with the release notification requirements. Information pertaining to the use of continuous release reporting forms appears in "green" type. Respondents have the option to use these forms provided by EPA. If respondents used these forms, the amount of burden would be less and so the burden numbers represent a low range estimate.

CERCLA section 103(a) requires persons in charge of a facility or vessel to immediately notify the National Response Center (NRC) of any hazardous substance release that equals or exceeds its reportable quantity (RQ) and is not federally permitted. Notification under CERCLA is intended to ensure that Federal authorities receive prompt notification of hazardous substance releases for which a timely response may be necessary to protect public health or welfare or the environment from any adverse effects that may be associated with the release. Section 103(f)(2) of CERCLA provides relief from the per-occurrence notification requirements of section 103(a) for hazardous substance releases that are "continuous," and "stable in quantity and rate," provided that such releases are reported "annually, or at such time as there is any statistically significant increase" in the quantity of the release. Section 103(f)(2) contemplates that, in the case of certain "continuous" and "stable" releases, the notification objectives of CERCLA can be achieved with less

¹ 2050-0086 (EPA No. 1445.11) expires on June 30, 2015. The forms are contained in Attachment A to this document and also available at: www.epa.gov/emergencies/content/reporting/rqover.htm#con.

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frequent reporting. The regulated community is expected to:

- Gather necessary release data, such as the time, quantity, and source of the release;
- Notify the facility manager of the release;
- Consult with the environmental compliance expert regarding the release;
- Make an initial report of the release to the NRC;
- Submit an initial written notification to the appropriate EPA Regional Office for the geographical area where the releasing facility or vessel is located;
- Provide follow-up notification within 30 days of the first anniversary date of the initial written notification;
- Make notifications to the NRC if there is a change in the release, including a statistically significant increase in a release;
- Make an annual evaluation of releases to determine if changes have occurred in the information submitted in the initial written notification, the follow-up notification and/or in a previous change notification - if there are no changes, submittal of a report is not required.
- Keep all supporting documents, materials, and other information on file for a period of one year to substantiate the reported normal range of releases, the basis for stating that the release is continuous and stable in quantity and rate, and the other information in the initial written report, the follow-up report, and the annual evaluations.

The continuous release final rule has been in effect since September 24, 1990. This ICR utilizes historical data on the number of continuous release reports submitted to the Federal government to estimate the number of burden hours attributable to the CRRR. The statistics on the number of continuous release reports submitted to the Federal government are available through the National Response Center's incident data base.²

²That data base is available at: <http://www.nrc.uscg.mil/>

2. NEED FOR AND USE OF THE COLLECTION

2a. Need and Authority for the Collection

The information collection required in the CRRR (40 CFR 302.8) is fully authorized under CERCLA section 103(f)(2) and section 104(e). CERCLA section 103(f)(2) provides relief from the notification requirements of CERCLA section 103(a) for hazardous substance releases that are “continuous,” “stable in quantity and rate,” and for which notification has been given under CERCLA section 103(a) “for a period sufficient to establish the continuity, quantity, and regularity” of the release. Further, CERCLA section 103(f)(2) requires that notification of releases qualified as continuous under the CRRR must be provided “annually, or at such time as there is any statistically significant increase” in the quantity of the release. The specific information provided in the required notifications is authorized under CERCLA section 104(e). CERCLA section 104(e) authorizes the collection of information, entry, and inspection and sampling activities for the purposes of determining the need for a response, or choosing or taking any response action under CERCLA. In addition, CERCLA section 103(f)(2) establishes a notification system that documents information provided in the respondent notifications. The information collection and management requirements of the CRRR are necessary to determine if a response action is needed to control or mitigate any potential adverse effects associated with a reported hazardous substance release.

2b. Practical Utility and Users of the Data

The information collected under the CRRR is used to evaluate the acute and chronic effects of the continuous release to determine if a response action is necessary to prevent or mitigate any adverse effects. Any hazardous substance release that equals or exceeds its RQ warrants a timely evaluation of its source, emission rate, and chemical form, the proximity of sensitive populations or ecosystems, and the ambient conditions, to ensure the protection of public health and welfare and the environment. Agency responses to continuous hazardous substance release notifications may take a number of forms ranging from requests for more detailed information (to allow for a more detailed risk assessment), to the imposition of more stringent emissions limitations, to removal and/or remedial actions. Finally, the release notification information is used by State and local government emergency planners to conduct State and local emergency response planning.

3. NON DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3a. Non Duplication

The hazardous substance release information requested under the CRRR in the initial written and follow-up reports is the minimum information necessary to properly evaluate a hazardous substance release. EPA analyzed possible areas of overlap with other regulations, concluding that

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there are limited areas of overlap with reporting requirements under other statutes and provisions. In particular, some facilities may need to provide similar hazardous substance release information to satisfy reporting requirements for the Toxic Release Inventory (TRI) report under SARA section 313. The level of duplication, however, is limited because of differences in the list of chemicals, and the SIC and facility sizes affected by SARA section 313. SARA section 313 requirements only apply to facilities in certain SIC categories whose inventory quantities exceed 10,000 pounds; CERCLA section 103 affects facilities in all SIC codes regardless of inventory amounts. In addition, the SARA section 313 list of toxic chemicals includes only about one-fourth of the listed CERCLA hazardous substances. Further, the SARA section 313 list includes some substances that are not on the CERCLA list at all.

To minimize any duplication in reporting, EPA allows facilities that are subject to the reporting requirements of both regulations to submit the SARA section 313 report (otherwise known as the TRI report) as a substitute for the written reports required under the CRRR, provided that certain additional continuous release information is included as an addendum to the TRI report. If the TRI report is submitted in lieu of the continuous release written report, based on each source release, the following continuous release information must also be included in the TRI report: (1) the upper and lower bounds (normal range) of the release over a 24-hour period of each hazardous substance; (2) the frequency of the release from each release source; (3) a signed statement describing the basis for asserting that the release is continuous and stable in quantity and rate; (4) the population density within a one-mile radius; and (5) the identity and location of any sensitive populations and ecosystems within a one-mile radius. These additions will provide EPA with information that is not available from the TRI report, but is required to properly evaluate the need for a government response.

Additionally, continuous release reporting under CERCLA section 103(f)(2) eliminates frequent and repetitive reporting under CERCLA section 103(a). If a facility with continuous releases were to report on a per-occurrence basis under section 103(a), the facility could be notifying the NRC daily. Respondents with continuous releases may be unnecessarily reporting under CERCLA section 103(a) because they: (1) may not be familiar with the reduced reporting option under section 103(f)(2), or (2) may not realize that there is a reduced burden associated with a one-time initial telephone notification and submission of an initial written report and one follow-up report under the CRRR. EPA's outreach efforts to increase industry awareness are described in Section 5(b). As respondents become more aware of the CRRR and the ability to simplify and reduce expenses associated with continuous release reporting, it is possible that some reports could be redirected from CERCLA section 103(a) (ERNS) to CERCLA section 103(f)(2) (CR-ERNS).

3b. Public Notice Required Prior to ICR Submission to OMB

In compliance with the Paperwork Reduction Act (PRA) (44 U.S.C. 3501 *et seq.*), EPA has notified the public through the Federal Register notice on the renewal of this ICR (See 80 FR 7460,

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Feb. 10, 2015). The Docket ID No. for the notice is EPA-HQ-SFUND-2015-0100, and can be accessed at www.regulations.gov. There were no comments received.

3c. Consultations

EPA consulted with a number of Federal and State government agencies in the development of the information collection activities described in this ICR. To develop the CRRR, EPA formed a Workgroup to address the comments received on the Notice of Proposed Rulemaking (NPRM) published on April 19, 1988 (53 FR 12868). The Workgroup consisted of representatives from various EPA program offices, the ten EPA Regions, and the NRC. EPA Regional offices were responsible for the implementation of the final rule. Participation by these parties in the Workgroup was sufficient to address and resolve all outstanding issues. The comments received on the NPRM are addressed in the Response to Comments Document and in the preamble to the final rule.

EPA sponsored several workshops throughout the country for industry and Federal, State, and local government officials on the release notification requirements under CERCLA and SARA Title III, including the requirements under the CRRR. The workshops were held to educate the regulated community as well as those Federal and State agencies required to implement the regulations. In addition, the workshops provided an opportunity for the public to comment on the implementation of the regulation. No workshops were conducted or planned during the period covered by ICR 1445.12. The forms are contained in Attachment A to this document and are also available at www.epa.gov/emergencies/content/reporting/rqover.htm#con.

For this renewal, several individuals (fewer than 9) responsible for making notifications to the NRC and submitting written follow-up reports were consulted regarding the process and burden this collection imposes. Brief summaries of those consultations are contained in Appendix A to this renewal supporting statement.

3d. Effects of Less Frequent Collection

The frequency of information collection established in the CRRR is the minimum level necessary for proper evaluation of continuous releases. If the information collected under the CRRR, such as the source, frequency, and composition of the release, the environmental media affected, and the identity and location of any sensitive populations or ecosystems, were collected less frequently than stipulated under the CRRR, the Federal government's ability to properly evaluate the threat posed by the release and the need for a response action would be jeopardized.

3e. General Guidelines

The regulations imposed by CERCLA section 103(f)(2) adhere fully to OMB's general guidelines concerning the collection of information and the control of paperwork burdens on the

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public.

3f. Confidentiality

The regulations implementing CRRR do not require the submittal of any proprietary, trade secret, or other confidential information.

3g. Sensitive Questions

The regulations implementing CRRR do not require the submission of any sensitive business information. In addition, the information collection requested under these regulations is in compliance with the Privacy Act of 1974 and OMB Circular A-108.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4a. Respondents and SIC Codes

This section is not applicable. The usage and release of hazardous substances are pervasive throughout industry. EPA expects a number of different industrial categories to report hazardous substance releases under the provisions of the CRRR. No one industry sector or group of sectors is disproportionately affected by the information collection burden.

4b. Information Requested

i. Data items, including record keeping requirements

To ensure that government authorities receive timely and sufficient information to evaluate potentially dangerous hazardous substance releases reported under CERCLA section 103(f)(2), the CRRR requires seven types of information collection activities:

- (1) An initial telephone call to the NRC;
- (2) An initial written report to the EPA Region;
- (3) A one-time follow-up written report to the EPA Region on or before the first-year anniversary of the submission of an initial written report;
- (4) An annual evaluation of a release beginning the year after the submission of the one-time follow-up written report;
- (5) Notification to the NRC and EPA Regions of a change in the sources, composition, or frequency of a release;
- (6) Notification to the EPA Region of a change in other information previously submitted; and
- (7) Immediate notification to the NRC of any statistically significant increase (SSI) in the

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quantity of a release.

The time required by a facility to complete the seven information collection activities varies and is largely contingent on the nature of the reported releases and the facility's information collection procedures. However, EPA estimated the average amount of time that is needed to perform these seven information collection activities and the average unit burden hours. The estimates are presented in section 6(a). The unit burden hours used in this ICR are based upon estimates from the CRRR economic analysis. The CRRR Economic Impact is available in rulemaking Superfund Docket Number 103(f)CR - 4-8.

Reporting continuous releases represents a reduction in burden for facilities that would otherwise report releases on a per-occurrence basis. EPA believes that the notification system developed under the CRRR represents the minimum level of reporting necessary for the Federal On-Scene Coordinator (OSC) to evaluate whether a response action is needed to prevent or mitigate any hazards to public health and welfare and the environment. The following paragraphs briefly describe the purpose and timing of each information collection activity and list the data items that comprise each notification.

Initial Telephone Notification to the NRC – The initial telephone call to the NRC serves to notify government authorities of the facility's intent to report a hazardous substance release under CERCLA section 103(f)(2). All such releases must be released in a continuous and stable manner. The initial telephone call, in conjunction with the initial written report, fulfills the statutory requirement that the release be reported under CERCLA section 103(a) for a period sufficient to establish the continuity, quantity, and regularity of the release. The information provided in the initial telephone notification must include:

- (8) The name and location of the facility; and
- (9) The name(s) and identity(ies) of the hazardous substance(s) being released.

Initial Written Report and the Follow-up Written Report – The initial written report and the follow-up written report, which are sent to the EPA Region, provide a full description of the release. The initial written report and follow-up written report serve as the basis for a comprehensive evaluation of the hazards posed by the release. Based on this comprehensive evaluation, government authorities determine if a response action is necessary to prevent or mitigate any adverse effects. The initial written report must be submitted within 30 days of the initial telephone call. This 30-day period does not necessarily provide enough time to collect all relevant and appropriate data, but does allow for an initial evaluation of the release. The follow-up written report, due one year after submission of the initial written report, serves to verify the information provided on the initial written report (NOTE: there cannot be any form of change in source, composition, or frequency of release without going through the process again). The follow-up written report helps ensure that the information used to evaluate the hazards posed by the release is current and provides accurate information.

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The data elements requested in the initial written and follow-up report are identical and consist of:

- (10) The name of the facility or vessel; the location, including the longitude and latitude; the case number assigned by the National Response Center or Environmental Protection Agency; the Dun and Bradstreet number of the facility (if available); the port of registration of the vessel (if applicable); and the name and telephone number of the person in charge of the facility or vessel. [40 CFR 302.8(e)(1)(i)]
- (11) A signed statement that the hazardous substance release described is continuous and stable in quantity and rate under the definitions of 40 CFR 302.8(b) and that all reported information is accurate and current to the best knowledge of the person in charge. [40 CFR 302.8(e)(1)(iv)(H)]
- (12) The population density within a one-mile radius of the facility or vessel, described in terms of the following ranges: 0-50 persons, 51-100 persons, 101-500 persons, 501-1,000 persons, and more than 1,000 persons. [40 CFR 302.8(e)(1)(ii)]
- (13) The identity and location of sensitive populations and ecosystems within a one-mile radius of the facility or vessel (e.g., elementary schools, hospitals, retirement communities, or wetlands). [40 CFR 302.8(e)(1)(iii)]

In addition, facilities must provide the following substance-specific information for each continuous release:

- (14) The sources of the release, including specific source information (e.g., valves, pump seals, storage tank vents, stacks). [40 CFR 302.8(e)(1)(iv)(C)]
- (15) The environmental medium(a) affected by the release: if air, provide stack height or surface area affected; if surface water, the name of the surface water body; if a stream, the stream order or average flow rate and designated use; if a lake, the surface area and average depth; if on or under ground, the location of public water supply wells within two miles. [40 CFR 302.8(e)(1)(iv)(G)(1-4)]
- (16) The frequency of the release and the fraction of the release from each release source and the period over which it occurs. [40 CFR 302.8(e)(1)(iv)(D)]
- (17) A brief statement describing the basis for stating that the release is continuous and stable in quantity and rate. [40 CFR 302.8(e)(1)(iv)(E)]
- (18) The name and identity of the hazardous substance; and the Chemical Abstracts

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Service Registry Number for the substance. If the release is a mixture, the hazardous substance components of the mixture and their approximate concentrations and quantities, by weight. [40 CFR 302.8(e)(1)(iv)(A)]

- (19) The upper and lower bounds of the normal range of the release over the previous year. [40 CFR 302.8(e)(1)(iv)(B)]
- (20) An estimate of the total annual amount of the hazardous substance released in the previous year (in pounds or kilograms). [40 CFR 302.8(e)(1)(iv)(F)]

Annual Evaluation of a Release – Although a reporting facility is no longer required to submit a written report on its continuous releases after submitting a one-time written follow-up report verifying the information provided on the initial written report remained the same, the reporting facility must conduct and document an annual assessment of its continuous releases beginning the year after the submission of the follow-up written report. The purpose of the annual evaluation is to identify any changes that may have occurred in the release situation over the preceding year. The annual evaluation of a continuous release helps ensure that the information used to evaluate the hazards posed by the release is current and accurate information.

Change in the Source, Composition, or Frequency of a Release Report – If there is a change in the source, composition, or frequency of a release, the release must be reported and treated as a new continuous release. An initial telephone notification and written change report must be provided as described above. The person in charge also must submit a follow-up report within one year of the change report.

Other Changes in Information – Facilities experiencing a change in a continuous release that invalidates information previously submitted on the continuous release must notify the appropriate EPA Region by letter within 30 days of the change. The letter regarding the change in the release should explicitly identify the new (or changed) information and include an explanation for the change. For example, a facility must notify EPA if any schools, hospitals, retirement homes, or other developments housing sensitive populations are open within one mile of the facility.

Statistically Significant Increase Report – The CRRR defines a SSI as a release of a hazardous substance that exceeds the upper bound of the normal range of the release as established by the facility. The normal range of a release is defined by the range of release weights (in pounds or kilograms) recorded during the preceding year under normal operating conditions (that is, conditions that prevail during the period establishing the predictability and regularity of the release). Therefore, a SSI does not include releases within the reported normal range of release. An SSI release is considered an episodic release because it is a release above the RQ. Thus, SSIs must be immediately reported to the NRC by telephone pursuant to the notification requirements of CERCLA section 103(a). The information collected by the NRC in a SSI report includes the same information supplied when reporting any other episodic release (e.g., quantity of the release, source

of the release, and a description of any response actions taken).

The person in charge of a facility with a SSI may modify the previously established normal range as an alternative to reporting multiple SSIs. To modify the normal range of the release over a 24-hour period under normal operating procedures, the person in charge of the facility must report at least one SSI to the NRC as an episodic release (to facilitate immediate evaluation), and then must submit a written change report of the release information to the appropriate EPA Region describing the new normal range and reasons for the change; thus treating the SSI as a new release. Thus, for example, if a facility doubles its production level thereby doubling its release level, the facility may want to double its reported normal range of the continuous release, rather than reporting multiple SSIs. The person in charge also must submit a follow-up report within one year of the submission of the change report.

Record keeping – Facilities may maintain a log or some other record of each hazardous substance release reported under CERCLA section 103(f)(2). The information documented in the record can be used to demonstrate compliance with the provisions of the CRRR, including the requirement to demonstrate the continuity and stability of the release and the requirement to conduct an annual evaluation of the release. Additionally, facilities may find it useful to document daily release quantities for use in substantiating and modifying the normal range of the release.

ii. Respondent Activities

To comply with the provisions of the CRRR, the regulated community performs the following information collection activities:

- (1) Provides an initial telephone call to the NRC;
- (2) Provides an initial written report to the EPA Region;
- (3) Prepares a one-time follow-up written report for the EPA Region on or before the first-year anniversary of the submission of an initial written report;
- (4) Conducts an annual evaluation of a release beginning the year after the submission of the one-time follow-up written report;
- (5) Prepares change in the sources, composition, or frequency of a release reports;
- (6) Prepares change in other information reports;
- (7) Provides immediate notifications of SSIs; and
- (8) Maintains a log or other formal record to document compliance with the CRRR.

Each of these notification and record keeping activities is listed and described in detail in section 4(b)(i), above. In addition to these activities, persons in charge of a facility may be required to perform supplemental collection activities in response to the Federal government's evaluation of the facility's continuous release reports. In situations where EPA's evaluation of release reports engenders concern over potential adverse effects, EPA may require the person in charge of the

facility in question to submit the additional information or clarify and refine information previously submitted. EPA may use this additional information to better assess the risks associated with the release. Finally, in response to a release report or additional information, EPA may conduct a site inspection. Industry personnel accompany EPA personnel during the site inspection to address any questions, concerns, or information requests that may arise. Thus, the following other activities are included within the information collection activities performed by the regulated community:

- (9) Provision of additional information; and
- (10) Site inspection.

Estimates of the burden hours incurred by industry as a result of reporting continuous releases were developed based on estimates of the time expended in providing a specific report (e.g., the initial telephone call, the initial written report, the follow-up written report) as opposed to developing estimates for each work element (e.g., gathering information, reviewing report formats, completing reports) involved in completing all of the required activities. The burden estimates for each information collection and record keeping activity performed by the regulated community under the CRRR are presented in Section 6(a) of this ICR.

5. THE INFORMATION COLLECTED – AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5a. Agency Activities

Each of the notification reports submitted by industry is processed and evaluated by Federal authorities. For some continuous releases evaluated under the CRRR, EPA may request additional (supplemental) information or clarification of information previously submitted by a facility. EPA may use this information to conduct a more in-depth risk assessment of the release. In some extreme cases, the in-depth risk assessment may not allay EPA's concerns and EPA may decide to conduct a site inspection to review the circumstances associated with the release first-hand. Additionally, site inspections may be conducted periodically as a compliance and enforcement measure. Thus, the Agency performs the following other activities as a result of continuous releases reported under CERCLA section 103(f)(2):

- Request additional information; and
- Conduct site inspections.

Estimates of the burden hours incurred by the Federal government are developed based on estimates of the time expended in processing the notification reports required under the CRRR (e.g., the initial written report, SSI notification) or completing another activity (e.g., additional information, site inspection) as opposed to developing estimates for each work element (e.g., reviewing data, entering data, filing, evaluating a release, storing evaluation results) involved in completing all of the required activities. The burden estimates developed for each of the processing,

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evaluating, and other activities performed by the Federal government are presented in Section 6(c) of this ICR.

5b. Collection Methodology and Management

To facilitate collection and storage of information on continuous releases, EPA developed CR-ERNS. CR-ERNS is an information management system that serves as the depository for continuous release information received by the EPA Regions. CR-ERNS is designed to assist EPA Regional personnel in managing continuous release information and establishing priorities with respect to the review and evaluation of continuous release reports. The reports submitted to the EPA Regions include the initial written report, the follow-up report, and changes in release reports. Additionally, the NRC immediately notifies the appropriate EPA Region of any SSI reports.

5c. Small Entity Flexibility

The notification requirements under section 103(a) of CERCLA and the reporting relief available under section 103(f)(2) apply equally to all firms regardless of size. There are no special information collection or record keeping requirements on small businesses. EPA believes that the notification system developed under the CRRR represents the minimum level of reporting necessary for the Federal OSC to evaluate whether a response action is needed to prevent or mitigate any hazards to public health and welfare and the environment. A reduction in the reporting requirements facing small businesses is not possible without jeopardizing the quality of the information needed to evaluate the threat posed by the release and the need for a Federal response.

5d. Collection Schedule

The facility must provide an initial telephone call to the NRC as soon as the person in charge has knowledge of a hazardous substance release that equals or exceeds its RQ. The caller must decide whether to report the release under CERCLA section 103(a) (i.e., as an episodic release) or CERCLA section 103(f)(2) (i.e., as a continuous release). The reporting and record keeping activities associated with reporting an episodic release under CERCLA section 103(a) are presented in EPA ICR No. 1049.11. If the caller reports a continuous release, the initial written report required by CERCLA section 103(f)(2) must be provided within 30 days of the initial telephone call. In the second year of reporting, the facility must submit a written follow-up report to the EPA Region within 30 days of the anniversary date of submission of the initial written report. This report is sometimes called the First Anniversary Report. Thereafter, the reporting facility is responsible for reevaluating the release annually, but no reports are required unless there is a change in the sources or composition of a release, a change in release information previously submitted, or an SSI in the release.

SSIs in a release are considered to be episodic releases and must be reported as soon as the person in charge is aware that an SSI has occurred. If there is a change in the information submitted in the initial written or follow-up report, other than a change in sources, composition, or frequency of the release, the person in charge must submit a letter detailing the change to the EPA Region within 30 days of determining that a change has occurred.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6a. Estimating Respondent Burden

The burden amounts represented in green text are for the use of the continuous release reporting form provided by EPA. The amounts in green are a low range of estimates, whereas the amounts in black represent a high range of estimates. If the forms are used then EPA expects a lower burden. For the purposes of this collection, EPA is using the high range estimates for the public notice.

In the first year of the three-year period covered by this ICR, it is estimated that 4,038 facilities will be affected by the CRRR. Of the 4,038 facilities affected in the first year, it is assumed that 6 will be reporting continuous releases for the first time and the remaining 4,032 will be meeting information collection requirements for ongoing releases. In the second and third years, it is estimated that 7 and 7 additional facilities, respectively, will generate reportable continuous releases. When calculating the burdens and costs in this ICR it has been assumed that the typical facility participates in information collection activities for each release. For example, the typical facility will provide an initial telephone notification and written report for each of its continuous releases. In fact, it is likely that many facility operators will consolidate collection activities for releases at their facilities (e.g., provide one telephone notification for several releases). Assuming eight releases per facility per year, and thus 8 information collection activities per facility per year, the total number of continuous release information collection activities in the first year of the three-year period covered by this ICR is estimated to be 32,308 (52 initial notification activities and 32,256 ongoing notification activities). In the second and third years of the period covered by this ICR, it is estimated that 55 and 60 information collection activities, respectively, will take place. The total estimated burden to respondents is approximately 324,928, 325,566, and 326,251 hours in years 1, 2, and 3, respectively. For the regulated community, the estimated information collection activity costs (including labor and O&M costs) are \$17,738,906, \$17,773,533 and \$17,810,974 in years 1, 2, and 3, respectively. The total estimated burden to the government is approximately 29,046, 29,072, and 29,140 hours in years 1, 2, and 3, respectively. The estimated total cost to the government is \$1,369,100, \$1,370,356, and \$1,373,530, in years 1, 2, and 3, respectively.

We estimate that the use of continuous release reporting forms will reduce overall burden to respondents by approximately 52, 55, and 60 hours in years 1, 2, and 3, respectively.³ For the

³The burden reduction is estimated to be *one hour/initial notification activity and information collection activity* which is

regulated community, the we estimate that the information collection activity costs (including labor and O&M costs) will be reduced by \$2,601, \$2,796, and \$3,005 in years 1, 2, and 3, respectively. The estimated burden reduction to the government is approximately 6,927, 6,931, and 6,947 hours in years 1, 2, and 3, respectively. The estimated reduction in cost to the government is \$326,519, \$326,685, and \$327,471, in years 1, 2, and 3, respectively.

To report a continuous release, the regulated community performs the following activities (outlined in Section 4(b) of this ICR): (1) provides an initial telephone notification to the NRC; (2) prepares an initial written report for the EPA Region; (3) prepares follow-up written report for the EPA Region on the first-year anniversary of the submission of the initial written report; (4) conducts an annual evaluation of the release beginning the year after the submission of the one-time follow-up written report; (5) reports a change in the sources, composition, or frequency of the release; (6) reports a change in other information; (7) reports SSIs in the release; (8) complies with other activities; and (9) keeps records on the release, including documentation of the annual evaluation. Activities (5), (6), (7), and (8) are conditional activities and are necessary for only a small fraction of all the continuous releases reported each year. For example, SSIs are defined in the CRRR as hazardous substance releases whose quantity exceeds the upper bound of the normal range, where the normal range includes all releases of the hazardous substance reported or occurring during the previous year. Thus, only a small fraction of facilities experience SSIs in their continuous releases in a given year.

When calculating the burden and costs in this ICR it is assumed that the typical facility participates in all the necessary information collection activities for each release. For example, the typical facility will provide an initial telephone notification and written report for each of its continuous releases. In fact, it is likely that many facility operators will consolidate collection activities for releases at their facility (e.g., provide one telephone notification for several releases).

The estimated burden hours for each of the activities listed in the paragraph above are presented in Exhibit 1. The burden estimates are taken from the CRRR economic impact analysis and are based on CERCLA reporting experience, SARA section 313 reporting experience, and professional judgment. A description of the basis for each burden estimate, as well as the percentage of continuous releases for which the burden is expected to be incurred, is provided in the remainder of this section.

why these numbers are the same as the paragraph above.

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Exhibit 1 – Unit Burden Hours per Respondent Information Collection Activity

Collection Activity	When Collection Activity is Performed	Percentage of Continuous Releases that Will Require a Collection Activity	Unit Burden Hours			
			Mgt	Tech	Clerical	Total
Providing an Initial Telephone Notification	When first reporting a release	100% of new releases	1.0	2.0	0.0	3.0
Preparing an Initial Written Report	Within 30 days of an initial telephone notification	100% of new releases	3.0	4.0	1.0	8.0
Preparing a Follow-up Written Report	A year after the submission of an initial written report	100% of all second year releases	3.0	1.0	1.0	5.0
Conducting an Annual Evaluation of a Release	Each year beginning the year after the submission of a written follow-up report	100% of all third year and subsequent year releases	3.0	1.0	1.0	5.0
Reporting a Change in the Sources, Composition, or Frequency of a Release	When the sources, composition, or frequency of a release changes	5% each year of all new and current releases	4.0	4.0	1.0	9.0
Reporting Other Changes in Information	Changes in other information	10% each year of all new and current releases	1.0	1.0	0.5	2.5
Reporting an SSI in a Release	Immediately after an SSI event is noticed	5% each year of all new and current releases	1.0	1.0	0.0	2.0
Other Activities – Providing Additional Information	Upon EPA request	30% each year of all new and current releases	4.0	0.0	0.0	4.0
Other Activities – Facilitating a Site Inspection	Upon EPA request	1% each year of all new and current releases	4.0	4.0	0.0	8.0
Record keeping	Each year of a release	100% of all new and current releases	0.0	4.0	0.0	4.0

The estimated burden hours for each of the activities listed in the paragraph above are presented in Exhibit 1 (With Forms). The burden estimates are taken from the CRRR economic impact analysis and are based on CERCLA reporting experience, SARA section 313 reporting experience, and professional judgment. A description of the basis for each burden estimate (including where there might be some savings due to the use of the continuous release reporting forms), as well as the percentage of continuous releases for which the burden is expected to be incurred, is provided in the remainder of this section.

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Exhibit 1 (With Forms) – Unit Burden Hours per Respondent Information Collection Activity

Collection Activity	When Collection Activity is Performed	Percentage of Continuous Releases that Will	Unit Burden Hours			
			Mgt	Tech	Clerical	Total
Providing an Initial Telephone Notification	When first reporting a release	100% of new releases	1.0	2.0	0.0	3.0
Preparing an Initial Written Report	Within 30 days of an initial telephone notification	100% of new releases	3.0	3.0	1.0	7.0
Preparing a Follow-up Written Report	A year after the submission of an initial written report	100% of all second year releases	3.0	1.0	1.0	5.0
Conducting an Annual Evaluation of a Release	Each year beginning the year after the submission of a written follow-up report	100% of all third year and subsequent year releases	3.0	1.0	1.0	5.0
Reporting a Change in the Sources, Composition, or Frequency of a Release	When the sources, composition, or frequency of a release changes	5% each year of all new and current releases	4.0	4.0	1.0	9.0
Reporting Other Changes in Information	Changes in other information	10% each year of all new and current releases	1.0	1.0	0.5	2.5
Reporting an SSI in a Release	Immediately after an SSI event is noticed	5% each year of all new and current releases	1.0	1.0	0.0	2.0
Other Activities – Providing Additional Information	Upon EPA request	30% each year of all new and current releases	4.0	0.0	0.0	4.0
Other Activities – Facilitating a Site Inspection	Upon EPA request	1% each year of all new and current releases	4.0	4.0	0.0	8.0
Record keeping	Each year of a release	100% of all new and current releases	0.0	4.0	0.0	4.0

Providing an Initial Telephone Notification to the NRC – In providing the initial telephone notification, facilities incur a one-time, first-year burden of notifying the NRC that a hazardous substance release is reported under CERCLA section 103(f)(2). Providing the required information by telephone to the NRC is estimated to require 15 minutes (0.25 hours) of management time. Prior to the telephone call, however, the facility must determine if the release is continuous and stable in quantity and rate as defined in the CRRR. This determination is estimated to require 45 minutes (0.75 hours) of management time and two hours of technical time. Forty-five minutes (0.75 hours) of management time and two hours of technical time should be sufficient to determine if a release is continuous because facilities likely to be affected by the CRRR should be familiar with the reporting requirements of CERCLA section 103. In total, the burden associated with the initial

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telephone call is *three hours*.

We do not expect that use of the continuous release reporting forms will reduce the total burden associated with the initial telephone notification to the NRC.

Preparing an Initial Written Report – The burden associated with providing the initial written report is also a one-time, first-year cost. Much of the information required for the initial written report (e.g., facility identification, hazardous substance identification, frequency and source of the release) is readily available to the facility. Information such as the composition of the release and the environmental media affected, however, may require more extensive consideration and analysis. In addition, some time is needed to organize and format the required information into a report suitable for submission to the government. It is assumed that many facilities will use EPA’s prepared report format to minimize report organization and formatting efforts. Preparation of the initial written report that uses EPA’s prepared report format is estimated to require three hours of managerial time, three hours of technical time, and one hour of clerical time. To account for the burden experienced by the facilities that do not use EPA’s prepared report format, EPA has increased the technical burden to four hours. The costs of photocopying and mailing this report and all other reports to the appropriate EPA Region are computed in Section 6(b). Preparation of the initial written report is estimated to require three hours of managerial time (including one-hour of legal review), four hours of technical time, and one hour of clerical time. Thus, the total burden associated with the initial written report is *eight hours*.

Estimated savings for use of continuous release reporting forms is found in the reduction of technical time from four hours to three hours, thus the total burden associated with the initial written report is *seven hours*.

Preparing a Follow-up Written Report – Within one year of submitting the initial written report, facilities must submit a one-time follow-up written report to the appropriate EPA Region. The follow-up report requires the same information as the initial written report but serves to confirm, update, and refine the information provided in the initial report based on release data from the previous operating year. Because some of the technical information gathered for preparation of the initial written report, such as the source of the release and specific information describing the environmental media affected remains unchanged, preparation of the follow-up report requires less technical time than preparation of the initial written report. EPA estimates that preparation of the follow-up report requires three hours of managerial time, one hour of technical time, and one hour of clerical time. In total, the burden associated with the follow-up written report is *five hours*. The burden associated with the follow-up written report is incurred in the second year of reporting.

We do not expect that use of the continuous release reporting forms will reduce the total burden associated with the follow-up written report.

Conducting an Annual Evaluation of the Release – Although the written follow-up report

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is prepared and submitted only once, facilities are required to conduct and document an annual evaluation of each hazardous substance release reported under section 103(f)(2) beginning the year after submitting the follow-up written report. This annual evaluation is comparable to the review and information collection necessary for preparation of the follow-up report. The burden associated with the annual evaluation, therefore, is assumed to be the same as the burden of preparing the written follow-up report (*five hours*). The burden associated with the annual evaluation is incurred in the third and all subsequent years.

We do not expect that use of the continuous release reporting forms will reduce the total burden associated with the annual evaluation of the release.

Reporting a Change in the Sources, Composition, or Frequency of the Release – When a facility experiences a change in the sources, composition, or frequency of a release, the release is considered a new release because the associated hazard may have changed significantly. Changes in the sources, composition, or frequency of a release are expected to result only from significant changes in the production process, such as the installation of new equipment or a change in the chemical nature of the process. While such significant changes are expected over the long-term, the likelihood of such a change occurring in a particular year is small. EPA estimates that the number of already reported continuous releases that experience a change in sources, composition, or frequency is equal to 5 percent of the total number of hazardous substance releases being reported under the CRRR in any given year.

Facilities experiencing a change in the sources, composition, or frequency of a continuous release must complete the initial notification process for the release (i.e., an initial telephone call to the NRC and an initial written report and follow-up report to the EPA Region). For facilities experiencing a change in the sources, composition, or frequency of a continuous release, much of the information from the previous initial written report (e.g., facility identifiers, the media affected) should not have changed. It is assumed that the technical time required evaluating the release, determining whether it is stable in quantity and rate, and accurately document the composition of the release and the environmental media affected would take four hours. The number of management and clerical hours required to report a new continuous release are assumed to be four hours and one hour respectively. Thus, the total burden associated with reporting a change in the sources, composition, or frequency of a continuous release is *nine hours*.

We do not expect that use of the continuous release reporting forms will reduce the total burden associated with reporting a change in the sources, composition, or frequency of a total continuous release.

Reporting Other Changes in Information – For changes other than a change in the sources, composition, or frequency of a release, the person in charge must notify the EPA Region by letter that the information previously submitted in support of a continuous release notification is no longer valid. For example, the population density in the vicinity of the facility would be reported by

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submitting a letter detailing the change and its cause. Such changes in information previously submitted are likely to occur over an extended period of time, but are much less likely to occur every year. EPA estimates that, on an annual basis, approximately 10 percent of the releases reported under CERCLA section 103(f)(2) will experience a change that requires submission of a letter to the EPA Region. Gathering and reporting the change in the release by a letter to the EPA Region is estimated to require one hour of managerial time, one hour of technical time, and one-half hour of clerical time for a total burden of *2 and one-half hours*.

We do not expect that use of the continuous release reporting forms will reduce the total burden associated with reporting other changes in information.

Reporting a Statistically Significant Increase in the Release – As soon as the person in charge of a facility has knowledge that the quantity of a continuous release being reported under CERCLA section 103(f)(2) exceeds the upper bound of its previously established normal range of release weights, the person in charge must notify the NRC. SSIs are episodic release events because the release has not been previously reported or evaluated. To avoid underestimating the burden, this ICR includes the burden for reporting an SSI, even though the burden may be captured in the ICR for episodic releases (EPA 1409.11). The estimated burden of reporting an SSI is based on interviews with chemical industry personnel and the burden associated with reporting similar episodic releases under CERCLA section 103(a). EPA estimates that reporting of an SSI requires one hour of managerial time and one hour of technical time for a total burden of *two hours*. The technical time consists of determining if the release is reportable, briefing management, and collecting the information required for NRC reporting. The managerial time includes alerting appropriate personnel and transmitting the information required in the telephone call.

Because SSIs are defined as releases that exceed the normal range, and the normal range is defined to include all release quantities recorded during the previous operating year, EPA estimates that no more than 5 percent of the hazardous substance releases reported under the CRRR will experience an SSI in a given year.

We do not expect that use of the continuous release reporting forms will reduce the total burden associated with reporting a statistically significant increase in the release.

Other Activities – In response to the government’s processing and evaluating the initial and follow-up reports, persons in charge of facilities may be required to: (1) provide additional information or clarify information previously submitted; and (2) accompany EPA personnel during a site inspection.

(1) **Providing Additional Information** – For some percentage of the continuous releases reported under the CRRR, the information provided in the initial and/or follow-up reports will be incomplete, incorrect, or worrisome, prompting EPA to request additional information regarding the

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nature and extent of the release. For example, EPA may seek additional information concerning release activity in order to better assess the risk posed by the release. EPA estimates that approximately 30 percent of the initial/follow-up reports could require submission of additional information or some level of interaction with EPA in the first and second years of reporting. Beginning in the third year of reporting, requests for additional information and further clarification of release information are assumed to be necessary only for newly reported releases. However, this analysis conservatively assumes that the percentage of reportable releases for which additional information is necessary will remain at 30 percent for all years of reporting. For each hazardous substance report that requires additional communication with EPA, industry is estimated to expend *four hours* of managerial time.

We do not expect that use of the continuous release reporting forms will reduce the total burden associated with reporting other activities.

(2) **Facilitating a Site Inspection** – In extreme cases, the preliminary risk assessment of a release will indicate the need for a site inspection, allowing EPA to directly assess and evaluate the circumstances of a release and the population and environment potentially affected by the release. In addition, site inspections are conducted periodically as a compliance and enforcement measure. Site inspections are estimated to be necessary for no more than one percent of the reported continuous releases. EPA estimates that facility participation in a site inspection requires four hours of managerial time and four hours of technical time for a total burden of *eight hours*.

We do not expect that use of the continuous release reporting forms will reduce the total burden associated with facilitating a site inspection.

Record keeping – EPA assumes many facilities maintain a log or some other record of each hazardous substance release reported under the CRRR. Facilities may find it useful to collect and record the following information for use in demonstrating compliance with the provisions of CERCLA section 103(f)(2): (1) estimates of daily release quantities to demonstrate the continuity and stability of the release, and to establish and modify the normal range of the release; (2) documentation of the methodology and calculations used in estimating required information; and (3) documentation of the annual assessment required each year subsequent to submission of the follow-up written report. Much of the time necessary to gather these records has already been attributed to the preparation of the initial and follow-up reports, however, it is estimated that an additional *four hours* of technical time is necessary for keeping records on each hazardous substance release reported under the CRRR.

We do not expect that use of the continuous release reporting forms will reduce the total burden associated with record keeping.

The estimated annual burden hours incurred by a “typical” facility are presented in Exhibit 2. A typical respondent is assumed to report eight continuous hazardous substance releases in year one

and to experience a change in one release in the second and third years of reporting (e.g., the frequency of the release increases from three to five times a week, causing a modification in the estimated annual release amount). No other conditional activities (e.g., SSI reporting and facilitating a site inspection) are assumed to be required of the typical respondent; the inclusion of burden estimates associated with any additional conditional activities may result in a significant overestimation of the burden incurred by a typical facility.

Exhibit 2 – Burden Hours for a Typical Facility

Collection Activity	First Year Burden Hours				Second Year Burden Hours				Third Year Burden Hours			
	Mgt	Tech	Clerical	Total	Mgt	Tech	Clerical	Total	Mgt	Tech	Clerical	Total
Providing an Initial Telephone Notification	8.0	16.0	0.0	24.0	NA	NA	NA	0.0	NA	NA	NA	0.0
Preparing an Initial Written Report	24.0	32.0	8.0	64.0	NA	NA	NA	0.0	NA	NA	NA	0.0
Preparing a Follow-up Written Report	NA	NA	NA	0.0	24.0	8.0	8.0	40.0	NA	NA	NA	0.0
Conducting an Annual Evaluation of a Release	NA	NA	NA	0.0	NA	NA	NA	0.0	24.0	8.0	8.0	40.0
Reporting Other Changes in Information	NA	NA	NA	0.0	1.0	1.0	0.5	2.5	1.0	1.0	0.5	2.5
Record keeping	0.0	32.0	0.0	32.0	0.0	32.0	0.0	32.0	0.0	32.0	0.0	32.0
Total Burden Hours for a Typical Facility	32.0	80.0	8.0	120.0	25.0	41.0	8.5	74.5	25.0	41.0	8.5	74.5

A “typical” respondent is assumed to report eight continuous hazardous substance releases in year one and to experience a change in one release in the second and third years (e.g., the frequency of the release per week changes each year, causing a modification in the estimated annual release amount). No other conditional activities are assumed to be required of the typical respondent.

NA = Not Applicable

The estimated annual burden hours incurred by a “typical” facility are presented in Exhibit 2 (With Forms). A typical respondent is assumed to report eight continuous hazardous substance releases in year one and to experience a change in one release in the second and third years of reporting (e.g., the frequency of the release increases from three to five times a week, causing a modification in the estimated annual release amount). No other conditional activities (e.g., SSI reporting and facilitating a site inspection) are assumed to be required of the typical respondent; the inclusion of burden

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estimates associated with any additional conditional activities may result in a significant overestimation of the burden incurred by a typical facility.

Exhibit 2 (With Forms) – Burden Hours for a Typical Facility

Collection Activity	First Year Burden Hours				Second Year Burden Hours				Third Year Burden Hours			
	Mgt	Tech	Clerical	Total	Mgt	Tech	Clerical	Total	Mgt	Tech	Clerical	Total
Providing an Initial Telephone Notification	8.0	16.0	0.0	24.0	NA	NA	NA	0.0	NA	NA	NA	0.0
Preparing an Initial Written Report	24.0	24.0	8.0	56.0	NA	NA	NA	0.0	NA	NA	NA	0.0
Preparing a Follow-up Written Report	NA	NA	NA	0.0	24.0	8.0	8.0	40.0	NA	NA	NA	0.0
Conducting an Annual Evaluation of a Release	NA	NA	NA	0.0	NA	NA	NA	0.0	24.0	8.0	8.0	40.0
Reporting Other Changes in Information	NA	NA	NA	0.0	1.0	1.0	0.5	2.5	1.0	1.0	0.5	2.5
Record keeping	0.0	32.0	0.0	32.0	0.0	32.0	0.0	32.0	0.0	32.0	0.0	32.0
Total Burden Hours for a Typical Facility	32.0	72.0	8.0	112.0	25.0	41.0	8.5	74.5	25.0	41.0	8.5	74.5

A “typical” respondent is assumed to report eight continuous hazardous substance releases in year one and to experience a change in one release in the second and third years (e.g., the frequency of the release per week changes each year, causing a modification in the estimated annual release amount). No other conditional activities are assumed to be required of the typical respondent.

N/A – Not Applicable

6b. Estimating Respondent Costs

i. Estimating Labor Costs

The estimated cost to complete various continuous release reports required under the CRRR is a function of the time expended by industry personnel (i.e., the burden estimates presented in section 6(a)), and the hourly wage rates for the appropriate categories of labor. The hourly wage rates used for industry in this ICR are from December 2014 and were obtained from the Bureau of Labor

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Statistics.⁴ For purposes of this analysis, EPA estimates an average hourly respondent labor cost of \$65.50 for managerial staff, \$50.40 for technical staff, and \$24.76 for clerical staff.

These rates reflect the employer costs for employee compensation in the United States as of December 2014 and include both employer costs for legally required benefits (e.g., social security, worker's compensation, and unemployment insurance), other important fringe benefit categories (e.g., insurance, paid leave, retirement, and savings), and overhead and general and administrative costs. Costs associated with the burden hours presented in Section 6(a) of this ICR are shown in Exhibit 3.

Exhibit 3 presents the unit costs to industry of performing the notification, record keeping, and other activities that may be required in reporting a continuous release. The unit cost of each collection activity is calculated by multiplying the annual burden hour estimates in Exhibit 2 by the hourly wage rate for the appropriate labor category (listed above).

Exhibit 3 – Unit Labor Cost per Respondent Information Collection Activity

Collection Activity	Burden Hours			Unit Labor Cost
	Managerial/hr \$65.50	Technical/hr \$50.40	Clerical/hr \$24.76	
Providing an Initial Telephone Notification	1.0	2.0	0.0	\$166.30
Preparing an Initial Written Report	3.0	4.0	1.0	\$422.86
Preparing a Follow-up Written Report	3.0	1.0	1.0	\$271.66
Conducting an Annual Evaluation of a Release	3.0	1.0	1.0	\$271.66
Reporting a Change in the Sources, Composition, or Frequency of a Release	4.0	4.0	1.0	\$488.36
Reporting Other Changes in Information	1.0	1.0	0.5	\$128.28
Reporting an SSI in a Release	1.0	1.0	0.0	\$115.90
Other Activities – Providing Additional Information	4.0	0.0	0.0	\$262.00
Other Activities – Facilitating a Site Inspection	4.0	4.0	0.0	\$463.60
Record keeping	0.0	4.0	0.0	\$201.60

4 Bureau of Labor Statistics' news release dated, March 11, 2015, entitled, "Employer Costs for Employee Compensation - December 2014" listed hourly compensation (wages and salaries plus fringe benefits) rates for civilian managerial, technical, and clerical workers. Therefore the wage rates used in this ICR (1445.12) include salaries, fringe benefits, overhead costs and general and administrative costs as of December 2014.

Exhibit 3 (With Forms) presents the unit costs to industry of performing the notification, record keeping, and other activities that may be required in reporting a continuous release. The unit cost of each collection activity is calculated by multiplying the annual burden hour estimates in Exhibit 2 (With Forms) by the hourly wage rate for the appropriate labor category (listed above).

Exhibit 3 (With Forms) – Unit Labor Cost per Respondent Information Collection Activity

Collection Activity	Burden Hours			Unit Labor Cost
	Managerial/hr \$65.50	Technical/hr \$50.40	Clerical/hr \$24.76	
Providing an Initial Telephone Notification	1.0	2.0	0.0	\$166.30
Preparing an Initial Written Report	3.0	3.0	1.0	\$372.46
Preparing a Follow-up Written Report	3.0	1.0	1.0	\$271.66
Conducting an Annual Evaluation of a Release	3.0	1.0	1.0	\$271.66
Reporting a Change in the Sources, Composition, or Frequency of a Release	4.0	4.0	1.0	\$488.36
Reporting Other Changes in Information	1.0	1.0	0.5	\$128.28
Reporting an SSI in a Release	1.0	1.0	0.0	\$115.90
Other Activities – Providing Additional Information	4.0	0.0	0.0	\$262.00
Other Activities – Facilitating a Site Inspection	4.0	4.0	0.0	\$463.60
Record keeping	0.0	4.0	0.0	\$201.60

Exhibit 4 presents the annual labor cost estimated to be incurred by a typical facility. (The reporting pattern assumed for a typical facility is discussed in Section 6(a) above.)

Exhibit 4 – Annual Labor Costs for a Typical Facility

Collection Activity	Annual Burden Hours			Annual Labor Costs		
	Managerial/hr \$65.50	Technical/hr \$50.40	Clerical/hr \$24.76	First Year	Second Year	Third Year
Providing an Initial Telephone Notification	8	16	0	\$1,330.40	NA	NA
Preparing an Initial Written Report	24	32	8	\$3,382.88	NA	NA
Preparing a Follow-up Written Report	24	8	8	NA	\$2,173.28	NA

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Conducting an Annual Evaluation of a Release	24	8	8	NA	NA	\$2,173.28
Reporting Other Changes in Information	1	1	0.5	NA	\$128.28	\$128.28
Record keeping	0	32	0	\$1,612.80	\$1,612.80	\$1,612.80
Total Labor Costs for a Typical Facility				\$6,326.08	\$3,914.36	\$3,914.36

A “typical” respondent is assumed to report **eight** continuous hazardous substance releases in year one and to experience a change in **one release in the second and third years** (e.g., the frequency of the release per week changes each year, causing a modification in the estimated annual release amount). No other conditional activities are assumed to be required of the typical respondent.

N/A = Not Applicable

Exhibit 4 (With Forms) presents the annual labor cost estimated to be incurred by a typical facility using the continuous release reporting forms (The reporting pattern assumed for a typical facility is discussed in Section 6(a) above.)

Exhibit 4 (With Forms) – Annual Labor Costs for a Typical Facility

Collection Activity	Annual Burden Hours			Annual Labor Costs		
	Managerial/ hr \$65.50	Technical/hr \$50.40	Clerical/hr \$24.76	First Year	Second Year	Third Year
Providing an Initial Telephone Notification	8	16	0	\$1,330.40	NA	NA
Preparing an Initial Written Report	24	24	8	\$2,979.68	NA	NA
Preparing a Follow-up Written Report	24	8	8	NA	\$2,173.28	NA
Conducting an Annual Evaluation of a Release	24	8	8	NA	NA	\$2,173.28
Reporting Other Changes in Information	1	1	0.5	NA	\$128.28	\$128.28
Record keeping	0	32	0	\$1,612.80	\$1,612.80	\$1,612.80
Total Labor Costs for a Typical Facility				\$5,922.88	\$3,914.36	\$3,914.36

A “typical” respondent is assumed to report **eight** continuous hazardous substance releases in year one and to experience a change in **one release in the second and third years** (e.g., the frequency of the release per week changes each year, causing a modification in the estimated annual release amount). No other conditional activities are assumed to be required of the typical respondent.

N/A = Not Applicable

ii. Estimating Capital and Operations and Maintenance Costs

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Capital costs usually include any produced physical good needed to provide the needed information, such as machinery, computers, and other equipment. EPA does not anticipate that respondents will incur capital costs in carrying out the information collection requirements of the CRRR.

Operating and Maintenance (O&M) costs are those costs associated with a paperwork requirement incurred continually over the life of the ICR. They are defined by the PRA as “the recurring dollar amount of cost associated with O&M or purchasing services.” The O&M costs that are incurred by industries are shown in Exhibit 5. For this ICR, O&M costs cover photocopying of report templates to be filled out for each release source (25 cents per page) and postage and an envelope for reports sent to the Agency. There are no O&M costs associated with providing the initial telephone notification to the Agency or reporting an SSI under the CRRR. Each written report, the initial written report, the follow-up written report, changes in sources, composition, or frequency of release report, and other changes in information report, are assumed to require five (5) pages. Requests for additional information by the Agency will vary considerably in scope and length, depending on the nature of the request, however, it is estimated that it will take industry approximately 10 pages to complete the Agency’s request. The postage and mailing costs are assumed to be equal for all documents, and are calculated as \$6.91 postage and \$0.30 per envelope, totaling \$7.21 per report.⁵

Exhibit 5 – Unit Operating and Maintenance Costs per Respondent Information Collection Activity

Collection Activity	Unit O&M Costs		Total Unit O&M Cost per Report
	Photocopying (\$/pg)	Mailing (\$/report)	
	\$0.25	\$7	
Providing an Initial Telephone Notification	\$0.00	\$0.00	\$0.00
Preparing an Initial Written Report (5pgs/1rpt)	\$1.25	\$7.21	\$8.46
Preparing a Follow-up Written Report (5pgs/1rpt)	\$1.25	\$7.21	\$8.46
Conducting an Annual Evaluation of a Release	\$0.00	\$0.00	\$0.00
Reporting a Change in the Sources, Composition, or Frequency of a Release (5pgs/1rpt)	\$1.25	\$0.00	\$1.25
Reporting Other Changes in Information (5pgs/1rpt)	\$1.25	\$7.21	\$8.46
Reporting an SSI	\$0.00	\$0.00	\$0.00
Other Activities – Providing Additional Information (10pgs/1rpt)	\$2.50	\$7.21	\$9.71
Other Activities – Facilitating a Site Inspection	\$0.00	\$0.00	\$0.00
Record keeping (5pgs)	\$1.25	\$0.00	\$1.25

Exhibit 5 (With Forms) shows the O&M costs that are incurred by industries that are using the continuous release reporting forms. We are not making changes to the assumption that each

⁵ Postage includes \$0.91 (3oz), certified \$3.30, and return receipt \$2.70. Certified and return receipt are not required, however, we expect most respondents to incur these costs.

written report, the initial written report, and other changes in information report will require five pages; however, this assumption will be reviewed during the next renewal. There is no difference realized in O&M unit costs when the continuous release reporting forms are used.

Exhibit 5 (With Forms) – Unit Operating and Maintenance Costs per Respondent Information Collection Activity

Collection Activity	Unit O&M Costs		Total Unit O&M Cost per Report
	Photocopying (\$/pg)	Mailing (\$/report)	
	\$0.25	\$7	
Providing an Initial Telephone Notification	\$0.00	\$0.00	\$0.00
Preparing an Initial Written Report (5pgs/1rpt)	\$1.25	\$7.21	\$8.46
Preparing a Follow-up Written Report (5pgs/1rpt)	\$1.25	\$7.21	\$8.46
Conducting an Annual Evaluation of a Release	\$0.00	\$0.00	\$0.00
Reporting a Change in the Sources, Composition, or Frequency of a Release (5pgs/1rpt)	\$1.25	\$0.00	\$1.25
Reporting Other Changes in Information (5pgs/1rpt)	\$1.25	\$7.21	\$8.46
Reporting an SSI	\$0.00	\$0.00	\$0.00
Other Activities – Providing Additional Information (10pgs/1rpt)	\$2.50	\$7.21	\$9.71
Other Activities – Facilitating a Site Inspection	\$0.00	\$0.00	\$0.00
Record keeping (5pgs)	\$1.25	\$0.00	\$1.25

In Exhibit 6, O&M costs for a typical facility are presented.

Exhibit 6 – Operating and Maintenance Costs for a Typical Facility

Collection Activity	Unit O&M Costs		Total Unit Cost		
	Photocopying (\$/pg)	Mailing (\$/rpt)	First Year	Second Year	Third Year
	\$0.25	\$7			
Providing an Initial Telephone Notification	\$0.00	\$0.00	NA	NA	NA
Preparing an Initial Written Report - 8 rpts @ (5pgs/1rpt)	\$1.25	\$7.21	\$67.68	NA	NA
Preparing a Follow-up Written Report - 8 rpts @ (5pgs/1rpt)	\$1.25	\$7.21	NA	\$67.68	NA
Reporting Other Changes in Information - 1 rpt @ (5pgs/1rpt)	\$1.25	\$7.21	NA	\$8.46	\$8.46
Record keeping - 8 rpts @ (5pgs/1 rpt)	\$1.25	\$0.00	\$10.00	\$10.00	\$10.00
Total O&M Costs for a Typical Facility			\$77.68	\$86.14	\$18.46

A “typical” respondent is assumed to report **eight** continuous hazardous substance releases in year one and to experience a change in **one release in the second and third years** (e.g., the frequency of the release per week

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changes each year, causing a modification in the estimated annual release amount). No other conditional activities are assumed to be required of the typical respondent.

NA = Not Applicable

In Exhibit 6 (With Forms), O&M costs for a typical facility that will use continuous release reporting forms are presented. There is no difference in O&M unit costs for a typical facility.

Exhibit 6 (With Forms) – Operating and Maintenance Costs for a Typical Facility

Collection Activity	Unit O&M Costs		Total Unit Cost		
	Photocopying (\$/pg) \$0.25	Mailing (\$/rpt) \$7	First Year	Second Year	Third Year
Providing an Initial Telephone Notification	\$0.00	\$0.00	NA	NA	NA
Preparing an Initial Written Report - 8 rpts @ (5pgs/1rpt)	\$1.25	\$7.21	\$67.68	NA	NA
Preparing a Follow-up Written Report - 8 rpts @ (5pgs/1rpt)	\$1.25	\$7.21	NA	\$67.68	NA
Reporting Other Changes in Information - 1 rpt @ (5pgs/1rpt)	\$1.25	\$7.21	NA	\$8.46	\$8.46
Record keeping - 8 rpts @ (5pgs/1 rpt)	\$1.25	\$0.00	\$10.00	\$10.00	\$10.00
Total O&M Costs for a Typical Facility			\$77.68	\$86.14	\$18.46

A “typical” respondent is assumed to report **eight** continuous hazardous substance releases in year one and to experience a change in **one release in the second and third years** (e.g., the frequency of the release per week changes each year, causing a modification in the estimated annual release amount). No other conditional activities are assumed to be required of the typical respondent.

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Annual labor and O&M costs incurred by the regulated community are summarized in Exhibit 7.

Exhibit 7 – Unit Labor and Operating and Maintenance Costs per Respondent Information Collection Activity

Collection Activity	Unit Labor Cost	Unit O&M Cost	Total Unit Costs
Providing an Initial Telephone Notification	\$166.30	\$0.00	\$166.30
Preparing an Initial Written Report	\$422.86	\$8.46	\$431.32
Preparing a Follow-up Written Report	\$271.66	\$8.46	\$280.12
Conducting an Annual Evaluation of a Release	\$271.66	\$0.00	\$271.66
Reporting a Change in the Sources, Composition, or Frequency of a Release	\$488.36	\$1.25	\$489.61
Reporting Other Changes in Information	\$128.28	\$8.46	\$136.74
Reporting an SSI in a Release	\$115.90	\$0.00	\$115.90
Other Activities – Providing Additional Information	\$262.00	\$9.71	\$271.71
Other Activities – Facilitating a Site Inspection	\$463.60	\$0.00	\$463.60
Record keeping	\$201.60	\$1.25	\$202.85

Annual labor and O&M costs incurred by the regulated community that will use continuous release reporting forms are summarized in Exhibit 7 (With Forms).

Exhibit 7 (With Forms) – Unit Labor and Operating and Maintenance Costs per Respondent Information Collection Activity

Collection Activity	Unit Labor Cost	Unit O&M Cost	Total Unit Costs
Providing an Initial Telephone Notification	\$166.30	\$0.00	\$166.30
Preparing an Initial Written Report	\$372.46	\$8.46	\$380.92
Preparing a Follow-up Written Report	\$271.66	\$8.46	\$280.12
Conducting an Annual Evaluation of a Release	\$271.66	\$0.00	\$271.66
Reporting a Change in the Sources, Composition, or Frequency of a Release	\$488.36	\$1.25	\$489.61
Reporting Other Changes in Information	\$128.28	\$8.46	\$136.74
Reporting an SSI in a Release	\$115.90	\$0.00	\$115.90
Other Activities – Providing Additional Information	\$262.00	\$9.71	\$271.71
Other Activities – Facilitating a Site Inspection	\$463.60	\$0.00	\$463.60
Record keeping	\$201.60	\$1.25	\$202.85

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In Exhibit 8⁶, annual labor and O&M costs for a typical facility are presented.

Exhibit 8 – Labor and Operating and Maintenance Costs for a Typical Facility

Collection Activity	Total Labor Costs			Total O&M Costs			Total Costs		
	First Year	Second Year	Third Year	First Year	Second Year	Third Year	First Year	Second Year	Third Year
Providing an Initial Telephone Notification	\$1,330.40	NA	NA	NA	NA	NA	\$1,330.40	NA	NA
Preparing an Initial Written Report	\$3,382.88	NA	NA	\$67.68	NA	NA	\$3,450.56	NA	NA
Preparing a Follow-up Written Report	NA	\$2,173.28	NA	NA	\$67.68	NA	NA	\$2,240.96	NA
Conducting Annual Evaluations	NA	NA	\$2,173.28	NA	NA	NA	NA	NA	\$2,173.28
Reporting Other Changes in Information	NA	\$128.28	\$128.28	NA	\$8.46	\$8.46	NA	\$136.74	\$136.74
Record keeping	\$1,612.80	\$1,612.80	\$1,612.80	\$10.00	\$10.00	\$10.00	\$1,622.80	\$1,622.80	\$1,622.80
Total Costs for a Typical Facility	\$6,326.08	\$3,914.36	\$3,914.36	\$77.68	\$86.14	\$18.46	\$6,403.76	\$4,000.50	\$3,932.82

A “typical” respondent is assumed to report **eight** continuous hazardous substance releases in year one and to experience a change in **one release in the second and third years** (e.g., the frequency of the release per week changes each year, causing a modification in the estimated annual release amount). No other conditional activities are assumed to be required of the typical respondent.

NA = Not Applicable

In Exhibit 8 (With Forms)⁷, annual labor and O&M costs for a typical facility are presented.

Exhibit 8 (With Forms) – Labor and Operating and Maintenance Costs for a Typical Facility

Collection Activity	Total Labor Costs			Total O&M Costs			Total Costs		
	First Year	Second Year	Third Year	First Year	Second Year	Third Year	First Year	Second Year	Third Year

⁶ Exhibit 8 does not include capital costs because there is no capital costs associated with implementing the regulations of the CRRR.

⁷ Exhibit 8 (With Forms) does not include capital costs because there is no capital costs associated with implementing the regulations of the CRRR.

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Providing an Initial Telephone Notification	\$1,330.40	NA	NA	NA	NA	NA	\$1,330.40	NA	NA
Preparing an Initial Written Report	\$2,979.68	NA	NA	\$67.68	NA	NA	\$3,047.36	NA	NA
Preparing a Follow-up Written Report	NA	\$2,173.28	NA	NA	\$67.68	NA	NA	\$2,240.96	NA
Conducting Annual Evaluations	NA	NA	\$2,173.28	NA	NA	NA	NA	NA	\$2,173.28
Reporting Other Changes in Information	NA	\$128.28	\$128.28	NA	\$8.46	\$8.46	NA	\$136.74	\$136.74
Record keeping	\$1,612.80	\$1,612.80	\$1,612.80	\$10.00	\$10.00	\$10.00	\$1,622.80	\$1,622.80	\$1,622.80
Total Costs for a Typical Facility	\$5,922.88	\$3,914.36	\$3,914.36	\$77.68	\$86.14	\$18.46	\$6,000.56	\$4,000.50	\$3,932.82

A "typical" respondent is assumed to report **eight** continuous hazardous substance releases in year one and to experience a change in **one release in the second and third years** (e.g., the frequency of the release per week changes each year, causing a modification in the estimated annual release amount). No other conditional activities are assumed to be required of the typical respondent.

N/A = Not Applicable

6c. Estimating Agency Burden and Cost

To comply with the provisions of the CRRR, Federal government authorities perform the following activities (see also Section 5(a) of this ICR): (1) process initial telephone notification; (2) process initial written report; (3) process follow-up written report; (4) process change in the sources, composition or frequency of release reports; (5) process other changes in information; (6) process SSI reports; and (7) conduct other necessary activities (obtain additional information, conduct site inspection). The estimated burden to the Federal government for completing each of these CRRR-mandated activities is based on the CRRR economic impact analysis. The CRRR Economic Impact is available in rule making Superfund Docket Number 103(f)CR - 4-8.

Exhibit 9 presents the estimated burden-hours and unit cost associated with the Federal government's processing and evaluation of the various continuous release reports, as well as the burden and cost associated with any other government initiated activities that may involve the collection of information. The unit cost estimates presented in Exhibit 9 are derived by multiplying the applicable burden estimates by the average hourly wage rate for government employees. Based

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on the 2015 GS pay schedule, EPA estimates an average hourly labor cost of \$47.14 for the average Federal government employee.⁸ A full description of the basis for each government burden estimate is provided in the remainder of this section.

Exhibit 9 – Unit Burden Hours and Costs Incurred by the Government per Information Collection Activity

Collection Activity	Burden Hours	Unit Cost
	(\$/hr) \$47.14	
Process Initial Telephone Notification	0.50	\$23.57
Process Initial Written Report	1.50	\$70.70
Process Follow-up Written Report	1.50	\$70.70
Process a Change in the Sources, Composition, or Frequency of a Release Report	2.00	\$94.27
Process Other Changes in Information	0.50	\$23.57
Process an SSI Report	1.25	\$58.92
Other Activities – Obtaining Additional Information	2.00	\$94.27
Other Activities – Conducting a Site Inspection	8.00	\$377.09

We believe that submission of continuous release reporting forms will increase efficiencies in processing reports by the Federal government. For the purposes of this analysis, we are assuming that processing forms will save approximately 1/3rd of estimated average times for each activity that requires processing a report. This assumption will be reviewed during the next renewal. Exhibit 9 (With Forms) presents the estimated burden-hours and unit cost associated with the Federal government's processing and evaluation of the various continuous release reports, as well as the burden and cost associated with any other government initiated activities that may involve the collection of information when continuous release reporting forms are submitted by industries.

⁸ This hourly wage estimate was calculated by summing the basic hourly wage rate for a GS-12 step 1 government employee in 2015 (\$29.46) and the hourly monetary value of the representative employee's fringe benefits (assumed to be the basic hourly wage rate multiplied by 60 percent).

Exhibit 9 (With Forms) – Unit Burden Hours and Costs Incurred by the Government per Information Collection Activity

Collection Activity	Burden Hours (\$/hr)	Unit Cost
	\$47.14	
Process Initial Telephone Notification	0.50	\$23.57
Process Initial Written Report	1.00	\$47.14
Process Follow-up Written Report	1.00	\$47.14
Process a Change in the Sources, Composition, or Frequency of a Release Report	1.50	\$70.70
Process Other Changes in Information	0.25	\$11.78
Process an SSI Report	1.00	\$47.14
Other Activities – Obtaining Additional Information	1.50	\$70.70
Other Activities – Conducting a Site Inspection	8.00	\$377.09

Process Initial Telephone Notification – EPA estimates that the NRC requires *30 minutes (0.5 hours)* to process the information provided in the initial telephone call. The first year unit cost associated with *processing the initial telephone call* is \$23.57.

We do not expect that the use of the continuous release reporting forms will reduce the burden associated with processing the initial telephone call.

Process Initial Written Report – Government authorities review initial written and follow-up reports to become familiar with the nature and extent of the release, to determine if the release qualifies for reduced reporting under CERCLA section 103(f)(2), and to assess the hazards to public health and welfare and the environment. EPA estimates that the preliminary evaluation of the release requires on average, *one and one half hour* of government time. The costs of processing and evaluating the initial written report are incurred in the first year of reporting. Therefore, the *unit cost for processing and evaluating the initial written report* is \$70.70.

We estimate that the preliminary evaluation of the release will require on average, *one hour* of government time to process continuous release forms. Thus the *unit cost for processing and evaluating the initial written report forms* is \$47.14.

Process Follow-up Written Report -- Within one year of submitting the initial written report, facilities must submit a written follow-up report to update and confirm previously submitted information. The follow-up report provides EPA with a more accurate baseline against which to evaluate both the threat posed by the release and the impact that SSIs in the release may have on public health and welfare and the environment. The activities necessary to reevaluate the continuous

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release with the newly submitted follow-up report are assumed to be identical to those required to process and evaluate the initial written report, *one and a half hour*. The costs associated with the follow-up written report, however, are incurred in the second year of reporting. Therefore, the *unit cost for processing and evaluating the follow-up written report is \$70.70*.

We estimate that the activities necessary to reevaluate the continuous release with the newly submitted follow-up report of the release will require on average, *one hour* of government time to process continuous release forms. Thus the *unit cost for processing and evaluating the follow-up written report forms is \$47.14*.

Process a Change in the Sources, Composition, or Frequency of a Release Report – After initial notification reports have been submitted for a release and reporting under section 103(f)(2) has commenced, EPA must be notified of any changes in release information previously submitted. Any change in the sources, composition, or frequency of a hazardous substance release constitutes a new release. Thus, any facility experiencing a change in the sources, composition, or frequency of a continuous release must complete the initial notification process for the new release. Government activities associated with new release reports consist of the processing and evaluation of the initial telephone and initial written reports, *2 hours*. The applicable unit cost is *\$97.27 per new continuous release report*.

We estimate that the government activities associated with new release reports to process a change in the sources, composition, or frequency of a release report will be reduced to *one and one-half hours*. The applicable unit cost is *\$70.70 per new continuous release report using the continuous release reporting forms*.

Process Other Changes in Information – For changes in a release other than a change in the sources, composition, or frequency, the person in charge must notify the EPA Region by submitting a letter presenting the updated information and explaining the reasons for the change. EPA estimates that processing a letter of changed information requires approximately *30 minutes (i.e., 0.50 hours)* of government time. This estimate consists of the time necessary evaluate the release in light of the changed information. The shorter evaluation time is assumed because it is necessary to evaluate only the incremental change in the risk using previous assessments of the release (assumed to be on file) as a baseline. The applicable unit cost is *\$23.57 per changes in a release report*.

We estimate that the government activities associated with processing other changes in information will be reduced to *fifteen minutes*. The applicable unit cost is *\$11.78 per report of changed information*.

Process an SSI (Statistically Significant Increase) Report – SSIs are episodic releases and must be reported immediately to the NRC. Release quantities in excess of the normal range have not been previously reported and evaluated and, thus, warrant immediate reporting. Upon receiving notification of an SSI, the NRC will record the SSI information in the NRC data base (*15 minutes*)

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and notify the appropriate EPA Region of the SSI report (15 minutes). Upon notification from the NRC (15 minutes), EPA will evaluate the potential hazard posed by the release in light of the SSI (30 minutes). Thus, the Federal government is estimated to require *one hour and fifteen minutes (1.25 hours)* of government time to process and evaluate each SSI reported under the CRRR. The applicable cost is \$58.92 *per SSI Report*.

We estimate that EPA's activities associated with processing an SSI report will be reduced to *fifteen minutes*. This will reduce the overall Federal government's time to process and evaluate each SSI reported under the CRRR to *one hour*. The applicable unit cost is \$47.14 *per SSI Report*.

Other Activities – For some percentage of continuous releases, the information provided in the initial and/or follow-up reports will be incomplete, incorrect, or worrisome, prompting EPA to request *additional information* concerning the release and its associated hazard. For example, additional information may be necessary to confirm the continuity and stability of the release or to better assess the risk posed by the release. EPA estimates that the process of requesting and reviewing additional information concerning a continuous release requires *2.0 hours* of government time. The applicable unit cost is \$94.27 *per request and review* of additional information.

We estimate that the government activities associated with reviewing additional information concerning a continuous release will be reduced to *one and one half hours* of government time. The applicable unit cost is \$70.70 *per request and review* of additional information.

In extreme cases, the preliminary risk assessment of a release will suggest the need for a *site inspection*, allowing EPA to directly assess and evaluate the circumstances of a release and the population and environment potentially affected by the release. In addition, site inspections are conducted periodically as a compliance and enforcement measure. EPA estimates that site inspections will require *eight hours* of government time, including one hour allocated for the EPA Region to communicate its concerns and findings to the appropriate SERC and LEPC, and will cost \$377.09.

We do not believe that submission of continuous release reporting forms will change the estimate for government time for site inspections.

6d. Estimating the Respondent Universe and Total Burden and Cost

The estimates presented in this ICR regarding the number of facilities and hazardous substance releases affected by the CRRR were computed using the number of CR-ERNS notifications made by the NRC to each respective region over the years 2012, 2013, and 2014 as reported by the NRC. The number of reports to be filed in the next three years is computed from the total number of reports already filed and reflects the number of annual reports in recent years. EPA has estimated that each affected facility has 8 continuous releases above the releases' RQs. Exhibit

10 summarizes the estimated number of facilities and hazardous substance releases already affected by the CRRR. The change report adjustment reflects 10% of the total number of facilities and reports for all regions. The same number of facilities is assumed for use of continuous release reporting forms.

Exhibit 10 – Number of Facilities and Hazardous Substance Releases Already Affected by the CRRR

	Total Estimated Number of Facilities with Continuous Releases	Estimated Number of Reportable Continuous Releases (3 years)
EPA Region 1	152	1,216
EPA Region 2	165	1,320
EPA Region 3	304	2,432
EPA Region 4	934	7,472
EPA Region 5	691	5,528
EPA Region 6	817	6,536
EPA Region 7	618	4,944
EPA Region 8	269	2,152
EPA Region 9	325	2,600
EPA Region 10	205	1,640
Minus Change Reports (10%)	-448	-3,584
Total in CR-ERNS	4,032	32,256

Exhibit 11 presents the estimate for the number of facilities and hazardous substance releases that will be affected by the CRRR in the next three years. The estimate is based on an expected 7.5% average annual percent increase in facilities (see 6(f)) adjusted from the number of continuous release notifications reported by the NRC for 2012. The same estimate is assumed for the use of continuous release reporting forms.

Exhibit 11 – Number of Facilities and Hazardous Substance Releases That Will Be Affected by the CRRR in the Next Three Years

	Total Estimated Number of Facilities with Continuous Releases	Estimated Number of Reportable Continuous Releases
Estimated New Releases in the First Year	6	52
Estimated New Releases in the Second Year	7	55
Estimated New Releases in the Third Year	7	60
Total Over Next Three Years	21	167
Total in CR-ERNS After Three Years	4,053	32,423

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6e. Bottom Line Burden Hours and Cost Tables

i. Respondent Tally

The total estimated and annual burden hours and costs incurred by industry affected by the CRRR are presented in Exhibit 12. The total and annual hours and costs incurred by industry are calculated over a three year period.

Exhibit 12 – Annual Burden Hours and Costs Incurred by Industry

Collection Activity	# of Reported Releases that Require the Collection Activity Over Three Years			Unit Burden Hours	Unit Labor Costs	Unit O&M Costs	Burden Hours Over Three Years			Labor Cost Over Three Years			O&M Costs Over Three Years		
	1st Year	2nd Year	3rd Year				1st Year	2nd Year	3rd Year	1st Year	2nd Year	3rd Year	1st Year	2nd Year	3rd Year
	Providing Initial Telephone Notification	52	55				60	3.00	\$166.30	\$0.00	155	166	179	\$8,581	\$9,225
Preparing Initial Written Report	52	55	60	8.00	\$422.86	\$8.46	413	444	477	\$21,820	\$23,456	\$25,215	\$437	\$469	\$504
Preparing Follow-up Written Report	72	52	55	5.00	\$271.66	\$8.46	360	258	277	\$19,560	\$14,018	\$15,069	\$609	\$437	\$469
Conducting Annual Evaluations	25,514	25,586	25,638	5.00	\$271.66	\$0.00	127,570	127,930	128,188	\$6,931,133	\$6,950,693	\$6,964,710	\$0	\$0	\$0
Reporting a Change in the Sources, Composition, or	1,615	1,618	1,621	9.00	\$488.36	\$1.25	14,538	14,563	14,590	\$788,887	\$790,241	\$791,697	\$2,019	\$2,023	\$2,026
Reporting Changes in Other Information	3,231	3,236	3,242	2.50	\$128.28	\$8.46	8,077	8,091	8,106	\$414,442	\$415,153	\$415,918	\$27,332	\$27,379	\$27,430
Reporting an SSI	1,615	1,618	1,621	2.00	\$115.90	\$0.00	3,231	3,236	3,242	\$187,223	\$187,544	\$187,890	\$0	\$0	\$0
Other Activities— Additional Information	9,692	9,709	9,727	4.00	\$262.00	\$9.71	38,769	38,836	38,907	\$2,539,377	\$2,543,737	\$2,548,424	\$94,112	\$94,274	\$94,447
Other Activities— Site Inspection	323	324	324	8.00	\$463.60	\$0.00	2,585	2,589	2,594	\$149,778	\$150,035	\$150,312	\$0	\$0	\$0
Record keeping	32,308	32,363	32,423	4.00	\$201.60	\$1.25	129,230	129,452	129,691	\$6,513,212	\$6,524,395	\$6,536,416	\$40,385	\$40,454	\$40,528
Total							324,928	325,566	326,251	\$17,574,012	\$17,608,497	\$17,645,569	\$164,894	\$165,035	\$165,405

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Exhibit 12 (With Forms) – Annual Burden Hours and Costs Incurred by Industry

ii.

Collection Activity	# of Reported Releases that Require the Collection Activity Over Three Years			Unit Burden Hours	Unit Labor Costs	Unit O&M Costs	Burden Hours Over Three Years			Labor Costs Over Three Years	
	1st Year	2nd Year	3rd Year				1st Year	2nd Year	3rd Year	1st Year	2nd Year
Providing Initial Telephone Notification	52	55	60	3.00	\$166.30	\$0.00	155	166	179	\$8,581	\$9,225
Preparing Initial Written Report	52	55	60	7.00	\$372.46	\$8.46	361	388	417	\$19,219	\$20,660
Preparing Follow-up Written Report	72	52	55	5.00	\$271.66	\$8.46	360	258	277	\$19,560	\$14,018
Conducting Annual Evaluations	25,514	25,586	25,638	5.00	\$271.66	\$0.00	127,570	127,930	128,188	\$6,931,133	\$6,950,69
Reporting a Change in the Sources, Composition, or Frequency of a Release	1,615	1,618	1,621	9.00	\$488.36	\$1.25	14,538	14,563	14,590	\$788,887	\$790,241
Reporting Changes in Other Information	3,231	3,236	3,242	2.50	\$128.28	\$8.46	8,077	8,091	8,106	\$414,442	\$415,153
Reporting an SSI	1,615	1,618	1,621	2.00	\$115.90	\$0.00	3,231	3,236	3,242	\$187,223	\$187,544
Other Activities— Additional Information	9,692	9,709	9,727	4.00	\$262.00	\$9.71	38,769	38,836	38,907	\$2,539,377	\$2,543,73
Other Activities— Site Inspection	323	324	324	8.00	\$463.60	\$0.00	2,585	2,589	2,594	\$149,778	\$150,035
Record keeping	32,308	32,363	32,423	4.00	\$201.60	\$1.25	129,230	129,452	129,691	\$6,513,212	\$6,524,39
Total							324,876	325,510	326,192	\$17,571,412	\$17,605,70

The Agency Tally

Exhibit 13 presents the total and annual estimated burden hours and costs incurred by government authorities as a result of the CRRR over a three year period.

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Exhibit 13 – Annual Burden Hours and Costs Incurred by Government

Collection Activity	# of Reported Releases Estimated to Require the Collection Activity Over Three Years			Unit Burden Hours	Unit Cost	Burden Hours Over Three Years			Cost Over Three Years		
	1st Year	2nd Year	3rd Year			1st Year	2nd Year	3rd Year	1st Year	2nd Year	3rd Year
Processing Initial Telephone Notification	52	55	60	0.50	\$23.57	26	28	30	\$1,216	\$1,307	\$1,405
Processing Initial Written Report	52	55	60	1.50	\$70.70	77	83	89	\$3,648	\$3,922	\$4,216
Processing Follow-up Written Report	72	52	55	1.50	\$70.70	108	77	83	\$5,091	\$3,648	\$3,922
Processing a Change in the Sources, Composition, or Frequency of a Release Report	1,615	1,618	1,621	2.00	\$94.27	3,231	3,236	3,242	\$152,285	\$152,547	\$152,828
Processing Other Change in Information	3,231	3,236	3,242	0.50	\$23.57	1,615	1,618	1,621	\$76,143	\$76,273	\$76,414
Processing an SSI Report	1,615	1,618	1,621	1.25	\$58.92	2,019	2,023	2,026	\$95,178	\$95,342	\$95,517
Other Activities— Obtaining Additional Information	9,692	9,709	9,727	2.00	\$94.27	19,385	19,418	19,454	\$913,711	\$915,279	\$916,966
Other Activities— Site Inspection	323	324	324	8.00	\$377.09	2,585	2,589	2,594	\$121,828	\$122,037	\$122,262
Total						29,046	29,072	29,140	\$1,369,100	\$1,370,356	\$1,373,530

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Exhibit 13 (With Forms) – Annual Burden Hours and Costs Incurred by Government

Collection Activity	# of Reported Releases Estimated to Require the Collection Activity Over Three Years			Unit Burden Hours	Unit Cost	Burden Hours Over Three Years			Cost Over Three Years		
	1st Year	2nd Year	3rd Year			1st Year	2nd Year	3rd Year	1st Year	2nd Year	3rd Year
Processing Initial Telephone Notification	52	55	60	0.50	\$23.57	26	28	30	\$1,216	\$1,307	\$1,405
Processing Initial Written Report	52	55	60	1.00	\$47.14	52	55	60	\$2,432	\$2,615	\$2,811
Processing Follow-up Written Report	72	52	55	1.00	\$47.14	72	52	55	\$3,394	\$2,432	\$2,615
Processing a Change in the Sources, Composition, or Frequency of a Release Report	1,615	1,618	1,621	1.50	\$70.70	2,423	2,427	2,432	\$114,214	\$114,410	\$114,621
Processing Other Change in Information	3,231	3,236	3,242	0.25	\$11.78	808	809	811	\$38,071	\$38,137	\$38,207
Processing an SSI Report	1,615	1,618	1,621	1.00	\$47.14	1,615	1,618	1,621	\$76,143	\$76,273	\$76,414
Other Activities— Obtaining Additional Information	9,692	9,709	9,727	1.50	\$70.70	14,538	14,563	14,590	\$685,283	\$686,460	\$687,724
Other Activities— Site Inspection	323	324	324	8.00	\$377.09	2,585	2,589	2,594	\$121,828	\$122,037	\$122,262
Total						22,119	22,142	22,192	\$1,042,581	\$1,043,671	\$1,046,059

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iii. Variations in the Annual Bottom Line

Exhibit 14 summarizes the estimated burden hours and costs incurred by industry if the respondents do not use the forms provided by EPA. This is the higher range estimate that will be posted in the public notice. The bottom line burden to industry is approximately 324,928 hours for the first year and 325,566, and 326,251 hours for the second and third years, respectively. The bottom line industry labor costs are approximately \$17,574,012, \$17,608,497 and \$17,645,569 for the first, second, and third years, respectively. The bottom line industry O&M costs are approximately \$164,894, \$165,035, and \$165,405 for the first, second, and third years, respectively. The average burden for industry over a three year period is 325,582 hours at an average labor cost of \$17,609,360 and O&M cost of \$165,111.

Exhibit 14 – Summary of Burden Hours and Costs Incurred by Industry (High Range)

	First Year	Second Year	Third Year	Average (over a three year period)
Total Number of Respondents	4,038	4,045	4,053	4,046
Reporting Burden Hours	195,697	196,113	196,560	196,124
Record Keeping Burden Hours	129,230	129,452	129,691	129,458
Total Burden Hours	324,928	325,566	326,251	325,582
Total Labor Costs (thousand \$)	\$17,574	\$17,608	\$17,646	\$17,609
O&M Costs Reporting (thousand \$)	\$125	\$125	\$125	\$125
O&M Costs Record Keeping (thousand \$)	\$40	\$40	\$41	\$40
Total O&M Costs (thousand \$)	\$165	\$165	\$165	\$165

Exhibit 14 (With Forms) summarizes the low estimate burden hours and costs incurred by industry if the respondents used the forms provided by EPA. The revised bottom line burden to industry is approximately 324,876 hours for the first year and 325,510, and 326,192 hours for the second and third years, respectively. The revised bottom line industry labor costs are approximately \$17,571,412, \$17,605,702, and \$17,642,563 for the first, second, and third years, respectively. The bottom line industry O&M costs remain the same. The revised average burden hour for industry over a three year period is 325,526, a revised average labor cost of \$17,606,559. The O&M average cost of \$165,405 remains unchanged. The average burden hour for industry over a three year period is 325,526, an average labor cost of \$17,606,559 and O&M cost of \$165,111.

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Exhibit 14 (With Forms) – Summary of Burden Hours and Costs Incurred by Industry (Low Range)

	First Year	Second Year	Third Year	Average (over a three year period)
Total Number of Respondents	4,038	4,045	4,053	4,046
Reporting Burden Hours	195,646	196,058	196,501	196,068
Record Keeping Burden Hours	129,230	129,452	129,691	129,458
Total Burden Hours	324,876	325,510	326,192	325,526
Total Labor Costs (thousand \$)	\$17,571	\$17,606	\$17,643	\$17,607
O&M Costs Reporting (thousand \$)	\$125	\$125	\$125	\$125
O&M Costs Record Keeping (thousand \$)	\$40	\$40	\$41	\$40
Total O&M Costs (thousand \$)	\$165	\$165	\$165	\$165

Exhibit 15 summarizes the estimated burden hours and costs incurred by government. This is the high range estimate. The bottom line burden to the government is approximately 29,046 hours for the first year, 29,072 for the second, and 29,140 for the third year. The bottom line cost to the government is approximately \$1,369,100, \$1,370,356, and \$1,373,530, respectively. The average burden hour for the government over a three year period is 29,086 hours, at an average annual cost of \$1,370,995.

Exhibit 15 – Summary of Burden Hours and Costs Incurred by Government (High Range)

	First Year	Second Year	Third Year	Annual Average
Total Burden Hours	29,046	29,072	29,140	29,086
Total Cost (thousand \$)	\$1,369	\$1,370	\$1,374	\$1,371

Exhibit 15 (With Forms) summarizes the estimated burden hours and costs incurred by government. This is the low range estimate. The revised bottom line burden to the government is approximately 22,119 hours for the first year, 22,142 for second, and 22,192 for the third year. The revised bottom line cost to the government is approximately \$1,042,581, \$1,043,671, and \$1,046,059, respectively. The revised average burden hour for the government over a three year period is 22,151 hours, at an average annual cost of \$1,044,103.

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Exhibit 15 (With Forms) – Summary of Burden Hours and Costs Incurred by Government (Low Range)

	First Year	Second Year	Third Year	Annual Average
Total Burden Hours	22,119	22,142	22,192	22,151
Total Cost (thousand\$)	\$1,043	\$1,044	\$1,046	\$1,044

6f. Reasons for Change in Burden

This ICR **increases** the burden incurred by industry, as a result of compliance with the CRRR, from 315,966 to 325,582 estimated average burden hours. This **increase** in burden results primarily from use of data on the actual number of continuous release reports from several regions and applying a growth rate consistent with prior years reporting. The average annual percent increase in facilities in the previous ICR was approximately 7.5%. The same percent increase was assumed for this ICR. The unit burden hours per respondent information collection activity (Exhibit 1) remains the same as the previous ICR.

For the low range estimate, EPA estimates that the use of the continuous release reporting forms will **reduce** the estimated average burden hours for industry from 325,582 to 325,526, an overall estimated savings of 56 hours.

6g. Burden Statement

The annual reporting and record keeping burden for this collection of information is estimated to average 10 hours per response. EPA estimates 80⁹ hours per affected facility (325,582 total burden hours/4,046 affected facilities), or 10.1¹⁰ hours per response (where we estimate 8 responses/facility - see note to Exhibit 6), including determining if the hazardous substance release qualifies for reporting under the CRRR, gathering and maintaining the required information, and completing and reviewing the written reports.

We estimate that the revised reporting and record keeping burden for this collection of information is estimated to average approximately 80¹¹ per affected facility (325,526 revised total burden hours/4,046 affected facilities), or 10.1¹² hours per response (where we estimate 8 response/facility – see note to Exhibit 6), including determining if the

980 hrs/facility is further broken out to 48 hours for reporting (196,124 reporting burden hours/4,046 affected facilities) and 32 hours for record keeping (129,458 record keeping hours/4,046 affected facilities)

10 6.1 hours for reporting and 4.0 for record keeping.

11 80 hrs/facility is further broken out to 48 hours for reporting (196,068 reporting burden hours/4,046 affected facilities) and 32 hours for record keeping (129,458 record keeping hours/4,046 affected facilities).

12 6.1 hours for reporting and 4.0 for record keeping.

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hazardous substance release qualifies for reporting under the CRRR, gathering and maintaining the required information, and completing and reviewing the written reports.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-SFUND-2015-0100, which is available for online viewing at www.regulations.gov, or in person viewing at the Superfund (SFUND) docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the superfund docket is (202) 566-0276. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-SFUND-2015-0100 and OMB Control Number 2050-0086 in any correspondence.

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APPENDIX A

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Phone-Log Summaries

The following calls were made between March 9, 2015 and March 11, 2015. The companies were selected from the universe of facilities for which a continuous release notification was made. Persons responsible for making notifications were queried about the internal process and procedures taken at the facility between the time a release is observed and a call is made to the NRC and through the 30 day follow-up report, one year anniversary report and any additional reports required that resulted from changes to the continuous release.

Dominion
Public Utility
Glen Allen, VA
Incident Report #1098812

On October 20, 2014, Dominion called the NRC to report a continuous release of acrolein into the atmosphere. On March 9, 2015, the HQ EPA CR-ERNS analyst spoke with the person responsible for reporting releases. The company representative indicated that they called back to retract that report, but that they have reported other continuous releases, so would be happy to speak with the HQ EPA CR-ERNS analyst. The company representative indicated that they don't have internal procedures in place for determining and reporting a continuous release, but that they are currently putting them in place. They are aware and have submitted copies of the continuous release reports to the appropriate SERCs and LEPCs, and they do not have any questions regarding reporting continuous releases. The HQ EPA CR-ERNS analyst let the company representative know that EPA now has the continuous release forms on its web site at: www.epa.gov/superfund/policy/release/faciliti.htm and that there is also a file that provides the contact information for submitting the continuous release reports to the Agency.

Weyerhaeuser
Private Enterprise
Oglethrope, GA
Incident Report #1087715

On July 1, 2014, Weyerhaeuser called the NRC to report an initial continuous release of hydrogen sulfide from a waste water treatment facility and an air emission stack. On

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March 11, 2015, the HQ EPA CR-ERNS analyst spoke with the person responsible for reporting releases. The individual indicated that the company does have procedures in place for continuous release reporting, but she said that they are not currently written down. They also know to make their reports to the SERCs and LEPCs. The individual asked questions about where to find more information on continuous release reporting. The HQ EPA CR-ERNS analyst let the company representative know that EPA now has the continuous release forms on its web site at: www.epa.gov/superfund/policy/release/faciliti.htm and that there is also a file that provides the contact information for submitting the continuous release reports to the Agency. This was well received.

BP-Husky Refining, LLC
Private Enterprise
Oregon, OH
Incident Report #1073924

On February 13, 2014, BP-Husky Refining, LLC called the NRC to make a report of an air release of nitrogen oxide from combustion emissions. On March 9, 2015, the HQ EPA CR-ERNS analyst spoke with the person responsible for reporting releases. The individual indicated that the company does have procedures in place for continuous release reporting. They are aware and have submitted copies of the continuous release reports to the appropriate SERCs and LEPCs, and they do not have any questions regarding reporting continuous releases. The HQ EPA CR-ERNS analyst let the company representative know that EPA now has the continuous release forms on its web site at: www.epa.gov/superfund/policy/release/faciliti.htm and that there is also a file that provides the contact information for submitting the continuous release reports to the Agency. This was well received.

Mears Fertilizer Inc.
Private Enterprise
Lavant, KS
Incident Report #1078814

On April 4, 2014, Mears Fertilizer, Inc., called the NRC to make a report of a continuous release of anhydrous ammonia from a portable pipe reactor, which is used to make liquid fertilizer. On March 9, 2015, the HQ EPA CR-ERNS analyst spoke with the person responsible for reporting releases. The individual indicated that the company does have procedures in place for continuous release reporting. They are aware and have submitted copies of the continuous release reports to the appropriate SERCs and LEPCs, and they

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do not have any questions regarding reporting continuous releases. The HQ EPA CR-ERNS analyst let the company representative know that EPA now has the continuous release forms on its web site at: www.epa.gov/superfund/policy/release/faciliti.htm and that there is also a file that provides the contact information for submitting the continuous release reports to the Agency. The representative indicated that she was already aware of this.

CHS, Inc.
Private Enterprise
Laurel, MT
Incident Report #1073644

On February 11, 2014, CHS, Inc., called the NRC to make a report of ammonia, nitrogen oxide, and NO₂ into the atmosphere. The caller stated that the release was due to normal plant operations. On March 9, 2015, the HQ EPA CR-ERNS analyst spoke with the person responsible for reporting releases. The individual indicated that the company has procedures in place for making continuous release reports. The HQ EPA CR-ERNS analyst let the company representative know that EPA now has the continuous release forms on its web site at: www.epa.gov/superfund/policy/release/faciliti.htm and that there is also a file that provides the contact information for submitting the continuous release reports to the Agency.

Ultramar Refinery
Private Enterprise
Wilmington, CA
Incident Report #1087724

On July 2, 2014, Ultramar Refinery called the NRC to make a report of a continuous release of hydrogen cyanide from an exhaust stack. On March 9, 2015, the HQ EPA CR-ERNS analyst spoke with the person responsible for reporting releases. The individual indicated that the company has procedures in place for making reports. He is aware that reports for continuous release reporting (written reports) as also sent to the SERCs and LEPCs. The individual did not have any questions regarding continuous release reporting. The HQ EPA CR-ERNS analyst let the company representative know that EPA now has the continuous release forms on its web site at: www.epa.gov/superfund/policy/release/faciliti.htm and that there is also a file that provides the contact information for submitting the continuous release reports to the Agency. The individual said that he was already aware of where the forms were located online.

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ATTACHMENT A – Continuous Release Reporting Forms

ATTACHMENT A – Continuous Release Reporting Forms

The following pages contain the Continuous Release Reporting Forms that are also available at: <http://www.epa.gov/emergencies/content/reporting/rqover.htm#con>.

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ATTACHMENT A – Continuous Release Reporting Forms

Form Approved OMB No. 2050-0086
Expiration Date: 12-31-2011

CHECKLIST* OF INFORMATION REQUIRED IN INITIAL AND FOLLOWUP WRITTEN REPORTS

*Checklist is to assist you in gathering information for CR-ERNS forms, you are not required to submit the checklist.

Section I: General Information**A. Facility Identification**

- The CR-ERNS number assigned to the facility by the NRC when you made the initial telephone notification.
- The name of your facility, including the full physical address (street address, city, county, state, zip code), not mailing address, and its longitude and latitude; and
- The name, position, telephone number, and alternate telephone number of the person in charge of your facility.

B. Population Information

- The population density within a one-mile radius of your facility; and
- The identity of sensitive populations and ecosystems, including distance and direction from the facility, within a one-mile radius.

NOTE: Lat/Long can be found with GPS units, Google Earth, Landview6.

Section II: Source Information**A. Basis for Asserting that the Release is Continuous and Stable in Quantity and Rate**

- A brief statement describing the basis for stating that the release is continuous and stable in quantity and rate.

B. Information on the Source

- The identity of each source of the release; and
- The environmental medium affected by the release.

C. Identity and Quantity of Each Hazardous Substance or Mixture Released

- The name/identity of the hazardous substances;
- The Chemical Abstracts Service Registry Number (CASRN) for the substance;
- If the release is a mixture, the components of the mixture and their approximate concentrations and quantities by weight;
- The upper and lower bounds of the normal range of the hazardous substance/mixture release over the previous year;
- An estimate of the total amount of the hazardous substance(s) released in the previous year;
- The frequency of the release; and
- The months during which the release occurs.

Section III: Hazardous Substance Information

- The aggregated upper bounds of the normal range of the hazardous substance released from all sources at the facility.

Signed Statement

- "I certify that the hazardous substance releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(b) or 355.32 and that all submitted information is accurate and current to the best of my knowledge."

EPA Form 6100-10, Continuous Release Reporting Form

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ATTACHMENT A – Continuous Release Reporting Forms

General Overview of How to Report a Continuous Release

If you have established that your release is continuous and stable in quantity and rate, you may begin reporting under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 103(f)(2). The continuous release reporting regulation provides you with two options for reporting continuous releases of CERCLA hazardous substances. You may aggregate multiple concurrent releases of the same hazardous substance from contiguous or adjacent facilities and report them in a single notification, or you may consider each facility separately and submit reports on a per-facility basis. Although you may elect either option for notification of continuous releases, whichever options you elect must also be used for reporting statistically significant increases (SSIs) in the release and reporting changes in information previously submitted.

To report a continuous release from your facility, you must comply with the standard reporting requirements under the Rule which require you to make an initial telephone notification, an initial written report, and a one-time, first anniversary follow-up report. In the written reports (i.e., the initial written report and the follow-up report), you must provide specific information that describes your continuous release. This information includes identifying the facility and providing certain ecological and population-density information on the surrounding area, as well as information on the source of the release. You must identify all sources of continuous release from your facility (e.g., smoke stacks, waste piles, valves) whenever those facility-wide releases equal or exceed a reportable quantity (RQ). You must also provide substance-specific information on each hazardous substance released from each identified source (40 CFR 302.8(e)).

In addition to the standard reporting requirements of the initial telephone notification and the written reports, under certain circumstances you must make additional reports. You must report any SSIs in the release, as well as any changes in the release that make the information submitted in the initial written or follow-up reports inaccurate or out-of-date. The specific information required in each of these types of continuous release reports is outlined below.

Initial Telephone Notification

When should you notify? The continuous release reporting regulation requires that an initial telephone notification be made as soon as you have a sufficient basis for establishing that the release is continuous and stable in quantity and rate. You may rely on release data, engineering estimates, knowledge of the plant's operations and release history, professional judgment, or any other method that has a strong technical basis to establish the basis for asserting that the release is continuous and stable in quantity or rate, or you may report the release (to the National Response Center (NRC) for CERCLA hazardous substances or to the State Emergency Response Commission (SERC) and Local Emergency Planning Committee (LEPC) for non-CERCLA Extremely Hazardous Substances (EHSs)) for a period sufficient to establish the continuity and stability of the release.

If a sufficient basis for establishing the release as continuous exists for a CERCLA hazardous substance, a minimum of one telephone call may be made to the NRC, SERC, and LEPC. For non-CERCLA EHSs, only the appropriate SERC and LEPC need be notified. In either case, you may report all continuous releases of hazardous substances at your facility in one telephone report to each authority.

Who must be notified? If you are the person in charge, owner or operator, of the facility from which a continuous release of a hazardous substance occurs, you must telephone the following organizations:

1. For CERCLA hazardous substances - NRC (1-800-424-8802)
2. For CERCLA hazardous substances and non-CERCLA EHSs -
 - o The SERC of any state likely to be affected by the release; and
 - o The LEPC of any area likely to be affected by the release.

Required information. The person in charge (for CERCLA hazardous substances) or the owner or operator (for non-CERCLA EHSs) is required to provide the information listed below to government authorities in the initial telephone notification.

1. Identify your report as a report of a continuous release under CERCLA Section 103(f)(2). It is very important for tracking purposes that the person at the NRC, SERC, and LEPC to whom you speak understands that you are giving the initial telephone notification of a continuous release (rather than an episodic report).
2. Identify the name and location of the facility responsible for the release and provide the corporate affiliation and address.
3. Identify each hazardous substance released.
4. Provide your name and telephone number and, if different, the name and telephone number of the person in charge of the facility.

If you are reporting a release of a CERCLA hazardous substance, when you make this initial telephone call to the NRC, you will be assigned a CR-ERNS number. 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.

If you are reporting a non-CERCLA EHS to the appropriate SERC or LEPC you will not receive a CR-ERNS number as your SERC and LEPC will use their own methods to track your continuous release.

Initial Written and Follow-up Reports

Where and when to submit initial written and follow-up reports? Within 30 days of your initial telephone call to the NRC, SERC, and LEPC, the initial written report of CERCLA hazardous substances must be submitted to the appropriate government authorities. You must send one copy of the completed initial written report to each of the following organizations:

- The EPA Regional Office for the geographical region in which your facility is located;
- The SERC of any state likely to be affected by the release; and
- The LEPC of any area likely to be affected by the release.

For reports of CERCLA hazardous substances, the one-time, first anniversary follow-up report must be submitted within 30 days of the first anniversary date of the initial written report to the EPA Regional Office. The first anniversary follow-up report must be submitted to the EPA Regional Office only. You are not required to submit the one-time first anniversary follow-up report to the SERC and LEPC.

Reports of releases of non-CERCLA EHSs must be reported only to the SERC and LEPC. No notification of Federal authorities is required.

What information is required? The information that you are required to submit for all initial written and follow-up reports can be divided into three primary sections: **general information**; **source information**; and **hazardous substance information**.

- **Section I - General Information** - This section includes identifying information about your facility, as well as information concerning the area surrounding your facility.
- **Section II - Source Information** - This section includes information on each source of the release including: the identity of each source; the basis for stating the release from a source qualifies as continuous and stable in quantity and rate; the environmental medium affected by the release; the names and quantities of the CERCLA hazardous substances or EHSs released from the source; and the normal range and frequency of the release. This information must be provided separately for each source of the continuous release.
- **Section III - Hazardous Substance Information** - This section includes the upper bound of the normal range for each hazardous substance released across all sources at a facility. This number is also known as the SSI trigger. Section II should be completed for each release source before you calculate the upper bound of the normal range of the release for each CERCLA hazardous substance or EHSs across all sources at the facility.

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Continuous Release Reporting Form

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SECTION I: GENERAL INFORMATION	CR-ERNS Number: <input style="width: 100%;" type="text"/>
Date of Initial Release: <input style="width: 100%;" type="text"/>	Date of Initial Call to NRC: <input style="width: 100%;" type="text"/>
Type of Report: Select from the drop-down list, the type of report that you are submitting	

Signed Statement: *I certify that the hazardous substance releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(b) or 355.32 and that all submitted information is accurate and current to the best of my knowledge.*

Date Name and Position Signature _____

Part A. Facility or Vessel Information

Name of Facility or Vessel

Person in Charge of Facility or Vessel

Name	<input style="width: 100%;" type="text"/>	Position	<input style="width: 100%;" type="text"/>
Phone Number	<input style="width: 100%;" type="text"/>	Alt Phone No.	<input style="width: 100%;" type="text"/>

Facility Address or Vessel Port of Registration

Street	<input style="width: 100%;" type="text"/>	County	<input style="width: 100%;" type="text"/>
City	<input style="width: 100%;" type="text"/>	State	<input style="width: 100%;" type="text"/>
		Zip Code	<input style="width: 100%;" type="text"/>

Dun and Bradstreet Number for Facility

Facility/Vessel Location

Latitude	Deg	<input style="width: 100%;" type="text"/>	Min	<input style="width: 100%;" type="text"/>	Sec	<input style="width: 100%;" type="text"/>	Vessel LORAN Coordinates
Longitude	Deg	<input style="width: 100%;" type="text"/>	Min	<input style="width: 100%;" type="text"/>	Sec	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>

NOTE: Latitude/Longitude information can be obtained at the following websites: <http://www.sat sig.net/maps/lat-long-finder.htm>, <http://earth.google.com/>, and <http://www.census.gov/geo/landview/>. Do not use P.O. Box, Rural Route or Mailing Address. Use physical location only.

Part B. Population Information

Population Density	Select from the drop-down list, the range that describes the population density within a one-mile radius of your facility or vessel.	<input style="width: 100%;" type="text"/>
Sensitive Populations and Ecosystems within One-Mile Radius	Sensitive Populations or Ecosystems (e.g., elementary schools, hospitals, retirement communities, or wetlands)	Estimated Distance and Direction from Facility, if Known
	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>

ATTACHMENT A – Continuous Release Reporting Forms

INSTRUCTIONS

SECTION I: GENERAL INFORMATION

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.

The information required in Section I of the initial written report and follow-up reports includes general information identifying your facility, as well as information regarding the area in which your facility is located. This general information is important because it provides a better understanding of the potential risks resulting from exposure from the facility's release. A signed statement asserting that the continuous release is continuous and stable in quantity and rate, and that the information supplied is accurate and current to the best of your knowledge, is also required in Section I.

In addition, Section I must clearly identify the type of written report that you are submitting (i.e., an initial written report, a first anniversary follow-up report, or a written report of the change in source or composition of a previously reported release). You must also include information on the initial notification of the release, such as the date of the release and the date of the initial call. For CERCLA hazardous substances, the CR-ERNS number assigned to you by the NRC will also be required.

Type of Report - Select from drop-down list.

Initial Written Notification - Within 30 days of the initial telephone notification, you are required to submit an initial written report to the appropriate EPA Regional Office, SERC, and LEPC (for releases of CERCLA hazardous substances) and to only the appropriate SERC and LEPC (for releases of non-CERCLA EHSS). The purpose of this report is to confirm your intent to report your release as a continuous release under Section 103(f)(2), and to provide government response officials with sufficient information about your release to enable them to determine if the release qualifies as a continuous release.

First Anniversary Follow-up Report - For reports of releases of CERCLA hazardous substances, within 30 days of the first anniversary of your initial written report, you are required to reassess your initial continuous release report and gather the information on all of the reported substances being released. After doing this, you must submit a one-time written first anniversary follow-up report to the appropriate EPA Regional Office. Please note that the first anniversary report must be sent to the appropriate EPA Regional Office for all reports of CERCLA hazardous substances, but is not required for reports of non-CERCLA EHSS.

Written Notification of a Change to Initial Notification and/or Written Notification of a Change to Follow-up Report

[NOTE: For these reports, select the report type that reflects the notification or report for which you are reporting a change.]

- = Notification of a change in source or composition, which is treated as if it were a new release (i.e., with a telephone call to the NRC, SERC, and LEPC, followed by a written report and a first anniversary follow-up report);
- = Notification of a change in the normal range, if there is a change in the release such that the quantity of the release exceeds the upper bound of the reported normal range, the release must be reported as a statistically significant increase;
- = For CERCLA substances only, notification of any other reported information (e.g., a change in facility ownership) in a written letter to only the EPA Region.

Part A. Facility or Vessel Information

1. The complete name of your facility (and company identifier where appropriate). If multiple facilities are included in your written report, provide the plant site name with the name of the facility.
2. The full address of your facility, including the street address or highway marker, city, county, state, and zip code. A post office box number should not be used as the facility address. The address provided should be the location of the facility where the hazardous substance release occurs.
3. The location of your facility by its latitude and longitude in units of degrees, minutes, and seconds. See below for helpful hints on how to obtain the latitude and longitude coordinates of your facility.
4. The nine digit number assigned by Dun and Bradstreet (D&B) to your facility. This number can be obtained via telephone by an officer of your company from the national office of Dun and Bradstreet (at 1-800-234-3867). If your facility has not been assigned a D&B number, please specify that the information is not applicable. http://www.dnb.com/US/duns_update/
5. For reports of CERCLA hazardous substances, the CR-ERNS number assigned by the NRC when you made the initial telephone report. Be certain to include the CR-ERNS number on each page of your report.
6. The name, telephone number (including area code), and an alternate telephone number for the person in charge of your facility.

SOURCES OF INFORMATION FOR IDENTIFYING THE LOCATION OF YOUR FACILITY

Sources of data on latitude and longitude coordinates of your facility include EPA permits (e.g., NPDES permits), county property records, facility blueprints, and site plans. In addition, information on the latitude and longitude of your facility may be obtained from a United States Geological Survey (USGS) topographical map. These maps are available in both the 7.5 minute and 15 minute series. These maps may be obtained from the USGS distribution center at your local public library. If you would like to order a map from USGS, contact: U.S. Geological Survey - Information Services, Box 25286, Denver, CO 80225, call 1-888-ASK-USGS (1-888-275-8747)/<http://library.usgs.gov/maplinks.html>

If you are not certain on which map your site is located, consult the index of topographic maps for your state, which may be obtained from USGS free of charge. USGS maps are also available at commercial dealers such as surveyors or outdoor recreation equipment dealers.

Latitude/Longitude information can be obtained at the following websites: <http://www.satsig.net/maps/lat-long-finder.htm>, <http://earth.google.com/>, and <http://www.census.gov/geo/landview/>.

Part B. Population Information

1. Choose the range from the drop down list, the range that most accurately describes the population density within a one-mile radius of your facility.
2. Identify and describe the location of any sensitive populations or ecosystems within a one-mile radius of your facility. If possible, describe the location of the populations or ecosystems in terms of distance and direction from your facility (e.g., located ¼ mile northwest of the facility). Exact addresses are not required.

Sensitive populations - populations likely to be more susceptible than average individuals to the effects of exposure to a hazardous substance. Examples of sensitive populations are elementary school children, retirement communities, or hospitals.

Sensitive ecosystems - environments likely to be more susceptible than average environments to the effects of exposure to a hazardous substance, or ecosystems that have been designated for special protection by Federal or state governments. Example of sensitive ecosystems includes wetlands.

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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 normal operations or treatment processes.

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 -

ATTACHMENT A – Continuous Release Reporting Forms

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.

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SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number:

Name of Source:

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a waste pile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

AIR If the medium affected is air, please also specify whether the source is a **stack** or a ground-based **area source**.

Stack Indicate stack height in feet or meters

SURFACE WATER

If the release affects any **surface water body**, give the name of the water body.

Surface Water Body

Stream If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.

Stream Order **OR** Average Flow Rate (cubic feet/second)

Lake Surface area of lake (in acres) Average depth of lake (in meters)

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.

SOIL OR GROUND WATER

If the release is on or under ground, the location of public water supply wells within two miles.

Optional Information

The following information is not required to comply with the regulation; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter (feet or meters) Gas Exit Velocity (ft or meters/sec) Gas Temp (degrees Fahrenheit, Kelvin, or Celsius)

For a release to surface water, provide the following information, if available:

Average velocity of surface water (feet/second)

ATTACHMENT A – Continuous Release Reporting Forms

INSTRUCTIONS
SECTION II: SOURCE INFORMATION
 (Part B)

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.

Part B - Specific Information on the Source:

You must identify the environmental medium (i.e., air, surface water, soil, or ground water) affected by the hazardous substance release from each source identified in Section II, Part A. In addition, you must provide specific information on the source and its affected environment. It is important to remember that if you have a release from a single source that affects two different media (e.g., gypsum stack releasing radon to air and radionuclides to ground water), you should treat the release to each medium as a separate source for purposes of reporting. Another important point to remember when completing all sections of the written report is to include the appropriate units, such as kilograms, meters, or curies.

Environmental medium - Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from the identified source.

1. **Air** - If the medium affected is air, provide the following information:
 - a. Indicate whether the source is a stack or ground-based area source.
 - b. If the source is a stack, provide the stack height in feet or meters. The stack height is the distance from the ground to the top of the stack.
 - c. If the source is an area source (e.g., a waste pile, surface impoundment, landfill, valve, pump seal, or storage tank vent), provide an estimate of the surface area or area of the release source including the appropriate unit such as square feet, square meters, or acres.
2. **Surface Water** - If the medium affected is surface water, provide the following information:
 - a. If the release affects any surface water body, give the name of the water body.
 - b. If the release affects a stream, give the "stream order" or the average flow rate (in cubic feet per second). This information can be obtained from your state water resource division of USGS. If you cannot locate this information, use the chart below to estimate the flow rate according to the velocity of the stream. If the velocity of the stream fluctuates during the year, use the average velocity when calculating average flow rate.
 - c. If the release affects a lake, or other large surface water body (e.g., a bay) give the surface area of the lake (in acres) and the average depth (in feet or meters). Below are sources of information for estimating the average lake depth.
3. **Soil or Ground Water** - If the medium affected is soil or ground water, provide the following information:
 - a. If the release is on or under ground, indicate the distance to the closest public water supply well within a two-mile radius of the site. Information regarding the location of public water supply wells may be available through the county office that issues permits for wells.

Estimated Average Stream Flow Rates

Stream Order	Mean Flow (CFS)	Mean Velocity (feet/sec)
1	0.65	1.0
2	3.10	1.3
3	15.00	1.5
4	71.00	1.8
5	340.00	2.3
6	1,600.00	2.7
7	7,600.00	3.3
8	56,000.00	3.9
9	171,000.00	5.6
10	810,000.00	5.9

Sources of Information for Estimating Average Lake Depth

If the lake is large enough to be navigable, your local Coast Guard office will have a navigation chart that will provide the average depth of the lake. For smaller lakes, you may estimate the average depth of the lake by relying on your knowledge of the use of the lake and the surrounding area, and your best professional judgment.

Optional information - The following information is *not* required to comply with the regulation; however, such information will assist EPA in evaluating the risks associated with a continuous release. If the information below is not provided, conservative values will be used to evaluate the risks associated with the continuous release.

1. If the source is a stack release to air, provide the: (a) inside diameter of the stack; (b) gas exit velocity; and (c) gas temperature.
2. If the release affects surface water, provide the average velocity of the surface water.

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SECTION II: SOURCE INFORMATION
(continued)

CR-ERNS Number:

Part C: Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source.

Name of Source:

List each hazardous substance released from the source identified above and provide the following information. Include units where appropriate. Radionuclides in curies (Ci).

Name of Hazardous Substance	CASRN #	Normal Range (in lbs., kg, or Ci per day)		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs., kg, or Ci)	Period of the Release
		Upper Bound	Lower Bound			

List each mixture released from the source identified above and provide the following information. Include units where appropriate. Radionuclides in curies (Ci).

Name of Mixture	Name of Hazardous Substance Components	CASRN #	Weight Percentage	Normal Range of Components (in lbs., kg, or Ci per day)		OR Normal Range of Mixture (in lbs., kg, or Ci per day)		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs., kg or Ci)	Period of the Release
				Upper Bound	Lower Bound	Upper Bound	Lower Bound			

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EXAMPLES OF REPORTING SINGLE HAZARDOUS SUBSTANCES

In this example, your facility has a release which may qualify for reduced reporting as a continuous release. The hazardous substances released from the identified source (Stack A) are hydrogen chloride (7647010) and hydrogen flouride (7664393).

The volume of hydrogen chloride (HCl) released in 24-hour period is between 0 and 9,950 lbs. During the previoius year, 11,500 lbs of HCl was released. The release occurs once per week in February and June for a total of 8 days per year. The amount of hydrogen flouride (HF) released is between 1 and 6,000 lbs. The release of HF occurs approximately 120 days each year. A total amount released last year was 13,800 lbs.

For these releases from the specific source, you must provide the information outlined below.

Name of Hazardous Substance	CASRN #	Normal Range (in lbs., kg or Ci per day)		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs., kg or Ci)	Period of the Release
		Upper Bound	Lower Bound			
Hydrogen Chloride (HCl)	7647010	9,950 lbs	0 lbs	8	11,500 lbs.	February, June
Hydrogen Flouride (HF)	7664393	6,000 lbs	1 lb	120	13,800	All 12 months

EXAMPLE OF REPORTING A MIXTURE

In this example, if your facility wants to report the release of a mixture of hazardous substances, you must list each component of the mixture by hazardous substance and include its percentage by weight. For example, for the release of mixture Z, you must provide the following information about its components, ethylene oxide, acrolein, and 2,3,5-tri-chlorophenol:

Name of Mixture	Name of Hazardous Substance Components	CASRN #	Weight Percentage	Normal Range of Components (in lbs., kg or Ci per day)		Normal Range of Mixture (in lbs., kg or Ci per day)		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs., kg or Ci)	Period of the Release
				Upper Bound	Lower Bound	Upper Bound	Lower Bound			
Z	(components listed below)					100 lbs	0 lbs	365	79,500 lbs	All 12 Months
Z	Ethylene oxide	75218	10%	10 lbs	0 lbs					
Z	Acrolein	107028	15%	15 lbs	0 lbs					
Z	2,3,5-tri- chlorophenol	933788	20%	20 lbs	0 lbs					

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INSTRUCTIONS
SECTION II: SOURCE INFORMATION
 (Part C)

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.

Part C - Identity and Quantity of Each Hazardous Substance or Mixture Released:

For each source, you must report information about the identity and quantity of the hazardous substances released from the source. In particular, you must identify the normal range of each release and the total annual quantity released during the previous year from each source.

You are not necessarily required to monitor releases to determine the normal range of the release. You may establish the normal range by using engineering estimates of releases under various operating conditions, knowledge of the operating history of the facility, experience with operating processes, professional judgment, or any other method that has a sound technical basis. EPA will use the upper bound of the normal range to estimate the risks to human health and the environment posed by the hazardous substance release.

To provide the required information regarding the quantity of the hazardous substance released from each identified source, you should begin by determining whether the release is a single hazardous substance or a mixture of hazardous substances.

Normal Range

The normal range of a continuous release includes all releases of a hazardous substance (in pounds, kilograms, or curies) reported or occurring during any 24-hour period under normal operating conditions during the previous year. Only releases that are both continuous and stable in quantity and rate may be included in the normal range.

Reporting Single Hazardous Substances - For each source, follow the directions below to report each hazardous substance released from the source that is a single hazardous substance or a component of a mixture that you wish to report separately.

1. Identify the hazardous substance released by name and by Chemical Abstracts Service Registry Number (CASRN). The CASRN for a hazardous substance can be located in any material safety data sheet or in most chemical supplier company catalogues.
2. Provide the upper and lower bounds of the normal range of the release from the identified source (i.e., quantity in pounds, kilograms, or curies) during the previous year.
3. Estimate the total annual amount (in pounds, kilograms, or curies) of the hazardous substance released from the identified source during the previous year.
4. Specify the frequency of the release by indicating the number of days the release occurs per year from the identified source. Stating "continuous" is not sufficient, as one source may be continuously operating 365 days a year, while another source may be continuously operating on weekdays, 261 days a year.
5. Indicate the actual months the release occurs.

Reporting a Mixture - For each source, follow the directions below to report each mixture released from the source.

1. Identify the mixture by name (e.g., Blue Pigment #23).
2. Identify each hazardous substance component of the mixture by name and CASRN.
3. Estimate the percentage by weight of each hazardous substance component of the mixture.
4. Provide the upper and lower bounds (i.e., quantity in pounds, kilograms, or curies) of the normal range of each hazardous substance component of the mixture that was released from this source. To calculate the upper bound of the normal range of each hazardous substance component, multiply the weight percentage of each component by the upper bound quantity of the mixture.
5. Provide the upper and lower bounds (i.e., quantity in pounds, kilograms, or curies) of the normal range of the mixture that was released from the identified source during the previous year.
6. Specify the frequency of the release by indicating the number of days the release occurs per year from the identified source. Stating "continuous" is not sufficient, as one source may be continuously operating 365 days a year, while another source may be continuously operating on weekdays, 261 days a year.
7. Estimate the total annual quantity (in pounds, kilograms, or curies) of the mixture that was released from the identified source during the previous year.
8. Indicate the actual months the release occurs.

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ATTACHMENT A – Continuous Release Reporting Forms

Continuous Release Reporting Form

Form Approved OMB No. 2050-0086
Expiration Date: 12-31-2011

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number:

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance.

Name of Hazardous Substance:

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)	Upper Bound of the Normal Range of the Release (specify lbs., kg., or Ci)
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>

TOTAL - SSI trigger for this hazardous substance release*: _____

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

ATTACHMENT A – Continuous Release Reporting Forms

INSTRUCTIONS
SECTION III: SUBSTANCE INFORMATION

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.

After you provide the required information for all sources of continuous releases from your facility, you must aggregate information of a hazardous substance release from all sources to determine the SSI trigger (upper bound of the normal range) for each hazardous substance released at your facility.

The SSI trigger of a particular hazardous substance is calculated by aggregating the upper bounds of the hazardous substance released across all sources at a facility.

If you are aggregating CERCLA hazardous substance releases from separate, contiguous, or adjacent facilities and reporting them in a single report, aggregate the upper bound of the normal range of the hazardous substance released from all sources at the site to determine the SSI trigger. If you aggregate your releases across facilities, the SSI trigger must also be site-specific, not facility-specific. Aggregating releases across facilities at the same site may reduce your reporting burden; however, EPA will evaluate the risks associated with the releases as if the releases were from one facility.

To calculate the SSI trigger for each hazardous substance you should:

1. *List each specific source name and enter the upper bound of the normal range of the release from that source. If the identified hazardous substance is a component of a mixture, enter the upper bound of the normal range for that component of the mixture (as determined in Section II, Part C).*
2. *Aggregate the upper bound quantities from each source of the release. Report these totals as the SSI trigger for the hazardous substance. The example that is provided below illustrates the calculation of the SSI trigger for a release of ammonia.*

The above method for calculating the SSI trigger of a hazardous substance assumes that all releases of the same hazardous substance occur simultaneously (i.e., over the same 24-hour period). To the extent that the frequency of the release differs, you may adjust the SSI trigger so that it more accurately reflects the frequency and quantity of the hazardous substance released from all sources over a 24-hour period. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility. The normal range of the release includes all continuous releases previously reported or occurring over a 24-hour period during the previous year.

Calculation of the SSI Trigger for a Hazardous Substance		
Hazardous Substance	Source	Upper Bound
Ammonia	Tank Vents in Building #1	120 lbs.
	Valves in Building #5	115 lbs.
Upper Bound for Ammonia		235 lbs.

For the purposes of this example, it is assumed that the only sources of the ammonia release at the facility are the Tank Vents in Building #1 and the Valves in Building #5.

Paperwork Reduction Act Notice

The public reporting and recordkeeping burden for this collection of information is estimated to average 10 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

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