

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(a) or 355.32 and that all submitted information is accurate and current to the best of my knowledge."

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.