

Continuous Release Reporting for Farms

ID Number
(CR-ERNS)

SECTION II: ANIMAL WASTE SOURCE INFORMATION

Part A: Basis for Asserting the Releases is Continuous and Stable in Quantity and Rate

For EACH animal waste source of a release of a hazardous substance to the air from your farm, provide the following information. Use a SEPARATE sheet for each animal waste source.

Name of Animal Waste Source:

Check One – Whether the release from this animal waste source is either:

- Continuous without interruption Routine, anticipated, intermittent

Identify the activity(ies) that results in the release from this animal waste source (e.g. manure pile, lagoon, etc.) to the air.

Identify below how you established the pattern of release and calculated release estimates. Check all that apply.

- Past Release Data Knowledge of the farm operations and release history Engineering Estimate
- AP-42 Procedures Best Professional Judgement

Other (explain)

INSTRUCTIONS

SECTION II: ANIMAL WASTE SOURCE INFORMATION (PART A)

ID Number (CR-ERNS)

The CR-ERNS Number is required for this submission. NRC will assign a CR-ERNS number for your farm when you make the initial notification.

General overview - The purpose of requiring information on the animal waste source(s) of the release to the air is to provide EPA with sufficient information to evaluate the risk associated with the continuous release. Providing this information accurately in the written report will minimize future requests for additional information or clarification.

When completing your written reports, you must take into consideration all animal waste sources of the air release of a hazardous substance from your farm. For example, if the aggregate amount of ammonia or hydrogen sulfide released within 24 hours from your farm equals or exceeds the RQ of 100 lbs., then each animal waste source of the particular air release must be identified, even if some release amounts from individual animal waste sources do not equal or exceed the RQ.

In this section of the written report, you should identify and describe separately each continuous release animal waste source. If the continuous release of the same hazardous substance comes from two or more animal waste sources (e.g., two barns), then information should be reported separately for each of the animal waste sources.

For example, if a barn is one of several animal waste sources of a hazardous substance air release at your farm, you must provide information on that barn including: the identity of the hazardous substance(s) being released from the barn; the quantity released to the air; and the frequency of the release from the barn. If you have a release of a particular hazardous substance from three barns, you should report each barn separately and provide the required information specified for each barn.

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 to the air from different animal waste 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 to the air from each animal waste source is the same. Similarly, aggregated barn releases are most readily evaluated if the frequency of the release from each barn is the same. If you elect to aggregate releases across the farm, be certain to identify information about each animal waste source of the release to the air.

Identification of animal waste sources - In Section II, you must identify (i.e., name) and describe each continuous release animal waste source. There are several ways to name animal waste sources. It is important to:

- (1) provide a name that clearly identifies the animal waste source; and
- (2) avoid giving two or more animal waste sources the same name.

It is also important to remember when naming your animal waste sources that you may be contacted with questions regarding releases from one of your named animal waste sources. It would be prudent, therefore, to name the animal waste sources at your farm in a manner that will be easy for you and other employees to identify them. For example, if your plant has four lagoons, two manure piles, and five barns, you may name the animal waste sources as follows: Lagoon #1; Lagoon #2; Lagoon #3; Lagoon #4; Manure pile #1; Manure pile #2; and Barn #1. Barn #2. Barn #3, Barn #4, and Barn #5.

Required information - Section II, Animal Waste Source Information, contains three Parts (A, B, and C). You must provide the information required in each of these Parts for each continuous release animal waste source. Be sure to place the name of the animal waste source on all pages associated with that specific source.

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

You must first identify the animal waste source of the release (include the name of the animal waste source in all subsequent parts), then briefly describe whether the release is continuous without interruption, or is a routine, anticipated, intermittent release. Briefly describe information on when the release is expected to occur (i.e., evidence of predictability of the release).

EPA considers emissions from animal waste to be continuous and stable in quantity and rate, and therefore eligible for continuous release reporting. The general assumption is that releases of hazardous substances to the air from animal waste at farms is essentially on-going and therefore continuous.

Your description should also identify the activity that results in the release. If the release occurs because of a malfunction or other unusual event, this should be explained fully.

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 animal waste 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 to the air from the animal waste source.
- (3) Identify how you established the pattern of the release and calculated release estimates.