

To: Distribution

From: F. G. Jeanson
Date: January 4, 1989

VISTA

Interoffice
Communication

Subject: RELEASE AND SPILL REPORTING

One of the requirements of the Emergency Planning and Community Right-to-Know Act of 1986, commonly referred to as SARA, is the reporting of releases of certain substances to the environment (Section 304). The report is to be made to the emergency coordinator of the local emergency planning committee and to the Mississippi Emergency Response Commission. This reporting requirement is in addition to the Superfund or CERCLA section 302(a) reporting to the National Response Center which we have been doing for some time. Naturally, the substances and conditions requiring notification are not the same for each of the reports.

Table I lists the substances used in the plant that require SARA release reporting. Table II lists the substances used in the plant that require CERCLA section 302(a) release reporting. The tables also show the reportable quantity for each of the substances. The regulations concerning when reporting is required are complex; therefore, the Environmental Coordinator should be contacted immediately in case of a spill or release to help determine if it requires reporting. In general, a spill or release of any substances in excess of the reportable quantity except for federally permitted discharges (most vinyl chloride emissions are federally permitted) must be reported.

Any non-permitted release of a gaseous material in excess of the reportable quantity will require reporting for both SARA and CERCLA 302(a). If greater than the reportable quantity of a liquid or solid is spilled on concrete and totally contained before it reaches any soil, the spill does not need to be reported by either SARA or CERCLA 302(a). If greater than a reportable quantity of a liquid or solid is spilled on the ground but the spill does not leave the plant boundary, it needs to be reported to CERCLA 302(a) only. If greater than the reportable quantity leaves the plant boundary, the spill will also need to be reported under SARA.

Attached is a form listing the questions usually asked when a release is reported to the National Response Center [CERCLA 302(a) list]. This form should be filled out by the operating personnel in the area where the release occurs prior to the phone call. Also attached is the Mississippi Emergency Management Agency Hazardous Material Release Report form. When notifying the emergency coordinator of the local emergency planning committee and the Mississippi Emergency Response Commission of a SARA release, the information in boxes 1 through 9 must be provided.

1/04/89

Release and Spill Reporting

Page 2

In addition to the verbal report of a SARA release, a written followup emergency notice is also required setting forth and updating the information required to be reported in the verbal report and to include additional information with respect to:

1. Actions taken to respond to and contain the release.
2. Any known or anticipated acute or chronic health risks associated with the release, and
3. Where appropriate, advice regarding medical attention necessary for exposed individuals.

This written report is to be sent to the emergency coordinator of the local emergency planning committee and to W. E. Austin, Special Projects Officer, SARA Title III, Mississippi Emergency Response Commission, P. O. Box 4501, Fondron Station, Jackson, MS 39216-0501. The written report is to be submitted as soon as practicable after the release. The written report should be submitted within ten days as a maximum.

F. G. Jeanson

F. G. Jeanson
Environmental Coordinator

rah

attachment