

REGULATORY REPORTING OF RELEASES OR EVENTS

Purpose

This RRES Environmental Services (ES) business line procedure describes how to determine whether an unplanned release, spill, fire, or explosion needs to be reported; and to fulfill all immediate reporting requirements (within appropriately the first 24 hours). It provides details of how to perform the initial reporting specified in LIR 402-130-01, "Abnormal Events."

Scope

This procedure applies to the ES business line RRES Division on-call responders who must respond to any release, spill, or event at the Laboratory that may require immediate notification to state or federal regulatory agencies, and describes the actions that must be performed within the first 24 hours. This procedure does **not** cover the response procedures for "continuous releases" (see definitions) nor the follow-up notifications and reports.

In this procedure



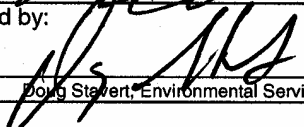
This procedure addresses the following major topics:

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Hazard Control Plan

The hazard evaluation associated with this work is documented in the appropriate HCP of the employee's group.

Signatures (continued on next page)

Prepared by:  Terry Morgan, MAQ QA Officer	Date: 7/28/04
Approved by:  Victoria George, Environmental Services Deputy Program Director	Date: 8/20/04
Approved by:  Doug Stever, Environmental Services Program Manager	Date: 8/23/04


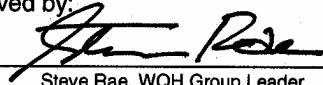


07/27/04

CONTROLLED DOCUMENT

This copy is uncontrolled if no red stamp is present on printed copies. Users are responsible for ensuring they work to the latest approved revision.

General information about this procedure

Signatures,
continued

Approved by:  Tony Grieggs, SWRC Group Leader	Date: 8/20/04
Approved by:  Steve Rae, WQH Group Leader	Date: Aug. 23, 2004
Approved by:  Jean Dewart, MAQ Group Leader	Date: 7/28/04
Approved by:  Jackie Little, ECO Group Leader	Date: 8-23-04

Attachments

This procedure has the following attachments:

Number	Attachment Title	No. of pages
1	Emergency Contacts	2
2	Emergency Notification Requirements for RCRA	2
3	Summary of Emergency Release or Event Reporting Requirements	1

History of revision

Revision	Date	Description of Changes
0	9/9/04	New document.

Who requires training to this procedure?

The following personnel require training before implementing this procedure:

- Environmental Services' and groups' designated **on-call representative** for the ES business line who may be asked to fulfill reporting requirements during release-related exercises or during actual releases.

Annual retraining to this procedure is required. This procedure will be reviewed annually by all affected personnel and updated as necessary.

Training method

The training method for this procedure is "**self-study**" (reading) and is documented in accordance with the trainee's organization's procedure for training.

Prerequisites

All on-call representatives for this procedure should have a laminated card, issued by the RRES Division emergency preparedness office, of emergency phone numbers.

General information, continued

Definitions specific to this procedure

CERCLA: Comprehensive Environmental Response, Compensation, and Liability Act.

Continuous Release: A release is continuous if it ‘occurs without interruption or abatement or if it is routine, anticipated, intermittent, and incidental to normal operations or treatment processes.’ The release must also be “stable in quantity and rate,” which means that it must be predictable and regular in the amount and rate of emission. The response procedures for continuous releases are not covered by this document. See guidance in [Reporting Continuous Releases of Hazardous and Extremely Hazardous Substances under CERCLA and EPCRA](#). [DOE/EH-0441, guidance document, 372,099 bytes, 51 pp.], available at <http://homer.ornl.gov/oepa/rq/>.

CWA: Clean Water Act.

Environment: includes "water, air, land, and the interrelationship which exists among and between water, air, land, and all living things." (40 CFR 355.20).

EPCRA: Emergency Planning and Community Right-to-Know Act.

Extremely Hazardous Substance (EHS): EPCRA also establishes emergency reporting requirements for extremely hazardous substances in 40 CFR 355, Appendix A. All of these substances are also CWA and CERCLA “hazardous” substances.

Hazardous Substance (HS): These substances are summarized in 40 CFR Part 302. As used in this context, refers to: (1) any elements, compounds, mixtures, solutions, or substances specially designated by EPA under section 311 of the Clean Water Act (CWA) (40 CFR 116.4); (2) any toxic pollutants listed under Section 307(a) of the CWA; (3) any hazardous substances regulated under Section 311(b)(2)(A) of the CWA; (4) any listed or characteristic RCRA hazardous waste (40 CFR 261), (5) any hazardous air pollutants listed under Section 112 of the Clean Air Act (CAA); or (6) any imminently hazardous chemical substances or mixtures regulated under Section 7 of the Toxic Substances Control Act (TSCA).

Release: Any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, excluding (1) emissions from the engine exhaust of any vehicle, (2) certain releases of source, byproduct, or special nuclear material from a nuclear incident, or (3) normal application of fertilizer.

General information, continued

Definitions, *continued*

ES: RRES Environmental Services business line.

EM&R: Emergency Management and Response organization that operates the Emergency Operations Center at LANL.

LEPC: Local Emergency Planning Committee. Locally, the contact is through LA County Police and Fire Departments.

NPDES: National Pollutant Discharge Elimination System.

RCRA: Resource Conservation and Recovery Act.

SERC: State Emergency Response Commission. In NM, the contact is through the NM Department of Public Safety.

TSCA: Toxic Substances Control Act.

References

The following documents are referenced in this procedure:

- 40 CFR 302, “Designation, Reportable Quantities, and Notification”
- 40 CFR 261, 264 Subpart D 270.30
- DOE guidance document “PCB Spill Response and Notification Requirements” (EH-231-059/1294), available on the RRES-SWRC group home page
- DOE – Office of Environmental Guidance, “CERCLA Information Brief”, EH-231-001-0490 (April 1990)
- EPA Web Site: <http://www.epa.gov/>
- EPCRA Information Web Site: <http://www.chemicalspill.org/EPCRA-facilities/spill.html>
- Federal Register, Volume 67, No. 47, Notices FRL-7172-4, Guidance on the CERCLA Section 101(10)H, “Federally Permitted Release Definition for Certain Air Emissions”
- LANL RCRA Permit No. NM0890010515-1
- LANL NPDES Permit No. NM0028355
- LIR 402-130-01, “Abnormal Events”
- LIR 403-00-01, “Emergency Management”
- LIR 404-50-01, “Water Pollution Control”
- National Response Center (NRC) Web Site: <http://www.nrc.uscg.mil/>
- New Mexico Water Quality Control Commission Regulations, 20.6.2 NMAC, dated December 1, 2001
- RQ Calculator Web Site: <http://homer.ornl.gov/oepa/rq/>
- QP-5.8, “Identification, Documentation, and Reporting of Newly Discovered Potential Release Sites”, ER Procedure.

Principles and policies on reporting releases or events

Background Events covered by this procedure include injuries, accidents, elevated environmental measurements, detonation or burns of unstable material, leaking or compromised gas cylinders, puncturing of bulging containers, fires, explosions, and chemical or radiological spills inside or outside of buildings.

List of on-call representatives On a quarterly or semi-annual basis, **members of the WQH group** prepare a list of individuals, provided by the group leaders, and the week each will be the on-call representative.

Responsibilities of on-call representative The **RRES ES on-call rep** is the party primarily responsible for:

- determining if the incident will require immediate notification to external agencies in accordance with LANL, State, and Federal regulatory reporting requirements
- notifying RRES Division upper management of immediate reporting requirements; and
- if needed, coordinating with other on-call subject matter experts and the Emergency Management and Response (EM&R) organization to make the required notification for the Laboratory.

The **RRES on-call rep** is NOT responsible for (these determinations will be made by the Emergency Management and Response (EM&R) organization):

- determining if the RCRA Contingency Plan must be implemented, or
- if a shock-sensitive material or leaking or compromised gas cylinder constitutes an emergency.

However, in order to ensure that the appropriate expertise is available for the affected media, the **RRES on-call rep** may immediately confer with a representative of the RRES group specifically affected by the release. If someone from the responsible group is able to respond to the event, the remaining steps in this procedure may be passed to that person.

A list of contact numbers for representatives of each responsible RRES group (MAQ, WQH, SWRC, ECR, and ECO) is available in Attachment 1 of this document. The RRES emergency preparedness coordinator and the Emergency Management and Response (EM&R) organization may also be contacted to determine the on-call representative for each group.

Principles and policies on reporting releases or events, continued

Follow-up to releases

This procedure describes the initial notifications (within the first 24 hours, approximately) to regulatory agencies, upper RRES Division and LANL management, and responsible groups. After the completion of the steps in this procedure, the RRES group specifically responsible for compliance with the relevant regulations (responsible group) will complete the required notifications and reports, as applicable under the appropriate regulations, according to established group procedures.

Summary of policy on reporting

- The **RRES ES on-call rep** and RRES groups have the authority and responsibility for deciding when to report and for making the report to regulatory agencies within regulatory deadlines.
- Upper division management and DOE LASO must be informed as soon as reasonably possible that a report was or will be made (“no surprises”), but their review is not required before a required report is made.

NOTE: EM&R (7-6211) maintains a current list of on-call managers.

Using this procedure

This procedure has four separate paths (and corresponding chapters) to follow for determining if a release is reportable. Follow ALL these paths to determine if one or more are applicable:

- RCRA
- TSCA
- NM Water Quality Act and NM Water Quality Control Commission
- CERCLA and EPCRA.

Under CERCLA or EPCRA, a Reportable Quantity (RQ) is the action level that may trigger an appropriate response to a release under the provisions of these regulations. A release may not meet RQ reporting limits **but still may be reportable** under RCRA requirements.

Note that **one or more** of these paths may need to be followed.

NOTE: The 24-hour deadline (15 minutes in some cases) applies regardless of whether it occurs during non-business days or after business hours.

Principles and policies on reporting releases or events, continued

Additional information

Additional information and guidance on how and when to report a release is available at this link: <http://homer.ornl.gov/oepa/rq/>.

Recommendation: All potential **on-call ES reps** should follow the various links at this site and be familiar with the guidance before any release or event occurs.

Determining if an event is reportable under RCRA

Determining if an event is reportable Follow the flow charts in Attachment 2 to determine if an event is reportable under RCRA. The 3 groups of circumstances described below (also delineated in the flow charts in Attachment 2) are evaluated to determine if an event is reportable:

Contingency plan Under the RCRA permit requirements, the **Lab’s Management and Response Group’s “Duty Emergency Manager”** determines if the “Contingency Plan” provisions should be implemented. The flow chart in Attachment 2 (page 1) starts with this determination. The **ES on-call representative** or a **SWRC group member** performs notifications that are necessary. This plan is available through the RRES-SWRC web page under the link “Release Reporting.”

The EM&R “Duty Emergency Manager” will normally attempt to contact the responsible member of SWRC for guidance in making this decision. If the SWRC representative is successfully contacted, the completion of the remainder of this procedure may be passed on to this individual.

Permit non-compliance, newly discovered releases from SWMUs The **ES on-call representative** makes the determination that one or more of these conditions occurred through consultation with SWRC and ECR (environmental restoration). 24-hour notification can be made by the on-call representative or a member of SWRC or the ECR group.

Unstable chemicals, leaking or compromised gas cylinders The **Duty Emergency Manager** of EM&R makes the determination that unstable chemicals, leaking or compromised gas cylinders represent an emergency situation and, typically with SWRC, how best to respond. 24-hour notification can be made by the on-call representative or SWRC.

Reporting If a release/event is reportable under RCRA rules, continue through the next chapters to determine if the release/event is reportable under other rules and proceed to the chapter *Reporting a Release or Event*.

Determining if a release is reportable under TSCA

Releases subject to TSCA reporting requirements

In practice, only spills of PCBs or PCB-suspect untested mineral oil to the environment (generally outdoors or with the potential to reach the outdoors) are reportable. Spills that are contained indoors are generally not reported.

When is a PCB spill or oil spill reportable?

Follow the steps in the chapter *Determining if a release is reportable under other regs* to determine if the RQ (of 1 pound) for PCBs has been triggered.

Additionally, reporting requirements are triggered if over 270 gallons of untested mineral oil suspected of containing PCBs has been spilled.

Locations of PCBs at LANL

There are about 13 capacitors at TA-55 PF-4 that still contain PCBs – these are all currently being replaced and contain relatively high concentrations of PCBs.

There are only 2 transformers at LANL that still have PCB contamination and they are scheduled to be replaced or refilled. One is indoors at TA-48 and the other is outdoors at TA-53 (N side of Sector A; due to be re-filled in May 2004; this is reportable only if the entire contents (710 gallons) are leaked).

Reporting

If a release (see definitions) is reportable under TSCA or CERCLA rules, continue through the next chapters to determine if the release/event is reportable under other rules and proceed to the chapter *Reporting a Release or Event* and determine if additional reporting is necessary (below).

Additional EPA Region 6 reporting requirements for PCBs

If the spill is ...

over 10 pounds by weight of PCBs (TSCA)

OR

of PCBs at concentrations ≥ 50 ppm that directly contaminate surface water, sewers, drinking water supplies, grazing lands, or vegetable gardens

Then...

Report to EPA Region 6 (Office of Prevention, Pesticides and Toxic Substances Branch) through EPA's 24-hour spill response number 866-372-7745 as soon as possible after discovery but no later than 24 hours after discovery.

Determining if a release is reportable under NM Water Quality Act

Reportable releases under NM WQA and CWA

The NM Water Quality Act (equivalent to the national Clean Water Act) does not use RQs (as described in the next chapter). Instead, “*Any amount of any material in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or may unreasonably interfere with the public welfare or the use of property. This includes chemical, biohazardous, petroleum-product, and sewage spills and incidents. In addition to recent spills, the discovery of evidence of previous unauthorized discharges, such as contaminated soil or ground water, also must be reported.*”

NOTE: The above rule requires the use of professional judgment to determine if reporting is required. No quantifiable metric is available to assist in making this determination. The on-call representative has the authority and responsibility to make this determination.

Spills of potable water (e.g., water line breaks) require reporting if there is a release of over 1000 gallons or if the release impacts a Solid Waste Management Unit (SWMU). Contact the ECR Group (environmental restoration) for the location of SWMUs and coordinate any necessary water quality notifications with SWRC and ECR (environmental restoration).

For oil discharges (film/sheen/discoloration) to water in stream channels, additionally notify NRC (24-hour verbal notification) and EPA Region 6.

Additional reporting requirement for petroleum storage tanks

New NMED regulations from August 2003 require verbal reporting within 24 hours (14-d written notification will be handled by WQH) of release of petroleum products (except asphalt: one tank at TA-60 Sigma Mesa) from regulated tanks (see below) to the Petroleum Storage Tank Bureau when there is:

- Evidence of release of regulated substances
- Unusual operational conditions (that would cause concern about a release)
- Monitoring results that show loss from the system.

Regulated tanks include those of 1320 gallons to 55,000 gallons and excludes tanks used to fuel emergency generators.

This reporting requirement is in addition to the reporting under WQA and CWA requirements for such releases. Call the PST Bureau at 984-1741 during business hours and 866-428-6535 after closing.

Determining if a release is reportable under NM Water Quality Act, continued

Reporting

If a release (see definitions) is reportable under WQA, continue through the next chapters to determine if the release/event is reportable under other rules and proceed to the chapter *Reporting a Release or Event*.

Determining if a release is reportable under other regs

What is a reportable quantity?

Under CERCLA or EPCRA, a Reportable Quantity (RQ) is the action level that may trigger an appropriate response to a release under the provisions of these regulations. RQs are summarized in 40 CFR 302. An RQ is based on the quantity of chemical released within any 24-hour period. The RQs for extremely hazardous substances can be found in 40 CFR 355, Appendices A and B, in the column labeled "RQ". This table has two columns of RQs: the Statutory RQ and the Final RQ. Use the weight in the Final RQ column for determining if the release must be reported. The chemicals that have not been assigned RQs by EPA have been given statutory RQs of one pound by Congress.

Releases (see definitions) that occur within a closed space with no emissions to the ambient environment (see definitions) are exempt from this requirement.

Reporting schedule

The exceedance of an RQ requires immediate notification.

Regulatory classification of the released material

Determine the regulatory classification of the substance released with respect to the hazard classifications: Extremely Hazardous Substance (EHS) and/or Hazardous Substance (HS) (see definitions).

Determining quantity of material released

Often during the course of an emergency, complete information will not be available regarding type and amount of material released. In this case, best professional judgment must be used to establish the level of confidence associated with the estimates. If the uncertainty is high enough that future estimates may require reporting, it is best to err on the side of caution and follow the reporting requirements (see next chapter).

- Identify the constituents in the material released using the Material Safety Data Sheet (MSDS), laboratory analysis, data sheet, manifest, or manufacturer information.
- A summary of the RQs can be found in 40 CFR Part 302 and 40 CFR 355, Appendices A and B. The RQ may also be determined using the on-line RQ Calculator (<http://homer.ornl.gov/oepa/rq/>).
- Calculate the amount of the listed chemical involved in the release (the weight of the material released multiplied by the percentage of the concentration of the listed chemical present in the material).

Determining if a release is reportable under other regs, continued

Determine if reportable

After determining the RQ of a released material, perform the following steps to determine if an RQ has been exceeded.

Step	Action						
1	Obtain an estimate of the quantity and type of material released (e.g., 4 pounds of chlorine gas or 150 curies of tritium).						
2	<p>Compare this quantity against the RQs provided in Appendix B to 40 CFR 302 and 40 CFR 355, Appendices A and B.</p> <table border="0"> <tr> <td>If the amount released is ...</td> <td>Then...</td> </tr> <tr> <td>Equal to or greater than the RQ</td> <td>Proceed to Chapter <i>Reporting a Release or event</i>.</td> </tr> <tr> <td>Less than the RQ</td> <td>Proceed to step 3</td> </tr> </table>	If the amount released is ...	Then...	Equal to or greater than the RQ	Proceed to Chapter <i>Reporting a Release or event</i> .	Less than the RQ	Proceed to step 3
If the amount released is ...	Then...						
Equal to or greater than the RQ	Proceed to Chapter <i>Reporting a Release or event</i> .						
Less than the RQ	Proceed to step 3						
3	<p>If this is an <u>airborne</u> release of <u>radioactive materials</u>, it is reportable if the RQ is exceeded AND if the release could cause an annual exposure to the nearest downwind residence or business of 10 mrem (40 CFR 61, Subpart H).¹ The exposure estimate can be estimated by a MAQ health physicist (see Attachment 1).</p> <table border="0"> <tr> <td>If the release...</td> <td>Then...</td> </tr> <tr> <td>Is over the RQ in 40 CFR 302 Appendix B AND could cause the Lab to exceed the 10 mrem/yr standard to downwind business or residence</td> <td>Proceed to Chapter <i>Reporting a Release or Event</i>.</td> </tr> <tr> <td>Is less than the RQ AND could NOT cause the Lab to exceed the 10 mrem/yr standard</td> <td>No reporting is required under CERCLA or EPCRA regs. Proceed to step 4.</td> </tr> </table>	If the release...	Then...	Is over the RQ in 40 CFR 302 Appendix B AND could cause the Lab to exceed the 10 mrem/yr standard to downwind business or residence	Proceed to Chapter <i>Reporting a Release or Event</i> .	Is less than the RQ AND could NOT cause the Lab to exceed the 10 mrem/yr standard	No reporting is required under CERCLA or EPCRA regs. Proceed to step 4.
If the release...	Then...						
Is over the RQ in 40 CFR 302 Appendix B AND could cause the Lab to exceed the 10 mrem/yr standard to downwind business or residence	Proceed to Chapter <i>Reporting a Release or Event</i> .						
Is less than the RQ AND could NOT cause the Lab to exceed the 10 mrem/yr standard	No reporting is required under CERCLA or EPCRA regs. Proceed to step 4.						
4	Continue to re-evaluate the situation as new data become available. Perform steps 1 – 3 as necessary.						

¹ It should be noted that “Area sources and other sources that are subject to regulation that limits their total annual emissions should generally report their releases at or above the RQ of hazardous substances and EHSs that are caused by accidents, malfunctions, unanticipated releases and other releases that are not part of the facility’s normal operations.” Federal Register, Volume 67, No. 47, Notices FRL-7172-4, Guidance on the CERCLA Section 101(10)H, “Federally Permitted Release Definition for Certain Air Emissions”.

Reporting a release or event

Background If a release or event is reportable (as determined by one or more of the previous chapters), the Laboratory is required to meet certain reporting requirements. The emergency notification requirements in this chapter must be followed upon determination that a release or event is reportable.

For informational purposes, a summary of emergency release/event reporting requirements is provided in Attachment 3. This document summarizes the primary statutes and the associated reporting requirements.

Keep records Start a notebook to record pertinent information about the release and to document the actions taken (see chapter *Records resulting from this procedure*).

For RCRA reporting only If RCRA reporting requirements are triggered, see the flow chart in Attachment 2 for reporting requirements and skip steps 2 and 3 below.

Initial notification Perform the following steps immediately after establishing that reporting will be performed.

Step	Action
1	<p>Collect the following information to provide as requested in steps 2 and 3 below (all this information may not be immediately available; use judgment and do not exceed immediate reporting deadlines):</p> <ul style="list-style-type: none">• Name, address, and telephone number of the person filing the report, the responsible party, and the owner or operator• Nature of report – required or courtesy• Name, address, and telephone number (of responsible group) of the facility (Los Alamos National Laboratory)• Specific location of the release (Technical Area and building)• Date and time the release or event occurred or was discovered• Nature of the release (substance and total quantity released, circumstances of the release, medium into which the discharge occurred – including amount spilled into water, where applicable)• Weather conditions• Identifying information, for example, name of the carrier or vessel, where applicable• Whether we need response assistance (generally, this type of request will come from EM&R group at the Emergency Operations Center)

Continued on next page.

Reporting a release or event, continued

Step	Action
	<p style="text-align: right;"><i>Continued from previous page.</i></p> <ul style="list-style-type: none"> • Number of persons injured and the nature of injuries (e.g., life-threatening or minor injury) • Extent of any protective actions taken (e.g., evacuations) • Name, address, and telephone number of the person to contact for further information • Whether the substance is an EHS (see definitions) • Associated health risks and medical attention necessary for exposed individuals • If available, information concerning the release of any hazardous and/or mixed waste which may endanger public or private drinking water supplies • Assessment of actual or potential hazards to human health or the environment outside the facility • If available, estimated quantity and disposition of recovered material that resulted from the incident • Precautions to take due to the release/event, including, in the case of fire, those associated with special hazards due to hazardous and/or mixed waste • Any other information which may help emergency personnel responding to the incident.
2	<p><i>[For RCRA: skip this step; see flow chart (Attachment 2).]</i> For releases of substances that classified as CERCLA hazardous substances, contact the National Response Center at 800-424-8802. Note: If it is an EHS but not a CERCLA hazardous substance, reporting is only necessary to state and local authorities. Exception: For reportable water releases, the NRC needs to be notified ONLY if the release includes oil (even a sheen on the surface).</p>
3	<p><i>[For RCRA: skip this step; see flow chart (Attachment 2).]</i> If the release is outside the LANL boundaries, or has the potential to go outside, additionally contact the New Mexico State Police at 800-827-9126 (SERC). Contact the Los Alamos County Police at (505) 662-8222 (LEPC). Contact the New Mexico Environment Department: during work hours: 505-428-2500 24-hr Emergency Hotline: 505-827-9329.</p>
4	<p>If requested by any of the above organizations, provide updates as new information becomes available.</p>

Reporting a release or event, continued

Management notification After establishing that reporting will be or was done, attempt to notify LANL and DOE managers as soon as possible. Management approval is not required before reporting, but attempts should be made to notify managers as soon as possible.

Steps to notify LANL management To notify LANL management, perform the following steps immediately after establishing that reporting will be performed.

Step	Action
1	<p>Attempt to contact <u>all</u> the following RRES Division personnel (for current numbers, contact EM&R at 667-6211):</p> <ul style="list-style-type: none"> • Environmental Protection Programs Manager • Principal Deputy Division Leader • Division Leader. <p>If no direct contact can be made, leave a message via their pagers and/or cell phones.</p>
2	<p>Contact <u>one</u> of the following Directorate personnel (in order) (for numbers, contact EM&R at 667-6211):</p> <ul style="list-style-type: none"> • Associate Director for Operations (ADO) • Deputy ADO • ADO Chief of Staff

Additional notification Immediately after making initial notifications, notify the following organizations (see group names and numbers in Attachment 1).

Joe Vozella DOE/LASO (505) 665-6351	Solid Waste Regulatory Compliance Group (SWRC) 667-0666
Water Quality & Hydrology Group (WQH) 667-0666	Ecological Resources Group (ECO) 665-8961
Meteorology and Air Quality Group(MAQ) 665-8855	<i>Recommended:</i> Courtesy call to NMED bureau chief of affected bureau if advised or approved by management.
Environmental Characterization and Remediation Group (ECR)	

Reporting a release or event, continued

**Additional
radiological
release
notification**

If the release involved radioactive materials, ask MAQ to additionally notify:
George Brozowski
EPA Region VI
(214) 665-8541

**Ecological
impacts**

If there is a release of contaminants to a wetland or destruction of a wetland, OR if the event could result in the "take" of a threatened or endangered species (i.e., a wildfire), notify DOE (Elizabeth Withers or other environmental officer) as soon as possible. DOE is required to notify U.S Fish and Wildlife Service within 24 hours.

**Hand off
response to
responsible
group**

After all the above notifications have been made, or when requested, hand off responsibility for additional actions and follow-up to the affected environmental group. (Which group is responsible will depend on the type and location of the release and the governing regulations or statutes.) Pass on all relevant records, as necessary (see chapter *Records resulting from this procedure*).

After hand-off

The affected environmental group should provide follow-up written notifications any state or federal organizations to which official or courtesy notifications were made, if required.

Provide a copy to the following internal Laboratory organizations.

- Public affairs office
- Legal counsel
- RRES Division leader
- RRES Environmental Program manager

Records resulting from this procedure

Records

The following records generated as a result of this procedure are to be submitted as records according to the responder's group's internal records management process:

- Field notebook documentation of the release, including:
 - Time and date of the release
 - Time, date, and description of notifications
 - Location and source of the release
 - Type of material released
 - Quantity of material released
 - Impacted media
 - Time release was stopped
 - Any immediate mitigation actions taken to contain or control the release
- Documentation of any verbal notifications and copies of any written notifications generated
- Documentation of any samples taken, analytical results, and quality assurance of results
- Documentation of any other contingency plan or emergency plan documentation
- Documentation of any PCB notification
- Documentation of any RCRA permit non-compliance that threatens human health and environment
- Documentation of treatment of any RCRA unstable chemicals, leaking or compromised gas cylinders

[Click here to record "self-study" training to this procedure.](#)

ATTACHMENT 1

EMERGENCY CONTACTS

NOTE: The contact numbers for upper-level LANL managers or other responders in these organizations are normally available from the EM&R's Emergency Operations Center.

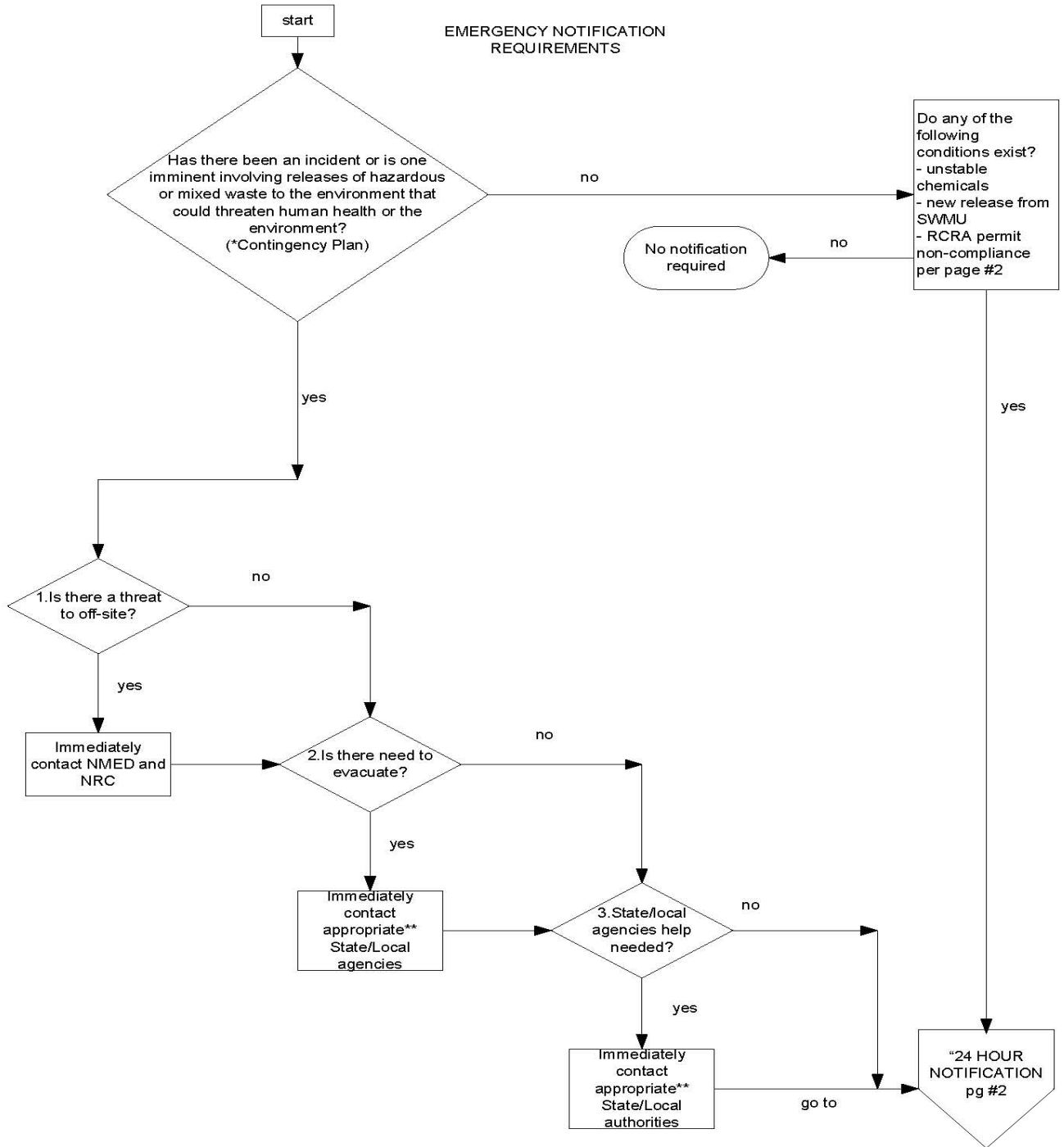
Name	Group	Work Phone	Home Phone	Pager	Cellular Phone	Email address
RRES Division Office	RRES-DO	667-2211	NA			
Division Director Ken Hargis	RRES-DO	667 2211		996-1385		bramsey@lanl.gov
Principal Deputy Division Director Ken Hargis	RRES-DO	667 2211				khargis@lanl.gov
Deputy Division Leader for Operations Tom Donovan	RRES-DO	667-2211				tkdon@lanl.gov
Deputy Program Director for Environmental Tori George	RRES-DO	667-7883		996-1055	699-2813	torig@lanl.gov
Environmental Programs Manager Doug Stavert	RRES-DO	665-0235		664-7743	699-1223	stavert@lanl.gov
Division Emergency Preparedness Office John Huchton	RRES-DO	665-3204		996 0563	699 1355	huchton@lanl.gov
Meteorology and Air Quality Group	RRES-MAQ	665-8855	NA	664-4417		
Jackie Hurtle	RRES-MAQ	665-4380		664-6641	699-0266	jhurtle@lanl.gov
Dave Fuehne	RRES-MAQ	665-3850		664-8903	699-5619	davef@lanl.gov
Scot Johnson	RRES-MAQ	667-0898		664-1640	699-2114	sjohnson@lanl.gov
Michael McNaughton	RRES-MAQ	667-6130		664-7733	699-5621	mcaught@lanl.gov
Keith Jacobson	RRES-MAQ	665-6080		664-3652		kwj@lanl.gov
Water Quality and Hydrology Group	RRES-WQH	665-0453	NA	664-4418		
Mike Alexander	RRES-WQH	665-4752		664-1060	699-1336	mikea@lanl.gov
Robin Reynolds	RRES-WQH	667-4689		664-3244	669-1945	robinp@lanl.gov
Mike Saladen	RRES-WQH	665-6085		664-4226	699-1284	Saladen_Michael_t@lanl.gov
Mark Haagenstad	RRES-WQH	665-2014		664-8699	699-1733	mph@lanl.gov
Solid Waste Regulatory Compliance Group	RRES-SWRC	667-0666	NA	664-4419		
Tony Grieggs	RRES-SWRC	667-2211		664-2032	699-8270	grieggst@lanl.gov
Alice Barr	RRES-SWRC	667-0820		664-2433	699-0750	barra@lanl.gov
Ecology Group	RRES-ECO	665-8961	NA			
Jackie Little	RRES-ECO	665-8971		996-0512	699-8685	jlittle@lanl.gov

Name	Group	Work Phone	Home Phone	Pager	Cellular Phone	Email address
David Keller	RRES-ECO	667-7037		664-8518	699-1535	dckeller@lanl.gov
Leslie Hansen	RRES-ECO	665-9873				hansenl@lanl.gov
Laura Marsh	RRES-ECO	665-6092				lkmarsh@lanl.gov
Environment Restoration Group	RRES-ECR		NA			
Alison Dorries	RRES-ECR	665-6952		664-5313	699-1979	adorries@lanl.gov
KSL/JENV/ Benchmark		667-0104	NA			
Central Alarm Station, Los Alamos Fire Dept.	Dispatch	667-7080	NA	NA	NA	
EM&R Group Emergency Operations Center	667-6211	NA	NA	NA	NA	

Changes to this list: For this attachment only, it is acceptable to mark up controlled copies of this attachment with changes to phone numbers and contact personnel. Ensure all known controlled copies have the changes marked. Initial and date the changes. Request that on-line electronic versions be changed appropriately and the date of these changes noted below. Other types of changes require procedure revision.

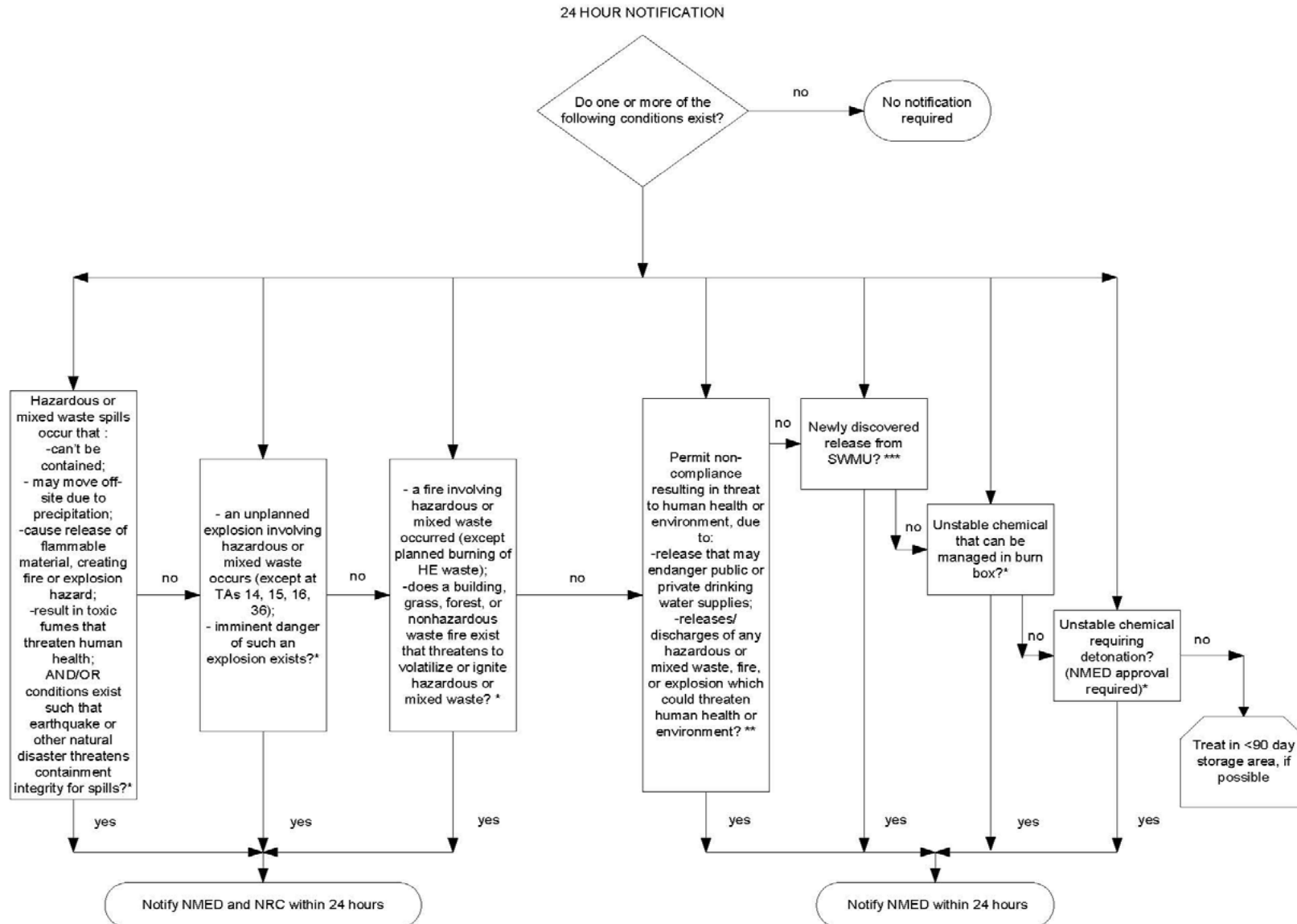
ATTACHMENT 2

EMERGENCY NOTIFICATION REQUIREMENTS FOR RCRA



* Contingency Plan implementation to be determined by EM&R

** can include State &/or Local police department, Local fire department, hospitals, contractors, State &/or Local emergency response teams, and/or NMED



* Contingency Plan implementation, need for burn box use, or for detonation to be determined by EM&R

** To be determined by SWRC

*** To be determined by ECR with SWRC as needed

A. Barr
3/4/04

For newly discovered releases from SWMUs, see ER2000-0069 QP-5.8 on SWRC or ER home pages.
For releases of water or liquid that impacts SWMUs, see ER 2000-0076 QP-5.9 on SWRC or ER homepages.

ATTACHMENT 3

SUMMARY OF EMERGENCY RELEASE OR EVENT REPORTING REQUIREMENTS

NOTE: This is only a guide and does not cover all federal, state, or permit reporting requirements. Refer to the Code of Federal Regulations and the RCRA permit for more details regarding these regulations.

STATUTE	REGULATIONS	INCIDENT	REPORT TO/BY	REPORTING
Clean Water Act	40 CFR 110.6	Oil discharge (film/sheen/discoloration) to water surface or shoreline, or violation of water quality standards.	NRC. If not practical then EPA or USCG by person in charge of vessel or facility.	Immediately, no later than 24 hours. Follow-up not required.
Clean Water Act	40 CFR 117.21	Discharge of hazardous substance (equal to or above RQ)	Appropriate govt. agency by person in charge of vessel or facility.	Immediately Follow-up not required.
New Mexico Water Quality Control Commission Regulations	20.6.2.1203 NMAC	Discharge from any facility of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or use of the property.	New Mexico Environment Department. Copy provided to EPA.	As soon as possible after learning of such a discharge, but in no event more than 24 hour thereafter (verbal notification). 7 day written report 15 day written Corrective Action Plan.
Comprehensive Environmental, Response, Compensation, and Liability Act	40 CFR 302.6(a)	Hazardous substance release (Equal to or greater than RQ).	NRC by person in charge of vessel or facility.	Within fifteen minutes Follow-up not required
Emergency Planning and Community Right- to-Know Act	40 CFR 355.40	Release of SARA extremely hazardous substance or CERCLA hazardous substance equal to or greater than RQ.	LEPC, SERC, or local emergency response personnel (911 in case of transportation related release) by owner/operator.	Within fifteen minutes Follow-up required within seven calendar days.
Resource Conservation and Recovery Act	40 CFR 262.34, 263.30, 264.51, 264.56 & .196, 265.51, .56 & .196, 270.14, & .30, 273.17, .37 & .54, 279.43 & .53, 280.50, .52, .53, .60, & .61	Release, fire, or facility explosion that threatens human health or environment.	NRC/OSC/state/ local /EPA Regional Administrator by emergency coordinator or owner/operator.	Immediate and/or within 24 hours (see flow chart) Follow-up: varies from 5 to 30 days report to OSC/NRC/EPA Regional Administrator.
Toxic Substance Control Act	40 CFR 761.120, 761.125	PCB spill (equal to or greater than 50 ppm) with release to surface water /drinking water supplies/ sewers/ grazing lands, etc. OR PCB spill over 10 pounds	NRC and EPA Region 6 office of pesticides and toxics by person in charge.	Within 24 hours Follow-up: as required by agency.

