



The National Park Service EnviroFact Sheet

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EPCRA: Reporting an Accidental Release (G-1)

DRAFT

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Accidental releases

can occur in even the most well run facilities. Accidents happen; but, when there is an accident involving the *release* of a hazardous substance, notification to state or local authorities may be required.

The EPA defines a **release** as any spilling, leaking, pumping, pouring, emitting, emptying, leaching, discharging, injecting, escaping, dumping, or disposing **into the environment**. This means that releases such as those inside a building or on a concrete pad (like a parking lot) would not require notification. (Note: releases that go down a drain may require reporting if they go to a storm sewer; they may also need to be reported to a local water authority if the release goes to the local publicly owned treatment works.)

The type of notifications (and to whom) depends on the substance released, the amount released, where the release occurred (e.g., air, water, or land), and local and state law.

Notifications will likely be required if the chemical that is released is classified as a hazardous substance (HS) or an extremely hazardous substance (EHS).

FOR MORE INFO...

EPA Chemical Emergency Prevention & Preparedness Office:
<http://www.epa.gov/ceppo/>

Consolidated "List of Lists":
[http://yosemite.epa.gov/osw/er/CeppoWeb.nsf/vwResourcesByFile-name/title3.pdf/\\$File/title3.pdf](http://yosemite.epa.gov/osw/er/CeppoWeb.nsf/vwResourcesByFile-name/title3.pdf/$File/title3.pdf)

APPLICABLE REGULATIONS

Section 304 of the Emergency Planning Community-Right-To-Know Act (EPCRA) requires the state and the local community to be notified of accidental releases (e.g., spills) of hazardous and extremely hazardous substances listed in the table at 40 CFR Part 302.4. Any facility releasing a listed substance must notify the State Emergency Response Commission (SERC) and/or Local Emergency Planning Committee (LEPC). Depending on the size of the release, federal authorities may also need to be notified.

In the event of an accidental release, state and local reporting requirements must always be followed. To avoid the burden of determining your state's regulations **during** an emergency, it is a good idea to determine your state's emergency reporting requirements **before** a release occurs.

WHAT TYPES OF CHEMICALS TRIGGER NOTIFICATION REQUIREMENTS?

Accidental releases of hazardous substances (HSs) or extremely hazardous substances (EHSs) may require notification of state or local authorities. An HS is defined as any element, compound, mixture, solution, and substance that, when released into the environment, may present substantial danger to the public health, public welfare, or the environment. HSs are specifically listed under 40 CFR Part 302.4. An EHS is any chemical that has immediate health effects; they are listed in Appendix A of 40 CFR Part 355.

REPORTING THRESHOLD

Accidental releases of EHSs and HSs need to be reported only if they are released in amounts above a specified "reportable quantity" (RQ). RQs for EHSs and HSs range from 1 to 5,000 pounds (a complete list of chemicals and their associated RQs is available in [EPA's Consolidated "List of Lists"](#). State RQs may be substantially lower. For instance, some states require notification by telephone if **any** amount of a reportable substance is released.

INITIAL VERBAL NOTIFICATION

In the event of a chemical spill or release that requires reporting, designated park staff should notify the park superintendent immediately, and report spills to the NPS Shenandoah Dispatch Center (540-999-3422) and the Regional Environmental Coordinator.

Designated park staff must also make an initial verbal notification to the LEPC and to the SERC. To the extent known, the notification must include the following:

- Indication as to whether the substance released was an EHS;
- Chemical name or identity of the HS or EHS involved in the release;
- An estimate of the quantity of the HS or EHS released to the environment;
- The time and duration of the release;
- The environmental medium or media (air, water, or land) into which the release occurred;
- Any known or anticipated acute or chronic health risks associated with the emergency along with treatment advice;
- Proper precautions to take as a result of the release, including evacuation; and
- Name and telephone number of the person to be contacted for further information.

In addition, if the release is an HS, the National Response Center (NRC) must be notified (1-800-424-8802). If the release is transportation-related, a 911 call will meet the requirement of notification to the state and local authorities; however, the NRC still must be contacted if the release is an HS.

FOLLOW-UP WRITTEN NOTIFICATION

A written notice to the state and local emergency response authorities must follow the initial notification as soon as possible. Information that may be required includes:

- An update of the original notification information;
- Actions taken to respond to and contain the release;
- Any known or anticipated acute or chronic health risks associated with the release; and
- Advice regarding medical attention necessary for exposed individuals.

NOTE: Many states have their own Emergency Release Notification forms that must be completed.

ACCIDENTAL RELEASE REPORTING COMPLIANCE CHECKLIST

Checklist Item	Notes
1. Determine what state or local regulations apply to the reporting of accidental releases of hazardous substances.	
2. Review Material Safety Data Sheets for products used/stored at the park. Determine if any of the products contain material that could trigger a reporting requirement, if spilled. (Reporting thresholds for individual chemicals can be found online in EPA's "Title III Consolidated List of Lists" at http://yosemite.epa.gov/oswer/CeppoWeb.nsf/vwResourcesByFile-name/title3.pdf/\$File/title3.pdf)	
3. Determine who (state or local emergency response organizations) must be contacted in the event of an accidental release. Ensure that phone numbers and contact information are easily accessible to individuals required to report the spill.	
4. Ensure that park staff are aware of the types of releases that require reporting to state and/or local officials (e.g., spills of certain chemicals, above certain amounts, to air, water or soil).	
5. Ensure that designated park staff will immediately notify the park superintendent regarding HS and EHS spills, and report such spills to the NPS Shenandoah Dispatch Center and the Regional Environmental Coordinator.	
6. In the event of a release of an HS, ensure that the National Response Center (NRC) is notified (1-800-424-8802). (See the "Consolidated List of Lists" for substances designated as "CERCLA hazardous.")	
7. In the event of a transportation-related release of an HS, ensure that park staff calls 911 (if available) or that the appropriate notification procedures are in place. Ensure that park staff is aware of the types of releases that would trigger reporting such a release.	
8. If a release occurs at the park, ensure that appropriate written follow-up notification is distributed to the proper authorities.	