


REPORTABLE RELEASES WORK GROUP

STATUS UPDATE NOVEMBER 7, 2012

RELEASE REPORTING WORK GROUP OVERVIEW

Our charge: What, When, How Much

- Group made up of DEEP staff, environmental attorneys, LEPs, business & industry representatives, DPH and representatives of the public
 - Met 4 times
 - Lively discussion and debate, wide range of opinions
 - Decided to divide and conquer by breaking discussion down into current (new), past (historical) and future (potential) releases
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CURRENT – NEW RELEASES

Items Considered:

- Status quo
- 2009 proposed spill regulations
- Reportable quantity model (example Massachusetts MCP)

RESULTS OF DISCUSSIONS


Planning on breaking into groups and developing summaries of advantages/disadvantages of different models:

1. Universal trigger quantity models (2009 Spill Regulations Model)
 - a. lower trigger quantity with exceptions for less toxic substances/circumstances
or
 - b. higher trigger quantity with exceptions for more toxic substances/circumstances
2. Chemical specific reportable quantities based on toxicity with exceptions for imminent threats to human health or the environment (MA MCP Model)

PAST – HISTORIC RELEASES

Identified through the collection and analysis of samples of environmental media (e.g., soil and groundwater)

Items Considered:

- Status Quo - Significant Environmental Hazard Reporting Law
 - Reportable concentration system (example Massachusetts MCP)
 - Develop database of all releases
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RESULTS OF DISCUSSIONS

Two models to be considered further:

- **Modification of Significant Environmental Hazard Law to consider additional circumstances/scenarios**
- **Adoption of reportable concentration system similar to Massachusetts MCP using RSR criteria**
- **Triggers – transfer, etc.????**

FUTURE – THREATENED RELEASES

Approach

- **Primarily containers that have been damaged and pose a threat but have not yet resulted in a release, such as an overturned rail car or bulging drum, should be reported**
- **Guidance – Examples**

