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Office of Emergency
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Washington, DC 20460

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Superfund

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Continuous Release — Emergency Response Notification System

User's Manual for Industry

OSWER Directive: 9360.7-02

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Continuous Release—Emergency Response Notification System

User's Manual for Industry

Office of Emergency and Remedial Response (OS-210)
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NOTICE

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1. INTRODUCTION

The purpose of this User's Manual is to help you report continuous releases of hazardous substances using the Continuous Release-Emergency Response Notification System (CR-ERNS). CR-ERNS is contained on the diskette accompanying this User's Manual. CR-ERNS contains a convenient report format that will assist you in complying with all of the reporting requirements contained in EPA's continuous release reporting regulation (55 FR 30166).[1]

This User's Manual explains how to install CR-ERNS on your personal computer, how to complete continuous release reports, and how to submit electronic copies of these reports to the appropriate EPA Regional Office, state emergency response commission (SERC), or local emergency planning committee (LEPC). It also includes a brief overview of the information that must be submitted in order to comply with the continuous release reporting requirements.

For more detailed information concerning the continuous release reporting requirements and your responsibility to report releases of hazardous substances, you are encouraged to obtain a copy of the following document through the RCRA/Superfund Hotline or the National Technical Information Service:

- U.S. EPA, "Reporting Requirements for Continuous Releases of Hazardous Substances: A Guide for Facilities and Vessels on Compliance," Office of Emergency and Remedial Response, OSWER Directive 9360.7-01, October 1990.

This Facility Guide provides a detailed explanation of the continuous release reporting regulations, including an extensive question and answer section. The Guide will assist you in understanding what continuous release information must be submitted to the relevant agencies. Because this information is presented in detail in the Facility Guide, this CR-ERNS User's Manual for Industry only addresses your reporting responsibilities in a brief manner. Instead, this Manual focuses on how to use CR-ERNS to submit your continuous release reports.

This User's Manual has been developed and organized to assist you in submitting the different types of continuous release reports that may be required for your facility. The first chapter provides an overview of the continuous release reporting requirements; Chapter Two explains how to install CR-ERNS; the remaining chapters describe how to complete and submit each of the following types of continuous release reports using CR-ERNS:

- Initial Written Notification;
- One-Time Follow-up Report; and
- Change Notifications.

[1] To obtain a copy of CR-ERNS, contact the National Technical Information Service at (703) 487-4600. To obtain a copy of the diskette call (202) 475-9814.

2. OVERVIEW OF CONTINUOUS RELEASE REPORTING REQUIREMENTS

This chapter provides a brief overview of EPA's continuous release reporting regulation (55 FR 30166; July 24, 1990). For a full explanation of your reporting responsibilities under these requirements, consult the Federal Register and EPA's guidance for facilities and vessels on complying with these regulations.[2]

The continuous release reporting regulation allows reduced reporting for releases of hazardous substances that equal or exceed a reportable quantity (RQ) in a "continuous" and "stable" manner. "Continuous" is defined as occurring without interruption or abatement, or routine, anticipated, intermittent, and incidental to normal operations. "Stable" is defined as predictable and regular in the amount and rate of emission. To report under the continuous release reporting regulation, you must have a sufficient basis for establishing that the release is continuous and stable in quantity and rate, as those terms are defined in the regulation. Once such a basis has been established, you may begin reporting by making the initial telephone notification.

There are four steps in the continuous release notification process. Each step in the process involves a different type of continuous release notification. CR-ERNS will assist you in developing three of the continuous release reports:

- Initial written notifications;
- Follow-up reports; and
- Change notifications.

The discussion below outlines your reporting responsibilities at each stage of the continuous release reporting process.

2.1 Initial Telephone Notification

You must make an initial telephone call to three separate government authorities: the NRC, the SERC, and the LEPC. The initial telephone call will alert authorities to your intent to report a release as a continuous release; be certain your intent is clear to those receiving your telephone call. (Part 2 of the Facility Guide includes a summary of the information that must be provided to government response officials in the initial telephone call.)

When you make the initial telephone notification, the NRC will assign a CR-ERNS number to your facility or vessel. You must use this number in all future release reports or correspondence related to continuous releases from your facility. It is important, therefore, to keep a record of your CR-ERNS number. The CR-ERNS number will identify your facility or

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[2] U.S. EPA, "Reporting Requirements for Continuous Releases of Hazardous Substances: A Guide for Facilities and Vessels on Compliance," Office of Emergency and Remedial Response, OSWER Directive 9360.7-01, October 1990. To obtain this document, contact the RCRA/Superfund Hotline at (800) 424-9346 (in Washington, DC, (202) 382-3000), or the National Technical Information Service at (703) 487-4600.

vessel and enable EPA to link all reports about releases from your facility or vessel. If you misplace your CR-ERNS number, contact the CR-ERNS Coordinator at the appropriate EPA Regional Office and provide information identifying your facility or vessel. The EPA Region will attempt to assist you.

If you elect to aggregate your hazardous substance releases from separate, contiguous, or adjacent facilities for purposes of continuous release reporting, the NRC will assign only one CR-ERNS number to your site. This number will be used by EPA to identify all reports on releases from your site.

2.2 Initial Written Notification

Within 30 days of the initial telephone notification, you are required to submit an initial written report to the appropriate EPA Regional Office. (The Facility Guide includes a listing of EPA Regional Offices.) The purpose of this written report is to confirm your intent to report your release as a continuous release under the requirements of section 103(f)(2) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), and to provide government response officials with sufficient information about the release to enable them to determine if the release qualifies as a continuous release and to identify the potential risks associated with the release.

The initial written notification must include specific information about each individual source of the continuous release, the environmental medium affected, certain ecological and population density information, and a brief statement describing the basis for asserting that the release is continuous and stable in quantity and rate. (A detailed discussion of the requirements of the initial written and follow-up reports is provided in the Facility Guide.)

To assist you in preparing written reports, such as the initial written notification and the one-time follow-up report, EPA has made available the IBM-compatible diskette described in this User's Manual, to assist those who would like to prepare their reports electronically. If you choose to use the diskette when preparing your reports, you should send the electronic version on a separate diskette and one signed copy of the report to the EPA Regional Office. (The SERC and LEPC must also be sent a signed copy of the initial written report.) You can also use the diskette to prepare the follow-up report and notifications of change, if you properly install the diskette on the hard drive of your computer using the "automatic install program." Directions for installing the diskette on your computer are presented in Chapter Three of this User's Manual.

2.3 Written Follow-up Report

The information required in the written follow-up report is identical to that required in the initial written notification, but it is based on release data gathered over the year (i.e., during the period since the submission of the initial written report). The purpose of the follow-up report is to update, confirm, and refine the information submitted in the initial written notification, thereby providing government authorities with a more accurate baseline against which to evaluate the risks associated with the continuous release. After you have submitted the follow-up report to the EPA Regional Office, you are responsible for reassessing the continuous releases annually, but you are not required to notify EPA of each reassessment unless there is a change in the information previously submitted to EPA.

2.4 Statistically Significant Increase

A statistically significant increase (SSI) is any release of a hazardous substance that exceeds the upper bound of the normal range. The normal range is defined to include all the releases of a hazardous substance reported or occurring over any 24-hour period under normal operating conditions during the preceding year. Only those releases that are both continuous and stable in quantity and rate may be included in the normal range.

An SSI in a continuous release of a hazardous substance must be reported to the NRC, SERC, and LEPC as soon as the person in charge is aware that the release exceeds the upper bound of the normal range. The upper bound of the normal range is often referred to as the "SSI trigger." SSIs are a type of episodic release and are treated as such by the NRC. When reporting an SSI, therefore, the caller should anticipate that the NRC will ask for information that is similar to the information requested when a person reports any other episodic release incident.

SSI reports to the NRC must include the CR-ERNS number assigned to the facility or vessel by the NRC during the initial telephone notification. It may be possible to adjust the SSI trigger (i.e., change the normal range of the release) if a particular continuous release frequently exceeds the upper bound of the normal range. Specific procedures for modifying the SSI trigger for a hazardous substance are contained in the Facility Guide.

2.5 Notification of Change in the Release

You must notify the EPA Regional Office if there are any changes in a continuous release. If there is a change in the source or composition of a continuous release, the release is considered a "new" release. A change in the source(s) or composition of a release may be caused by such factors as equipment modifications or process changes. To continue reporting the release under CERCLA section 103(f)(2), you must establish the new release as continuous and stable in quantity and rate, with an initial telephone call to the NRC, SERC, and LEPC and, within 30 days, submit an initial written notification to the appropriate EPA Regional Office, SERC, and LEPC. When telephoning the NRC, clearly identify the release as a change in the source or composition of a previously reported release and provide the CR-ERNS number assigned by the NRC in your original initial telephone call. The CR-ERNS number identifies your facility or vessel.

For all other changes (i.e., changes other than source or composition) in the information submitted in the initial written notification or follow-up report, you must notify the EPA Regional Office by letter within 30 days of determining that the information submitted previously is no longer accurate. Examples of changes in information other than a change in source or composition that would require notification include a change in the identity of the person in charge of the facility or vessel or a change in the frequency of the release. All notifications of changes in releases must include the original CR-ERNS number assigned to the facility or vessel by the NRC in the initial telephone notification. You must also include a signed statement with the notification certifying that all the reported information on the release submitted to date is accurate and current. (A similar signed statement is required in all written correspondence pertaining to the continuous release.)

3. HOW TO INSTALL AND OPERATE CR-ERNS

This chapter explains how to install CR-ERNS on the hard drive of your personal computer system and how to operate CR-ERNS. CR-ERNS requires an IBM or 100% compatible personal computer system to operate. Exhibit 3.1 below presents the minimum hardware requirements that are necessary to install and operate CR-ERNS properly.

Exhibit 3.1
Minimum Computer System Requirements

- IBM or compatible personal computer
- 512 KB available random access memory
- One 3-1/2" or 5-1/4" floppy disk drive
- Laser jet or dot matrix printer
- One hard disk drive (1.5 MB available)
- DOS 3.x or higher

3.1 Installing CR-ERNS

CR-ERNS has been provided with an installation file to assist you in installing it on your personal computer. Step-by-step instructions describing how to install CR-ERNS using this batch file are provided below.

Step 1: Turn on your computer system and start DOS.

As described above in Exhibit 3.1, your computer system must be equipped with a hard disk drive with at least 1.5 MB of free space available. The Disk Operating System (DOS) should start automatically when you turn on your computer. DOS must be started before you can install and use CR-ERNS. You must have DOS 3.x or higher to operate this system properly.

Step 2: Place CR-ERNS in your floppy disk drive.

Next, place CR-ERNS in your floppy disk drive. (The diskette is available from EPA in either the 3-1/2" or 5-1/4" disk formats.) If your computer has two floppy disk drives, insert CR-ERNS in one of the drives; for the remainder of the installation all references to the floppy drive must be to this drive. For example, if you insert CR-ERNS in the floppy disk drive designated as the "A:\" drive on your computer, set your computer to this drive when completing Step 3 below (i.e., be sure your computer displays the "A:\>" prompt).

Step 3: At the "A:\>" DOS prompt, type the following installation command:

A:\>*install*

The "install" command will access the install program on CR-ERNS (placed in the "A:\" drive in this example). Next, it will create a "\CRERNS\" subdirectory on your hard drive (the

default drive is assumed to be your "C:\" drive). (If you want CR-ERNS installed on a different drive, such as a "D:\" drive, the install program will prompt you accordingly.) Finally, it will copy the CR-ERNS program to your hard drive.

Upon completing Step 3, your computer screen will print the following message, indicating that you have successfully installed CR-ERNS on your computer:

"CR-ERNS has been successfully installed."

After installing CR-ERNS on your hard drive, the install program will change your current directory to the new directory on which CR-ERNS has been installed. For example, if you installed the system on your "C:\" drive, your computer will be set to the following directory upon completing the installation program:

C:\CRERNS\>

Whenever you want to access CR-ERNS on your computer, it will be necessary to make this "CRERNS" directory your current directory (or you may want to create a batch file to access CR-ERNS from a menu). You are now ready to move on to the next section, Getting Started.

3.2 Getting Started

This section explains how to get started using CR-ERNS after installing it on your computer system. It explains how to enter CR-ERNS and how to set up your printer and default drives. This section also provides an overview of some of the commands and features of CR-ERNS.

3.2.1 Entering CR-ERNS

You must follow the two steps listed below to enter CR-ERNS.

Step 1: Change directories to your "CRERNS" directory.

After installation, your computer will be set to the proper directory for running CR-ERNS. Thus, as in the example above, your system will be set to the "C:\CRERNS" directory. Once you have installed the program onto your hard drive, you can access the directory by typing "**cd \crerns**" at any DOS prompt. For further information, consult your DOS manual.

Step 2: Type the CRERNS command to enter the program

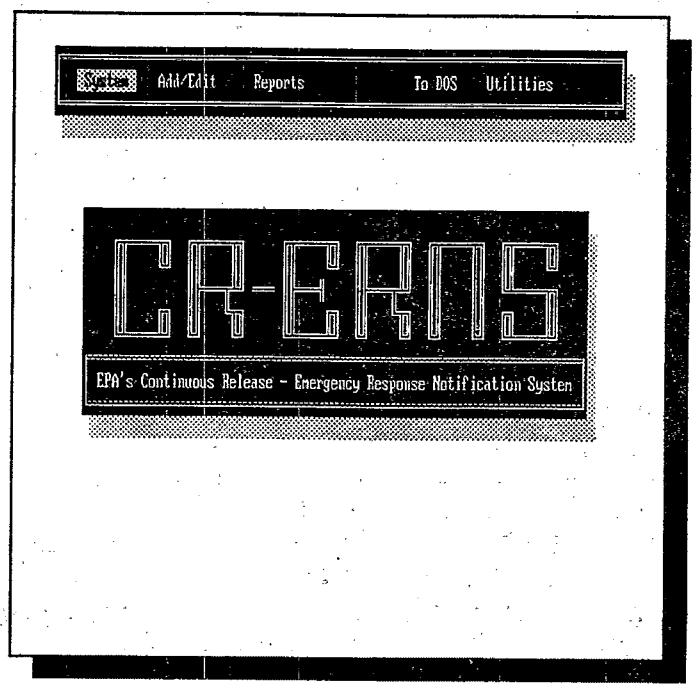
The next step is to type the CR-ERNS command at the DOS prompt to enter the system. You will have to type one of two possible commands, depending upon whether you have a color or monochrome monitor (the example below assumes the default directory is "C:\CRERNS\":

Color Monitor:	**C:\CRERNS\>***CRERNS*
Monochrome Monitor:	**C:\CRERNS\>***CRERNSM*

After pressing the <Enter> key, you will have entered the CR-ERNS program and will be ready to configure the program to your system specifications (primarily setting it up to recognize your printer). The Main Menu that you will see is illustrated in Exhibit 3.2.

The Main Menu displays the five primary options available on CR-ERNS. To access any of these system options, simply use the cursor keys to highlight the selected option and press the <Enter> key to select it; or, you can press the first letter of the desired command.

Exhibit 3.2
Main Menu



The five menu options are described below:

- **System:** This component provides general information on CR-ERNS and allows the user to access a scheduler and pop-up calculator. It also can be used to exit from CR-ERNS. You can also exit CR-ERNS by pressing the <Ctrl>-<Q> key from anywhere in the system.

- **Add/Edit:** This function allows the user to add or edit continuous release reports.

- **Reports:** This function allows the user to print or view the continuous release reports that will be submitted to EPA. It also contains a display that can be used to track how many of the various kinds of continuous release reports have been submitted by your company.

- **To DOS:** This auxiliary function allows the user to exit temporarily from the system to access the operating system; by typing "EXIT" the user will then be brought back into CR-ERNS. This function can be accessed from anywhere in CR-ERNS by pressing the <Ctrl>-<F10> key.

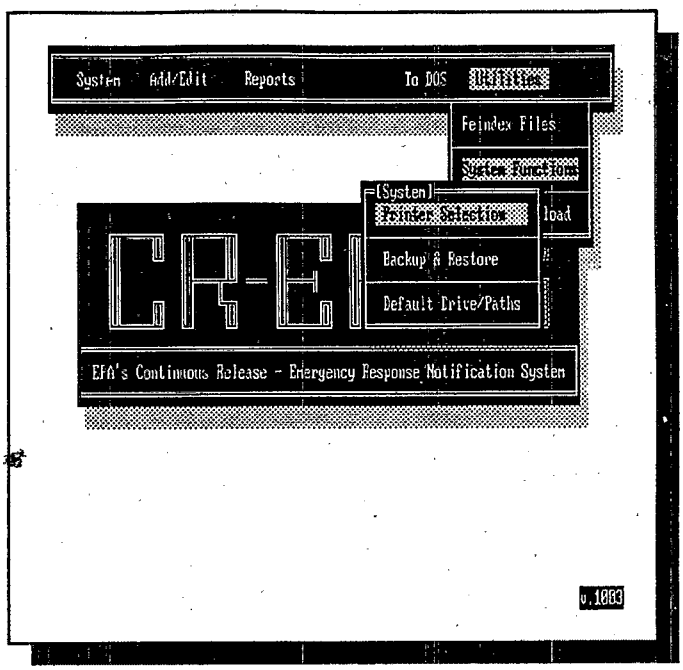
- **Utilities:** The Utilities option contains a number of functions necessary for system setup and for submitting reports. It contains the functions for specifying your printer to allow you to print reports, transferring your continuous release reports to a floppy disk for submittal to EPA, backing up your data, and reindexing your files.

3.2.2 Printer Setup

Because you must submit a printed, signed copy of your reports along with the electronic disk version created with CR-ERNS, it is necessary to configure CR-ERNS to communicate with your printer. Exhibit 3.3 presents the computer screen that you must access to select your printer.

To select your printer, select the Utilities option from the Main Menu. There are three menu options under the Utilities Menu: Reindex Files, System Functions, and Upload/Download. Select the System Functions option and then the Printer Selection option as shown in Exhibit 3.3. Once you have selected this option, the system will display a list of over 100 printer options (Exhibit 3.4). You can scroll through the various printer options using your cursor keys. Once you have found your printer, select this printer by pressing the <Enter> key.

Exhibit 3.3
Printer Setup Screens



Next, you must specify the printer port to which the printer is attached on your computer. This will typically be one of a few options, depending upon the number of printer ports on your computer; the printer port will be designated "LPT1, LPT2, or LPT3." Typically, the printer port will be LPT1. Type in the proper printer port at the prompt and press the <Enter> key to finish setting up your printer. Press the <Esc> key to return to the Main Menu.

3.2.3 General Note on Protecting Your Continuous Release Data

CR-ERNS has been designed to allow you to manage all of your continuous release data for as long as may be necessary. Accordingly, it contains several data security features with which you should be familiar, most notably the backup/restore and reindexing features. With all of your computer data management activities, it is important that you backup your data frequently to minimize the potential for data corruptions or losses.

In addition to your general backup procedures, you should take note of one additional source of potential data problems. Your data may be compromised any time that your computer crashes while you are entering data or working with CR-ERNS. For example, you may experience a power failure while you are entering substance information, or your computer may crash due to memory limitations while entering data (should you have less than the required 512 kB RAM available on your computer). In these cases, it is important that you "reindex" your files immediately upon reentering CR-ERNS after such a crash. Reindexing will ensure that the files that you have entered are not corrupted or lost.

To reindex CR-ERNS, select the Utilities option from the main menu (see Exhibit 3.2) and press the <Enter> key. Next, select the Reindex Files option from the Utilities menu and then press the <Enter> key. CR-ERNS will display a message for you to confirm that you have correctly selected the reindex option; enter <Y>es at this prompt. CR-ERNS will now reindex all of the database files.

Exhibit 3.4
List of Available Printers

AST TurboLaser
Alphacom 8125
Anadex 9620A
Anadex DP-6500
Anadex DP-9000/DP-9500
Anadex DP-9001/DP-9501
Blaser
Brother HR1
Brother HR15/25
C. Itoh 8510A
C. Itoh F10
C. Itoh LIPS 10+
Canon LBP-8 A1/A2
Canon LBP-8 A1/A2(ISO)
Centronics 351/352/353
Centronics H80-1/H80-2
Citizen MSP-10/MSP-15
Comrex CR-I
Comrex CR-II
Cordata LP300
Cordata Lbls 10x1"high
DaisyWriter 1500/2000
Data Products SPG-8010
Datasouth DS 180
Diablo 620 & 630
Dynax DX-15
Epson E/F/J/RX/LQ
Epson EX-800/1000
Epson LX
Epson LX-90
Epson MX
Generic printer
HP 2225C+ (Epson Mode)
HP 2225C+ (HP Mode)
HP LaserJet (2000)/III
HP LaserJet 500/+/II
HP PaintJet (HP3630)
IBM 80 CPS Graphics
IBM 80 CPS Matrix
IBM Color Printer
IBM LetterQuality 5218
IBM Pageprinter 3812
IBM Proprinter
IBM Quietwriter 5201
IBM Quietwriter III
IBM Wheelprinter 5216
IDS 460
IDS Prism 80/132
Juki 6100
Kyocera F-1010 (Land)
Kyocera F-1010 (Port)
Mannesmann MT160/180
Mannesmann Spirit-80
NEC Pinwriter P2/P3
NEC Pinwriter P2200
NEC Pinwriter P5/P6/P7
NEC Silentwriter LC850
NEC Silentwriter LC860
NEC Spinwriter 3550
NEC Spinwriter 5515/25
NEC Spinwriter 7710/20
NEC Spinwriter 7715/25
NEC Spinwriter 7730
Oki Laserline 6
Oki Microline 182/183
Oki Microline 192/193
Oki Microline 292/3/4
Oki Microline 82A/83A
Oki Microline 84/92/93
Oki Okimate 20
Oki Pacemark 2350
Oki Pacemark 2410
Oki Pacemerk 2410-IBM
Oki Plug&Play 192/193
Oki Plug&Play 82A/83A
Oki Plug&Play 84/92/93
Other Printer
Panasonic KX-P1090
Panasonic KX-P1091
Panasonic KX-P3151
Postscript
QuadLaser
Quadram QuadJet
Qume Sprint 5
Qume Sprint 9/45, 9/55
Sanyo PR-5500
Silver Reed 550 (Line)
Silver Reed 550 (Ser)
Silver Reed 770
Star Gemini 10-X/15-X
Star Radix 10/15
Texas Inst 850/855
Texas Inst 860/865
Toshiba P 341/351
Toshiba P1340
Toshiba P1350
Toshiba P1351
Xerox 2700 II
Xerox 4045 - 630 Mode

3.2.4 Configuring Your Computer System to Operate CR-ERNS

Many computers that are typically used for wordprocessing or spreadsheet software must be reconfigured to operate database management software such as CR-ERNS. If your computer is configured in this manner, it may generate an error when you attempt to run CR-ERNS. This section provides instructions for reconfiguring your system to allow the proper operation of CR-ERNS. These instructions assume that you have a working understanding of DOS and that you can use an ASCII text editor to edit your system configuration files.

If you have installed CR-ERNS on an improperly configured computer, you may have found that CR-ERNS crashes and exits to DOS (your system will also display a DOS error message). Even if you have not yet encountered this problem, it may be useful to check your system configuration as explained below to determine whether your system should also be reconfigured.

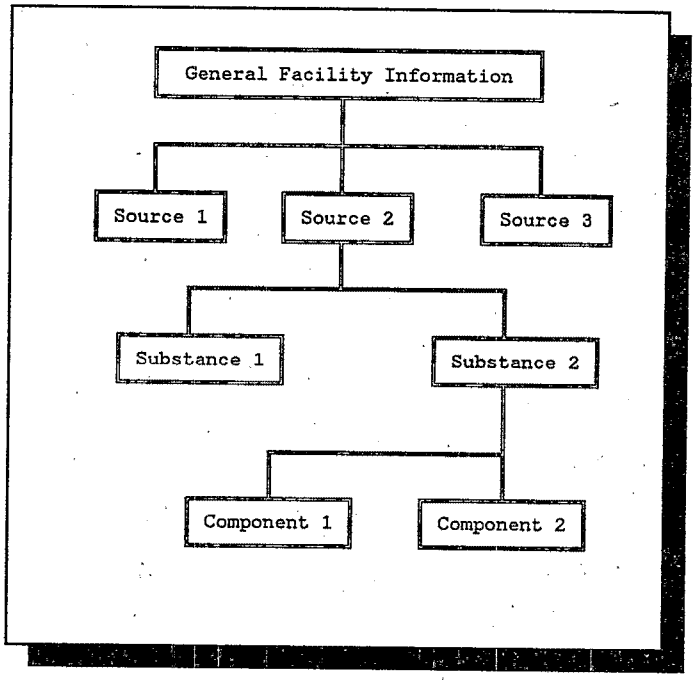
First, you must enter your system's CONFIG.SYS file using a word processor or editor that can edit ASCII files. The CONFIG.SYS file is always located in the root directory of your hard disk (e.g., "C:\"). Once you have entered this file, examine your "FILES=" line; if it is set at 26 or higher, you do not need to change it. If it is less than 26, you must change the "FILES=" line to a value ranging from 26 to 30. Because setting your "FILES=" line too high can cause your machine to slow down, we do not recommend setting this parameter larger than 30 unless you have other software that requires it. When you have reset this parameter to 26 or higher, save the file in ASCII format, and reboot your machine so that the new value takes effect. For further information, consult your DOS manual.

4. SUBMITTING INITIAL WRITTEN NOTIFICATIONS

This chapter explains how to use CR-ERNS to complete and submit initial written notifications to the EPA Regional Office, SERC, and LEPC. You are encouraged to consult the Facility Guide before completing an initial written notification. The Guide contains information that will help you understand the reporting requirements.

CR-ERNS is structured to allow you to report more than one continuous release. Thus, the system can manage a variable number of sources and substances. To understand how to best complete an initial written notification, it is useful to understand how the system structures the reports. Exhibit 4.1 below is a flow diagram illustrating how initial written notification information is organized in CR-ERNS.

Exhibit 4.1
Information Hierarchy



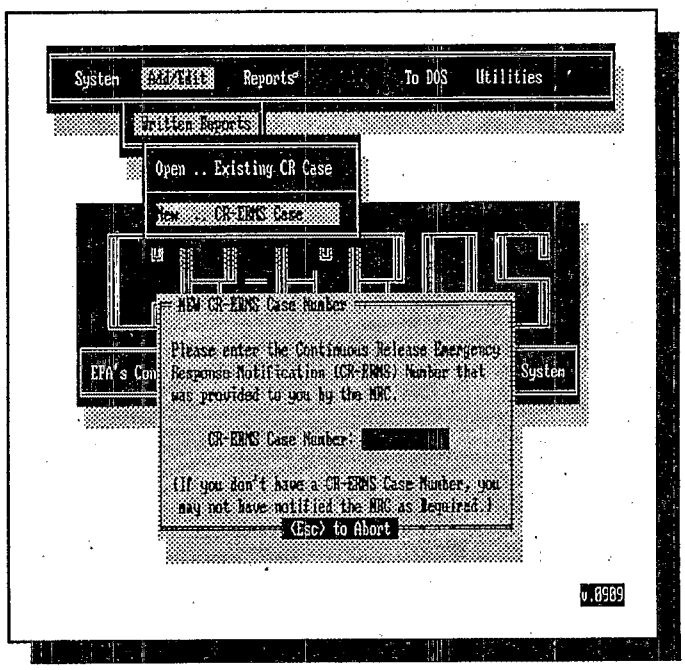
As Exhibit 4.1 illustrates, each initial written notification must include the same general facility information (which is described in Section 4.2). After completing the general facility information, you must enter information relating to the source(s) of the continuous release(s), and information on the hazardous substance(s) being released from the source(s). The order in which you enter this information, however, is not fixed. For example, once you enter information about Source 1, CR-ERNS allows you either to enter information on the hazardous substance(s) being released from Source 1, or to enter information about Source 2. Although CR-ERNS is designed to allow flexibility in reporting, it is recommended that you complete all of the information for a given source (including the hazardous substance information) before entering information on additional sources. This will help ensure that you do not mistakenly omit critical substance information from your report.

The explanation of how to complete the initial written notification that follows below is organized by type of information (e.g., general facility information, source information, substance information). Section 4.1 explains how to access the various report screens; Section 4.2 describes the general facility information screens; Section 4.3 presents screens for the different types of release sources; and Section 4.4 describes how to fill in hazardous substance information for each source.

4.1 Getting Started

To begin creating an initial written notification, select the Add/Edit option from the Main Menu by pressing the <Enter> key. Next, select the Written Reports option from the Add/Edit Menu and then the New .. CR-ERNS Case option from the Written Reports Menu (Exhibit 4.2). CR-ERNS will now prompt you to enter the CR-ERNS case number given to you by the NRC when you made your initial telephone notification.

Exhibit 4.2
Creating a CR-ERNS Written Report



After you have typed in your CR-ERNS case number, the system will prompt you to verify that you have entered the correct number. It is critical that you enter the CR-ERNS number correctly, as all future correspondence with EPA, the SERC, and the LEPC will be based on this number.

After you verify your CR-ERNS number, the system will display the input screen for reporting general facility information (Exhibit 4.3). Guidance on how to complete this general facility information is provided below.

4.2 Entering General Facility Information

Your first responsibility in completing an initial written report involves entering the general facility information that is required in the continuous release reporting regulation. The required information is briefly summarized below. For a more complete discussion of the general facility information requirements in the continuous release reporting regulations, consult the Facility Guide referenced earlier in this document.

Exhibit 4.3
General Facility Information

```
08/21/90 | Continuous Releases Notification System | Written Notificat

CR-ERNS Case Number ... 000000000001          Report Number ... WRI-001

  Facility Information                        Notification Date: 15/02/90

  Name: BLANCO INDUSTRIES                     State :OH
Street: WHITE ROAD                              Zip :44124-
  City: CLEVELAND                             County :CUYAHOGA

 Latitude => Deg 041 Min 00 Sec 00 | Vessel Loran Coordinates :    -
Longitude => Deg 082 Min 00 Sec 00 |      (if Lat/Long are unavailable)

 Vessel Port of Registration :

 Dun & Bradstreet Number of Facility.. 1: 123123123123123  2:

 Population Density within a One Mile Radius of Discharger : 101-500

Person in Charge: J. BODINE                   Telephone: (216)831-5180
                  (Last Name, First)          Alt. Phone: (216)831-5181

 F1 - Help     F8 - Comments                  F10 - Save    <Esc> Abort
```

Notification Date: Enter the date on which you complete this report.

Facility Information: You must provide the name of your facility, along with its street address, city, county, state, and ZIP Code.

Latitude and Longitude: Enter the latitude and longitude of your facility in degrees, minutes, and seconds. If you are reporting a continuous release from a vessel, leave this entry blank and identify your location in Loran Coordinates. If you do not know your latitude and longitude, CR-ERNS includes a validation function to ensure that you enter values that are within your county.

Vessel Loran Coordinates: If you are reporting a continuous release for a vessel, enter the Loran Coordinates of the location where the release occurs. If you are reporting a release from a facility, leave this entry blank.

Vessel Port of Registration: If you are reporting a continuous release for a vessel, enter the port name and state in which your vessel is registered. Enter "N/A" if the release is from a facility.

Dun & Bradstreet Number(s) of Facility: Enter the Dun & Bradstreet Number(s) assigned to the whole physical facility. If there is more than one profit-center (and, therefore, more than one Dun & Bradstreet Number) per physical facility, report the Dun & Bradstreet Number for the profit-center where the release is occurring.

Population Density within a One-Mile Radius of Facility: You must provide an estimate of the population per square mile within a one-mile radius of the facility. You can report population density in a number of ranges specified on the continuous release reporting regulation (e.g., 101-500 persons per square mile).

Person in Charge: Provide the name and phone number of the person at the facility with the highest level of responsibility concerning the continuous release(s). Provide an alternative phone number if available.

Sensitive Populations and Ecosystems within a One-Mile Radius of Facility: If there are sensitive populations or ecosystems located within a one-mile radius of the facility, you must provide the identity and location in your report. To enter this information, you must press the <F8> key to display the comments field. Type your sensitive populations and ecosystems information in this field, and then press <Ctrl><W> to save.

After completing all of the general facility information, you should review your report carefully. Once you are confident that you have accurately reported this information, press the <F10> key to save the information displayed on the screen. The computer will prompt you to verify this information; if it is correct proceed as indicated. The next step will be to enter source and substance information associated with your continuous release.

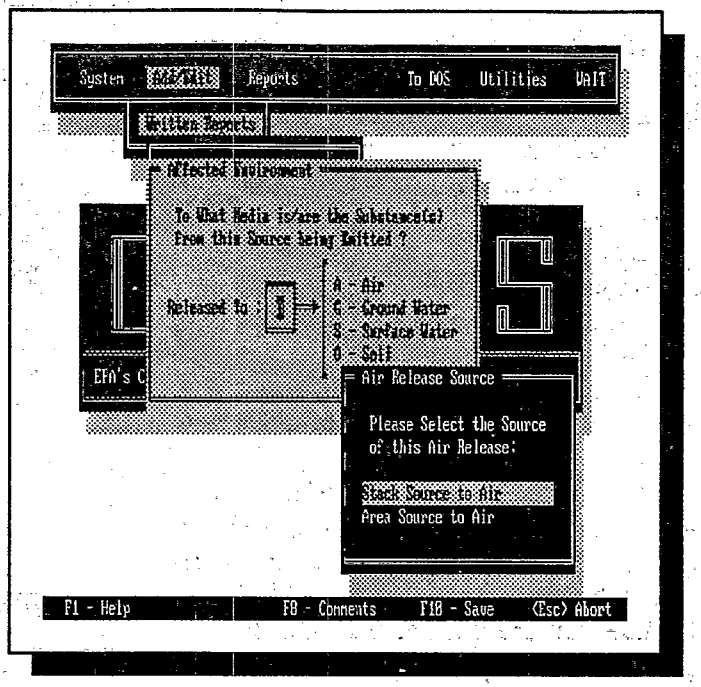
4.3 Entering Source Information

After completing the general facility information, CR-ERNS will display the Affected Environment screen shown in Exhibit 4.4, which relates to the first source of a continuous release that you are reporting. As described in the Facility Guide, you may report several releases and sources in one initial written notification. CR-ERNS is designed to allow you to submit

information on as many sources as you would like to report.

The Affected Environment input screen requires you to identify the affected environmental medium for your first release source. Because the release information that must be submitted differs for each medium, it is important that you identify the affected environmental medium correctly. CR-ERNS provides you with four choices: air, ground water, surface water, and soil. If your release is a multimedia release that could affect more than one environmental medium, select the medium that receives the greatest percentage of the release. If your source releases hazardous substances in a continuous and stable manner to more than one medium (e.g., gypsum stack that releases radon to air and other hazardous substances to soil), treat the source as if it were two distinct sources and report the release into each medium separately.

Exhibit 4.4
Affected Environment Screen



As shown in Exhibit 4.4, if your release is to air, you must further specify whether the release is from a stack source or an area source. If you are not sure which kind of release is most relevant, consult the Facility Guide. Generally, most air releases from ground sources should be treated as area sources. Thus, if your facility has a tank farm with continuous releases from a variety of tank vents and valves, the entire tank farm would constitute your area source.

After you select one of the environmental media shown in Exhibit 4.4, the computer will display the source screen relevant to that environmental pathway. These source screens are described individually below.

4.3.1 Releases to Air

CR-ERNS tracks releases to air from two basic kinds of sources: stack sources and area sources. As described above, you must indicate which of these two source types is relevant for each air release. After selecting one of these two source types, the computer will display the source screen for the stack source or area source (Exhibits 4.5 and 4.6, respectively).

Exhibit 4.5 displays the source information that you must report for stack releases to air. This information is briefly described below.

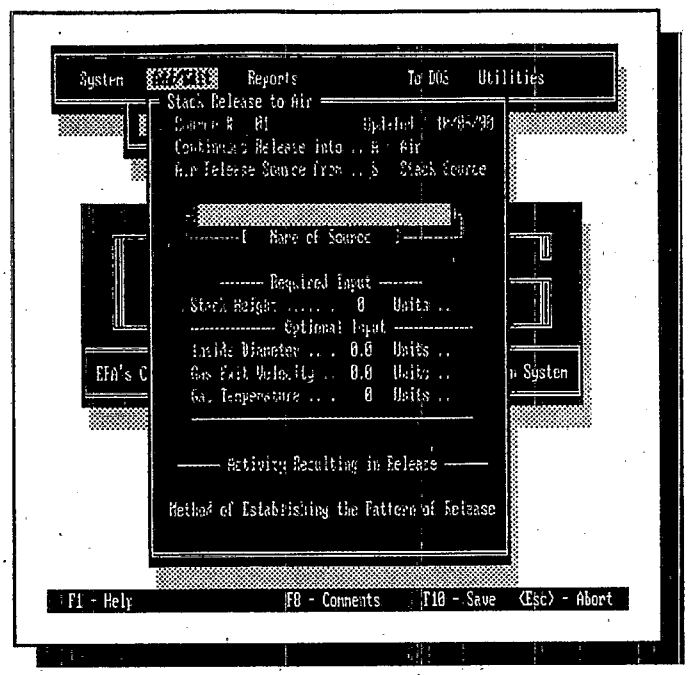
Source Name: Enter the name of the source from which the release occurs. A descriptive name is preferable. For example, if the unit is a centrifugal processor, name the source Centrifugal Processor #4, rather than Unit #4.

Stack Height: Provide the height of the stack from which this release occurs.

Activity Resulting in Release: You must identify the specific activity that causes the release. For example, production process for material X should be indicated as such. If the release is caused by a malfunction and you are reporting this as a continuous release, please describe the circumstances surrounding the release in the comments section of CR-ERNS (i.e., press the <F8> key and explain, press the <Ctrl>-<W> keys when finished to save and exit.)

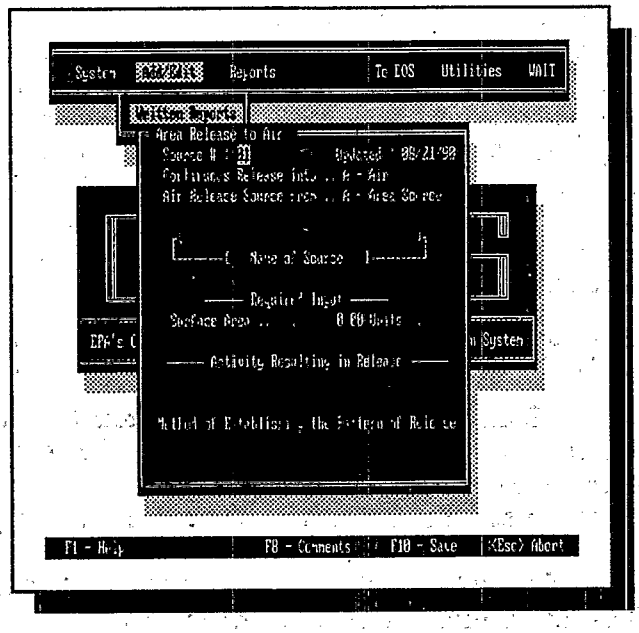
Method of Establishing Pattern of Release: State the method you used to determine that the release is continuous and stable in quantity and rate. Methods include, but are not limited to, best professional judgment, your knowledge of the process, and past release data.

Exhibit 4.5
Stack Release Source Information



Optional Inputs: CR-ERNS provides the user with an opportunity to provide information on the inside diameter of the stack, the gas exit velocity, and the gas temperature. Reporting these three parameters is optional but would aid EPA in evaluating the risks from the release. If this information is not provided, EPA will use conservative default values for purposes of evaluating the risks from the release, which may result in an overestimation of the risks and inquiries or site visits from EPA Regional personnel.

Exhibit 4.6
Area Source Release Information



Once you have filled in the source information, press the <F10> key to save the data. At this point, you should proceed to input substance information pertaining to this source. (Instructions for completing substance information is presented in Section 4.4 below.) After completing the substance information for this source, you can then continue to complete source and substance information for additional sources.

Exhibit 4.6 displays the source information that you must report for area source releases to air. This information is briefly described below.

Source Name: Enter the name of the source from which the release occurs. A descriptive name is preferable (e.g., Centrifugal Processor #4, rather than Unit #4).

Surface Area: Enter the total surface area of the release source. For example, this might consist of the area that encompasses a group of pipe vents releasing a hazardous substance, or the surface area of a mining waste pile.

Activity Resulting in Release: You must identify the specific activity that causes the release. For example, fugitive dust emissions from mining waste piles should be indicated as such. If the release is caused by a malfunction and you are reporting this as a continuous release, please describe the circumstances surrounding the release in the comments section of CR-ERNS (i.e., press the <F8> key and explain, press the <Ctrl>-<W> keys when finished to save and exit.)

Method of Establishing Pattern of Release: State the method you used to determine that the release is continuous and stable in quantity and rate. Methods include, but are not limited to, best professional judgment, your knowledge of the process, and past release data.

Once you have filled in the source information, press the <F10> key to save the data. At this point, you should proceed to input substance information pertaining to this source. (Instructions for completing substance information are presented in Section 4.4 below.) After completing the substance information for this source, you can then continue to complete source and substance information for additional sources.

4.3.2 Releases to Ground Water

To report information on releases to ground water, you must select the ground water option from the Affected Environmental Media screen (Exhibit 4.4). After selecting this option, the computer will display the screen shown in Exhibit 4.7. The data elements presented on the Release to Ground Water screen are described briefly below.

Source Name: Enter the name of the source from which the release occurs. A descriptive name is preferable. For example, if the unit is a centrifugal processor, name the source Centrifugal Processor #4, rather than Unit #4.

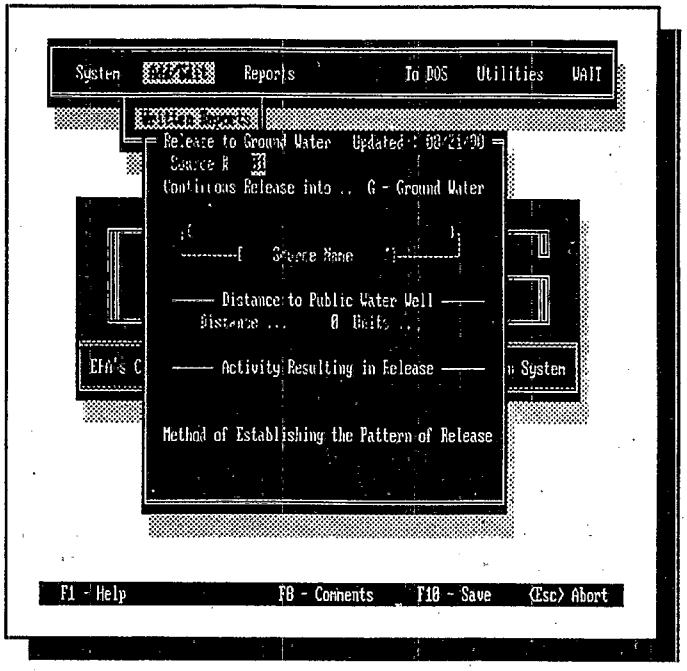
Distance to Public Water Well: Provide the distance to the public water well nearest to the source of the continuous release. This should include either residential wells or public water supply wells.

Activity Resulting in Release: You must identify the specific activity that causes the release. For example, leaching from a stockpile of material X should be indicated as such. If the release is caused by a malfunction and you are reporting this as a continuous release, please describe the circumstances surrounding the release in the comments section of CR-ERNS (ie., press the <F8> key and explain, press the <Ctrl>-<W> keys when finished to save and exit.)

Method of Establishing Pattern of Release: State the method you used to determined that the release is continuous and stable in quantity and rate. Methods include, but are not limited to, best professional judgment, your knowledge of the process, and past release data.

Once you have filled in the source information, press the <F10> key to save the data. You should now proceed to input substance information pertaining to this source. (Instructions for completing substance information are presented in Section 4.4 below.) After completing the substance information for this source, you can then continue to complete source and substance information for additional sources.

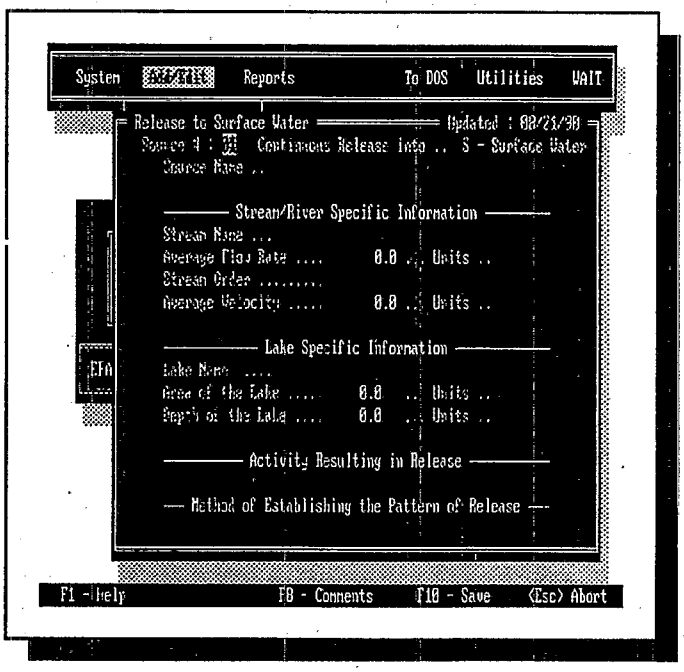
Exhibit 4.7
Ground Water Source Information



4.3.3 Releases to Surface Water

To report information on sources releasing to surface water, you must select the surface water option from the Affected Environmental Media screen (Exhibit 4.4). After selecting this option, the computer will display the screen shown in Exhibit 4.8.

Exhibit 4.8
Surface Water Source Information



To report a release to surface water, you must indicate whether the hazardous substances are released to a stream/river or a lake. You must fill in one or the other of these two types of surface water bodies, but you cannot specify a release to both. The data elements presented on the Release to Surface Water screen are described briefly below.

Source Name: Enter the name of the source from which the release occurs. A descriptive name is preferable. For example, if the unit is a centrifugal processor, name the source Centrifugal Processor #4, rather than Unit #4.

Stream/River Specific Information: If the release is to a stream or river, enter the name of the stream or river, and either the stream/river volumetric flow rate or the stream/river order. Report the stream/river velocity if it is known.

Lake Specifics: If the release is to a lake, enter the lake's name, surface area, and depth.

Activity Resulting in Release: You must identify the specific activity that causes the release. For example, stormwater runoff should be indicated as such. If the release is caused by a malfunction and you are reporting this as a continuous release, please describe the circumstances surrounding the release in the comments section of CR-ERNS (ie., press the <F8> key and explain, press the <Ctrl>-<W> keys when finished to save and exit.)

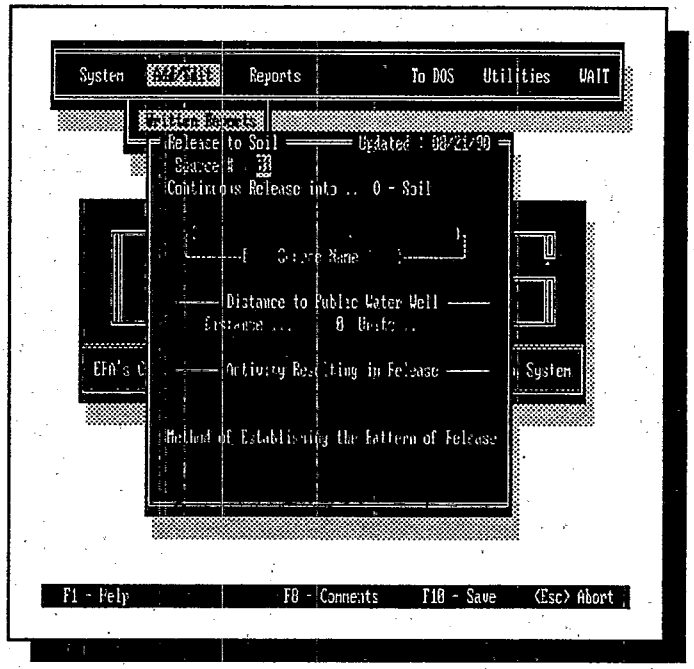
Method of Establishing Pattern of Release: State the method you used to determine that the release is continuous and stable in quantity and rate. Methods include, but are not limited to, best professional judgment, your knowledge of the process, and past release data.

Once you have filled in the source information, press the <F10> key to save the data. You should now proceed to input substance information pertaining to this source. (Instructions for completing substance information are presented in Section 4.4 below.) After completing the substance information for this source, you can then continue to complete source and substance information for additional sources, if appropriate.

4.3.4 Releases to Soil

To report information on sources releasing to soil, you must select the soil option from the Affected Environmental Media screen (Exhibit 4.4). After selecting this option, the computer will display the screen shown in Exhibit 4.9.

Exhibit 4.9
Soil Release Source Information



The data elements presented on the Release to Soil screen are identical to those pertaining to releases to ground water. See section 4.3.2 for a description of these elements.

4.4 Entering Substance Information

This section explains how to input substance-specific information into CR-ERNS for your initial written notification. This information represents the most critical component of the report because it provides EPA with information about the specific hazardous substances being released, the upper and lower bounds of the amounts released during each 24-hour period, and the number of releases that have occurred over the past year. For a detailed discussion of how to report this substance-specific information and other Agency

policy on compliance with the continuous release reporting requirements, you are encouraged to refer to the Facility Guide.

Once you have filled in the source information for a given source, press the <F10> key to save the data. You will then be placed on the Release Source Listing screen shown in Exhibit 4.10 (this exhibit also displays the Substance Listing Screen described below). You should now proceed to input substance-specific information pertaining to this source. After completing the substance information for this source, continue to fill in source and substance information for additional sources, as necessary.

From the Release Source Listing screen (Exhibit 4.10), press the <F4> key to enter substance-specific information to the highlighted source. A Substance Specific Information screen is shown in Exhibit 4.11.

To enter information in the Substance Specific Information screen, move the cursor to each entry, type in the correct response, and press the <Enter> key. After completing all of the information on the screen, press the <F10> key to save the information. Each of the data elements that must be completed are described briefly below.

CASRN: You must provide the hazardous substance's Chemical Abstract Service Registry Number (CASRN). This number is a (maximum) ten digit number and should be entered without the usual dashes. See section 4.4.1 of this Manual for assistance in identifying a CAS Number for a particular hazardous substance.

CHRIS Code: If available, you should enter the hazardous substance's Chemical Hazards Response Information System

Exhibit 4.10
Release Source and Substance Listing Screens

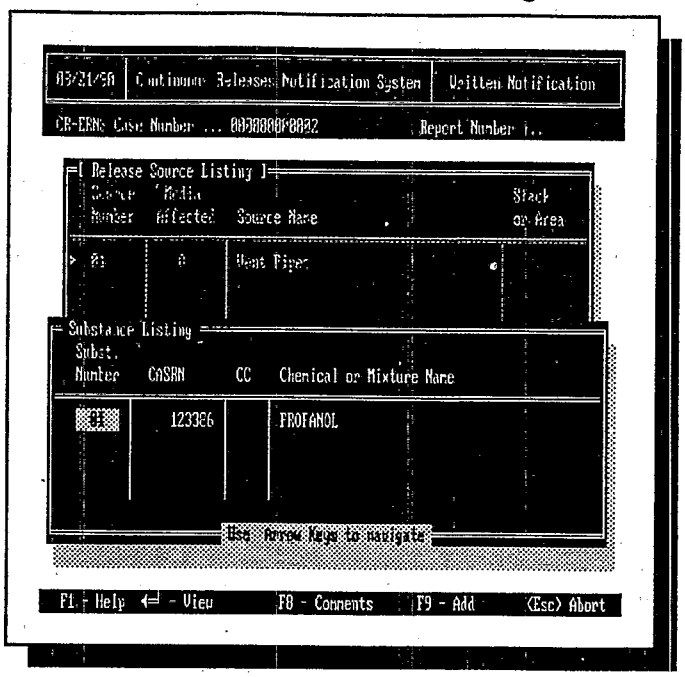
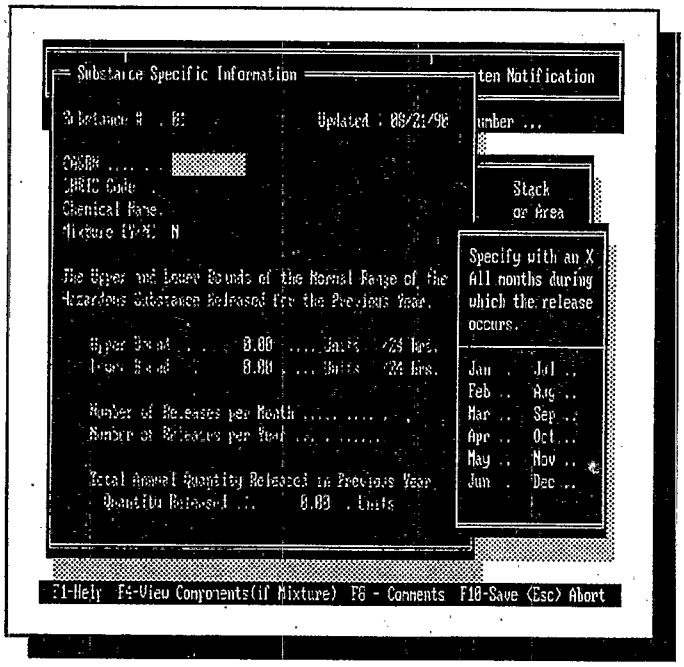


Exhibit 4.11
Substance Specific Information Screens



(CHRIS) Code. This is a three letter code that may not exist for every substance.

Chemical Name: Enter the name of the hazardous substance. There may be several names for each hazardous substance; you must use the name that appears in the lookup table described below in section 4.4.1 of this Manual. In most cases, you must specify the chemical name using the International Union of Physical and Applied Chemists (IUPAC) convention, although the common name may be appropriate in many cases.

Mixture (Y/N): Indicate whether or not the release in question is a mixture of hazardous substances.

Upper and Lower Bounds of the Normal Range: In this field, you must report the largest and smallest amounts of the hazardous substance or mixture that was released under normal operating conditions during a 24-hour period over the previous year.

Number of Releases per Month: Provide the average number of releases per month that occurred over the previous year. When estimating this number, do not include months when the release does not occur.

Number of Releases per Year: Indicate the number of releases per month multiplied by the number of months in which the hazardous substance was released

Total Annual Quantity Released in Previous Year: Indicate the total amount of this hazardous substance or mixture released in the preceding year.

Months During Which the Release Occurs: Indicate the months in which the release occurred. You must select at least one month.

After you have finished entering the hazardous substance information, press the <F10> key to save the entry. CR-ERNS will return you to the Substance Listing screen (shown in Exhibit 4.10), which will now display the chemical that you have reported for this source. If you need to report an additional substance, press the <F9> key; CR-ERNS will display the Substance Specific Information screen again. Complete the same information for the second substance released from the source. Repeat this until you have reported all of the hazardous substances being released from this source.

4.4.1 Assistance in Entering Hazardous Substance Information

To assist in adding accurate hazardous substance data to your notification, CR-ERNS includes a detailed chemical database of all CERCLA hazardous substances subject to the continuous release reporting requirements. To ensure that you designate the chemical name or its CAS Number properly, CR-ERNS has a built-in chemical validation function that helps ensure the accuracy of your response.

If you are unsure of the CAS Number for a substance being released from your facility, leave the CAS Number entry blank and press the <Enter> key. The computer will display a window in the Substance Specific Information screen that will prompt you to specify how you would like to search for the relevant chemical (Exhibit 4.12). If you select Option 2, for example, you must specify the chemical name; CR-ERNS will then identify the correct CAS Number.

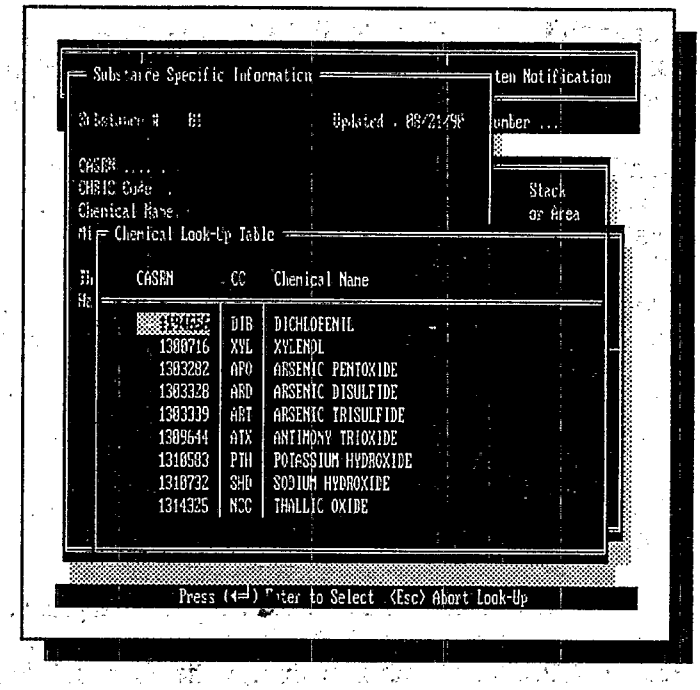
After entering the chemical name and pressing the <Enter> key, the system will input the correct CAS Number, CHRIS Code, and chemical name in the proper entries on the screen. If you misspell the chemical name, CR-ERNS will also display the chemical lookup table shown in Exhibit 4.13.

Exhibit 4.12
Chemical Look-Up Prompt

1. Search on CAS Number
2. Search on Chemical Name
3. Search on CHRIS Code
4. Chemical is a Mixture

To use the chemical lookup table, scroll through the chemical list with your cursor until you find the chemical that you want to report. Press the <Enter> key. The chemical, along with its correct CAS Number and CHRIS Code, will now be placed in their proper places in the input screen.

Exhibit 4.13
Chemical Look-Up Table



4.4.2 Reporting Mixtures of Hazardous Substances

As described in the Facility Guide, you may report a continuous release of a mixture of hazardous substances in your written notification. To specify a mixture, do not fill in the entry for CAS Number on the Substance Specific Information table. Pressing the <Enter> key will call the prompt for the chemical lookup screen (see Exhibit 4.12). Select Option 4, which corresponds to a chemical mixture. CR-ERNS will place a string of zeros in the entry for CAS Number, will leave the CHRIS Code entry blank, and will type "Chemical Mixture" under chemical name. You should now type in the correct name of the chemical mixture to replace this generic name created by CR-ERNS, and press the <Enter> key. Fill in the remainder of the information on the input screen. While you are entering information on this screen, treat the mixture as if it were one hazardous substance; that is, enter all the information, including the bounds of the normal range, for the released mixture.

The next step is to specify the release information for the hazardous substance components of the mixture. From the Substance Specific Information screen, press the <F4> key; CR-ERNS will display the Chemical Component Specific Information screen (Exhibit 4.14). The Chemical Component Specific Information screen is almost identical to the Substance Specific Information screen (Exhibit 4.11), in that it has entries for CAS Number, CHRIS Code, and chemical name. In addition to these entries, however, you must report the percentage by weight of the hazardous substance component in the mixture as a whole. For example, if your mixture contains two hazardous substance components, each accounting for 15% of the mixture by weight, enter 15 in the appropriate entry. More detailed information on how to report mixtures can be found in the Facility Guide. [Note: Because of differences in units, do not report non-radionuclide and

radionuclide releases together in a single mixture. Rather, for purposes of reporting such combinations, you can report the radionuclide releases as one mixture, and the other hazardous substances as a second mixture.]

After you have finished entering the required information for the first hazardous substance component, press the <F10> key to save the information and to return to the Chemical Components Listing Screen (Exhibit 4.15). This screen provides a list of the hazardous substance components that you reported for this mixture. To add another hazardous substance component to the report on this mixture, press the <F9> key. Repeat this procedure until you have reported all of the hazardous substance components of this mixture. From the Chemical Components Listing screen, press the <Enter> key to return to the Substance Specific Listing Screen (Exhibit 4.11).

4.5 Submitting the Initial Written Notification

Once you have entered information on all the hazardous substances for a given source, complete the required information for the next source you wish to report and enter the information on all of the hazardous substances released from that source. Continue this process until all of the sources and hazardous substances released in a continuous and stable manner from your facility have been reported. When you finish each section, save your work, thus eliminating the need to save the entire report before returning to the Main Menu.

Exhibit 4.14
Chemical Component Specific Information

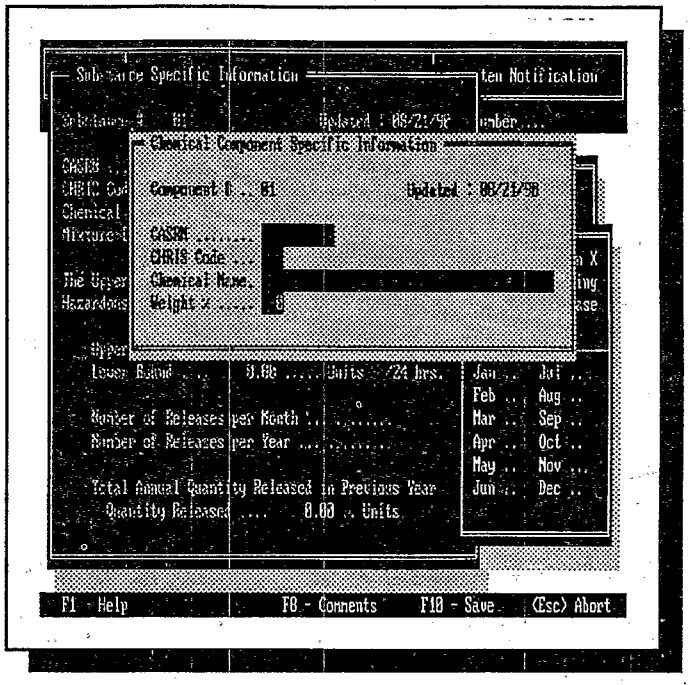
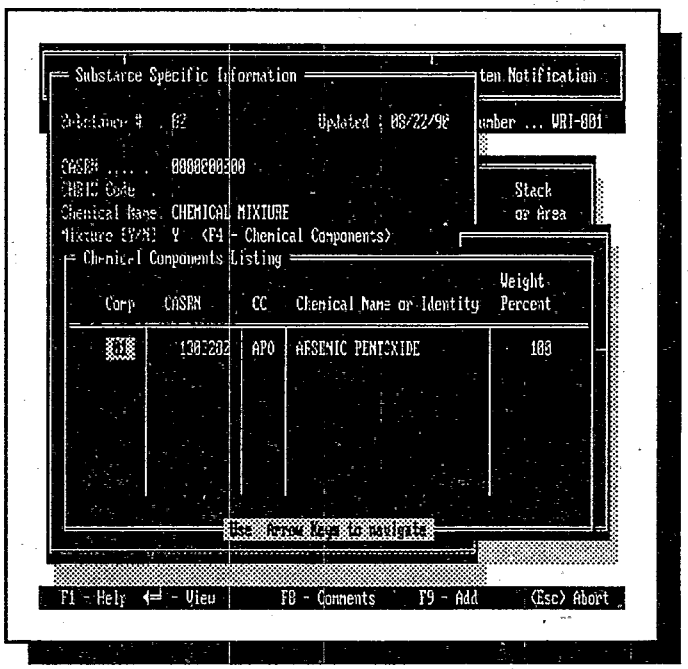
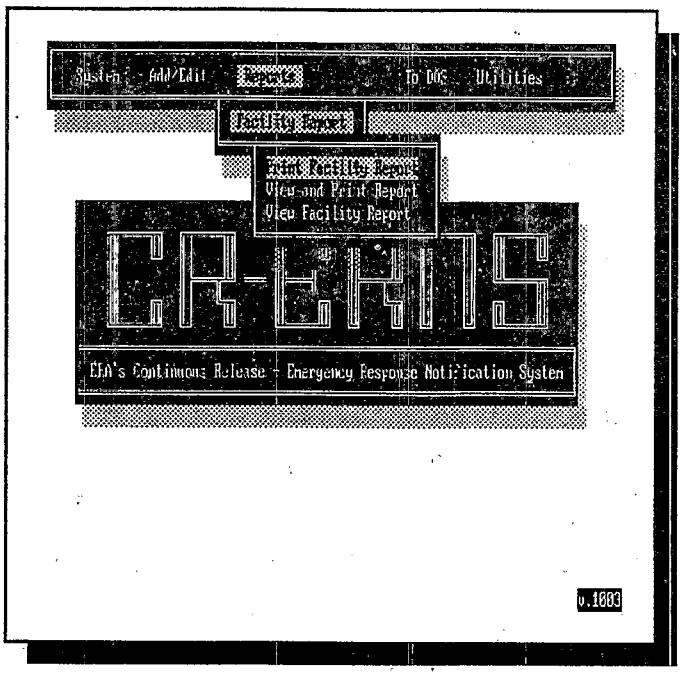


Exhibit 4.15
Chemical Components Listing Screen



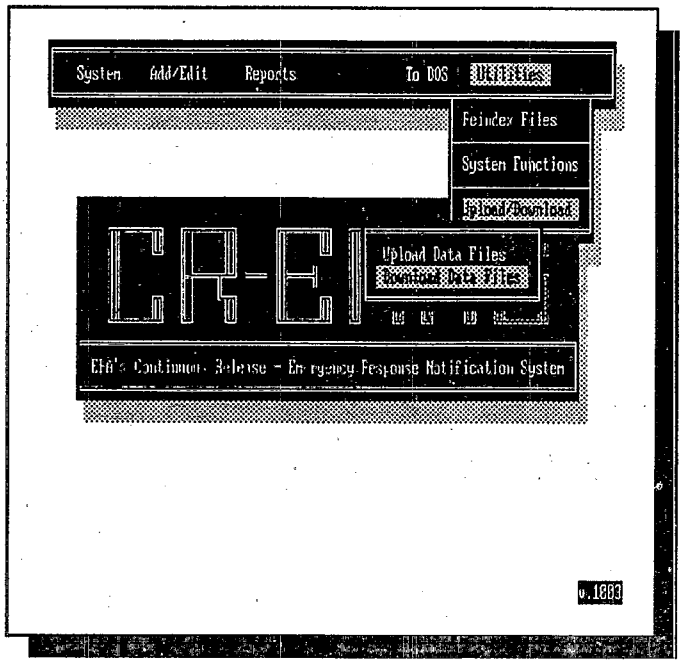
The next step involves printing a copy of the Report and verifying the information. Before printing your report, you may wish to reindex your files (see Section 3.2.3) To print, first select the Reports option from the Main Menu (Exhibit 4.16). Enter your CR-ERNS number and then select the Facility Report option from the Reports Menu. Next, select the Print Report option from the Facility Reports Menu. Finally, specify how many copies you would like to print; this number can be as many as nine. Once you have a copy, review it to ensure that the information you entered is correct. If the information is correct, sign the last page of the report. The report should then be sent to the EPA Regional Office, SERC, and LEPC (along with the electronic diskette). Note: *If you have not configured CR-ERNS to the printer you are using, see Section 3.2.2, Printer Setup, of this document.*

Exhibit 4.16
Printing Facility Reports



The last action you must take before you are finished is to download the Notification to a floppy disk for submittal to the EPA Regional Office, along with the signed copy of the Report. To perform this function, place a blank, formatted floppy disk in your "A:\" drive (the rest of this example assumes that you are using the "A:\" drive; if not, substitute the drive you are using wherever the "A:\" drive is indicated here). Next, select the Utilities option from the Main Menu, select the Upload/Download option from the Utilities Menu, and finally select the Download option from the Upload/Download Menu (as shown in Exhibit 4.17). At the options screen for selecting the path for downloading your report, press the <Enter> key twice to download your report to your "A:\" drive (Exhibit 4.18). If you are downloading your report to another drive, specify the proper drive and path accordingly.

Exhibit 4.17
Download Menu Screen



If your floppy disk is not formatted or cannot be read correctly, CR-ERNS will give you an error message. Exit CR-ERNS, reformat your floppy disk, return to CR-ERNS, and try again. Finally, select the facilities or vessels that you want to download to disk by highlighting them and then pressing the <Enter> key (as shown in Exhibit 4.19). If you accidentally tag a facility you do not want to download on this disk, repeat the tagging process and the facility or vessel will be untagged.

Once CR-ERNS has completed the download procedure, place the floppy disk in a disk mailer and send the disk mailer along with the signed copy of the Written Notification to your EPA Regional Office. *Note: The signed copy of the Written Notification MUST accompany the disk when you mail it to the EPA Regional Office.* Send another signed copy of the Written Notification to the SERC and LEPC.

Exhibit 4.18
Download Options Screen

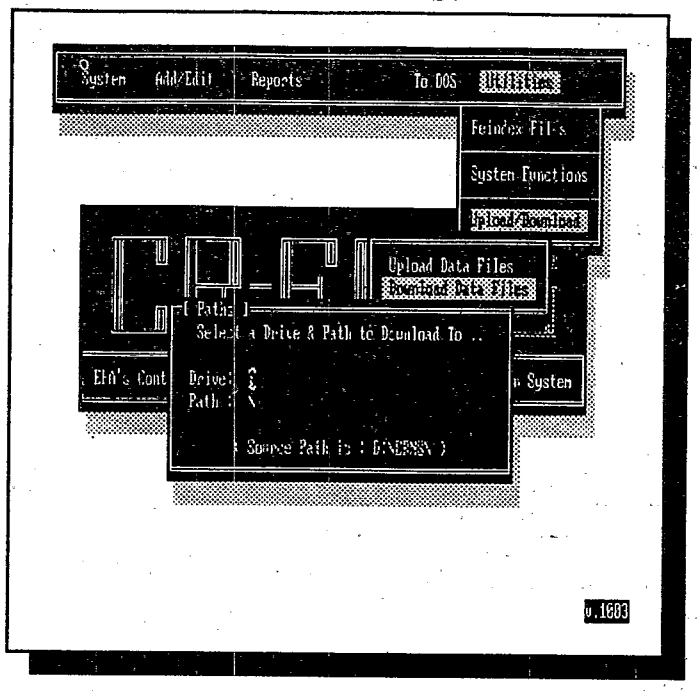
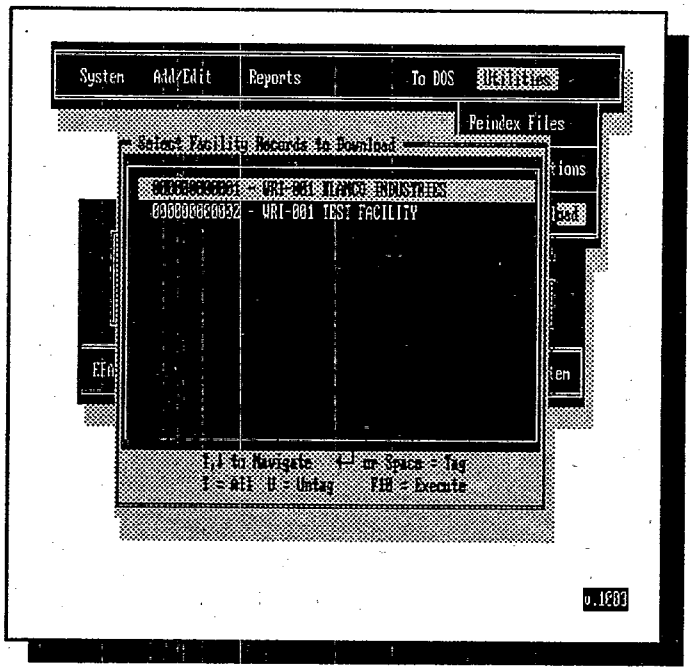


Exhibit 4.19
Download Facility Pick List Screen



5. SUBMITTING ONE-TIME FOLLOW-UP REPORTS

This chapter explains how to fill out the one-time Follow-up Report. Under the continuous release reporting regulation, this report must be submitted one year after submitting the initial written notification. You are encouraged to consult the Facility Guide before completing the follow-up report. The Guide contains information that is useful in helping you understand the reporting requirements.

The one-time follow-up reports are identical in content to the Initial Written Notification. The procedures for submitting these reports are also the same as for the Initial Written Notification. To begin entering the information for a one-time follow-up report, select the Add/Edit option from the Main Menu, select the Written Reports option, and then select the "Open .. Existing CR Case" option from the Written Reports Menu (as shown in Exhibit 5.1). Next, enter your CR-ERNS number and press the <Enter> key, or press <Enter> to call for a look-up table displaying your facility's reports to ensure you enter your CR-ERNS number correctly. Next, select the Follow-Up Report option as shown in Exhibit 5.2. This will place you on the General Facility Data screen (which is identical to the one shown previously in Exhibit 4.3). You can now begin entering your follow-up report.

Entering a follow-up report largely involves verifying the information that you entered into CR-ERNS when you created the initial written notification. If you have any questions, refer to the appropriate section of Chapter 4 of this Manual.

Exhibit 5.1
Entering a Follow-Up Report Screen 1

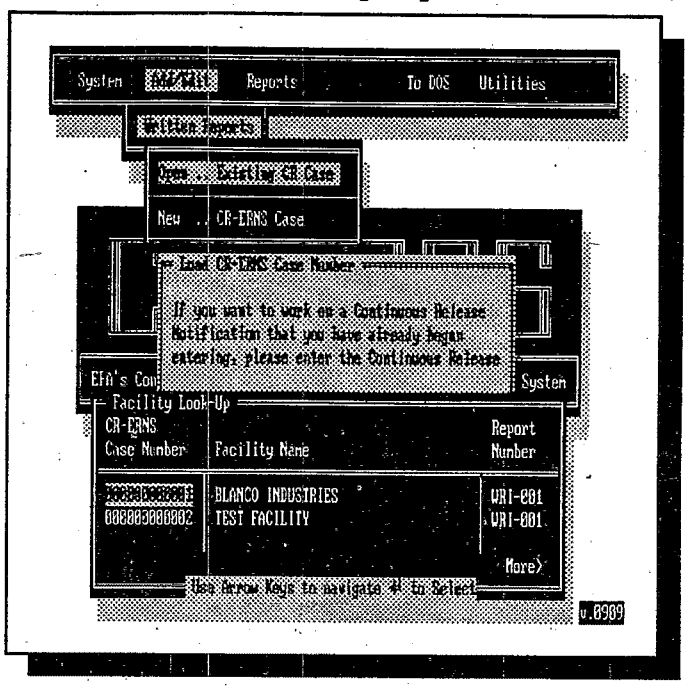
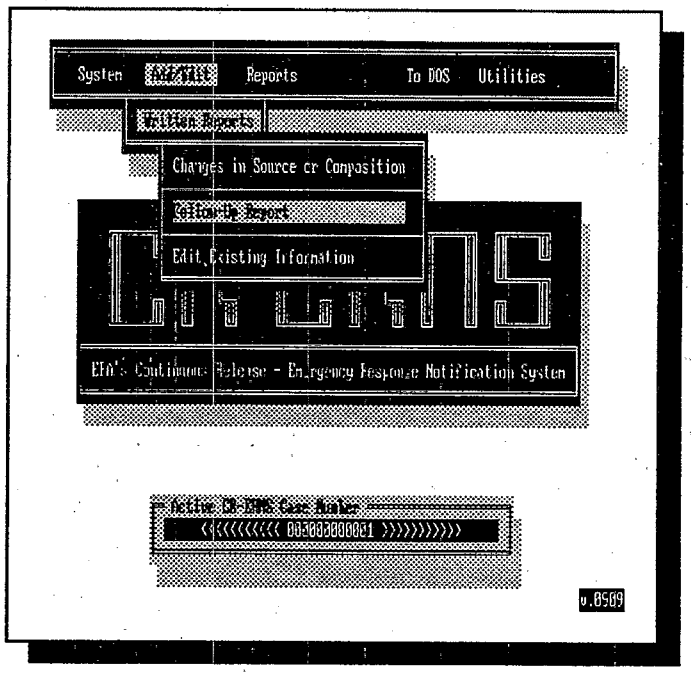


Exhibit 5.2
Entering a Follow-Up Report Screen 2



To print the follow-up Report and download it to a disk for submittal to the EPA Region, follow the procedures outlined in Section 4.5 for the initial written notification. The process will be identical for follow-up reports. Again, you are required to submit a signed printed version of the report along with the electronic version submitted on a floppy disk.

6. SUBMITTING CHANGE NOTIFICATIONS

This chapter describes how to use CR-ERNS to notify EPA about changes in the continuous release information previously submitted. Entering the required information will occur in the same manner as that described in Chapter 4, but you will only enter the changed or modified information into CR-ERNS. You are encouraged to consult the Facility Guide before completing a change notification. The Guide contains information that will be useful in helping you understand the reporting requirements.

There are two types of change notifications. General change notifications are used to report such changes as the facility or vessel name, facility address, or the magnitude of the upper or lower bound of your continuous release. Submitting a general change notification involves two steps: (1) changing the information in CR-ERNS, and (2) sending a letter to the EPA Regional Office detailing the change.

To edit the information that is no longer valid, select the Add/Edit option from the Main Menu and then select the Written Report option from the Add/Edit Menu (as shown in Exhibit 6.1). Next, enter your facility's CR-ERNS number and press the <Enter> key, or press the <Enter> key at the prompt to display a look-up table of all continuous release reports you may have submitted. This will ensure that you enter the correct CR-ERNS number. Finally, select the Edit Existing Information option and then the General Facility Information option (Exhibit 6.2).

The second type of change notification is a notification of change in source or composition. If there is a

Exhibit 6.1
Change Notification Menu Screen 1

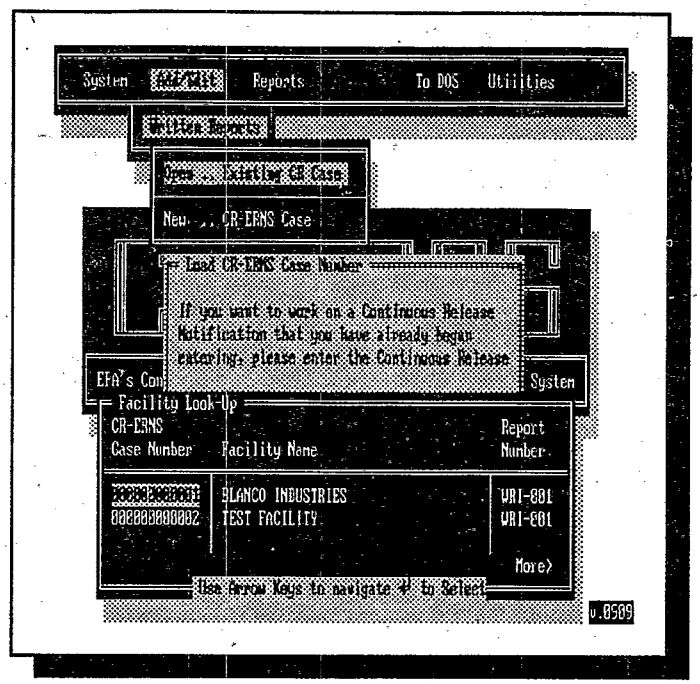
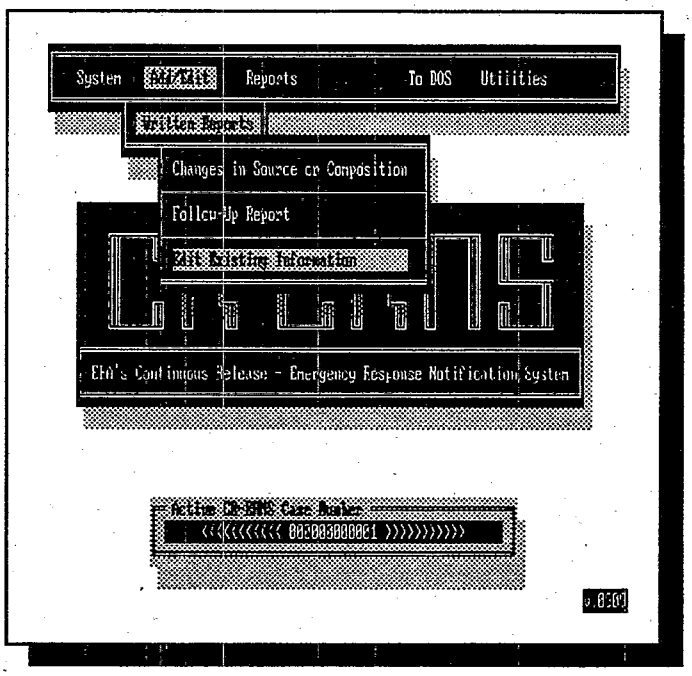


Exhibit 6.2
Change in General Facility Information Screen



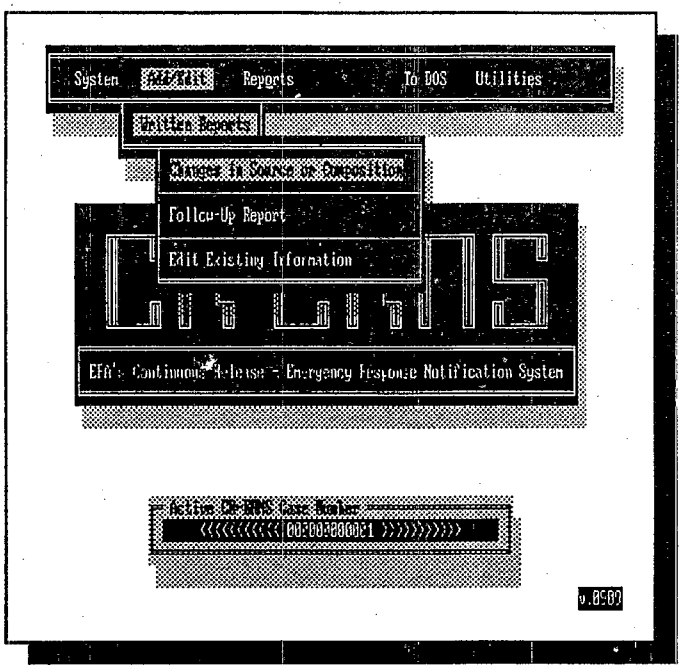
change in the source of a hazardous substance (this includes the addition of a new source or the release of a new hazardous substance from an existing source), then the release is considered a new release. In this case, you must make an Initial Telephone Notification to the NRC and then submit an initial written report within 30 days of your call to the NRC. You will continue to use your original CR-ERNS case number for this new continuous release, and you will be prompted by the NRC to provide this when you call.

The examples presented above are situations in which a source or composition change would be necessary. They do not represent the entire spectrum of situations where such a change notification would be required. Again, consult the Facility Guide for more information regarding your reporting requirements.

To enter a notification of change in source or composition, select the Add/Edit option from the Main Menu and then select the Written Report option from the Add/Edit Menu. Next, enter your facility's CR-ERNS number and press the <Enter> key. Finally, select the Change Notification option and the Source and Composition option (as shown in Exhibit 6.3).

After completing the entries in the report, which are identical to the initial written notification screens, you may submit the report to the EPA Regional Office, SERC, and LEPC. Submitting the notification of change in source or composition involves the same steps as those required for submitting a written initial report; consult Section 4.5 of this Manual for details.

Exhibit 6.3
Change in Source or Composition Screen



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