Environmental Release Policy

BRIEF

Policy Summary

Berkeley Lab’s Environmental Release Policy ensures that significant accidental releases of hazardous materials, pollutants, or chemical agents are properly reported, investigated, and cleaned up.

Who Should Read This Policy

Berkeley Lab employees, visitors, affiliates, and subcontractors who work with hazardous materials and wastes, including personnel who transport hazardous materials

To Read the Full Policy, Go To:
The POLICY tab on this wiki page

To Read the ES&H Program Details, Go To:
http://www.lbl.gov/ehs/pub3000/CH51.html

Contact Information

Environmental Release Subject Matter Expert
Environmental Services Group
EHS Division

POLICY

A. Purpose

The Environmental Release Policy at Lawrence Berkeley National Laboratory (Berkeley Lab) ensures that significant accidental releases of
hazardous materials, pollutants, or chemical agents are properly reported, investigated and cleaned up.

B. Persons Affected

Berkeley Lab employees, visitors, affiliates, and subcontractors who work with hazardous materials and wastes, including personnel who transport hazardous materials

C. Exceptions

None

D. Policy Statement

1. Berkeley Lab must report any significant environmental spills or releases of hazardous materials, pollutants, or chemical agents to the appropriate federal, state and/or local agencies.
2. Line organization is responsible for immediately reporting accidental releases and spills of any magnitude that enter the environment.
3. The Environmental Services Group will investigate all reports of environmental spills or unplanned releases to determine the appropriate reporting and clean up requirements for each instance (Work Process A, General Requirements).

E. Roles and Responsibilities

<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibilities</th>
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</table>
| Principal Investigators and Supervisors | • Notify the Environment/Health/Safety (EHS) Division immediately of any unplanned environmental releases  
• Ensure that laws, regulations, and policies pertaining to environmental protection and release reporting are followed  
• Request technical advice from the Environmental Services Group on appropriate environmental protection requirements and compliance strategies  
• Provide employee training in operational requirements for preventing environmental releases, and maintain records of such training  
• Ensure that activities are performed within acceptable operating standards and that any required records are current |
| Employees                          | • Take immediate action to stop unplanned releases to the environment, and report all instances of unplanned environmental releases to the EHS Division  
• Follow applicable laws, regulations, and policies on environmental protection and release reporting  
• Must be fully aware of the environmental impact of their activities, and comply with all requirements that govern those activities  
• Adhere to all environmental requirements contained in regulatory agency permits for their activities  
• Perform activities within acceptable operating standards, and maintain current records whenever required  
• Ensure that exposures of the public and the environment to radioactive emissions are kept as low as reasonably achievable  
• Complete all required training provided by supervisors and the EHS Division |
Environmental Services Group

- Investigates reports of unplanned environmental releases, and notifies appropriate federal, state, and/or local authorities in a timely manner, as required by regulatory agencies and DOE
- Develops Laboratory policies and procedures to assure that operations are conducted in an environmentally safe manner and fully comply with all applicable environmental laws and regulations and DOE orders
- Assesses current and planned Berkeley Lab programs, and assists in defining environmental protection compliance controls and practices.
- Provides training, makes presentations, and participates in discussions regarding environmental protection practices and releases with Berkeley Lab employees, regulatory agencies, concerned public citizens, community organizations, and the media
- Curtails or suspends any operations that pose an immediate hazard to members of the public or to the environment
- Evaluates environmental releases to determine the potential impacts to environmental and public health, and the appropriate compliance actions
- Coordinates and represents Berkeley Lab activities during follow-up inspections by regulatory agencies and DOE
- Responds to information requests from regulatory agencies and the public
- Participates in DOE audits of off-site analytical laboratories to ensure the quality of analytical results received for environmental samples

F. Definitions/Acronyms

See the ES&H Manual Environmental Release program for technical terms related to the details of this policy and its implementation.

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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<tbody>
<tr>
<td>As low as reasonably achievable (ALARA)</td>
<td>An approach to radiological management and control intended to keep exposures (individual and collective) to the general public and the environment at levels as low as is reasonable, taking into account social, technical, economic, practical, and public-policy considerations. As used in this manual, ALARA is not a dose limit but a process with the objective of attaining doses as far below the applicable controlling limits as is reasonably achievable.</td>
</tr>
<tr>
<td>Effluent</td>
<td>Any treated or untreated liquid discharge from Berkeley Lab or from a Laboratory facility</td>
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<tr>
<td>Emission</td>
<td>Any filtered or unfiltered substance released to the air from Berkeley Lab or from a Laboratory facility</td>
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<tr>
<td>Hazardous air pollutant</td>
<td>Any pollutant listed in Section 112(b) of the Clean Air Act</td>
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<tr>
<td>Hazardous wastes</td>
<td>Wastes exhibiting any of the following characteristics: ignitability, corrosivity, reactivity, or toxicity. In addition, the Environmental Protection Agency has listed specific wastes as hazardous that do not necessarily exhibit these characteristics.</td>
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<tr>
<td>U.S. Environmental Protection Agency</td>
<td>A federal agency responsible for enforcing environmental laws. In California, some of this responsibility is typically delegated to state and local regulatory agencies.</td>
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</table>

G. Recordkeeping Requirements

Incident reports maintained by the EHS Division

H. Implementing Documents
I. Contact Information

Environmental Release Subject Matter Expert
Environmental Services Group
EHS Division

J. Revision History

<table>
<thead>
<tr>
<th>Date</th>
<th>Revision</th>
<th>By whom</th>
<th>Revision Description</th>
<th>Section(s) affected</th>
<th>Change Type</th>
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<td>1/2/2012</td>
<td>0</td>
<td>Pauer</td>
<td>Rewrite for wiki (brief)</td>
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<td>3/27/2013</td>
<td>1</td>
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<td>Rewrite for wiki (policy)</td>
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<tr>
<td>12/9/2016</td>
<td>1.1</td>
<td>Madison</td>
<td>Minor edits (program name change)</td>
<td>All</td>
<td>Minor</td>
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Document Information

**DOCUMENT INFORMATION**

- **Title:** Environmental Release Policy
- **Document number:** 07.03.003.000
- **Revision number:** 1.1
- **Publication date:** 12/9/2016
- **Effective date:** 3/27/2013
- **Next review date:** 12/1/2019
- **Policy Area:** Incident Review and Reporting
- **RPM Section (home):** ESH
- **RPM Section (cross-reference):** None
- **Functional Division:** EHS
- **Prior reference information (optional):** PUB-3000 Section 11.3.1 moved to Chapter 51

Source Requirements

- Clean Water Act: Section 307, Toxic and Pretreatment Effluent Standards; and Section 311, Oil and Hazardous Substance Liability
- Comprehensive Environmental Response, Compensation and Liability Act, Section 102, Hazardous Substances Releases, Liability, Compensation – Reportable Quantities and Additional Designations
- Resource Conservation and Recovery Act, Section 3001, Identification and Listing of Hazardous Waste
- Clean Air Act, Section 112, Air Pollution Prevention and Control – Air Quality and Emission Limitations – Hazardous air pollutants
- Toxic Substances Control Act, Section 7, Control of Toxic Substances – Imminent hazards
- California Health and Safety Code, Section 25501

### Implementing Documents

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<tr>
<th>Document Number</th>
<th>Other Reference Number</th>
<th>Title</th>
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<td>Environmental Release</td>
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<td>Work Process A, General Requirements</td>
<td>Process</td>
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<td>Emergency Response</td>
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<td>LBNL/PUB-533</td>
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<td>Berkeley Lab Master Emergency Program Plan (MEPP)</td>
<td>Plan</td>
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