

8. REPORTS

8.1 INTRODUCTION

The purpose of this section is to address the general requirements for records and reporting. As stated by the *Regulatory Guide*, environmental statutes and regulations are constantly changing and are frequently amended or superseded. Each of the *should** statements of the *Regulatory Guide* will be addressed. The specifics of records and reporting for each of the environmental monitoring areas are contained in the regulations that mandate the programs.

8.2 REPORTING REQUIREMENTS

The preparation and disposition of reports relevant to environmental monitoring are shown in Table 8.1. ASER contains summary information about the effluent monitoring and environmental surveillance programs for the past calendar year. Data that are collected less frequently than annually are contained in each year's reports until new data are available. ASER includes comparisons of average values of contaminants at sampling locations to reference values or to environmental standards, criteria, or permit limits. Other chapters in ASER include a summary of annual activities performed by the WM program and ER program. All permit activities are summarized, including mitigation action plans. Special studies describing research activities or corrective measures that are related to the environmental programs are also discussed.

Table 8.1. Applicable reporting requirements

Reporting	Deadline	Source of Requirement	Requirement
Environmental Monitoring Plan (EMP)	Annually	DOE 5400.1 Ch. IV	All U.S. Department of Energy (DOE) facilities that conduct significant environmental protection programs shall prepare an EMP. The contents of the EMP are outlined in Chapter IV of DOE Order 5400.1. The EMP shall be reviewed annually and updated as needed or every 3 years.
Annual Site Environmental Report (ASER)	10/1*	DOE 231.1	All DOE facilities that conduct significant environmental protection programs shall prepare an ASER. The report must provide a comprehensive review of the environmental surveillance programs, status of environmental compliance, and effluent data for both radioactive and nonradioactive pollutants.

Table 8.1. Applicable reporting requirements (cont.)

Reporting	Deadline	Source of Requirement	Requirement
Unplanned releases of radioactive materials in effluents		DOE 5400.1, Ch. II	Unplanned off-site or on-site releases of radioactive materials in effluents shall be reported if they are of concern to the environment.
Annual compliance report	6/30*	National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR Part 61, Subpart H)	Reporting shall include results from monitoring of radionuclide emissions to the ambient air as well as required dose calculations.
Preoperational environmental survey report	As required	DOE 5400.1	An environmental study shall be conducted prior to startup of a new site, facility, or process that has the potential for significant adverse environmental impact. The study shall be consistent with National Environmental Policy Act (NEPA) compliance activities.
Occurrence report	Determined by categorization	DOE 232.1A	An occurrence report shall be prepared for all events or conditions to be reported in accordance with the criteria defined in DOE 232.1A.
Discharge monitoring report	Monthly	Clean Water Act	Discharge monitoring reports are required for compliance with the state and federal National Pollutant Discharge Elimination System (NPDES) permit.
Superfund Amendments and Reauthorization Act (SARA) Sect. 312 report	3/1	SARA Title III	Facilities at which hazardous chemicals are present in excess of specified thresholds shall submit inventory information to the local emergency and planning commissions, state Emergency Response Commission, and local fire departments.

Table 8.1. Applicable reporting requirements (cont.)

Reporting	Deadline	Source of Requirement	Requirement
SARA Sect. 313 report	7/1	SARA Title III	Covered facilities (see above) shall report to the U.S. Environmental Protection Agency (EPA) and the state all environmental releases of specified toxic chemicals that are manufactured, processed, or otherwise used in excess of specified thresholds.
Monitoring notification for statistically significant increases of parameters of constituents	7 days	Resource Conservation and Recovery Act (RCRA) 40 CFR 264.98(g)	If there is a statistically significant increase for parameters of monitored constituents at any monitoring well at the point of compliance, this finding shall be reported to the EPA.
Compliance monitoring notification requirements	7 days	RCRA 40 CFR 264.99	If sample analysis from any monitoring well at the compliance point determines the presence of constituents in the uppermost aquifer that are not identified in the permit as hazardous constituents, the concentrations of these additional constituents shall be reported to the EPA.
Compliance monitoring notification requirements	7 days	RCRA 40 CFR 265.99	If the groundwater protection standard is being exceeded at any monitoring well at the point of compliance, EPA shall be notified of this finding.
Groundwater quality notification	7 days	RCRA 40 CFR 265.93	If analysis confirms a significant increase (or pH decrease) for indicator parameters of groundwater contamination, EPA shall be notified that the facility may be affecting groundwater quality.
Reporting of suspected releases from underground storage tanks (USTs)	24 hr	RCRA 40 CFR 280.50	The implementing agency shall be notified of: (a) discovery of releases of regulated substances, (b) unusual operating conditions, or (c) monitoring results indicating the possibility of release.
Investigations for soil and groundwater cleanup	As soon as practicable	RCRA 40 CFR 280.65(b)	In order to determine soil and groundwater contamination, investigations of releases from USTs must be submitted to the implementing agency.

Table 8.1. Applicable reporting requirements (cont.)

Reporting	Deadline	Source of Requirement	Requirement
Annual RCRA groundwater monitoring report	3/1	RCRA 40 CFR 265 TDEC 1200-1- 11.05(6)	Summarizes results of RCRA groundwater monitoring program.
Biological monitoring and abatement program annual report	4/1	NPDES permit	Characterizes ecology of the watersheds impacted by DOE facilities.
Toxicity control and monitoring program report	Quarterly	NPDES permit	Provides toxicity test methods and results for DOE facilities liquid effluents and streams.
Radiological monitoring data	Quarterly	NPDES permit	Submit results as an addendum to the NPDES Discharge Monitoring Report.
Sanitary sewer monitoring data	Quarterly	City of Oak Ridge permit	Submit monitoring results in accordance with the City of Oak Ridge Industrial and Commercial User Wastewater Discharge Permit.
Waste tracking system progress report	Quarterly	Tennessee Oversight Agreement	Tracks hazardous, radioactive, and mixed wastes from generation to disposal at the Oak Ridge Reservation (ORR) and waste shipment off-site for storage, treatment, or disposal.
Groundwater monitoring at industrial landfills	Semi-annually	Sanitary Landfill permit	Reporting of groundwater monitoring data from perimeter wells at the ORR sanitary landfills.
Storm water monitoring data	Annually	NPDES permit	Submit results as an addendum to the NPDES Discharge Monitoring Report.

*Covering previous calendar year.

8.3 *REGULATORY GUIDE* PERFORMANCE CRITERIA

- a. **DOE officials and DOE Management and Operating Contractors *should** identify and comply with the relevant reporting requirements.**

One organization at each of the facilities on ORR has the responsibility for identifying reporting requirements and ensuring that the reporting schedules are met. The reporting responsibility for ORR environmental surveillance resides with ORNL.

- b. **Timely notification of occurrences and information involving DOE and its contractors *should** be made to the appropriate DOE officials and to other responsible authorities.**

The requirements for occurrence reporting are resident in DOE Order 232.1-1A, *Occurrence Reporting and Processing of Operations Information*. These requirements have been implemented and the timeliness of occurrence reporting is consistent with the specifications of the DOE Orders.

- c. **Auditable records relating to environmental surveillance and effluent monitoring *should** be maintained. Calculations, computer programs, and other data handling *should** be recorded or referenced.**

Environmental monitoring data are managed in accordance with SOPs of the responsible organizations and consistent with the QA program in Sect. 9.

- d. **As they apply to records and reporting activities, the general QA program provisions of Chap. 10 of this guide *should** be followed.**

The activities discussed in this section are conducted by organizations that have QAPs consistent with the requirements. Additional information is provided in Sect. 9 of this EMP.