



EPCRA SARA TITLE III REPORTING

Region 8 Sustainability & Environmental Management System

1.0 Purpose & Scope

The purpose of the Emergency Planning and Community Right-to-Know Act (EPCRA), also known as Superfund Amendments and Reauthorization Act (SARA) Title III was to provide emergency planners, responders, and the general public information regarding the use, storage, production, and release of hazardous chemicals in their community. EPCRA established requirements for reporting on hazardous and toxic chemicals. It provides access to information on chemicals to improve chemical safety and protect public health and the environment. The program will ensure compliance with Federal, State, local, and GSA requirements.

2.0 Activities & Departments Affected

This procedure affects all GSA personnel and contractors who store greater than 10,000 pounds of hazardous chemicals and/or greater than 500 pounds or the Threshold Planning Quantity (TPQ) of extremely hazardous chemicals at GSA facilities in Region 8. A list of the TPQ is found in EPCRA Section 302.

3.0 Exclusions

None

4.0 Forms Used & Permits Required: (include reporting requirements)

☐ **Federal and State Forms and Permits:**

- EPA Tier II Emergency and Hazardous Chemical Inventory Form or equivalent

☐ **In-house GSA Region 8 and Contractor Forms:** None

5.0 Acronyms, Abbreviations and Definitions

Acronyms	Meaning
EPA	Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
GSA	General Service Administration
LEPC	Local Emergency Planning Committee
MSDS	Material Safety Data Sheets
O&M	Operations and Maintenance
PBS	Public Building Services
SARA	Superfund Amendments and Reauthorization Act
SERC	State Emergency Response Commission
TPQ	Threshold Planning Quantity

Definitions:

Local Emergency Planning Committee (LEPC): A committee appointed by the state



EPCRA SARA TITLE III REPORTING

Region 8 Sustainability & Environmental Management System

emergency response commission, as required by SARA Title III, to formulate a comprehensive emergency plan for its jurisdiction.

State Emergency Response Commission (SERC): Commission appointed by each state governor according to the requirements of SARA Title III. The SERCs designate emergency planning districts, appoint local emergency planning committees, and supervise and coordinate their activities.

6.0 Procedure

State Specific Procedure:

STATE	SARA TITLE III - TIER II REPORTING REQUIREMENT
Colorado	Colorado Emergency Planning Commission c/o Colorado Department of Public Health & Environment, requests that facilities using Tier2 Submit 2009 submit electronically via email http://www.cdphe.state.co.us/oeis/sara/index.html
Montana	Two Departments: Disaster and Emergency Services: http://dma.mt.gov/des/ Montana Department of Environmental Quality: http://deq.mt.gov/Tier2.mcpx
North Dakota	North Dakota Department of Emergency Services, Division of Homeland Security, Hazardous Chemicals Preparedness & Response Program requires facilities to use their new online reporting tool. Use the website link above to access the system: http://www.nd.gov/DES/planning/haz-chem/default.asp
South Dakota	South Dakota Dept. Environment and Natural Resources, facilities must submit a paper (hardcopy) Tier II form, either the South Dakota Tier II Reporting form, the standard Federal Tier II form, or a paper form generated from the Tier2 Submit software: http://denr.sd.gov/des/gw/SARATitleIII/Sara_Title_III.aspx
Utah	The Utah Department of Environmental Quality (UDEQ), Division of Environmental Response and Remediation is tasked by state statute to manage EPCRA data for the Utah State Emergency Response Commission (SERC). UDEQ prefers that each facility use EPA's Tier2Submit software application for the current reporting year. UDEQ will accept Tier2Submit electronic file submissions via email attachment, or submissions on diskette, or paper through regular mail (UDEQ does not offer on-line direct internet form submission). UDEQ will reply in kind to submissions (of Tier2Submit electronic files only) made by email with an acknowledgment of receipt only. Email acknowledgment does not constitute validity of the data and a followup notification will be made to the facility if UDEQ encounters problems with data. When using the Tier2Submit application, UDEQ requests that each facility enter its Utah Tier II State ID number (A facility submitting Tier II for the first time should contact UDEQ to be assigned a State ID number). See the Utah Supplemental Guidance Document: www.superfund.utah.gov/t2home.htm
Wyoming	Wyoming Office Homeland Security, requests that facilities use Tier2 Submit 2009 and submit electronically: http://wyohomelandsecurity.state.wy.us/serc.htm

Source: EPA State Tier II Reporting Requirements, <http://www.epa.gov/oem/content/epcra/statetier2.htm>

Standard Procedure:

6.0 All the following tasks are to be performed by the Property Manager and reviewed by the Industrial Hygienist (IH).



EPCRA SARA TITLE III REPORTING

Region 8 Sustainability & Environmental Management System

- 6.1 Inventory the hazardous chemicals on the site. If there is over 10,000 pounds of any chemical, it needs to be reported. Otherwise the reporting quantity for extremely hazardous chemicals varies by chemical but can range from any quantity to a maximum of 500 pounds. Most likely you do not have any extremely hazardous chemicals on the site. Also collect usage data. This should all be accomplished somewhere between December and early February each year.
- 6.2 Complete the section 312 threshold determination portion of the Tier II Inventory Form by mid-February and submit this to State Emergency Response Committee (SERC), Local Emergency Planning Committee (LEPC), and the local fire department by March 1st. Assistance filling out the form (or any mentioned in further sections below) may be obtained from the Facilities Management and Services Programs group in the Regional Office.
- 6.3 Update the section 311 list if necessary and send it to SERC, LEPC, and the local fire department within 3 months.
- 6.4 Collect additional data for section 313 thresholds in March and April and complete the section 313 threshold determination to identify toxic chemicals in May.
- 6.5 Collect data needed to estimate releases and complete a Form R for each toxic chemical in May.
- 6.6 Submit the section 313 Form R reports via TRI-MEweb to EPA and to SERC (through what every method they use) by July 1st.
- 6.7 Watch for TRI Facility Data Profile (FDP) and respond to any issues identified by the EPA in July, August, and September.
- 6.8 Review section 302 notification whenever a change is identified in July through September and submit an update to SERC and LEPC if required within 30 days.
- 6.9 All forms and data should be stored on the P drive.

7.0 Records Management

- Completed Tier II Inventory Form
- Documentation recording dates of inventory review and persons conducting the review
- Documentation confirming the dissemination of forms.



EPCRA SARA TITLE III REPORTING

Region 8 Sustainability & Environmental Management System

8.0 References

Emergency Planning and Community Right-To-Know, Title III of the Superfund Amendments and Reauthorization Act, 42 U.S.C. 11001 et seq., Public Law 99-499, Oct. 17, 1986

EPA, Tier 2 Submit Facility Submission Guide, November 2009

EPA, List of Lists, Consolidated List of Chemicals, Subject to the Emergency Planning and Community Right-To-Know Act (EPCRA) and Section 112(r) of the Clean Air Act, EPA 550-B-01-003, October 2006

9.0 Appendices

Attachment A: EPCRA Reporting Timeline

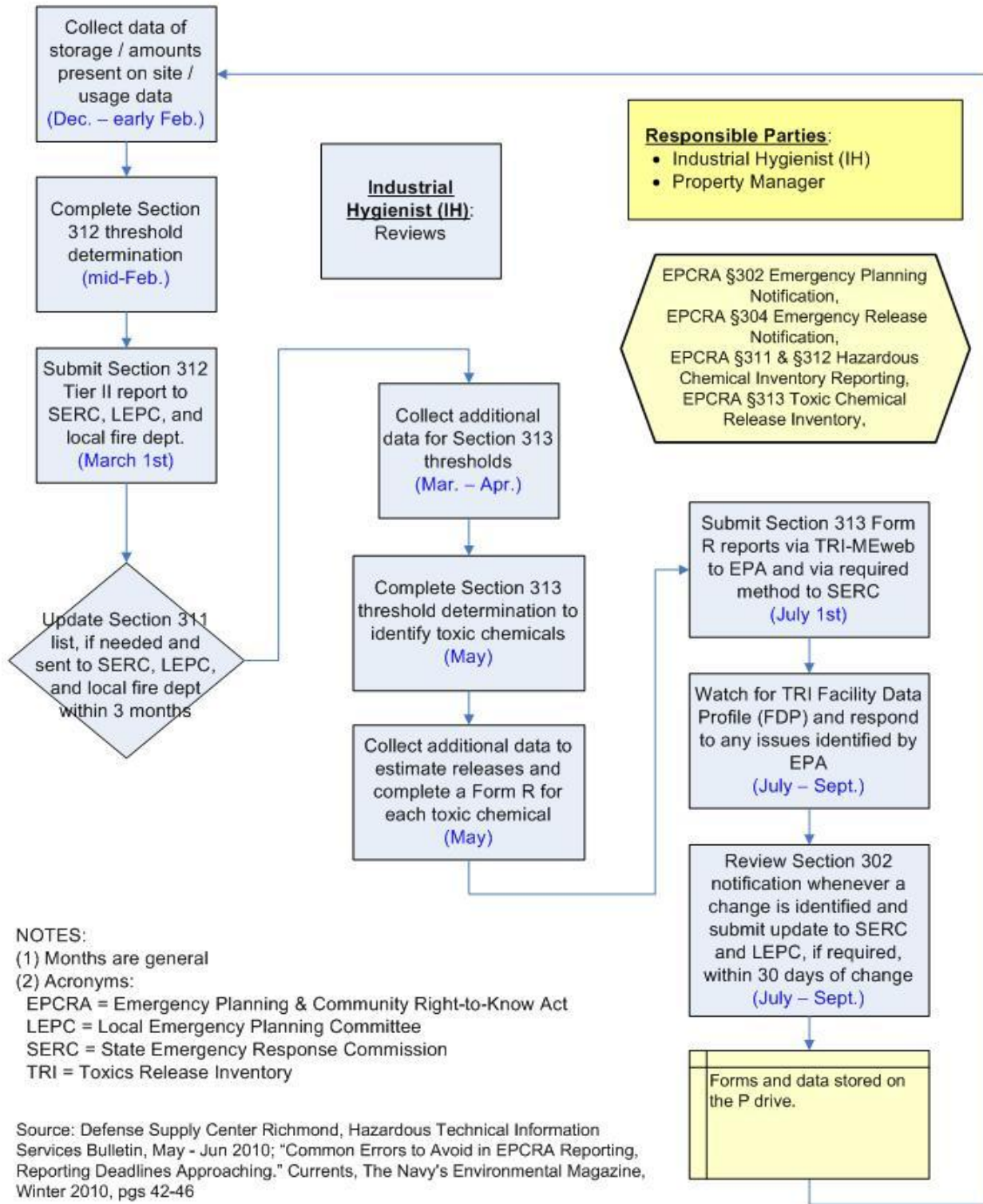
Attachment B: EPA Tier II Emergency and Hazardous Chemical Inventory Form

Document Control Information:	Approved & Dated:
EPCRA SARA Title III "Month-Date-Year".doc	RJM July 17, 2012

Document Revision and Update:		
Revision Date	Nature of Revision	Revision made by:
01/04/2010	Original	Tom Record
06/22/2010	EPA State Tier II Reporting Requirements and EPCRA Reporting Timeline added	Robert Melvin
10/14/2010	Add definitions	Robert Melvin
05/16/2012	Emphasize Roles and Responsibilities in section 6, update flowchart	Nick Gutschow

Attachment A: EPCRA Reporting Timeline

Property Manager:



NOTES:

(1) Months are general

(2) Acronyms:

EPCRA = Emergency Planning & Community Right-to-Know Act

LEPC = Local Emergency Planning Committee

SERC = State Emergency Response Commission

TRI = Toxics Release Inventory

Source: Defense Supply Center Richmond, Hazardous Technical Information Services Bulletin, May - Jun 2010; "Common Errors to Avoid in EPCRA Reporting, Reporting Deadlines Approaching." Currents, The Navy's Environmental Magazine, Winter 2010, pgs 42-46

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EPCRA SARA TITLE III REPORTING

Region 8 Sustainability & Environmental Management System

ATTACHMENT B: EPA Tier II Emergency and Hazardous Chemical Inventory Form

Form Approved OMB No. 2050-0072

Tier Two EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY <i>Specific Information by Chemical</i>	Facility Identification Name <u>General Services Administration</u> Street _____ City _____ County _____ State _____ Zip _____ NAICS Code _____ Dun & Brad Number _____			Owner/Operator Name Name <u>General Services Administration</u> Phone <u>()</u> Mail Address _____														
	FOR OFFICIAL USE ONLY ID # _____ Date Received _____			Emergency Contact Name _____ Title _____ Phone <u>()</u> 24 Hr. Phone <u>()</u> Name _____ Title _____ Phone <u>()</u> 24 Hr. Phone <u>()</u>														
	Important: Read all instructions before completing form			Reporting Period From January 1 to December 31, 20____														
Chemical Description		Physical and Health Hazards <i>(check all that apply)</i>	Inventory	Container Type Pressure Temperature	Storage Codes and Locations (Non-Confidential) <i>Storage Locations</i>	Optional												
CAS _____ Trade Secret _____ Chem. Name _____ Check all that apply ☐ Pure ☐ Mix ☐ Solid ☐ Liquid ☐ Gas ☐ EHS EHS Name _____		☐ Fire ☐ Sudden Release of Pressure ☐ Reactivity ☐ Immediate (acute) ☐ Delayed (chronic)	Max. Daily Amount (code) Avg. Daily Amount(code) No. of Days On-site (days)	<table border="1" style="width:100%; border-collapse: collapse;"> <tr><td style="width:33px; height:20px;"></td><td style="width:33px; height:20px;"></td><td style="width:33px; height:20px;"></td></tr> <tr><td style="height:20px;"></td><td style="height:20px;"></td><td style="height:20px;"></td></tr> <tr><td style="height:20px;"></td><td style="height:20px;"></td><td style="height:20px;"></td></tr> <tr><td style="height:20px;"></td><td style="height:20px;"></td><td style="height:20px;"></td></tr> </table>													_____ _____ _____ _____ _____	☐
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Certification (Read and sign after completing all sections) I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages one through _____, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. Name and official title of owner/operator OR owner/operator's authorized representative _____ Signature _____ Date signed _____				Optional Attachments ☐ I have attached a site plan ☐ I have attached a list of site coordinate abbreviations ☐ I have attached a description of dikes and other safeguards measures														