



PTSA

Petroleum Transportation & Storage Association

COMPLIANCE KIT FOR PETROLEUM MARKETERS

TIER II REPORTS

EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT (EPCRA)

ANNUAL REPORTING REQUIREMENTS FOR BULK PLANTS, MARINAS, FLEET FUELING SYSTEMS AND CERTAIN RETAIL OUTLETS

Prepared By

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Petroleum Transportation & Storage Association

COMPLIANCE BULLETIN

January 26, 2006

2006 EPCRA TIER II INVENTORY REPORTING

ISSUE: The EPA requires bulk plant operators to report to local emergency authorities the identity, location and quantity of hazardous materials located on site by March 1 of each year. The information must be included on an EPA Emergency Planning and Community Right to Know (EPCRA) Tier II Inventory Reporting Form. EPCRA Tier II Forms must also be filed for marinas and fleet fueling facilities. Retail fueling facilities with storage capacity less than 75,000 gallons of gasoline and/or 100,000 gallons of diesel fuel, are exempt from filing Tier II reports.

COMPLIANCE:

- EPCRA Tier II Inventory Reporting Forms for bulk plants, marinas and fleet fueling facilities that stored more than 10,000 pounds of hazardous chemicals at any time during the 2005 calendar year must be filed with local or state emergency response authorities no later than **March 1, 2006**. Check with local fire marshal for proper mailing address.
- Retail fueling facilities with storage capacity less than 75,000 gallons of gasoline and/or 100,000 gallons of diesel fuel are exempt from the annual Tier II inventory reporting under EPCRA. Retail facilities above these thresholds must submit EPCRA Tier II Inventory Reporting Forms.
- The following CAS designations (from MSDS sheets) must be included on EPCRA Tier II Forms:
 - **Gasoline** (CAS 8006-61-9)
 - **Diesel Fuel** (CAS 68476-34-6)
 - **Kerosene** (CAS 8008-20-6)
 - **Fuel Oil** (CAS 68476-30-2)
 - **Aviation Gasoline** (CAS Mixture)
 - **Jet A** (CAS Mixture)
 - **JP 8** (CAS Mixture)
- Most states have adopted the federal regulations and follow the new exemption thresholds. However, a few states (including Vermont, Ohio, Missouri, New Jersey, Louisiana, Nevada, Oregon and California) have promulgated their own reporting requirements or have chosen to follow the old reporting threshold of 10,000 **pounds** (1 gallon of gasoline = 6 _ lbs, 1 gallon of diesel fuel = 8 lbs, 1 gallon of Heating Oil = 7 _ lbs) for retail fueling outlets.

CAUTION: Petroleum marketers should contact their state emergency planning authority (**see contact information below**) to determine the status of reporting in their states.

FORMS: The EPCRA TIER II Reporting Form and instructions are provided below.

Got Questions? Contact Mark S. Morgan Esq. at mmorganptsa@cox.net or (202) 364-6767.

STATE EPCRA CONTACTS

To obtain specific Tier II reporting procedures and requirements in your state, please go to the state website where the reporting facility is located.

Alabama

Tier II Administration: Alabama Department of Environmental Management

Address:

P.O. Box 301463

Montgomery, AL 36130-1463

Phone: (334) 260-2700

E-Mail: kfc@adem.state.al.us

Website: <http://www.adem.state.al.us/FieldOps/TRI/TRIInformation.htm>

Arizona

Tier II Administration: Arizona Emergency Response Commission

Address:

5636 East McDowell Road

Phoenix, Arizona 85008

Phone: (602) 231-6346

E-Mail: Dan.Roe@azdema.gov

Website: <http://www.dem.state.az.us/azserc/>

Arkansas

Tier II Administration: Arkansas Department of Emergency Management

Address:

P.O. Box 758

Conway, AR 72033-0758

Phone: (501) 730-9750

Website: <http://www.adem.state.ar.us>

California

Tier II Administration: California Office of Emergency Services

Phone: HAZMAT Public Information Line (916) 845-8741

Website: <http://www.oes.ca.gov>

Colorado

Tier II Administration: Colorado Department of Public Health and Environment

Address:

Colorado Emergency Planning Commission

c/o Colorado Department of Public Health & Environment

SARA Title III -- Tier II Reports

Pollution Prevention - B2

4300 Cherry Creek Drive South

Denver, Colorado 80246-1530

Phone: (303) 692-2977

E-Mail: cdphe.PPSaraTitle3@state.co.us

Website: <http://www.cdphe.state.co.us/el/sara/tieriireports.html>

Connecticut

Tier II Administration: State Emergency Response Commission

Address:

79 Elm Street

Hartford, CT 06106-5127

Phone: (860) 424-3373

Website: <http://www.dep.state.ct.us/wst/serc/index.htm>

Delaware

Tier II Administration: State of Delaware Emergency Planning and Community Right-to-Know

Address:

Delaware EPCRA Reporting Program
Emergency Prevention and Response Branch, DNREC
156 South State Street
Dover, Delaware 19901

Phone: (302) 739-9405

Website: <http://www2.state.de.us/serc/epcra.shtml>

Florida

Tier II Administration: Florida Department of Community Affairs Emergency Management Division

Phone: (850) 413-9970

Website: <http://www.dca.state.fl.us/cps/SERC/serc.htm>

Georgia

Tier II Administration: Georgia Department of Natural Resources

Address:

7 Martin Luther King Jr. Dr. # 643
Atlanta, GA 30334

Phone: (404) 656-6905

E-Mail: kent_howell@mail.dnr.state.ga.us

Website: <http://www.gaepd.org/Documents/tier2.html>

Idaho

Tier II Administration: Idaho Bureau of Homeland Security

Address:

Idaho Bureau of Homeland Security
4040 Guard Street, Bldg. 600
Boise, ID 83705-5004

Phone: (208) 334-3460

E-Mail Inquiry: mhalverson@bhs.idaho.gov

E-mail for submitting Tier II reports: tier2@bhs.idaho.gov

Website: <http://www.bhs.idaho.gov/agency/ops/teir2.htm>

Illinois

Tier II Administration: Illinois Emergency Management Agency

Address:

Illinois Emergency Management Agency
Tier 2 Reporting
1035 Outer Park Drive
Springfield, IL 62704

Phone: (217) 782-8719

E-Mail for inquiry: Tier2Mgr@iema.state.il.us

Website: http://www.state.il.us/iema/disaster/serc_tier2.htm

Indiana

Tier II Administration: Indiana Department of Environmental Management

Phone: 317-233-0066

E-Mail: mjohnson@idem.in.gov

Website: http://www.in.gov/serv/idem_sara

Special Instructions:

Iowa

Tier II Administration: Iowa Workforce Development

Phone: 515-281-5151

E-Mail: anne.jackson@iwd.state.ia.us

Website: <http://www.iowaworkforce.org/labor/serc.htm>

Kansas

Tier II Administration: Kansas Division of Health and Environment

Phone: (785) 296-1689

E-Mail: sbangert@kdhe.state.ks.us

Website: <http://www.kdhe.state.ks.us/bar/index.html>

Louisiana

Tier II Administration: Louisiana State Police / Right-to-Know Unit

Phone: (225) 925-6113, extension 225

E-Mail: dbencaz@dps.state.la.us

Website:

LA Tier II Guidance Documents - <http://www.lsp.org/rtk.html>

Maine

Tier II Administration: Maine Emergency Management Agency

Address:

72 State House Station

Augusta, ME 04333-0072

Phone: 1-800-452-8735 (ME only)

(207) 624-4440 (outside ME)

E-Mail: maine.serc@maine.gov

Website: <http://www.maine.gov/mema>

Massachusetts

Tier II Administration: Massachusetts Emergency Management Agency

Address:

State Emergency Response Coordinator

400 Worcester Rd.

Framingham, MA 01702-5399

Phone: (508) 820-2000

E-Mail: Elaine.Denniston@state.ma.us

Website: <http://www.mass.gov/mema>

Michigan

Tier II Administration: Michigan Department of Environmental Quality

Phone: (517) 373-8481

Website: http://www.michigan.gov/deq/0,1607,7-135-3307_3667_4139-17480--CI,00.html

Minnesota

Tier II Administration: Tier II Administration: Minnesota Emergency Planning and Community Right-to-Know Act (EPCRA) Program

Address: 444 Cedar Street - Suite 223 St. Paul, MN 55101-6223

Phone: (651)297-7372

E-Mail: Steve.Tomlyanovich@state.mn.us

Website: <http://www.epcra.state.mn.us>

Special Instructions:

The SARA Title III Information Packet including information on state related fees and other information can be obtained from our website at

<http://www.epcra.state.mn.us>

Mississippi

Tier II Administration: Mississippi Emergency Management

Phone: (601) 352-9100

E-Mail: lwesley@msema.org

Website: <http://www.msema.org/pte/hazmat.htm>

Missouri

Tier II Administration: Missouri Emergency Response Commission

Address:

2302 Militia Drive

PO Box 3133

Jefferson City, MO 65102

Phone: 800-780-1014

E-Mail: bdopp01@mail.state.mo.us

Website: <http://hazmat.dps.state.mo.us>

Montana

Tier II Administration (2 Depts) : Disaster and Emergency Services

Address:

P.O. Box 4789

1100 North Last Chance Gulch

Helena, Mt 59604

Email: Sherri Lanz- sheris@state.mt.us

Website: <http://www.state.mt.us/dma/des/>

Nebraska

Tier II Administration: Nebraska Department of Environmental Quality

Address:

1200 N Street, Suite 400

PO Pox 98922

Lincoln, Nebraska 68509

Phone: 402-471-2186

Website: <http://www.deq.state.ne.us/EAD.nsf/Pages/NEPCRA>

New Hampshire

Tier II Administration: Office of Emergency Management

Address:

NH Department of Safety

Division of Fire Safety & Emergency Management

Bureau of Emergency Management

33 Hazen Drive

Concord, NH 03305

Phone: (603) 271-2231

E-Mail: wfoote@nhoem.state.nh.us

New Jersey

Tier II Administration: New Jersey Department of Environmental Protection

Website: <http://www.state.nj.us/dep/enforcement/relprev/crtk/index.html>

New Mexico

Tier II Administration: New Mexico Office of Emergency Management

Address:

State Emergency Response Commission

Hazardous Materials Program

P.O. Box 1628

Santa Fe, NM 87504

Phone: (505) 476-9681

Website: <http://www.dps.nm.org/emergency/>

New York

Tier II Administration: New York State Emergency Response Commission

Address:

1220 Washington Avenue, Building 22, Suite 101

Albany, New York 12226-2251

Phone: 518-457-8900

Website: <http://www.nysemo.state.ny.us/SERC/Default.htm>

North Carolina

Tier II Administration: North Carolina Division of Emergency Management

Address:

4714 Mail Service Center

Raleigh, NC 27699-4714

Phone: 919-715-4406

E-Mail: fpowell@ncem.org

Website: <http://www.ncem.org/SERC/downloads.htm>

North Dakota

Tier II Administration: North Dakota Division of Homeland Security

Address: North Dakota Department of Emergency Services

Division of Homeland Security

Hazardous Chemicals Preparedness & Response Program Coordinator

P.O. Box 5511

Bismarck, ND 58506-5511

Phone: 701-328-8112

E-Mail: rdeboer@state.nd.us

Website: <http://www.state.nd.us/des/reports/sara.html>

Ohio

Tier II Administration: Ohio Environmental Protection Agency

Address:

Phone: (614) 644-2269

E-Mail: jeff.beattie@epa.state.oh.us

Website: <http://www.epa.state.oh.us/dapc/serc>

Oklahoma

Tier II Administration: Oklahoma Department of Environmental Quality

Address:

DEQ Customer Service

Monty Elder

P.O. 1677

Oklahoma City, OK 73101

or FedEx to:

707 N. Robinson

Oklahoma City, OK 73101

Phone: 405-702-1013

E-Mail: tom.bergman@deq.state.ok.us

Website: <https://www.deq.state.ok.us/CSDnew/saratitleiii/tierii.htm>

Oregon

Tier II Administration: Hazard Substances Information Survey

Address:

Office of State Fire Marshal

Community Right to Know Unit

4760 Portland Rd NE

Salem Or 97305-1760

Phone: (503) 378-6835

E-Mail: SFM.CR2K@state.or.us.

Website: http://www.sfm.state.or.us/CR2K/CR2K_Reports/Haz_Sub_Rept_Default_Pg.htm

Pennsylvania

Tier II Administration: Department of Labor and Industry

Phone: 717-787-2516

E-Mail: edavenport@state.pa.us

Website: <http://www.dli.state.pa.us/landi/cwp/view.asp?a=1444&Q=65642>

Rhode Island

Tier II Administration: Rhode Island Department of Labor and Training Division of Occupational

Safety

Address: 1511 Pontiac Ave. P.O. Box 20157 Cranston, RI 02920-0942

Phone: 401-462-8559

E-Mail: jarisa@dlt.state.ri.us

Website: <http://www.dlt.state.ri.us/webdev/osha/EPCRA.htm>

South Carolina

Tier II Administration: Bureau of Air Quality

Address:

SCSERC EPCRA Reporting Point

2600 Bull St.

Columbia SC, 29201

Phone: 803-898-3849

E-Mail: EPCRA@dhec.sc.gov

Website: <http://www.scdhec.gov/eqc/baq/html/eqepcra.html>

South Dakota

Tier II Administration: South Dakota Dept. Environment and Natural Resources

Address:

Joe Foss Building

523 E Capitol

Pierre, SD 57501

Phone: (800) 433-2288

E-Mail: LeeAnn.Smith@state.sd.us

Website: <http://www.state.sd.us/denr/DES/Ground/SARATitleIII/SARATitleIII.htm>

Tennessee

Tier II Administration: Tennessee Emergency Response Council

Address: 3041 Sidco Dr. Nashville, TN 37204

Phone: 615-741-2986

E-Mail: beaves@tnema.org

Texas

Tier II Administration: Texas Department of State Health Services, Tier II Chemical Reporting Program

Phone: 512-834-6603 or 1-800-452-2791 (toll-free within the state of Texas)

E-Mail: paula.mckinney@dshs.state.tx.us

Website: <http://www.texastiertwo.com>

Utah

Tier II Administration: Utah Division of Environmental Response and Remediation

Address:

168 North 1950 West

P.O. Box 144840

Salt Lake City, Utah 84116

Phone: (801) 536-4143

Website: <http://superfund.utah.gov/serc/t2home.htm>

Vermont

Tier II Administration: Vermont Department of Public Safety

Address:

VT Dept of Safety

Atten: Randy Bronson

103 South Main Street

Waterbury, VT 05671-2101

Phone: (802) 244-8721

E-Mail: rbronson@dps.state.vt.us

Website: http://www.dps.state.vt.us/vem/index_hazmat.htm

Virginia

Tier II Administration: Virginia Department of Environmental Quality

Address:

VA DEQ SARA Title III Program
629 East Main St. Richmond, VA 23219

Post Office Box:

P.O. Box 10009
Richmond, VA 23240-0009

Phone: (804) 698-4489**E-Mail:** drhuang@deq.state.va.us**Website:** <http://www.deq.state.va.us/sara3/311312.html>**Washington****Tier II Administration:** Community Right-to-Know Unit**Address:** PO Box 47659 Olympia WA 98504-7659**Phone:** 1-800-633-7585**E-mail:** swhi461@ecy.wa.gov**Website:** <http://www.ecy.wa.gov/epcra/>**West Virginia****Tier II Administration:** West Virginia Office of Emergency Services**Address:**

1900 Kanawha Blvd
Bldg # 1 Room EB80
Charleston, WV 25305

Phone: (304) 558-5380**E-Mail:** lmuncy@wvoes.state.wv.us**Website:** <http://www.state.wv.us/wvoes>**Wisconsin****Tier II Administration:** Wisconsin Emergency Management EPCRA Program Resources**Phone:** (608) 242-3221**E-mail:** dawn.foss@dma.state.wi.us**Website:** <http://emergencymanagement.wi.gov/sublink.asp?linksubcat2id=12&locid=18>**Wyoming****Tier II Administration:** Wyoming Office Homeland Security - Emergency Management Agency**Address:**

Herschler Building 1st Floor East
122 W 25th Street
Cheyenne, WY 82002

Phone: 307-777-7540**E-Mail:** klee@state.wy.us**Website:** <http://wyohomelandsecurity.state.wy.us>**Washington DC****Tier II Administration:** DC Emergency Management Agency**Phone:** (202) 673-2101**E-Mail:** michele.penick@dc.gov**EPCRA TIER II FORM AND INSTRUCTIONS****EPA TIER TWO INSTRUCTIONS****GENERAL INFORMATION AND INSTRUCTIONS**

Submission of this Tier Two form (when requested) is required by Title III of the Superfund Amendments and Reauthorization Act of 1986, Section 312, Public Law 99-499, codified at 42 U.S.C. Section 11022. The purpose of this Tier Two form is to provide State and local

officials and the public with specific information on hazardous chemicals present at your facility during the past year.

CERTIFICATION

The owner or operator or the officially designated representative of the owner or operator must certify that all information included in the Tier Two submission is true, accurate, and complete. On the first page of the Tier Two report, enter your full name and official title. Sign your name and enter the current date. Also, enter the total number of pages included in the Confidential and Non-Confidential Information Sheets as well as all attachments. An original signature is required on at least the first page of the submission. Submissions to the SERC, LEPC, and fire department must each contain an original signature on at least the first page. Subsequent pages must contain either an original signature, a photocopy of the original signature, or a signature stamp. Each page must contain the date on which the original signature was affixed to the first page of the submission and the total number of pages in the submission.

YOU MUST PROVIDE ALL INFORMATION REQUESTED ON THIS FORM TO FULFILL TIER TWO REPORTING REQUIREMENTS.

This form may also be used as a worksheet for completing the Tier One form or may be submitted in place of the Tier One form.

WHO MUST SUBMIT THIS FORM

Section 312 of Title III requires that the owner or operator of a facility submit their Tier Two form if so requested by a State emergency response commission, a local emergency planning committee, or a fire department with jurisdiction over the facility.

This request may apply to the owner or operator of any facility that is required, under regulations implementing the Occupational Safety and Health Act of 1970, to prepare or have available a Material Safety Data Sheet (MSDS) for a hazardous chemical present at the facility. MSDS requirements are specified in the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard, found in Title 29 of the Code of Federal Regulations at 1910.1200.

This form does not have to be submitted if all of the chemicals located at your facility are excluded under Section 311(e) of Title III.

WHAT CHEMICALS ARE INCLUDED

If you are submitting Tier Two forms in lieu of Tier One, you must report the required information on this Tier Two form for each hazardous chemical present at your facility in quantities equal to or greater than established threshold amounts (discussed below), unless the chemicals are excluded under Section 311(e) of Title III. Hazardous chemicals are any substance for which your facility must maintain an MSDS under OSHA's Hazard Communication Standard.

If you elect to submit Tier One rather than Tier Two, you may still be required to submit Tier Two information upon request.

WHAT CHEMICALS ARE EXCLUDED

Section 311(e) of Title III excludes the following substances:

- I. Any food, food additive, color additive, drug, or cosmetic regulated by the Food and Drug Administration:

- II. Any substance present as a solid in any manufactured item to the extent exposure to the substance does not occur under normal conditions of use;
- III. Any substance to the extent it is used for personal, family, or household purposes, or is present in the same form and concentration as a product packaged for distribution and use by the general public;
- IV. Any substance to the extent it is used in a research laboratory or a hospital or other medical facility under the direct supervision of a technically qualified individual;
- V. Any substance to the extent it is used in routine agricultural operations or is a fertilizer held for sale by a retailer to the ultimate customer.

OSHA regulations, Section 1910.1200(b), stipulate exemptions from the requirement to prepare to have available an MSDS.

REPORTING THRESHOLDS

Minimum thresholds have been established for Tier One/ Tier Two reporting under Title III, Section 312. These thresholds are as follows:

For Extremely Hazardous Substances (EHSs) designated under Section 302 of Title III, the reporting threshold is 500 pounds (or 227 kg.) or the threshold planning quantity (TPQ), whichever is lower.

For all other hazardous chemicals for which facilities are required to have or prepare an MSDS, the minimum reporting threshold is 10,000 pounds (or 4,540 kg.).

You need to report hazardous chemicals that were present at your facility at any time during the previous calendar year at levels that equal or exceed these thresholds. For instructions on threshold determinations for components of mixtures, see "What About Mixtures?" on page 2 of these instructions.

A requesting official may limit the responses required under Tier Two by specifying particular chemicals or groups of chemicals. Such requests apply to hazardous chemicals regardless of established thresholds.

INSTRUCTIONS

Please read these instructions carefully. Print or type all responses.

WHEN TO SUBMIT THIS FORM

Owners or operators of facilities that have hazardous chemicals on hand in quantities equal to or greater than set threshold levels must submit either Tier One or Tier Two forms by March 1.

If you choose to submit Tier One, rather than Tier Two, be aware that you may have to submit Tier Two Information later,

upon request of any authorized official. You must submit the Tier Two form within 30 days of receipt of a written request.

WHERE TO SUBMIT THIS FORM

Send either a completed Tier One form or Tier Two form(s) to each of the following organizations:

1. Your State Emergency Response Commission.

2. Your Local Emergency Planning Committee.
 3. The fire department with jurisdiction over your facility.
- If a Tier Two form is submitted in response to a request, send the completed form to the requesting agency.

PENALTIES

Any owner or operator who violates any Tier Two reporting requirements shall be liable to the United States for a civil penalty of up to \$25,000 for each such violation. Each day a violation continues shall constitute a separate violation.

If your Tier Two responses require more than one page, use additional forms and fill in the page number at the top of the form.

REPORTING PERIOD

Enter the appropriate calendar year, beginning January 1 and ending December 31.

FACILITY IDENTIFICATION

Enter the full name of your facility (and company identifier where appropriate).

Enter the full street address or state road. If a street address is not available, enter other appropriate identifiers that describe the physical location of your facility (e.g., longitude and latitude). Include city, county, state and zip code.

Enter the primary Standard Industrial Classification (SIC) code and the Dun & Bradstreet number for your facility. The financial officer of your facility should be able to provide the Dun & Bradstreet number. If your firm does not have this information, contact the State or regional office of Dun & Bradstreet to obtain your facility number or have one assigned.

OWNER/OPERATOR

Enter the owner's or operator's full name, mailing address, and phone number.

EMERGENCY CONTACT

Enter the name, title, and work phone number of at least one local person or office who can act as a referral if emergency responders need assistance in responding to a chemical accident at the facility.

Provide an emergency phone number where such emergency information will be available 24 hours a day, everyday. The requirement is mandatory. The facility must make some arrangement to ensure that a 24 hour contact is available.

IDENTICAL INFORMATION

Check the box indicating identical information, located below the emergency contacts on the Tier Two form, if the current chemical information being reported is identical to that submitted last year. Chemical descriptions, hazards, amounts, and locations must be provided in this year's form, even if the information is identical to that submitted last year.

CHEMICAL INFORMATION: Description, Hazards, Amounts, and Locations

The main section of the Tier Two form requires specific information on amounts and locations of hazardous chemicals, as defined in the OSHA Hazard Communication Standard.

If you choose to indicate that all of the information on a specific hazardous chemical is identical to that submitted last year, check the appropriate optional box provided at the right side of the storage codes and locations on the Tier Two form. Chemical descriptions, hazards, amounts, and locations must be provided even if the information is identical to that submitted last year.

- What units should I use?

Calculate all amounts as *weight in pounds*. To convert gas or liquid volume to weight in pounds, multiply by an appropriate density factor.

- What about mixtures?

If a chemical is part of a mixture, *you have the option* of reporting either the weight of the entire mixture or only the portion of the mixture that is a particular hazardous chemical (e.g., if a hazardous solution weighs 100 lbs. but is composed of only 5% of a particular hazardous chemical, you can indicate either 100 lbs. of the mixture or 5 lbs. of the chemical).

The option used for each mixture must be consistent with the option used in your Section 311 reporting.

Because EHSs are important to Section 303 planning, EHSs have lower thresholds. The amount of an EHS at a facility (both pure EHS substances and EHSs in mixtures) must be aggregated for purposes of threshold determination. It is suggested that the aggregation calculation be done as a first step in making the threshold determination. Once you determine whether a threshold for an EHS has been reached, you should report either the total weight of the EHS at your facility, or the weight of each mixture containing the EHS.

CHEMICAL DESCRIPTION

1. Enter the Chemical Abstract Service registry number (CAS). For mixtures, enter the CAS number of the mixture as a whole if it has been assigned a number distinct from its constituents. For a mixture that has no CAS number, leave this item blank or report the CAS numbers of as many constituent chemicals as possible.

If you are withholding the name of a chemical in accordance with criteria specified in Title III, Section 322, enter the generic class or category that is structurally descriptive of the chemical (e.g., list toluene diisocyanate as organic isocyanate) and check the box marked Trade Secret. Trade secret information should be submitted to EPA and must include a substantiation. Please refer to EPA's final regulation on trade secrecy (53 FR 28772, July 29, 1988) for detailed information on how to submit trade secrecy claims.

1. Enter the chemical name or common name of each hazardous chemical.
2. Check box for ALL applicable descriptors: pure or mixture; and solid, liquid, or gas; and whether the chemical is or contains an EHS.
3. If the chemical is a mixture containing an EHS, enter the chemical name of each EHS in the mixture.

EXAMPLE:

You have pure chlorine gas on hand, as well as two mixtures that contain liquid chlorine. You write "chlorine" and enter the CAS number. Then you check "pure" and "mix" -- as well as "liquid" and "gas".

**Hazard Category Comparison
For Reporting Under Sections 311 and 312**

EPA's Hazard Categories	OSHA's Hazard Categories
Fire Hazard	Flammable Combustion Liquid Pyrophoric Oxidizer
Sudden Release of Pressure	Explosive Compressed Gas
Reactive	Unstable Reactive Organic Peroxide Water Reactive
Immediate (Acute) Health Hazards	Highly Toxic Toxic Irritant Sensitizer Corrosive
	Other hazardous chemicals with an adverse effect with short term exposure
Delayed (Chronic) Health Hazard	Carcinogens
	Other hazardous chemicals with an adverse effect with long term exposure

PHYSICAL AND HEALTH HAZARDS

For each chemical you have listed, check all the physical and health hazard boxes that apply. These hazard categories are defined in 40 CFR 370.2. The two health hazard categories and three physical hazard categories are a consolidation of the 23 hazard categories defined in the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

MAXIMUM AMOUNT

1. For each hazardous chemical, estimate the greatest amount present at your facility on any single day during the reporting period.
2. Find the appropriate range value code in Table I.
3. Enter this range value as the Maximum Amount.

Table I REPORTING RANGES

Range	Weight Range in Pounds	
Value	From...	To...
01	0	99
02	100	999
03	1,000	9,999
04	10,000	99,999
05	100,000	999,999
06	1,000,000	9,999,999
07	10,000,000	49,999,999
08	50,000,000	99,999,999
09	100,000,000	499,999,999
10	500,000,000	999,999,999
11	1 billion	higher than 1 billion

If you are using this form as a worksheet for completing Tier One, enter the actual weight in pounds in the shaded space below the response blocks. Do this for both Maximum Amount and Average Daily Amount.

EXAMPLE:

You received one large shipment of a solvent mixture last year. The shipment filled five 5,000-gallon storage tanks. You know that the solvent contains 10% benzene, which is a hazardous chemical.

You figure that 10% of 25,000 gallons is 2,500 gallons. You also know that the density of benzene is 7.29 pounds per gallon, so you multiply 2,500 gallons by 7.29 pounds per gallon to get a weight of 18.225 pounds.

Then you look at Table I and find that the range value 04 corresponds to 18.225. You enter 04 as the Maximum Amount.

(If you are using the form as a worksheet for completing a Tier One form, you should write 18.255 in the shaded area.)

AVERAGE DAILY AMOUNT

1. For each hazardous chemical, estimate the average weight in pounds that was present at your facility during the year. To do this, total all daily weights and divide by the number of days the chemical was present on the site.

1. Find the appropriate range value in Table I.
2. Enter this range value as the Average Daily Amount.

EXAMPLE:

The 25,000-gallon shipment of solvent you received last year was gradually used up and completely gone in 315 days. The sum of the daily volume levels in the tank is 4,536,000 gallons. By dividing 4,536,000 gallons by 315 days on-site, you calculate an average daily amount of 14,400 gallons.

You already know that the solvent contains 10% benzene, which is a hazardous chemical. Since 10% of 14,400 is 1,440, you figure that you had an average of 1,440 gallons of benzene. You also know that the density of benzene is 7.29 pounds per gallon, so you multiply 1,440 by 7.29 to get a weight of 10,500 pounds.

Then you look at Table I and find that the range value 04 corresponds to 10,500. You enter 04 as the Average Daily Amount.

(If you are using the form as a worksheet for completing Tier One form, you should write 10,500 in the shaded area.)

NUMBER OF DAYS ON-SITE

Enter the number of days that the hazardous chemical was found on-site.

EXAMPLE:

The solvent composed of 10% benzene was present for 315 days at your facility. Enter 315 in the space provided.

STORAGE CODES AND STORAGE LOCATIONS

List all non-confidential chemical locations in the column, along with storage types/conditions associated with each location. Please note that a particular chemical may be located in several places around the facility. Each row of boxes followed by a line represents a unique location for the same chemical.

Storage Codes: Indicate the types and conditions of storage present:

- a. Look at Table II. For each location, find the appropriate storage type and enter the corresponding code in the first box.
- b. Look at Table III. For each location, find the appropriate storage types for pressure and temperature conditions. Enter the applicable pressure code in the second box. Enter the applicable temperature code in the third box.

Table II - STORAGE TYPES

CODES	Types of Storage
A	Above ground tank
B	Below ground tank
C	Tank inside building
D	Steel drum
E	Plastic or non-metallic drum
F	Can
G	Carboy
H	Silo
I	Fiber drum
J	Bag
K	Box
L	Cylinder
M	Glass bottles or jugs
N	Plastic bottles or jugs
O	Tote bin
P	Tank wagon
Q	Rail car
R	Other

Table III - PRESSURE AND TEMPERATURE CONDITIONS

CODES	Storage Conditions
	(PRESSURE)
1	Ambient pressure
2	Greater than ambient pressure
3	Less than ambient pressure
	(TEMPERATURE)
4	Ambient temperature
5	Greater than ambient temperature
6	Less than ambient temperature but not cryogenic
7	Cryogenic conditions

EXAMPLE:

The benzene in the main building is kept in a tank inside the building, at ambient pressure and less than ambient temperature.

Table II shows you that the code for a tank inside a building is C. Table III shows you that the code for ambient pressure is 1, and the code for less than ambient temperature is 6.

You enter:	C	1	6
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STORAGE LOCATIONS:

Provide a brief description of the precise location of the chemical, so that emergency responders can locate the area easily. You may find it advantageous to provide the optional site plan or site coordinates as explained below.

For each chemical, indicate at a minimum the building or lot. Additionally, where practical, the room or area may be indicated. You may respond in narrative form with appropriate site coordinates or abbreviations.

If the chemical is present in more than one building, lot, or area location, continue your responses down the page as needed. If the chemical exists everywhere at the plant site simultaneously, you may report that the chemical is ubiquitous at the site.

Optional attachments: If you choose to attach one of the following, check the appropriate Attachments box at the bottom of the Tier Two form.

- a. A *site plan* with site coordinates indicated for buildings, lots, areas, etc. throughout your facility.
- b. A *list of site coordinate abbreviations* that correspond to buildings, lots, areas, etc. throughout your facility.
- c. A *description of dikes and other safeguard measures* for storage locations throughout your facility.

EXAMPLE:

You may have benzene in the main room of the main building, and in tank 2 in tank field 10. You attach a site plan with coordinates as follows: main building = G-2, tank field 10 = B-6. Fill in the Storage Location as follows:

B-6 [Tank 2] G-2 [Main Room]

CONFIDENTIAL INFORMATION

Under Title III, Section 324, you may elect to withhold location information on a specific chemical from disclosure to the public. If you choose to do so:

- Enter the word “confidential” in the Non-Confidential Location section of the Tier Two form on the first line of the storage locations.
- On a separate Tier Two Confidential Location Information Sheet, enter the name and CAS number of each chemical for which you are keeping the location confidential.
- Enter the appropriate location and storage information, as described above for non-confidential locations.
- Attach the Tier Two Confidential Location Information Sheet to the Tier Two form. This separates confidential locations from other information that will be disclosed to the public.

CERTIFICATION

Instructions for this section are included on page one of these instructions.

See EPCRA Tier II Form Below

	Facility Iden	
	Name	<small> Confidential Type Pressure Temperature Optional </small>
Tier Two	Street	
EMERGENCY	City	
AND		
HAZARDOUS	SIC Code	
CHEMICAL		
INVENTORY		
<i>Specific</i>		

EHS Name
Trade
CAS
Chem. Name
<i>Check all</i>
<i>that apply</i>
EHS Name
Certification (Read and sign after completing all sections)
I certify under penalty of law that I have personally examined and am familiar
on my inquiry of those individuals responsible for obtaining the information, I
complete.