



EPCRA & Tier II Reporting

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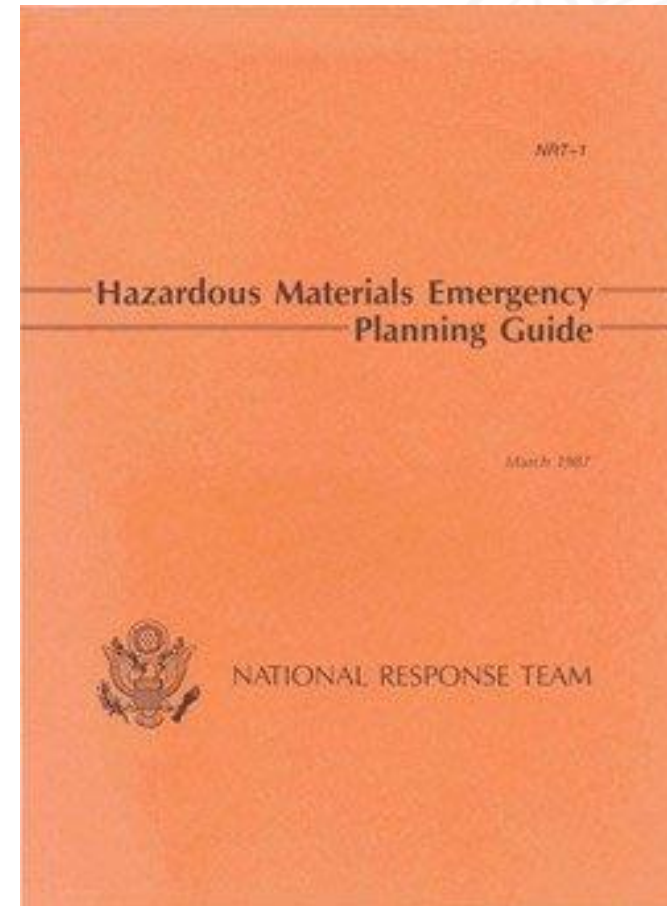


Clean Air, Safe Water,
Healthy Land for Everyone



Topics of Discussion

- EPCRA Overview
- Tier II Reporting
- New Tier II system updates

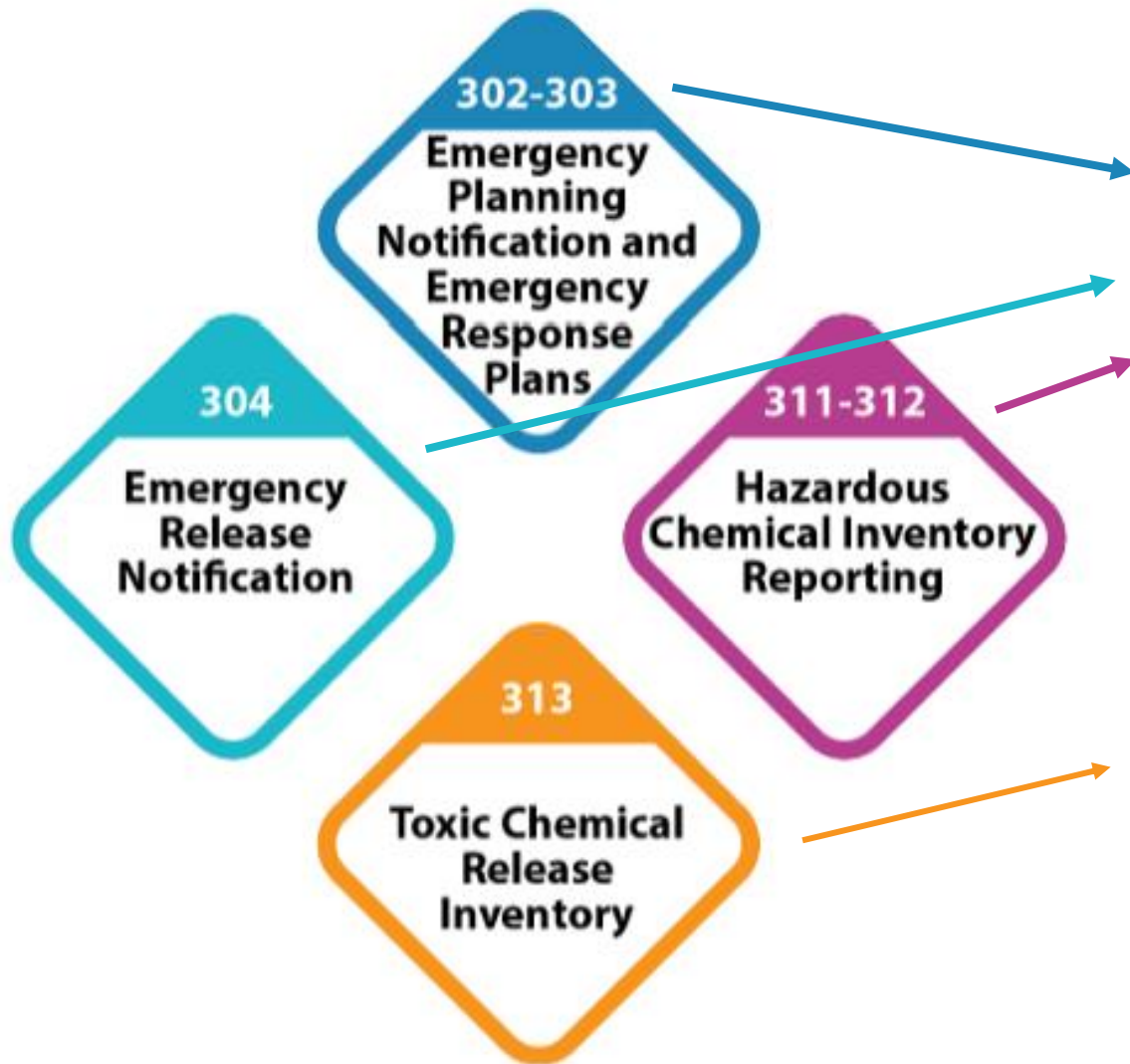


- Public demand for chemical release information skyrocketed in the mid-1980s after a deadly cloud of highly toxic pesticide, methyl isocyanate, killed thousands of people in Bhopal, India in 1984. Shortly thereafter, a serious chemical release at a plant in West Virginia hospitalized 100+ individuals in 1985. [Union Carbide](#)
- The Emergency Planning and Community Right-to-Know Act (EPCRA), also known as SARA Title III, was enacted in October 1986. This law provided an infrastructure at the state and local levels to plan for chemical emergencies.
- After the enactment, EPCRA was implemented in 1987.

EPCRA (cont'd)

- 1987, State Emergency Response Commissions (SERCs) are formed.
- SERC duties include:
 - Establishing procedures for receiving and processing public requests for information collected under EPCRA
 - Reviewing local emergency response plans
 - Designating local emergency planning districts
 - Appointing a Local Emergency Planning Committees (LEPC) for each district
 - Supervising the activities of the LEPC





Provisions regulated by the state:

- Em. Planning & ERPs
- Em. Release Notification
- **Haz Chemical Inventory Reporting**

Provisions regulated by EPA:

- Toxic Chemical Release Inventory (TRI)
 - Linked through ADEQ webpage

Spill Reporting

ADEQ manages the Spill Line for facilities to report releases of hazardous and extremely hazardous substances (EHS).

To inform the department of any release, call **602-771-2330**.

The Spill Line is not manned 24/7. When leaving a message, please include the following information:

- Your Name
- Contact information
- Company name
- Facility Name
- Description of substance spilled
- Quantity of spill (if possible)
- Location of spill (did it leave the premises)
- Any other relevant details (including remediation)

Facilities Report a Spill



What is Tier II?



Oxidiser



Flammable



Explosive



Acute Toxicity



Corrosive



Compressed Gases



Health Hazard



Environmental
Hazard



Harmful

Tier II Overview (Fed & State)

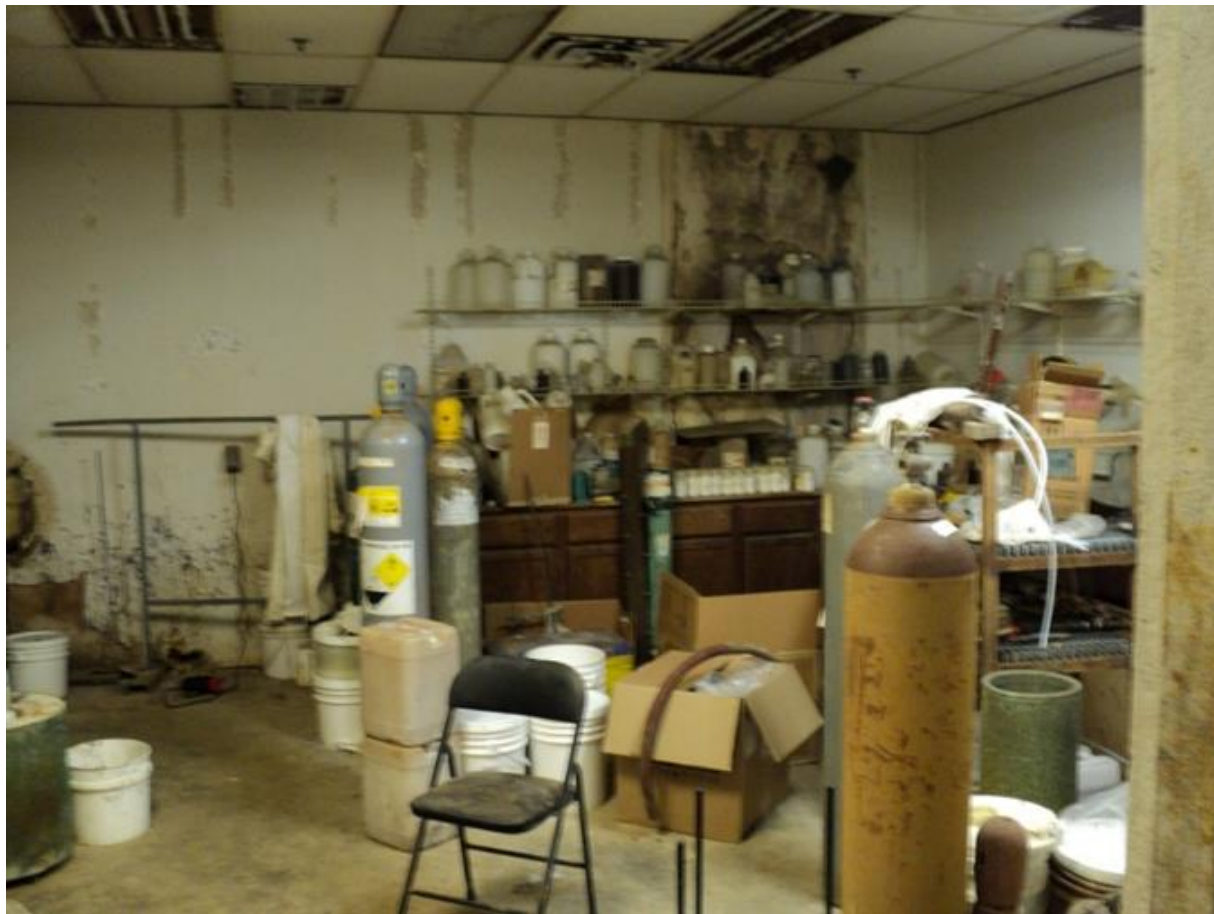
Tier II is information from regulated facilities regarding hazardous materials, the quantity, emergency contacts, and emergency planning information designed to assist communities in preparing for potential accidents/incidents.

EPCRA Sections 311 & 312:

- Applies to the owner or operator of any facility that is required to have or has an SDS for a Hazardous Chemical under the OSHA Hazard Comms Standard,
- And meets reporting thresholds identified by 40 CFR 370.10:
 - EHS of 500lbs or TPQ (whichever is lower)
 - Non-EHS chemicals at or above 10,000lbs (lbs not gal)
 - Gasoline (UST) in excess of 75,000 gallons
 - Diesel fuel (UST) in excess of 100,000 gallons



LEPC and Fire Department had been to the site and were not allowed in the workshop area due to the work being “Military” and for the “Department of Defense”.



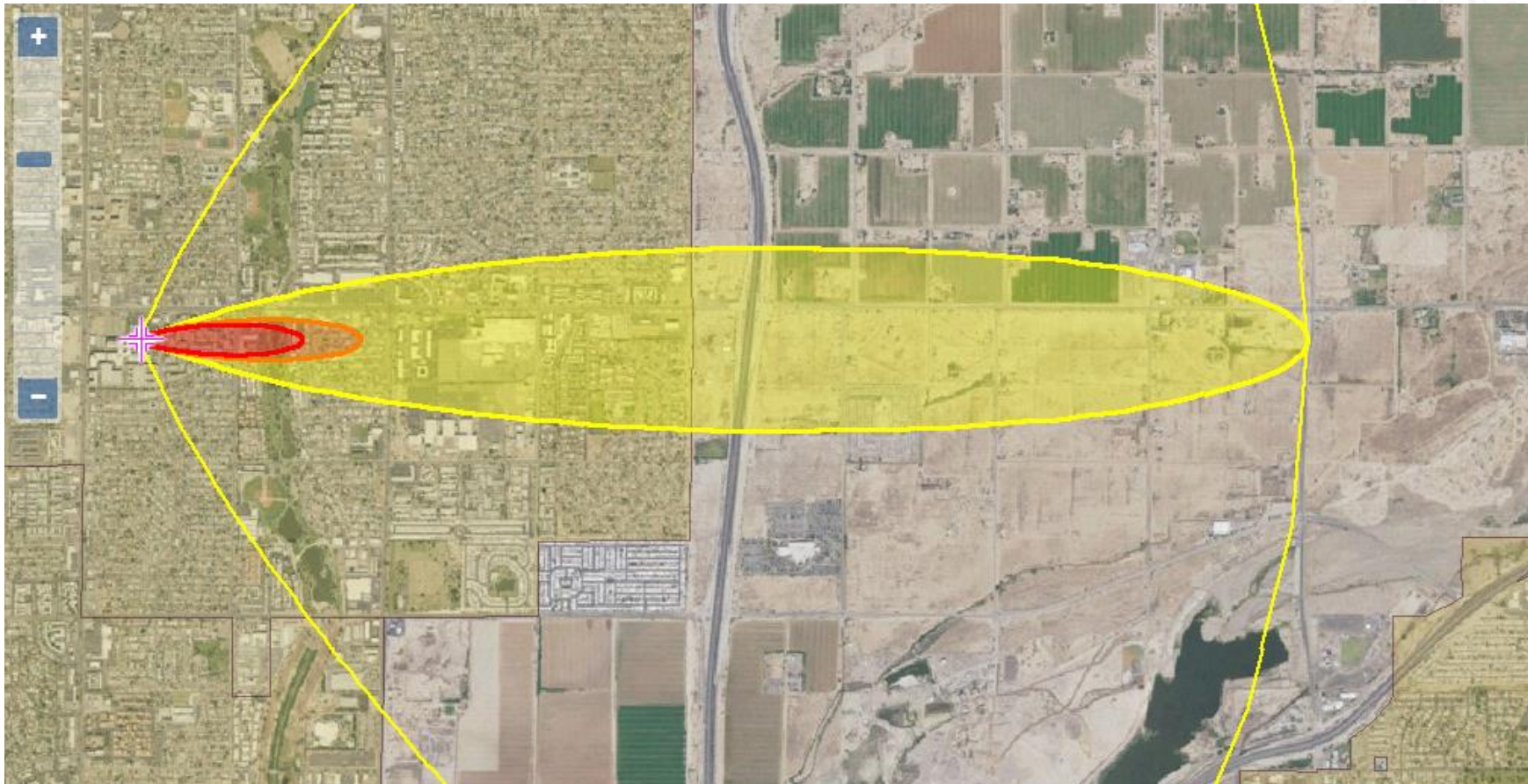


30,000 pounds of Anhydrous Hydrogen Fluoride (AHF) out back. AHF is considered an acid that would cause a vapor cloud if released. It is an extremely toxic corrosive gas and liquid.

Sample Plume

Population: 4,428

Housing units: 2,588



ARS 49-126 indicates the importance of regulated requirements of a facility that contains an EHS, and their respective reporting/threshold quantities

ARS 49-127 outlines the requirements for EHS facility

- Emergency Response Plan
- Emergency Contact
- Facility Emergency Coordinator
- Copy of ERP to LEPC and FD w/ Jurisdiction



For non-EHS facilities, under 49-127(B) and under 40 CFR 370.10(b)(2) those facilities may still be required to follow Tier II reporting requirements.

Questions about Tier II?

- All files included in the report are stored in the myDOCUMENTS tab (RCO and DROs only), with the submitted report, and in the Plan Inventory.
 - The Plan Inventory can be updated any time during the year and will not amend documents in previously submitted reports.
- Information and documentation that are required sections for submission are built into the system.
- Fire Departments and Local Emergency Planning Committees (LEPCs) have electronic agreements.
- Site maps (site plans) are required for all reporting facilities.
- Fee Exemption Questions have been updated based on user feedback.
- Facilities subject to state and federal EPCRA and Tier II requirements must report electronically.

What this means for facilities?

- Registered FDs and all LEPCs have electronic agreements
 - Facilities do not have to mail or email Tier II reports and plans to any fire department that appears on the list of participating agencies posted on our website.
 - If the FD for your facility is not registered for electronic agreements, reports have to be sent directly.
- The list is updated weekly.

Site Map Requirements

The site map (site plan) is vital Tier II information for first responders as it allows for better response planning.

At the request of fire agencies and Local Emergency Planning Committees (LEPCs), **all facilities that are submitting a Tier II report**, regardless of whether or not they are reporting extremely hazardous substances at or above threshold planning quantities, **are required to provide a site map.**

This request is authorized under 40 CFR §370.10(b)(2) which states that the threshold for reporting is zero:

- (2) If your LEPC, SERC, or the fire department with jurisdiction over your facility requests that you submit Tier II information.

Site Map Requirements

What should you include in your site map?

- All points of ingress and egress
- Locations in and around the facility where substances are stored
- General layout of the facility



Figure 1. Example Site Plan

ERU is here for you!

We understand Tier II and EPCRA can be overwhelming and it is a lot to digest if you're unaware or unprepared. The Emergency Response Unit (ERU) can provide upon request:

- Points of contact for LEPCs and FDs
- Updated Tier II User Guide
- Assistance with chemical inventory reporting
- Regulatory requirements for your facility

Tier II Website



Tier II Support Information

For assistance with questions related to EPCRA and Tier II Chemical Inventory Reporting:

- Tier II Hotline - 602-771-0397
- Email - tier2@azdeq.gov

For assistance with system and account errors or account set up information:

- myDEQ Support - 844-827-4768
- Email - mydeq.support@azdeq.gov

When leaving a message, please include the following information:

- Name and phone number
- Facility ID number(s)
- Facility name(s)
- Brief description of the issue you are experiencing



Questions?
Comments?
Concerns?

Contact Information

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