EPCRA (Emergency Planning and Community Right to Know Act) a k a SARA Title III

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Why EPCRA?

- Key hazardous chemical releases
  - Bhopal, India (1984)
  - Institute, West Virginia (1985)
- Increased public concern
- Worker right-to-know laws
  - OSHA Hazard Communication Standard (HAZCOM)
- State right-to-know laws
EPCRA Overview

- Purpose of Emergency Planning
- Protect public health and safety, and the environment
- Integrate with local emergency planning efforts
- Purpose of Community Right-to-Know
EPCRA Overview (continued)

- Support and focus state and local planning activities
- Increase community awareness of chemical hazards
- Support chemical accident and pollution prevention initiatives
Three EPCRA Subtitles

Title III of SARA (Superfund Amendments Reauthorization Act) is made up of three principal subtitles:

Subtitle A - Emergency Planning and Notification
Subtitle B - Reporting Requirements
Subtitle C - General Provisions
EPCRA Overview

<table>
<thead>
<tr>
<th>SECTION</th>
<th>COVERAGE/ TOPIC</th>
<th>REQUIREMENT</th>
<th>RELEVANT CHEMICAL LIST</th>
<th>THRESHOLDS</th>
<th>SUBMIT TO:</th>
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<tbody>
<tr>
<td>304</td>
<td>Emergency Notification</td>
<td>Accidental Release Reporting</td>
<td>EHS and CERCLA102(a) Substances</td>
<td>Specified Reportable Quantities</td>
<td>SERC* LEPC</td>
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<tr>
<td>311</td>
<td>Hazardous Chemical Inventory</td>
<td>MSDSs or List of Chemicals</td>
<td>OSHA Hazardous Chemicals (No Specific List)</td>
<td>10,000 #; or, if EHS, 500 #, or TPQ - whichever is lower</td>
<td>SERC* LEPC Local Fire Dept.</td>
</tr>
<tr>
<td>312</td>
<td>Hazardous Chemical Inventory</td>
<td>Inventories, Hazards, and Locations (Tier I or II)</td>
<td>OSHA Hazardous Chemicals (No Specific List)</td>
<td>10,000 #; or, if EHS, 500 #, or TPQ - whichever is lower</td>
<td>SERC* LEPC Local Fire Dept.</td>
</tr>
<tr>
<td>313</td>
<td>Toxic Chemical Release Reporting</td>
<td>Total Annual Release, Waste Management, &amp; Source Reduction Data - PPA (Form R)</td>
<td>Over 600 Toxic Chemicals and Chemical Categories</td>
<td>25,000 # manufactured or processed; 10,000 # otherwise used</td>
<td>EPA State</td>
</tr>
</tbody>
</table>

Summary Chart of EPCRA Requirements (as of January 1, 1999)
EPCRA
Sections 301-303

Emergency Planning
Emergency Planning Requirements (EPCRA Sections 301-303)

- **Section 301:** Establish State Emergency Response Commissions (SERCs), designate local emergency planning districts, and appoint Local Emergency Planning Committees (LEPCs for each district).

- **Section 302:** Designate extremely hazardous substances (EHSs) and threshold planning quantities and notification requirements for covered facilities.

- **Section 303:** Develop local emergency response plans.
Emergency Planning Infrastructure

- How state and local emergency planning infrastructure is established
  - Governor designates state emergency response commission (SERC) and SERC membership; or Tribal Chief executive officer designates tribal emergency response commission (TERC)
  - SERC designates local emergency planning districts within state
Emergency Planning
Infrastructure (continued)

- SERC appoints members of local emergency planning committee (LEPC) for each planning district
  - Membership includes industry, police department, fire department, elected officials, and the general public
Extremely Hazardous Substances (EPCRA Section 302)

- Selection criteria are based on acute lethal toxicity
- 356 chemicals initially designated as EHSs
  - Overlap with 138 chemicals with CERCLA hazardous substances
- EPA can revise the list by adding or deleting
- Substances identified in 40 CFR part 355
Facility Notification Requirements (EPCRA Section 302)

- Facilities subject to emergency planning requirements
  - Any facility (e.g., warehouses, manufacturers) that:
    - Has a quantity of EHS present at any one time that meets or exceeds specified threshold planning quantity (TPQ)
    - or
    - Is designated for participation by SERC
Emergency Planning Requirements (EPCRA Sections 302-303)

- Planning Notification
  - Notify SERC or TERC and LEPC
  - Designate facility emergency coordinator
  - Supply LEPC with planning information, as requested
  - Coordinate emergency response planning with community
## Commonly Used Chemicals

<table>
<thead>
<tr>
<th>CHEMICAL NAME</th>
<th>EHS (TPQ)</th>
<th>RQ</th>
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</thead>
<tbody>
<tr>
<td>Formaldehyde</td>
<td>CAS 50-00-0</td>
<td>500 lbs</td>
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<td>Sodium Cyanide</td>
<td>CAS 143-33-9</td>
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<td>CAS 151-50-8</td>
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<td>Mercuric acetate</td>
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<td>Nitric acid</td>
<td>1,000 lbs</td>
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<td>Chlorine</td>
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<td>Chromic chloride</td>
<td>CAS 10025-73-7</td>
<td>1/10,000 lbs</td>
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<td>Ozone</td>
<td>CAS 10028-15-6</td>
<td>100 lbs</td>
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<tr>
<td>Sodium azide</td>
<td>CAS 26628-22-8</td>
<td>500 lbs</td>
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EPCRA Section 304

Emergency Release Notification
Emergency Release Notification

- Releases of EHSs (40 CFR 355) or Hazardous Substances (40 CFR 302.4) in a reportable quantity (RQ)
  - RQ set by US EPA through rulemaking
  - If RQ not set by EPA, statutory RQ of one pound applies
  - RQ is specified quantity released within a rolling 24-hour period
Regulated Substances

- CERCLA Hazardous Substances (739)
- Section 313 Chemicals (Over 600)
- EHSs (356)

228, 79, 59
Emergency Release Notification

- Initial immediate notification (via telephone, radio, or in person)
  - For EPCRA Section 304 chemicals & CERCLA Section 103 chemicals, notify:
    - SERCs/TERCs of any state or Tribe likely to be affected by release
    - Emergency Coordinators for LEPCs of any area likely to be affected by release
  - For CERCLA Section 103 chemicals only, notify National Response Center (NRC)
Emergency Release Notification (continued)

- Reduced reporting for continuous releases
  - Initial notification to the SERC, LEPC, and/or NRC
  - Initial written follow-up to SERC, LEPC, and/or EPA regional offices
  - One-time written follow-up report to EPA regional office one year later (for CERCLA hazardous substances only)
  - Subsequent notification of any statistically significant increases or other changes in the release
Follow-up written notifications required for non-transportation related releases

Releases that are "continuous" and "stable in quantity and rate"

- Continuous
  - Occurs without interruption or abatement; or
  - Is routine, anticipated, intermittent, and incidental to normal operation or treatment processes

- "Stable in quantity and rate"
  - Is predictable and regular in amount and rate of emission
Emergency Release Notification (continued)

- Continuous releases exclude:
  - Accidents
  - System upsets and malfunctions
  - Statistically predicted upsets
# Emergency Release Notification

<table>
<thead>
<tr>
<th>Chemicals Covered</th>
<th>CERCLA Section 103</th>
<th>EPCRA Section 304</th>
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<tbody>
<tr>
<td></td>
<td>CERCLA Hazardous Substances (40 CFR 302.4)</td>
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<tr>
<td></td>
<td>EPCRA Section 302 EHS (Appendix A to 40 CFR 355)</td>
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<tr>
<td>Releases Covered</td>
<td>Any release into the environment</td>
<td>Any potential release with potential for exposure to persons off-site</td>
</tr>
<tr>
<td>Notification Requirements</td>
<td>NRC</td>
<td>LEPC(s) SERC(s) TERC(s)</td>
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CERCLA Section 103 versus EPCRA Section 304
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<td>CAS 26628-22-8</td>
<td>500 lbs</td>
<td>1000 lbs</td>
</tr>
<tr>
<td>Benzene</td>
<td>CAS 71-43-2</td>
<td>10 lbs</td>
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<tr>
<td>Ethyl Acrylate</td>
<td>CAS 140-88-5</td>
<td>1000 lbs</td>
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<tr>
<td>Xylene (mixed isomers)</td>
<td>CAS 1330-20-7</td>
<td>100 lbs</td>
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<tr>
<td>Mercury</td>
<td>CAS 7439-97-6</td>
<td>1 lbs</td>
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EPCRA
Sections 311-312

Hazardous Chemical Inventory Reporting
EPCRA Sections 311-312

- Chemical inventory reporting
  - Section 311 - Material Safety Data Sheets (MSDSs)
  - Section 312 - Tier II forms

- Regulated facilities
  - Facilities subject to OSHA's HAZCOM (29 CFR 1910.1200)
  - No specific list of hazardous chemicals
  - HAZCOM applies to broad categories of chemicals, including any chemical that poses a physical or health hazard
EPCRA Sections 311-312

- Regulated chemicals and reporting thresholds
  - 500 # or TPQ, whichever is less, for EHS (include any EHS in a mixture)
  - 10,000 # for other OSHA hazardous chemicals
  - Maximum quantity on-site at any one time
  - Most aggregate EHS quantities present in raw materials and all mixtures
EPCRA Sections 311-312

- Submit sections 311 and 312 information to:
  - SERC or TERC
  - LEPC
  - Local fire department
EPCRA Sections 311-312

- Reporting for Mixtures
  - Report on mixtures as a whole or by hazardous components
  - Choose either reporting method
  - Maintain consistent method for reporting under EPCRA Sections 311 and 312
MSDS Reporting
(EPCRA Section 311)

- Section 311 reporting requirements
  - Material Safety Data Sheets (MSDSs); or
  - List of hazardous chemicals grouped by EPA's five physical and health hazard categories:
    - Fire
    - Sudden release of pressure
    - Reactivity
    - Immediate (acute)
    - Delayed (chronic)
MSDS Reporting (EPCRA Section 311)

- Submit original list or copies of MSDSs within 90 days of exceeding reporting thresholds
- Update submission within 90 days of obtaining significant new information
Tier II Reporting
(EPCRA Section 312)

- Section 312 reporting requirements
  - Report chemical-specific information on Tier II form
  - Submit reports annually on or before March 1 for previous calendar year's activities
EPCRA Sections 311-312

- States may require facilities to:
  - Submit Tier II form
  - Submit state reporting forms
  - Report lists of hazardous chemicals
  - Report exact quantities
  - Provide additional information (e.g., UN registry number)

- States may set lower reporting thresholds

- States may have a fee system
EPCRA Sections 311-312

- Public availability of inventory information
  - EPCRA Sections 311 and 312 information available to the general public upon request from SERC/TERC or LEPC
  - General public has the right to request, through the SERC/TERC or LEPC, additional information
311 & 312 Reporting Thresholds

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 4.450 kg).
Reporting on Mixtures

- Reports on mixtures or hazardous components should:
  - Provide the required information on each component of a mixture which is a hazardous chemical by calculating the quantity of each hazardous chemical in the mixture; or
  - Provide the required information on the mixture itself by reporting on the total quantity of the mixture.
EPCRA SECTION 313

TOXIC CHEMICAL RELEASE INVENTORY (TRI)
**TRI:** THREE POINTS TO ID THOSE WHO MUST REPORT

◆ **Point No. 1 of 3 - SIC Codes**

Private-sector facilities in the following SIC codes:
- 20 through 39,
- 10 (except 1011, 1081, and 1094),
- 12(except 1241),
- 4911, 4931, 4939 (limited to facilities that combust coal and/or oil for the purpose of generating power for distribution in commerce),
- 4953 (limited to facilities regulated under RCRA Subtitle C),
- 5169, 5171, 7389 (limited to facilities primarily engaged in solvent recovery services on a contract fee basis); AND
TRI: THREE POINTS TO ID THOSE WHO MUST REPORT

- **Point No. 2 of 3 – No. of Employees**
  Those with 10 or more full time employees (equivalent of 20,000 hours per year); **AND**

- **Point No. 3 of 3 – Exceeding Threshold Amounts**
  Those that exceed threshold amounts for manufacturing, or processing, or otherwise using listed chemicals in a given year.
For a Section 313 chemical, a facility meeting all other criteria must file a **Form R** report for that chemical *if the facility*:

- Manufactured (including imported) more than 25,000 pounds per year, or
- Processed more than 25,000 pounds per year, or
- Otherwise used more than 10,000 pounds per year (this includes amounts imported)
INTERDEPENDENCE OF CHEMICAL LISTS IN SARA TITLE III (EPCRA)

CERCLA 102(a) (SUPERFUND) Hazardous Substances

SARA Section 302 Extremely Hazardous Substances - 360

Section 313 Toxic Chemicals - 317

WHITE CIRCLE: SARA 311-312 Hazardous per OSHA HCS - - Over 500,000 Substances
## Title III List of Lists

### SAMPLE OF LAYOUT

<table>
<thead>
<tr>
<th>Cas Number</th>
<th>Chemical Name</th>
<th>Sec. 302(EHS) TPQ</th>
<th>Section EHS RQ</th>
<th>304 CERCLA RQ</th>
<th>CAA 112R TQ</th>
<th>Sec 313</th>
<th>RCRA Code</th>
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<tbody>
<tr>
<td>74-90-8</td>
<td>Hydrocyanic acid</td>
<td>100</td>
<td>10</td>
<td>10</td>
<td>2500</td>
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<td>74-95-3</td>
<td>Methyl bromide</td>
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<td>74-98-6</td>
<td>Propane</td>
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United States Environmental Protection Agency – Region 4

Emergency Planning and Community Right-to-Know Act (EPCRA)
What is EPCRA

The EMERGENCY PLANNING and COMMUNITY RIGHT-TO-KNOW ACT (EPCRA) was enacted in 1986 in response to accidental chemical releases in Bhopal, India (1984) and Institute, West Virginia (1985).
What is EPCRA (cont’d)

- Established requirements for the identification and reporting of hazardous chemicals within the community.
- Established requirements for state and local emergency planning.
- Established requirements for chemical release reporting.
Components of EPCRA

- Emergency Planning (Section 302)
- Release Notification (Section 304)
- Hazardous Chemical Inventory Reporting (Sections 311-312) (Tier I or Tier II)
- Toxic Chemical Release Inventory (Section 313) (TRI)
EPCRA Organizations/Roles

- USEPA Region 4 EPCRA Section
- SERC (State Emergency Response Commission)
- LEPC (Local Emergency Planning Committee) usually at county-level
USEPA R-4 Role in EPCRA

- The R-4 EPCRA Enforcement Section monitors and enforces EPCRA requirements within the eight state Region
- Inspections and Compliance Assistance
- Release Investigations
- EPCRA Violation Enforcement Actions
- CAMEO Training
State Emergency Response Commission (SERC) Role

- Designates local emergency planning districts (NC has three regional offices plus the county-level LEPCs)
- Supervises/coordinates LEPC activities
- Receives
  - Tier II and TRI chemical inventories
  - Receives Emergency Release Notifications
Local Emergency Planning Committee (LEPC) Role

- The LEPC is your local resource for chemical right-to-know.
  - Maintains emergency response plans.
  - Maintains copies of chemical inventories.
  - Maintains MSDSs or list of hazardous chemicals in the inventories.
  - Consists of representatives of facilities subject to emergency planning and notification requirements.
Most Common Healthcare Industry EPCRA Violations*

- Failure to report accidental chemical releases to local authorities (LEPC and Fire Department) (CERCLA 103 and EPCRA 304)
- Failure to report hazardous chemicals inventory to LEPC and SERC (EPCRA 302, 311 and 312)

What If I Have A Release?

- **Release contained within property?**
  - EHS only chemical > No formal notification
  - EHS and/or CERCLA chemical > Notify National Response Center (NRC) at 1-800-424-8802

- **Release leaves property?**
  - EHS only > Immediate report and follow-up to SERC & LEPC
  - CERCLA only > Immediate report to SERC, LEPC and NRC and follow-up to SERC & LEPC
  - EHS and CERCLA > Immediate report to SERC, LEPC and NRC and follow-up to SERC & LEPC
Do I Need To Report My Chemical Inventory?

- If chemicals in inventory have MSDS and:
  - More than 10,000 lbs for non-EHS chemicals;
  - More than the TPQ or 500 lbs (whichever is less) for EHS chemicals; and,
  - Threshold met at any one time during the year
How Do I Report My Inventory?

- **Initial report:**
  - Emergency planning notification letter
  - One time notification
  - Notify SERC and LEPC

- **Tier I or II report:**
  - Annually to SERC and LEPC

- **Information:**
  - [http://www.ncem.org/SERC/downloads.htm](http://www.ncem.org/SERC/downloads.htm)
EPCRA Contacts

- National response Center (800) 424-8802
- USEPA Region 4 (800) 241-1754, or
- USEPA Region 4 EPCRA Section
- NC SERC
  - [http://www.ncem.org/sercmenu.htm](http://www.ncem.org/sercmenu.htm)
# USEPA R-4 CONTACTS

<table>
<thead>
<tr>
<th>US EPA Region 4</th>
<th>General Information</th>
</tr>
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<tbody>
<tr>
<td>61 Forsyth Street</td>
<td>(800)241-1754</td>
</tr>
<tr>
<td>Atlanta, Georgia 30303</td>
<td>(404)562-9900</td>
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**US EPA Region 4 EPCRA Enforcement Section**

<table>
<thead>
<tr>
<th>Name</th>
<th>State</th>
<th>Phone</th>
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</thead>
<tbody>
<tr>
<td>Caron Falconer</td>
<td></td>
<td>(404)562-8451</td>
</tr>
<tr>
<td>Robert Bookman</td>
<td></td>
<td>(404)562-9169</td>
</tr>
<tr>
<td>Erika White</td>
<td>Alabama</td>
<td>(404)562-9195</td>
</tr>
<tr>
<td>Bryce Covington</td>
<td>Florida</td>
<td>(404)562-9192</td>
</tr>
<tr>
<td>Henry Hudson</td>
<td>Georgia</td>
<td>(404)562-9188</td>
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<tr>
<td>Charles Combs</td>
<td>Kentucky</td>
<td>(404)562-9179</td>
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<td>Lawrence Fincher</td>
<td>Mississippi</td>
<td>(404)562-9190</td>
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<td>Vinson Poole</td>
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<td>Jyoti Bhushan</td>
<td>South Carolina</td>
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</tr>
<tr>
<td>Andrew Porter</td>
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Email: lastname.firstname@epa.gov
Selected References

- 40 CFR Subchapter J, Parts 302, 355, 370 and 372 available at:
  - [http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?sid=401d1fa5a85e820674e669b8a3edf23b&c=ecfr&tpl=/ecfrbrowse/Title40/40cfrv27_02.tpl](http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?sid=401d1fa5a85e820674e669b8a3edf23b&c=ecfr&tpl=/ecfrbrowse/Title40/40cfrv27_02.tpl)

- CAMEO Chemical Library
  - [CAMEO Chemicals](#)

- Tier II Submit
  - [http://yosemite.epa.gov/oswer/ceppoweb.nsf/content/tier2.htm](http://yosemite.epa.gov/oswer/ceppoweb.nsf/content/tier2.htm)

- Healthcare Sector Notebook
  - [http://www.hercenter.org/links/](http://www.hercenter.org/links/)
## What & Where To Submit

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<th>SECTION</th>
<th>COVERAGE/TOPIC</th>
<th>REQUIREMENT</th>
<th>RELEVANT CHEMICAL LIST</th>
<th>THRESHOLDS</th>
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<tr>
<td>CERCLA 103* / EPCRA 304</td>
<td>Emergency Notification</td>
<td>Accidental Release Reporting</td>
<td>CERCLA102(a) Substances* and EHSs</td>
<td>Specified Reportable Quantities</td>
<td>NRC* SERC LEP, LEPC</td>
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<td>311</td>
<td>Hazardous Chemical Inventory</td>
<td>MSDSs or List of Chemicals</td>
<td>OSHA Hazardous Chemicals (No Specific List)</td>
<td>10,000 lb.; or, if EHS, 500 lb., or TPQ - whichever is lower</td>
<td>SERC LEP, Local Fire Dept.</td>
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<td>312</td>
<td>Hazardous Chemical Inventory</td>
<td>Inventories, Hazards, and Locations (Tier I or II)</td>
<td>OSHA Hazardous Chemicals (No Specific List)</td>
<td>10,000 lb.; or, if EHS, 500 lb., or TPQ - whichever is lower</td>
<td>SERC LEP, Local Fire Dept.</td>
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<td>Over 600 Toxic Chemicals and Chemical Categories</td>
<td>25,000 lb. manufactured or processed; 10,000 lb. otherwise used; PbT Thresholds</td>
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