

Tier II Chemical Reports

The annual hazardous chemical inventory Tier II report deadline is fast approaching. The deadline to report is March 1st.

There are Tier I and Tier II reports that are typically filed. Tier I reports provide the minimum information that a facility must report to be in compliance with the hazardous chemical inventory reporting requirements. Tier I reports are essentially obsolete because state and local officials no longer accept them. Basically, all the states require Tier II reports be completed which has incorporated the hazardous chemical inventory report otherwise known as Tier I. Tier II reports require submission of more detailed, location- and chemical-specific information.

Tip: Tier II reports are submitted to state and local emergency planning and response authorities. While many states want you to use the U.S. Environmental Protection Agency's (EPA) Tier2 Submit software for filing your Tier II information, some states and local agencies have different requirements. Be sure to check with your state or local agency on how it wants the report submitted. Remember you are not required to report chemicals for which you are not required to have an SDS. Also there are chemicals that are exempt from hazardous chemical inventory reporting.

Are You Required to Submit a Tier II Report?

If you are required to maintain safety data sheets (SDSs), under the Occupational Safety and Health Administration (OSHA) regulations for hazardous chemicals stored or used in the workplace, you may be required to submit a Tier II report under EPA's Emergency Planning and Community Right to Know (EPCRA) regulations

You are required to submit a Tier II report if your facility used or stored:

- A hazardous chemical that is a listed extremely hazardous substance (EHS), as listed in 40 CFR 355 Appendix A, and it is present at the facility at any one time in an amount greater than 500 pounds (lb.) or the threshold planning quantity (TPQ), whichever is less; or
- A hazardous chemical that is not an EHS and it is present at the facility at any one time in an amount greater than 10,000 lb.

Note: Thresholds are higher for gasoline and diesel storage at retail gas stations.

What Information Must Be Reported?

When filing a Tier II report, you must provide:

Facility and contact information A certification statement Chemical information, including Whether it is a pure chemical or a mixture Name of the chemical or mixture, (CAS) number, if applicable Is the chemical an Extremely Hazardous Substance Is it a solid, liquid, gas, or trade secret The hazards associated with the chemical	Inventory information, including Maximum amount Average daily amount Number of days on-site Type of storage Storage conditions, including temperature and pressure Storage locations, which may require attaching a site plan or map
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Questions? Contact The Redstone Group at 614-763-5034 x7007 or jwilliams@redstonegrp.com