

SARA Title III or EPCRA has four main components

1) Emergency Planning (Sections 301-303)

Section 301 - Mandates the establishment of State Emergency Response Commissions (SERCs) and Local Emergency Planning Committees (LEPCs). SERCs and LPECs are tasked with carrying out the work of SARA Title III on the state and local level.

Section 302 - Sets a one-time reporting requirement for facilities with Extremely Hazardous Substances (EHS) in excess of the Threshold Planning Quantity (TPQ). EHSs and their TPQ's can be found on the EPA's List of Lists.

Section 303 - Requires LPEC's to create regional emergency response plans based working with information from facilities covered under Section 302. Facilities are required to provide LPECs with the name of the facility emergency coordinator and any necessary information the LEPC needs to develop such plans.

2) Emergency Release Notification (Section 304)

Section 304 - In the event of an accidental chemical release that exceeds minimal Reportable Quantity (RQ), Section 304 compels facilities to notify SERCs, LPECs and fire departments for all affected region as well as the National Response Center. A written follow-up is also required.

3) Hazardous Chemical Storage Reporting Requirements, (Sections 311-312)

Section 311 - Requires facilities with hazardous chemicals in quantities above certain thresholds (for which they are obligated by OSHA to maintain MSDSs) to provide copies of the MSDSs for those chemicals to the SERC, LEPC and local fire department. In lieu of MSDSs, facilities may instead provide a list of their chemicals grouped by hazard categories. Section 311 is a one-time reporting obligation

Section 312 - Companies with chemicals in sufficient quantities to trigger obligations under Section 311 must also submit an annual emergency and hazardous chemical inventory form to the SERC, LEPC and local fire department. The required form is usually either a Tier I or Tier II form, with Tier II forms being the most common type. Learn more about Tier II forms.

4) Toxic Chemical Release Inventory (Section 313)

Section 313 - Requires facilities with 10 or more employees that use certain toxic chemicals in quantities above threshold levels to report annually on the use, release and disposal of those chemicals on Form R. Information collected from all facilities on Form R is compiled into the Toxics Release Inventory or TRI. Chemicals that trigger TRI reporting can be found on the EPA's List of Lists. The preceding is a thumbnail sketch of SARA Title III and the obligations facilities that use hazardous chemicals have under the regulation. Be sure to visit the EPA's website for the most up-to-date information on EPCRA and other environmental considerations.

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