# Tier2 Submit

A PRIMER
HOW TO FILL OUT YOUR TIER II FORM
USING TIER2 SUBMIT SOFTWARE



#### Notice

This document provides guidance to facilities with EPCRA Tier II reporting requirements. The statutory provisions and EPA regulations described in this guidance presentation contain legally binding requirements. This guidance presentation does not substitute for those provisions or regulations nor is it a regulation in itself. In the event of a conflict between the discussion in this presentation and any statute or regulation, this presentation would not be controlling. The guidance does not impose legally binding requirements on EPA or the regulated community, and might not apply to a particular situation based upon circumstances. For specific requirements and details, refer to the implementing regulations of 40 CFR – Chapter I subchapter J Part 370 EPCRA (42 U.S. Code § 11022).

# A few things you need before you get started:

- EPA acronyms
- Your chemicals
- Industry codes
- Your facility contacts
- Thresholds for reporting
- Your state requirements

### EPA Tier II Acronyms

- EHS Extremely Hazardous Substance
- TPQ Threshold Planning Quantity
- SDS Safety Data Sheet
- MSDS Material Safety Data Sheet (now SDS)

### You need to know your chemicals

It is a **Hazardous Chemical**...
...if OSHA requires an SDS sheet.

It may also be an **Extremely Hazardous Substance** (EHS)...

...if it is listed on the EPA's List of Lists under the Section 302 (EHS) column.

...EHSs have more stringent reporting thresholds.

Check to verify both: first, if it is Hazardous Chemical and then if it is also an Extremely Hazardous Substance.

# TPQ Threshold Planning Quantity

- TPQs are for Extremely Hazardous Substances (EHSs).
- TPQs are established by the EPA.
- TPQs are identified in the <u>List of Lists</u> and 40 CFR Part 355, Appendix A and B.
- CAMEO Chemicals can be used to search for TPQs of chemicals, <u>https://cameochemicals.noaa.gov/</u>
- TPQs vary from chemical to chemical; you need to check your particular chemicals.

### You need to know...

- the names of chemicals stored at the facility,
- their CAS numbers,
- if they are Hazardous Chemicals (these include Extremely Hazardous Substances listed in 40 CFR part 355),
- the maximum quantity present at the facility, in pounds, at any time during the previous calendar year.

#### Know...

- Dun and Bradstreet number for your company
  - If you don't have one, <u>click here</u>
- The NAICS code for your industry
  - If you don't know it, click here
- The correct latitude and longitude location for the facilities you are reporting (Tier2 Submit will help you determine this)

#### Know ...

- Your facility contact information for:
  - Emergency (two phone numbers, one of which is 24 hour),
  - > The owner or operator,
  - > The Tier II information contact.

# Do you need to submit a Tier II report?

**Hazardous Chemical** 

- Required to have an SDS under OSHA HCS
- Over 10,000 pounds at any one time

If Yes

**Extremely Hazardous Substance** 

- On the List of Lists or 40 CFR part
   355 Appendix A or B
- Over the TPQ or 500 pounds ...whichever is less

If Yes

Tier II Report required

If Yes

Diesel or Gasoline

- Retail
- Underground storage tank
- Over 100,000 gallons of diesel
- Over 75,000 gallons of gasoline

### The Tier2 Submit software includes two parts:

- Facility: information about name, location, and at least 3 contacts
- Chemicals in Inventory: information on chemicals stored at your facility during the previous year

# GETTING STARTED (Assuming Windows users as steps)

slightly differ for Mac users)

- 1. Download the free Tier2 Submit software from the EPA site
  - Download the most current Tier2 Submit program
- 2. Install the program, or have your administrator install it
- 3. The Tier2 Submit icon will appear on your computer most likely as a purple file folder
- 4. Click on that icon to start the program

#### **Getting Started**

This is what you see when you open Tier2 Submit

Here is a valuable <a href="link">link</a> for more information about Tier II reporting

Click here to start creating your own Tier II Report



#### Welcome to Tier2 Submit 2016!

Tier2 Submit is the personal computer software program that helps facilities electronically report Tier II information for Section 312 of the Emergency Planning and Community Right to Know Act (EPCRA).

In addition to providing data fields for the information required under EPCRA, this program also provides data fields to allow you to submit additional information requested or required by States. After you choose your state abbreviation from the pull down menu on the first screen, the program will load any data fields specific for your State.

Facilities can find information about Federal Tier II requirements as well as individual State requirements at

**EPA Tier II Webpage** 

If you need help while operating Tier2 Submit or if you need assistance submitting your Tier II information click the Help button at the top of any module for the User's Manual.

Start Tier2 Submit

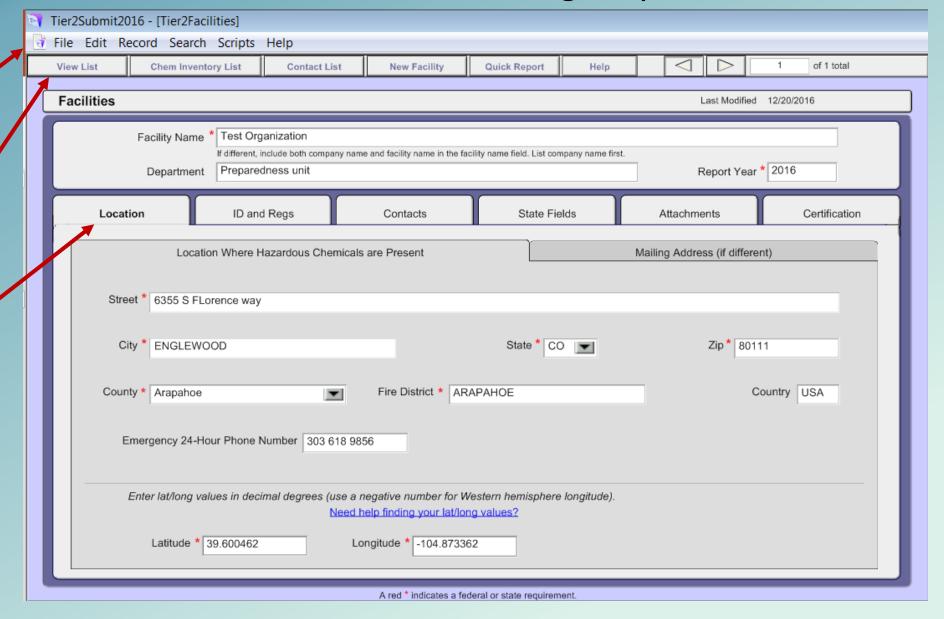
Quit

#### Tabs for navigation

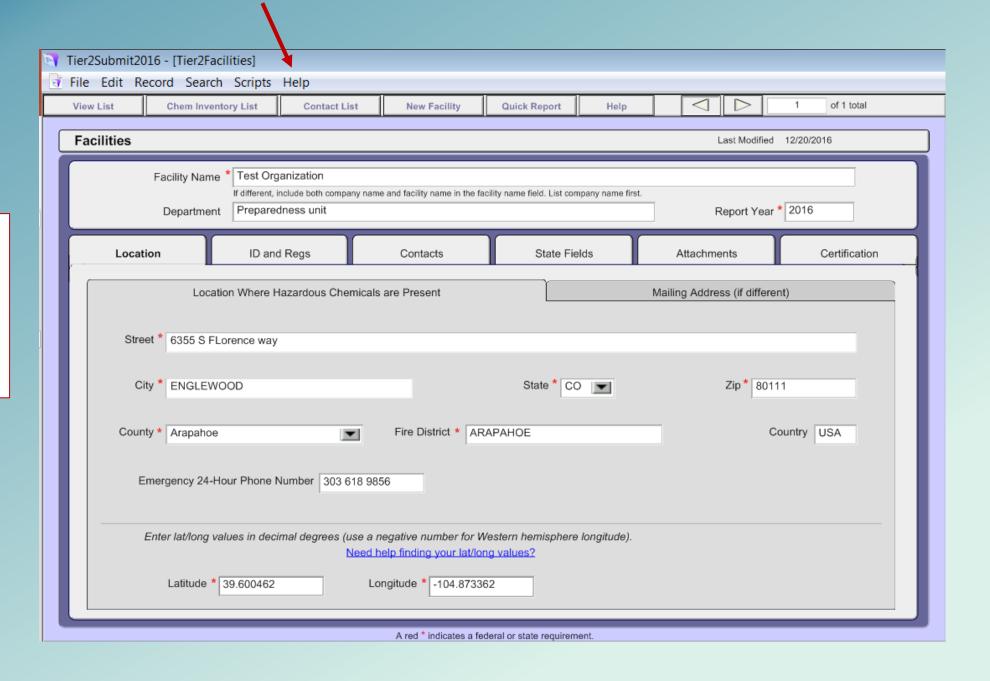
- This menu bar has the typical File, Edit, Record, Search, and Help.
- Below that is a tool bar that allows you to move between modules.
- Centered in the page are tabs associated with each module.

Any field with a red star is a required field.

#### The Tier2 Submit Page Layout

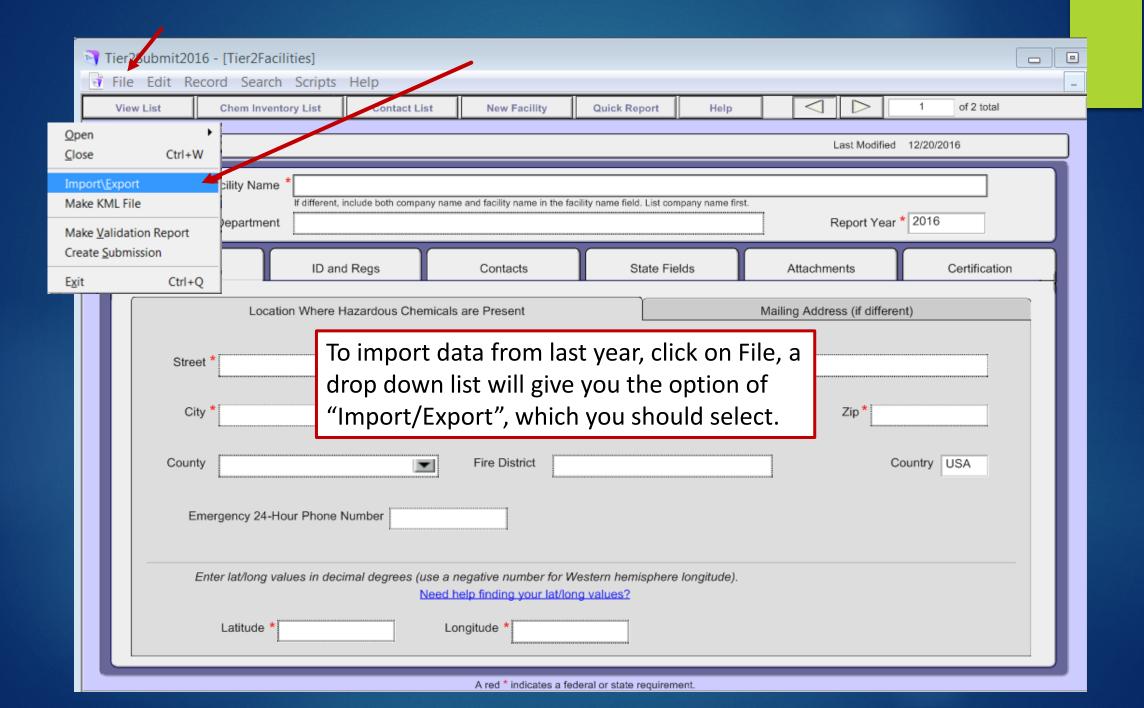


The Help function in Tier2 Submit will guide you through the entire process. It's a great tool; use it often.



### Did your facility use Tier2 Submit last year?

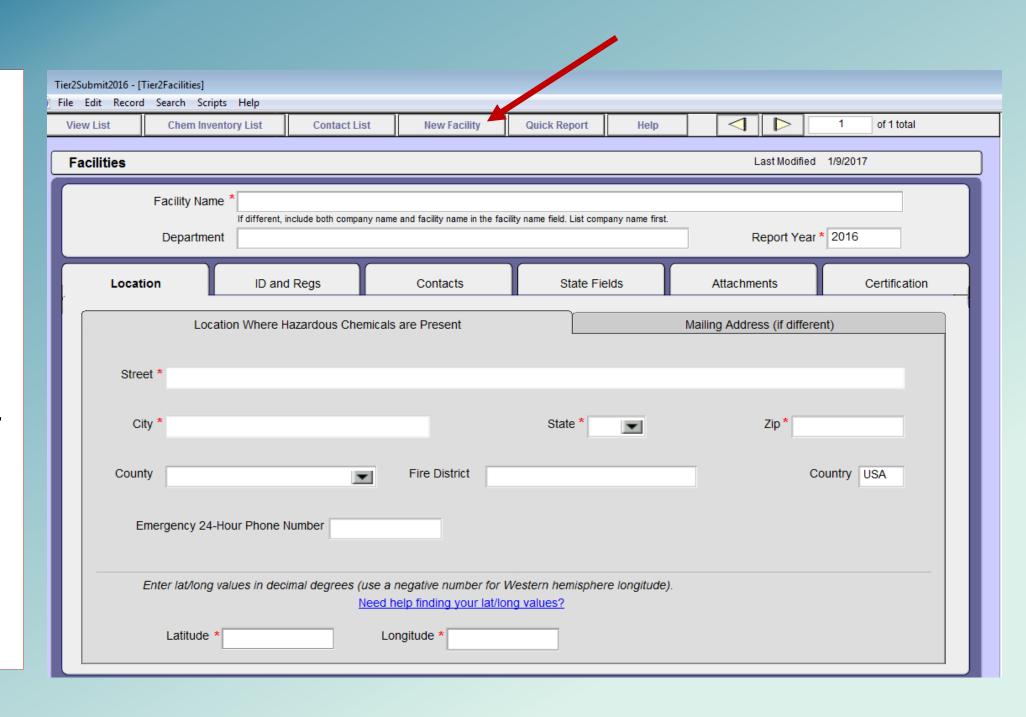
- If so, that data is available to modify, and update, and can be used for this year's filing.
- Tier2 Submit provides the process to import that data.
- Locate last year's data file, and use that path to import the data into Tier2 Submit.
- You may be able to get the file in electronic format from your state if you don't have it.

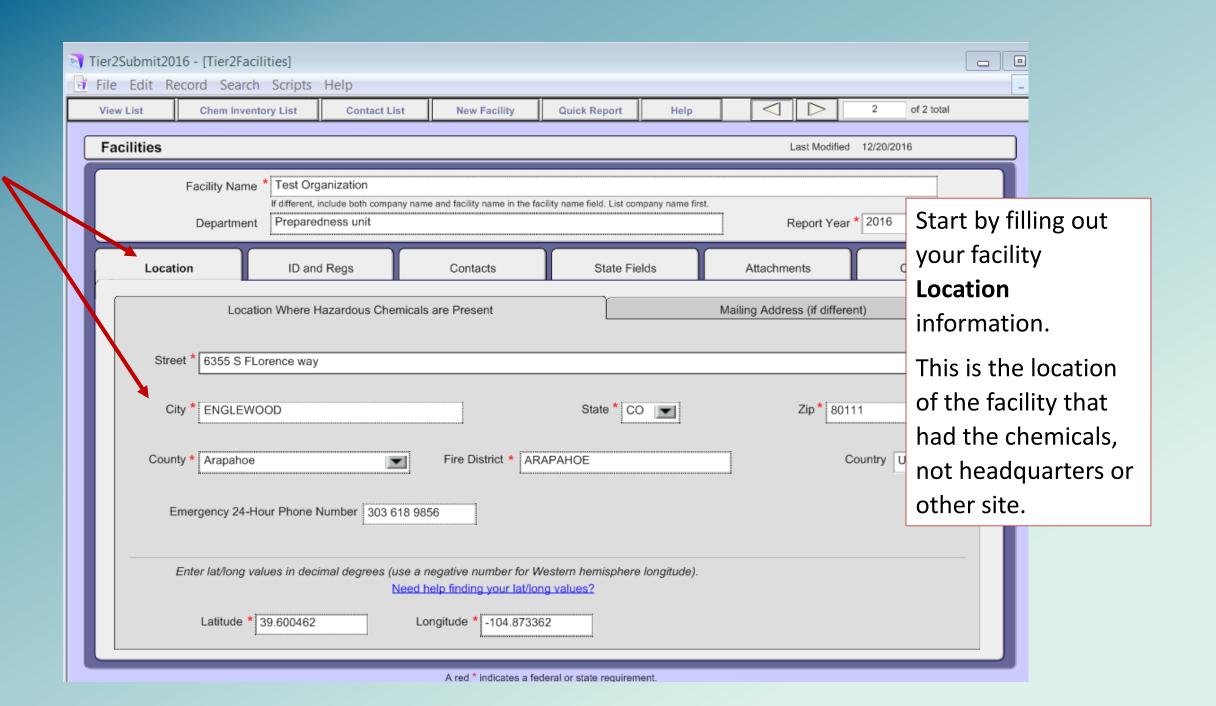


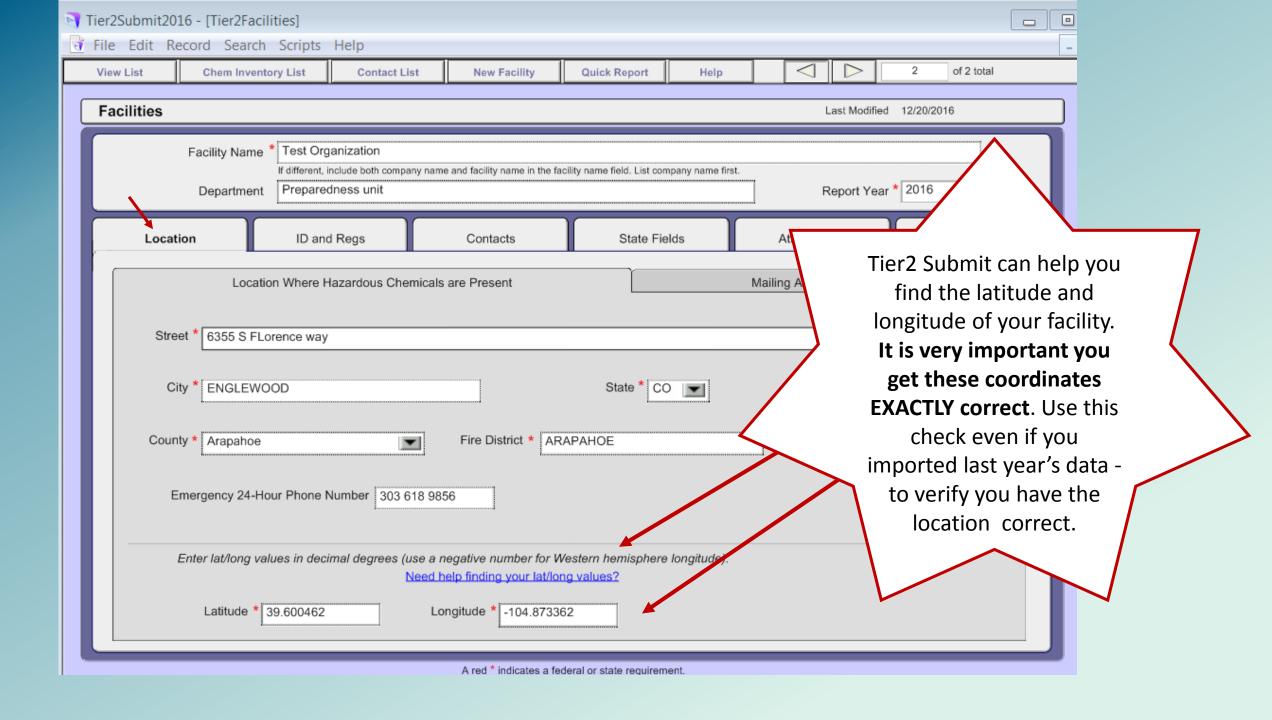
- If you are not importing data, or
- if this is the first
   Tier II report for
   your company,
   or
- if you're adding new facilities to your previous company report,

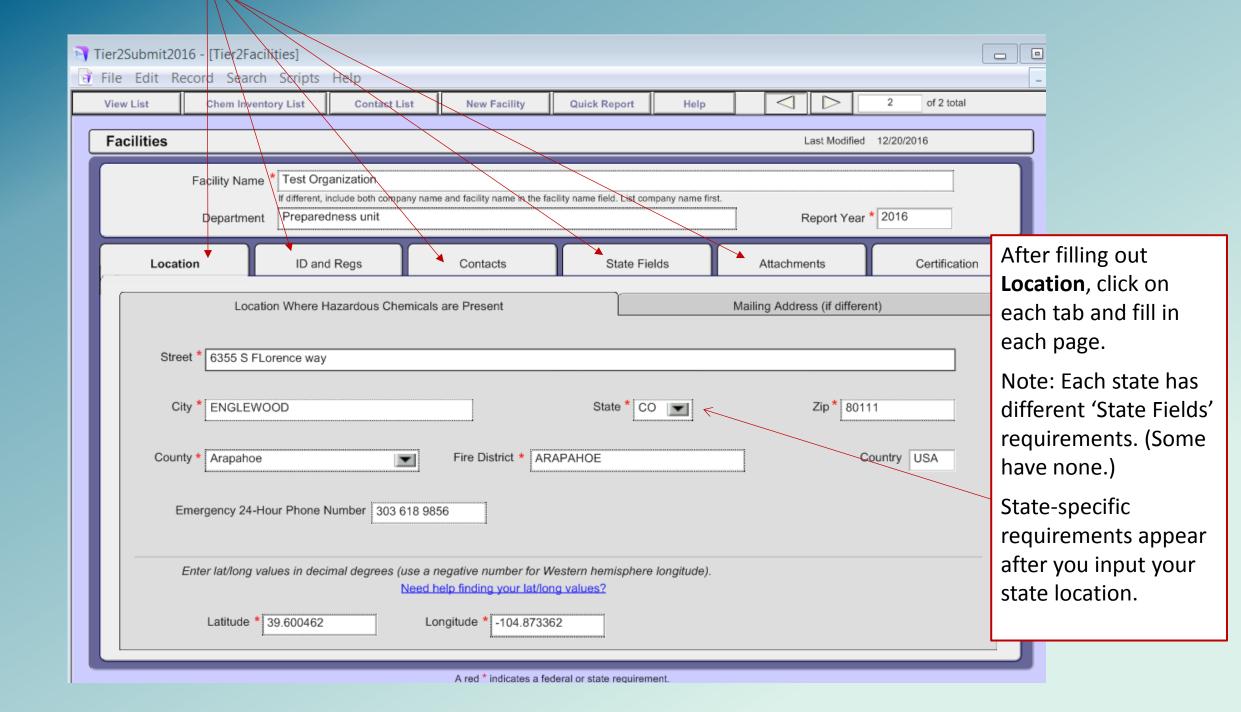
fill out the pages associated with these tabs.

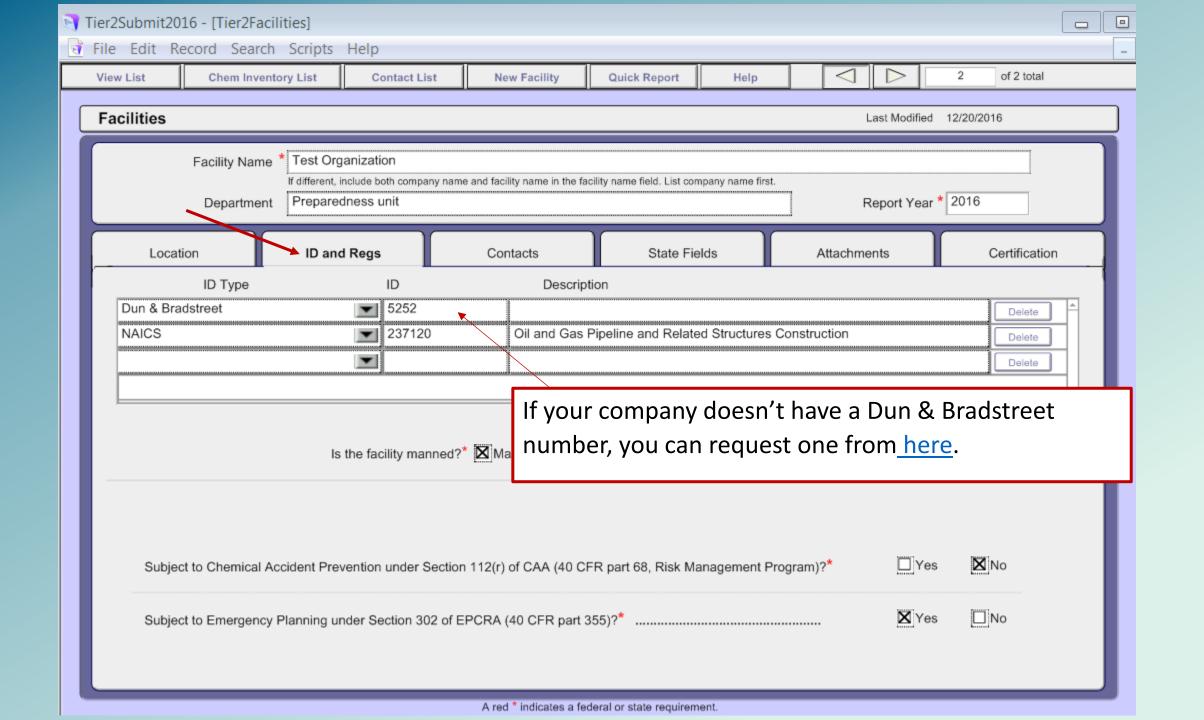
(If you are adding a new facility, click on **New Facility** tab to reach this page.)

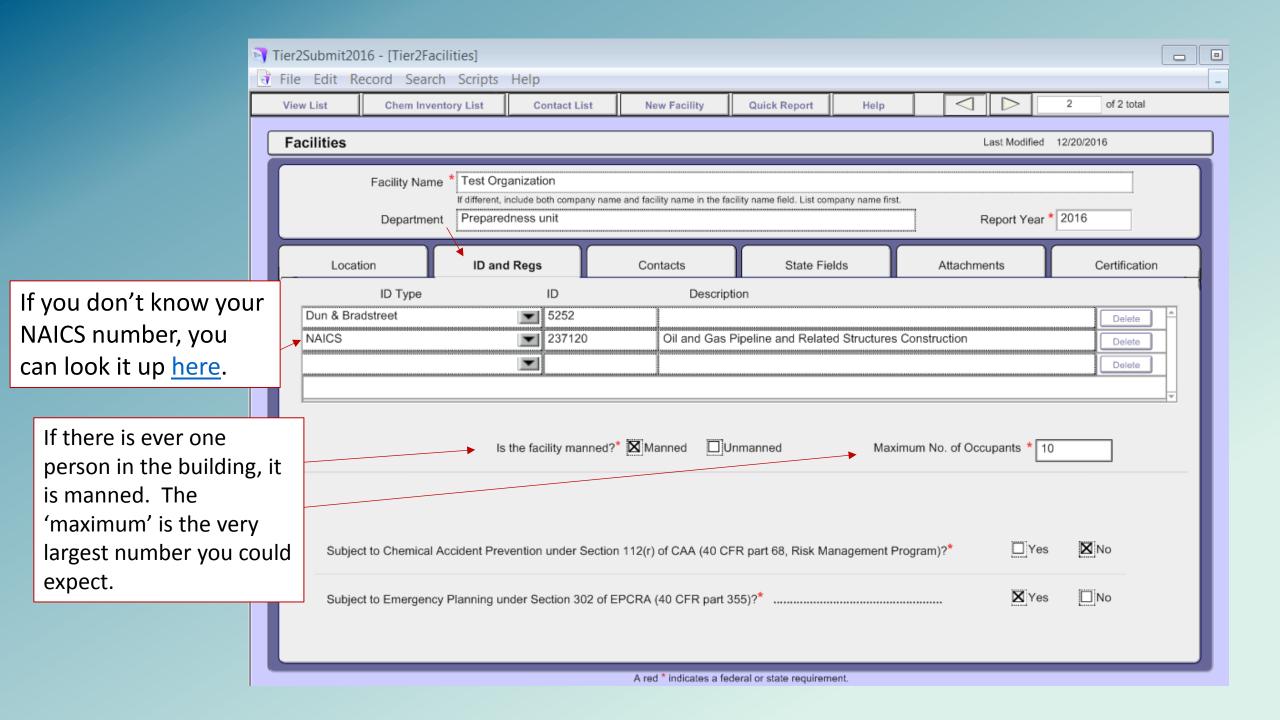


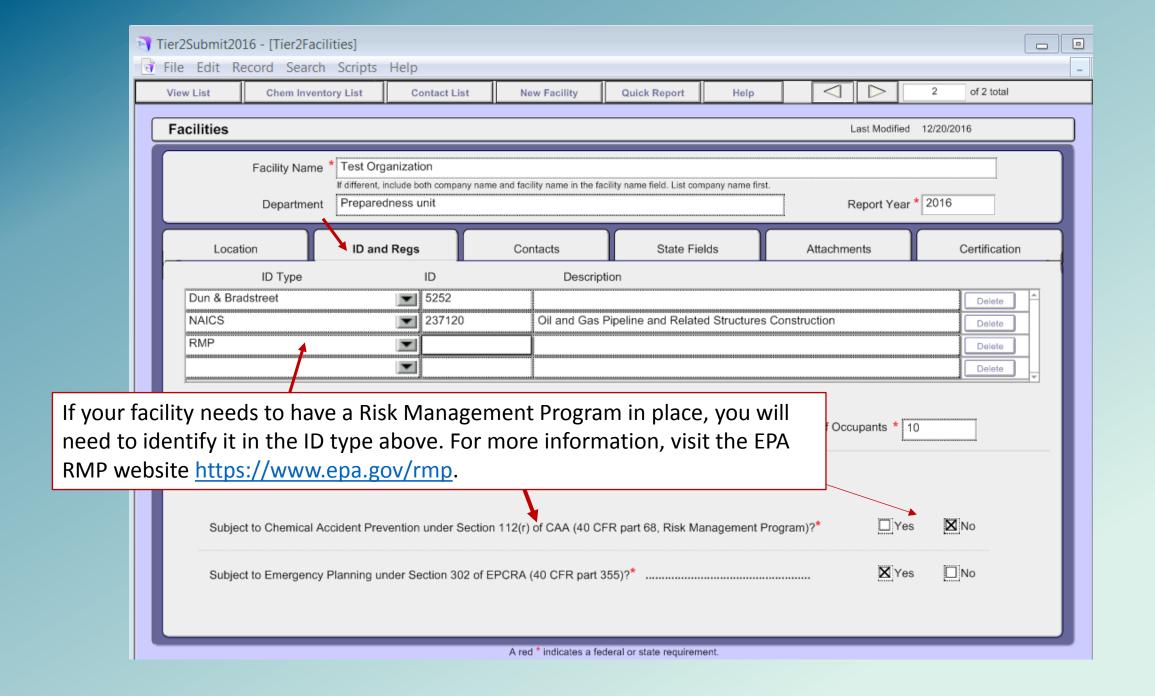


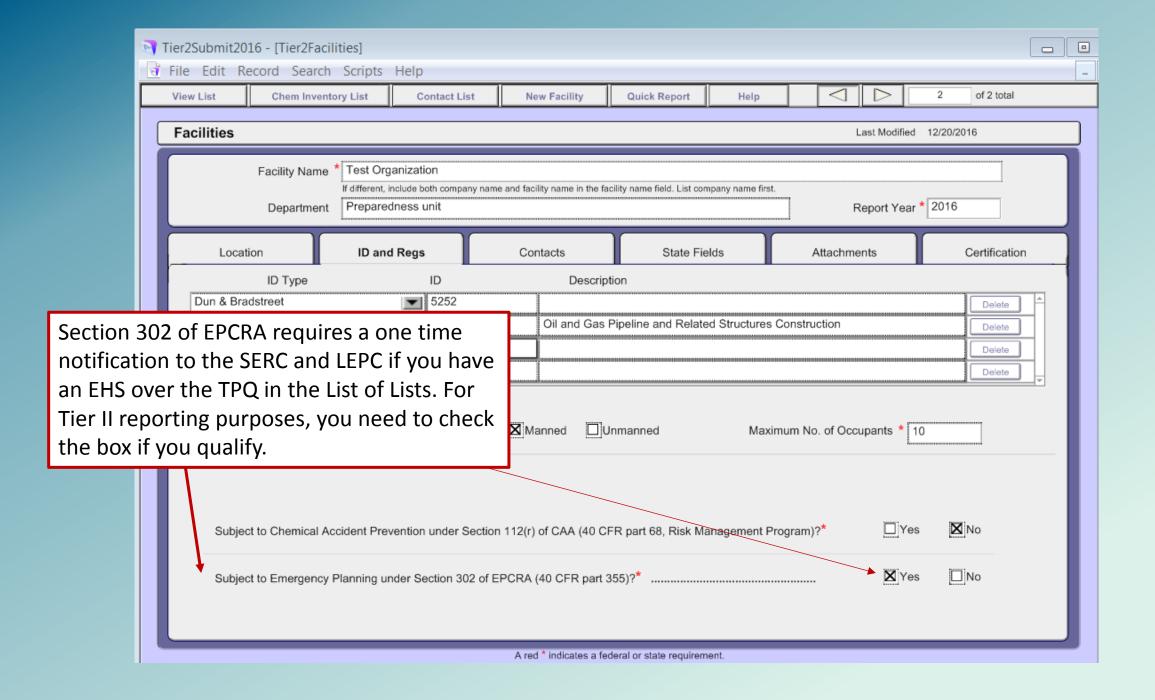


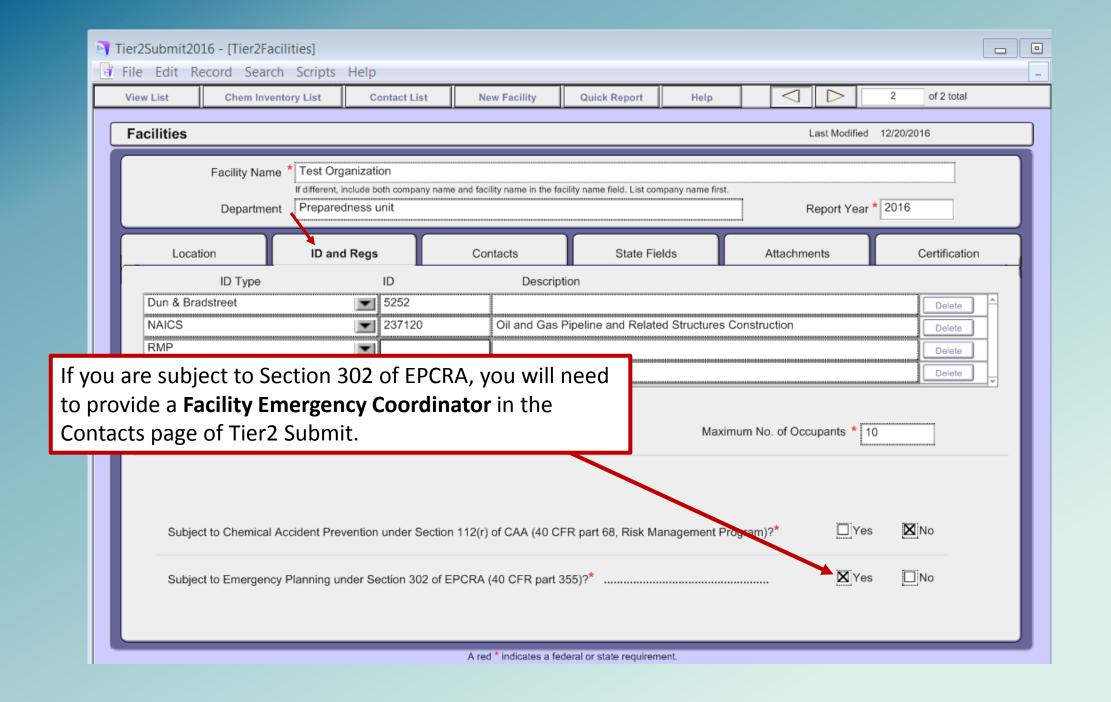


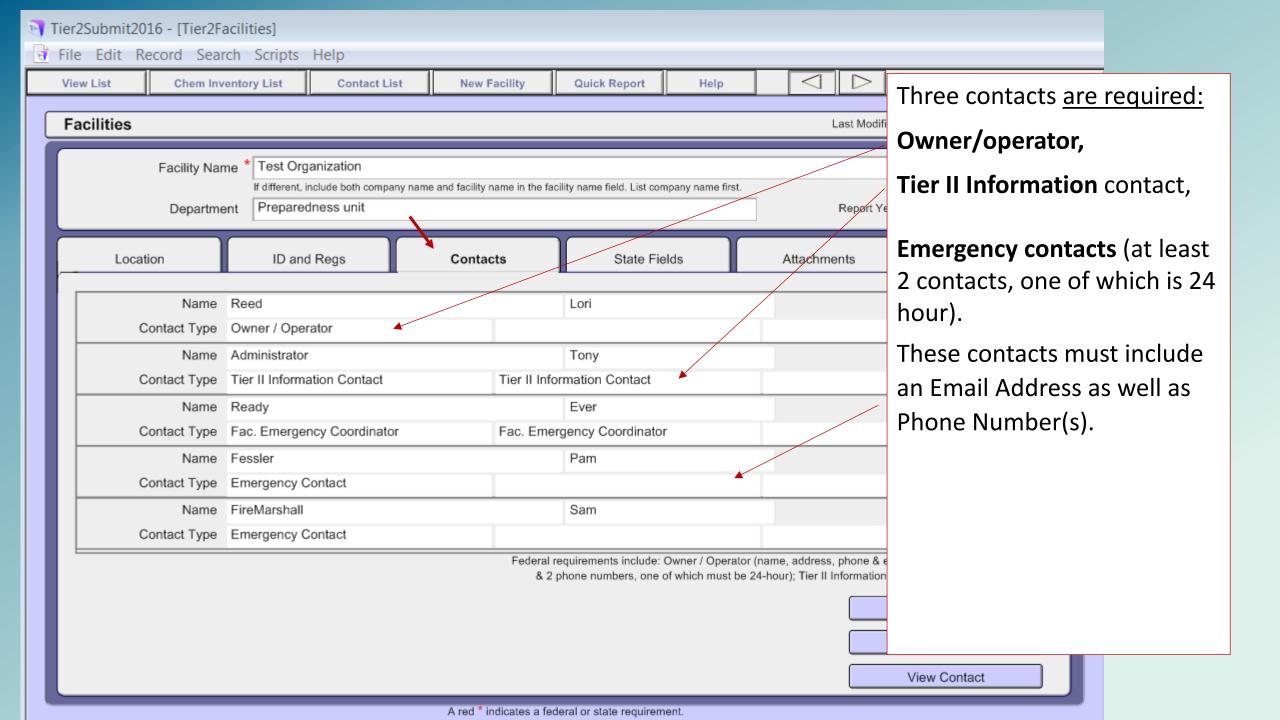


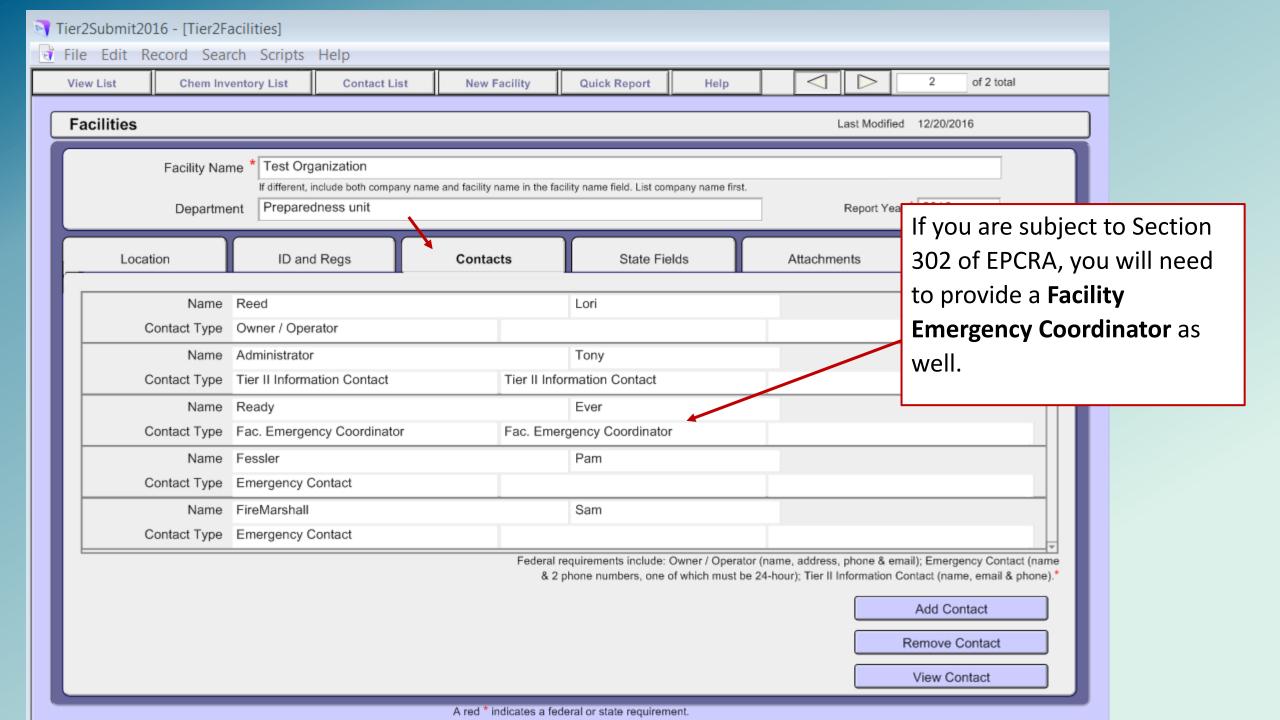


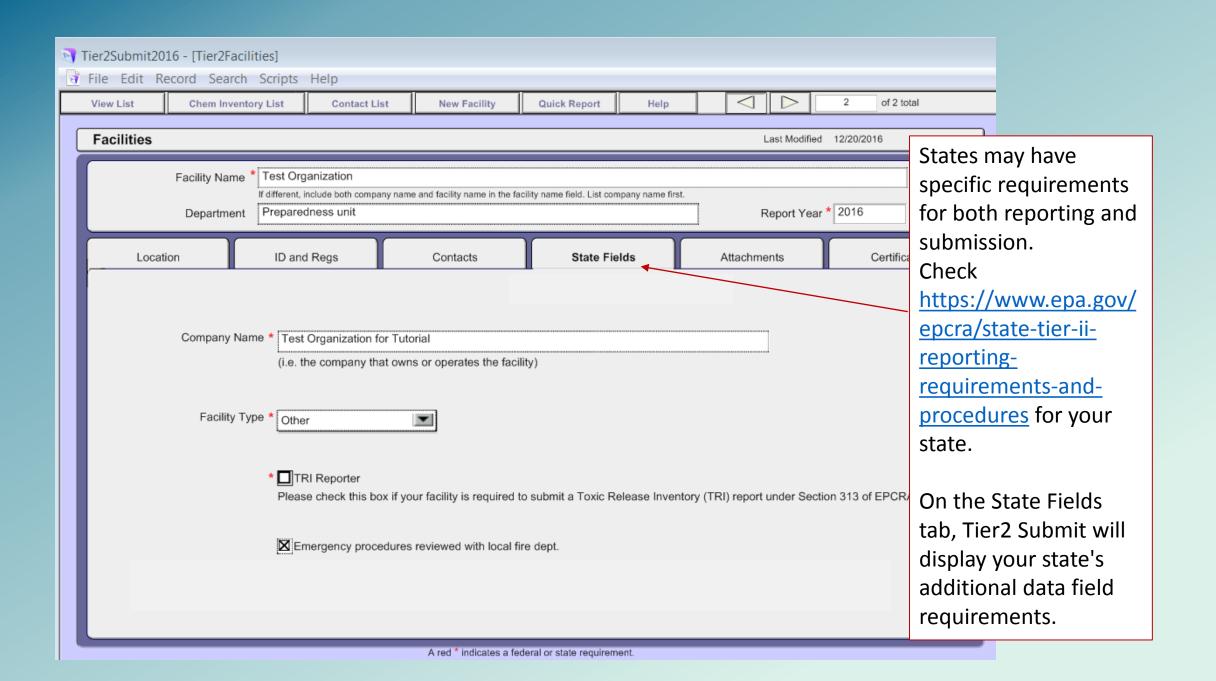


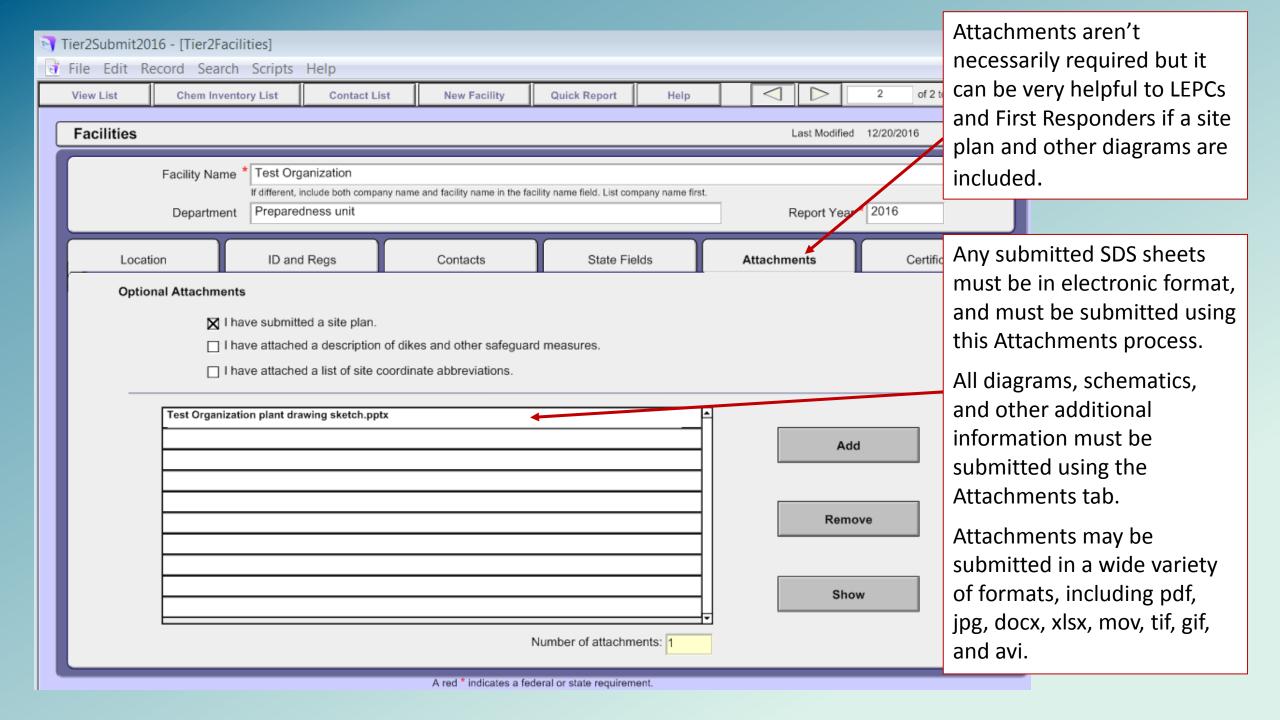


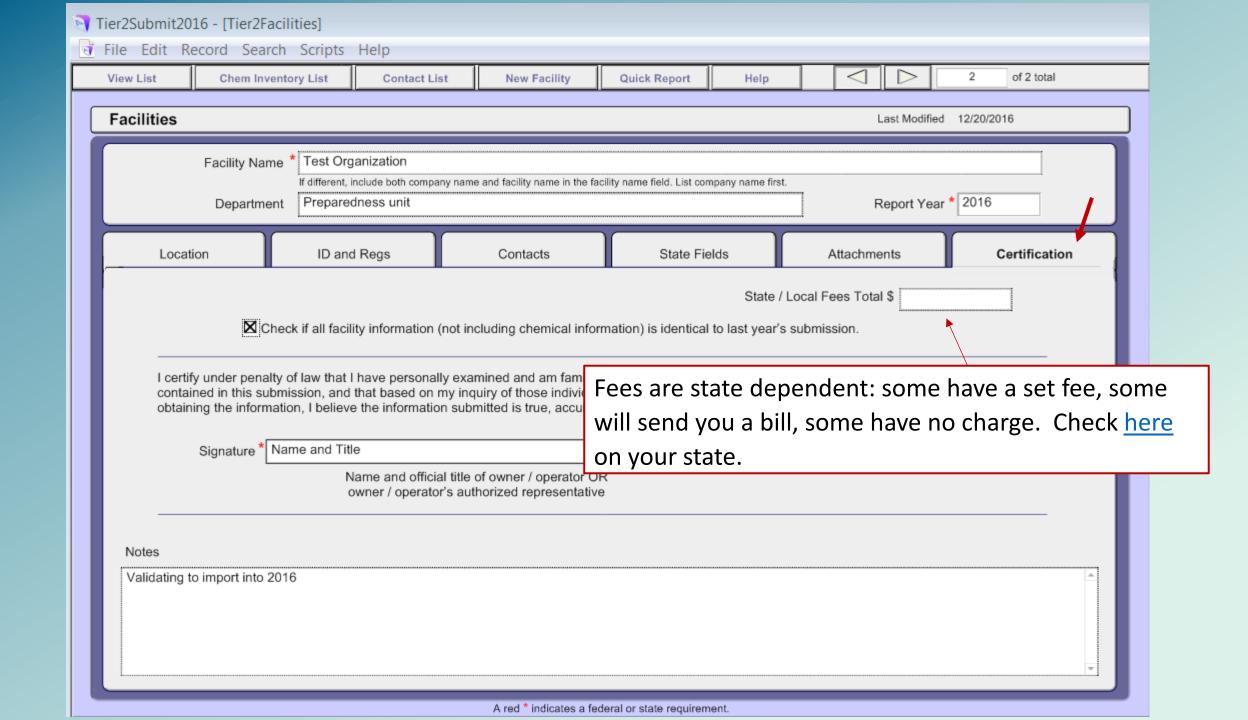


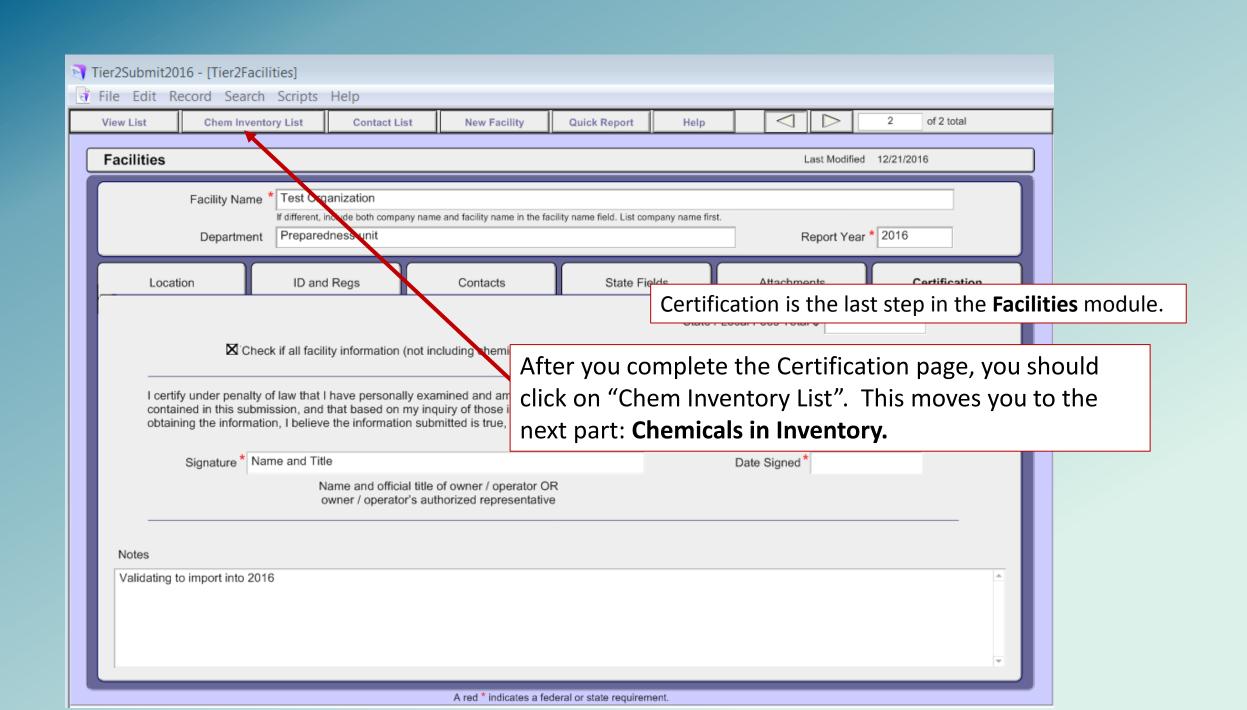












In the second part of Tier2 Submit,

- you add or verify chemicals you are required to report.
- either 'Hazardous Chemicals' or 'Extremely Hazardous Substances' (EHS) or a mixture containing these chemicals.
  - Hazardous Chemicals require OSHA Safety Data Sheets (SDS)
  - Extremely Hazardous Substances (EHS) are identified in the EPA <u>List of Lists</u>
  - CAMEO *Chemicals* can be used to search for EHSs of chemicals, <a href="https://cameochemicals.noaa.gov/">https://cameochemicals.noaa.gov/</a>

### Tier II Reporting Quantities:

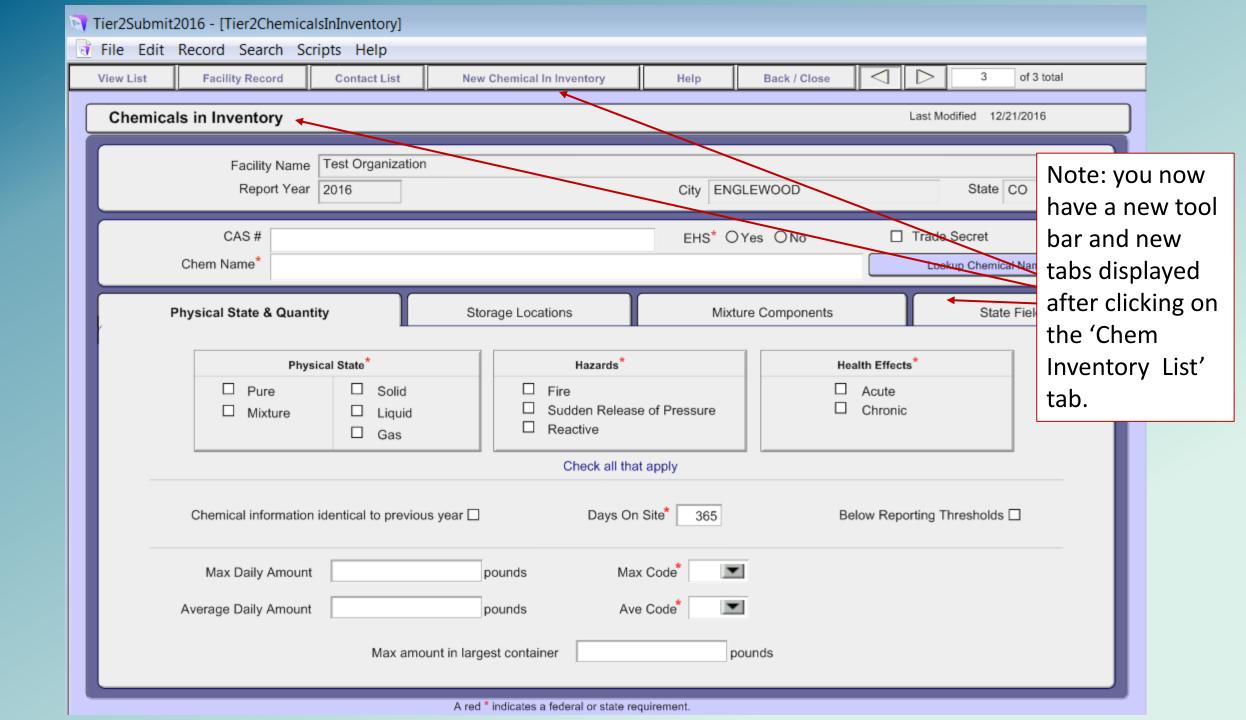
- 10,000 pounds for Hazardous Chemicals that are non-EHSs
- 500 pounds or the TPQ for Extremely Hazardous
   Substances (EHS), whichever is lower
- 75,000 gallons for gasoline or 100,000 gallons for diesel,
   if stored underground (UST) at a retail facility

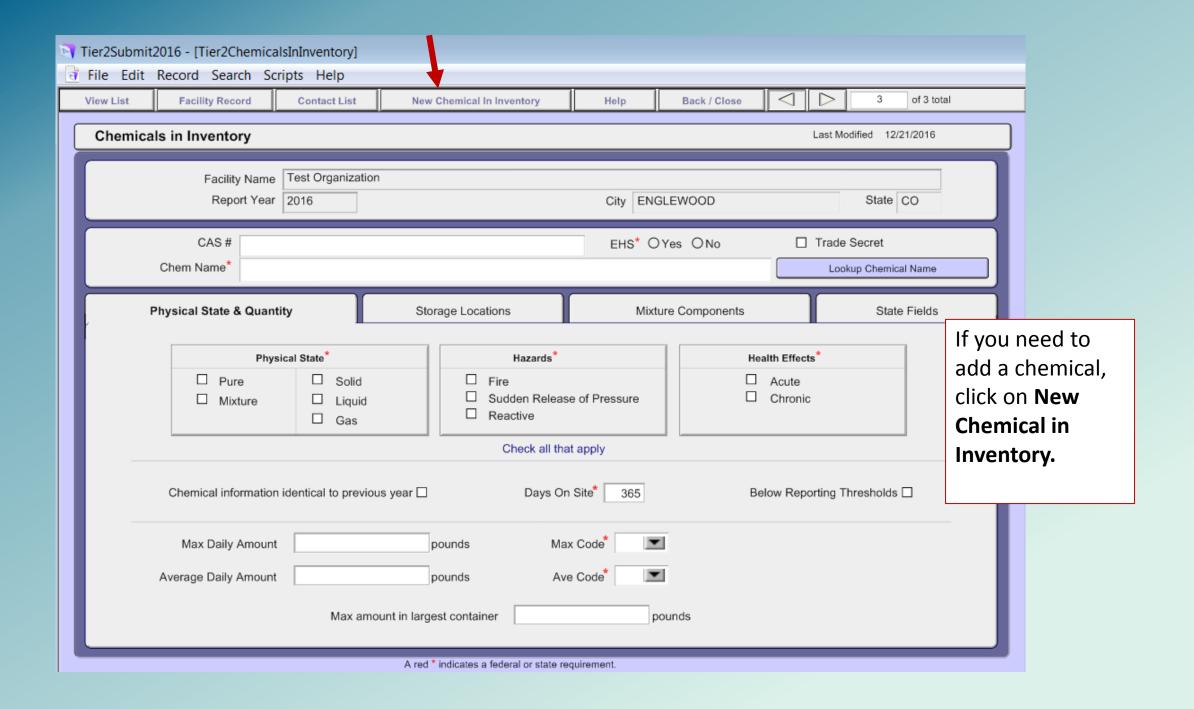
### **Qualifying Quantities**

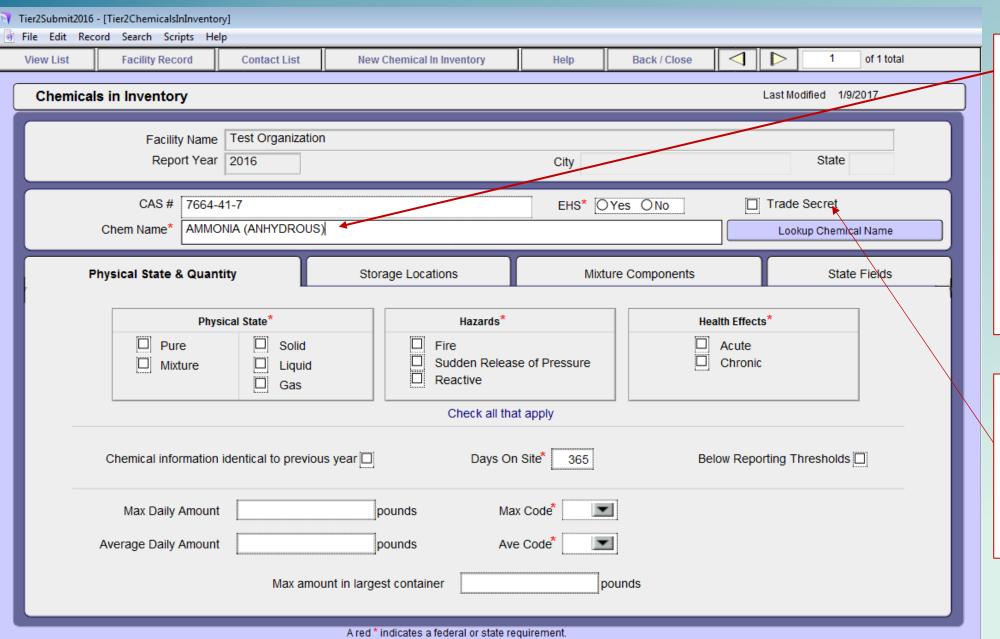
	Section 302	Section 304	Sections 311/312	Section 313
Chemicals Covered	355 Extremely Hazardous Substances	>1,000 substances	Approximately 500,000 hazardous chemicals	> 650 Toxic Chemicals and categories
Thresholds	Threshold Planning Quantity 1-10,000 pounds on site at any one time	Reportable quantity, 1-5,000 pounds, released in a 24-hour period	500 pounds or TPQ whichever is less for EHSs; 75,000 gallons for gasoline; 100,000 gallons for diesel and 10,000 pounds for all other hazardous chemicals	25,000 pounds per year manufactured or processed; 10,000 pounds a year otherwise used; persistent bioaccumulative toxics have lower thresholds

#### Excerpt from the:

Emergency Planning and Community Right-to-Know Act
Office of Emergency Management. For more information, click on <u>Fact Sheet.</u>

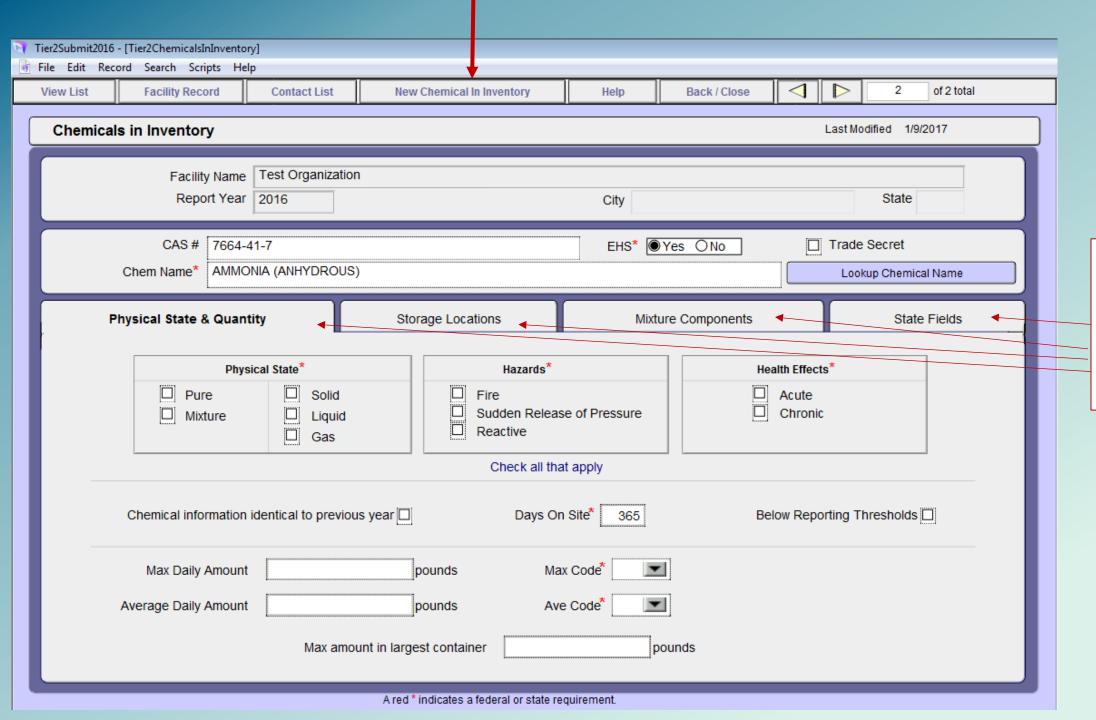




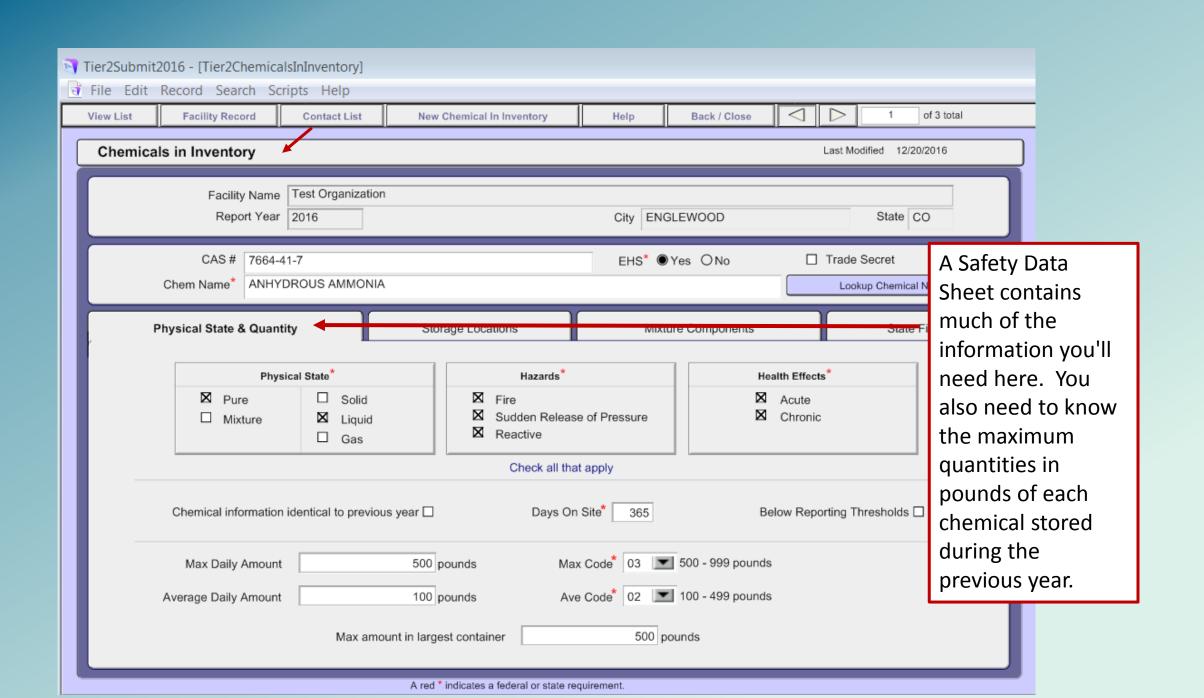


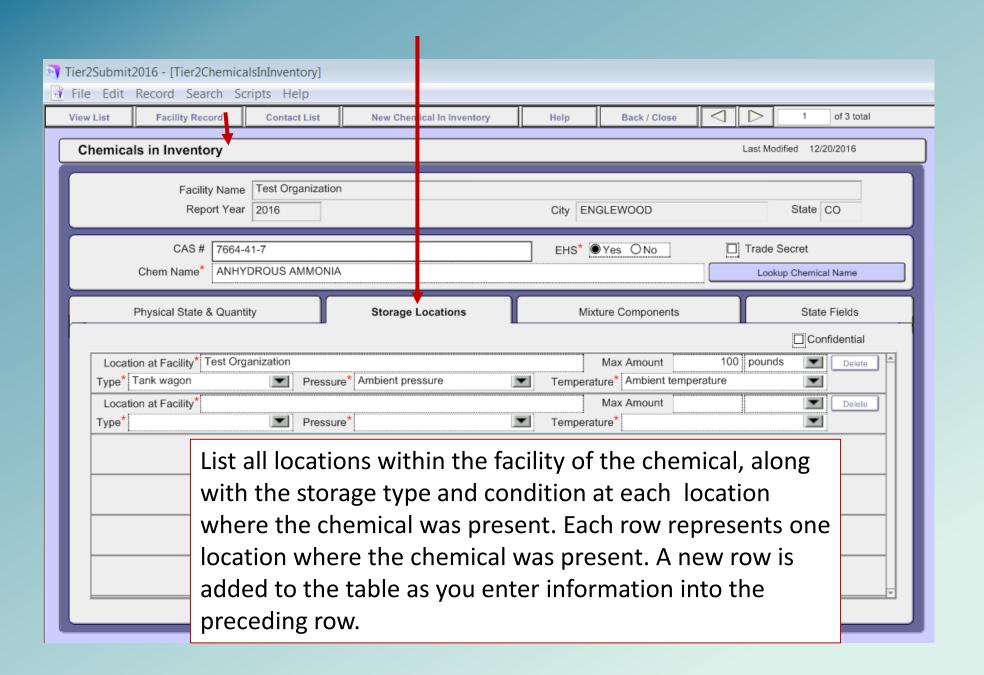
Make sure you fill in the correct chemical name, the CAS number, and note if it is an Extremely Hazardous Substance (EHS).

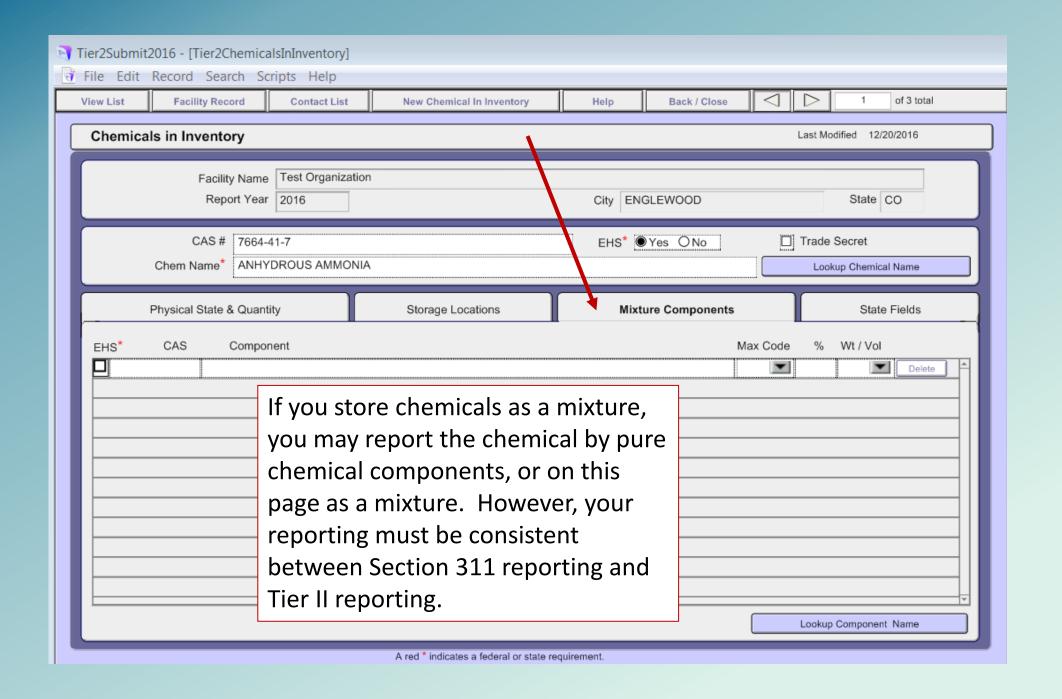
Select the Trade
Secret box ONLY if
you have followed
all the steps and
have been
approved by EPA.

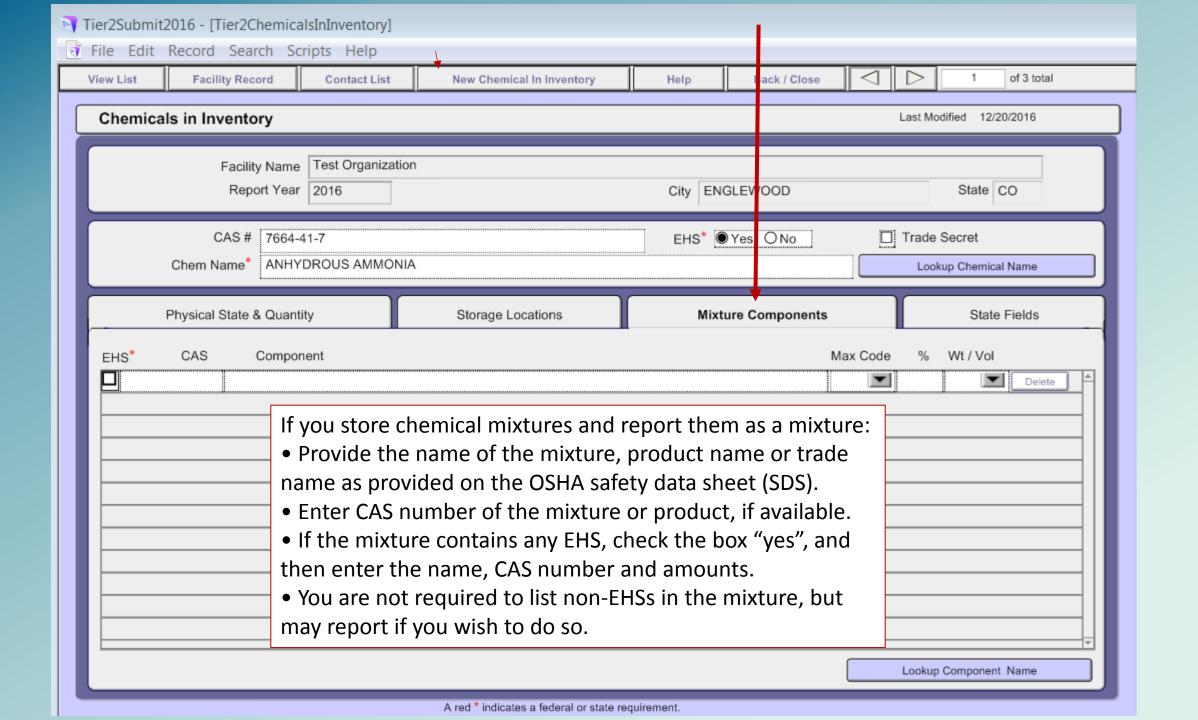


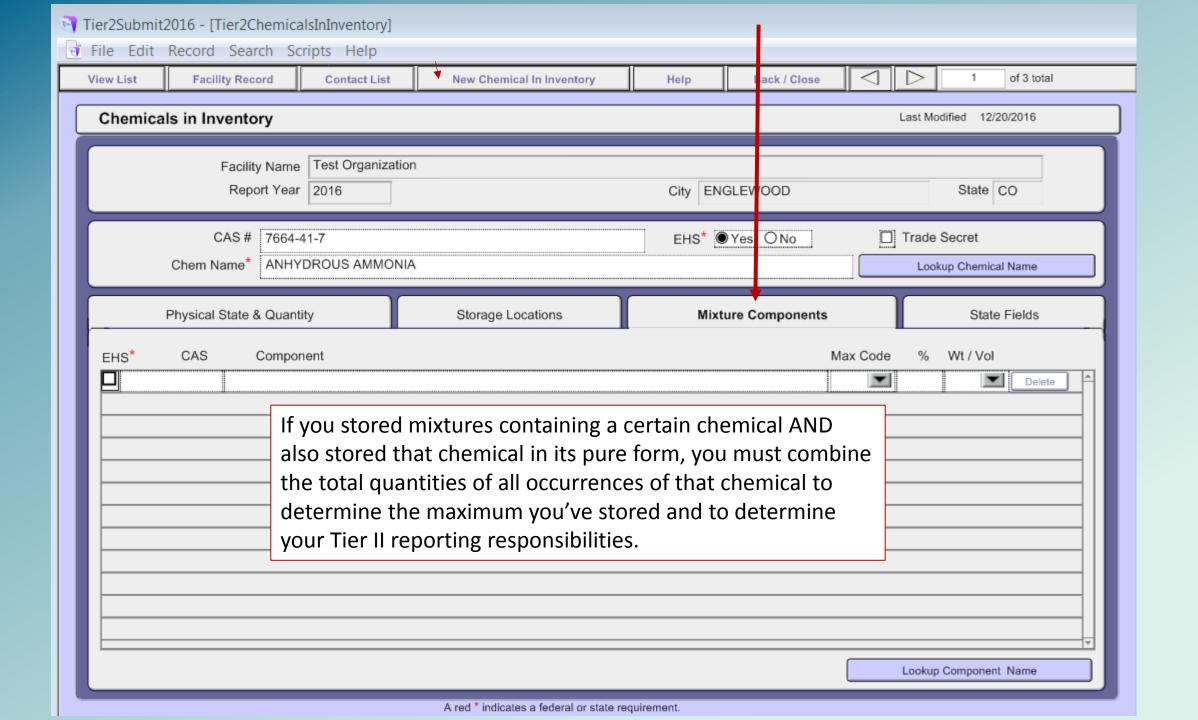
You will have a set of tabs to fill out for the new chemical.

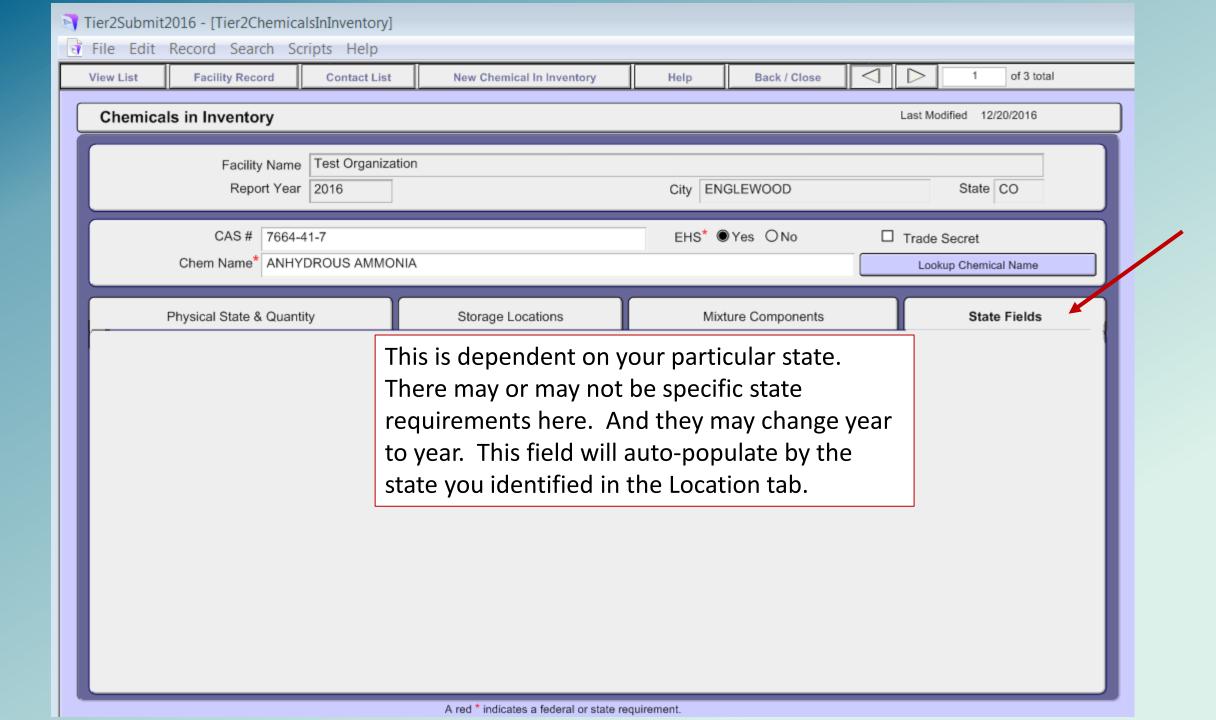




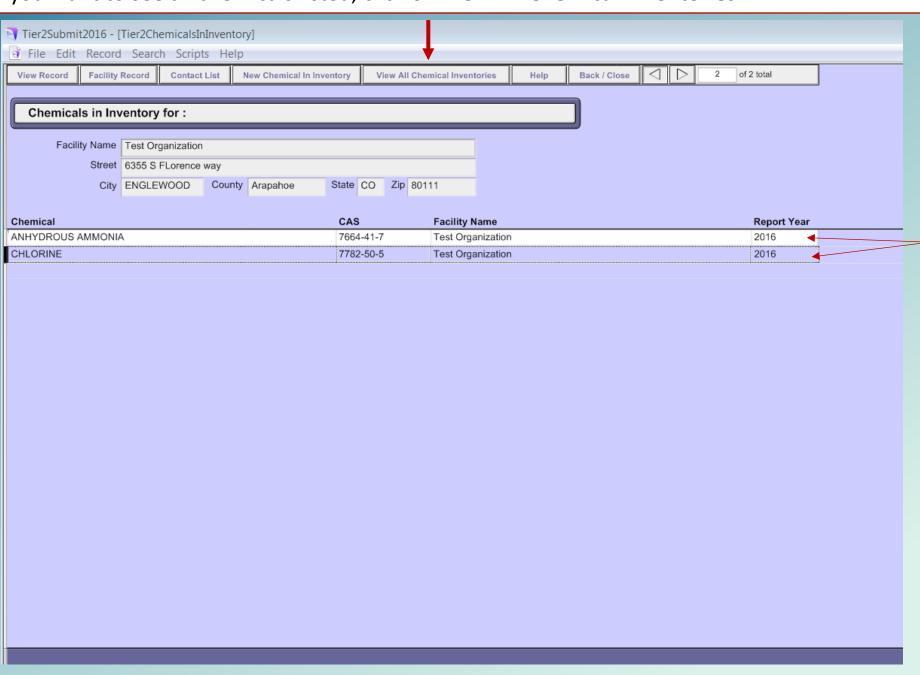




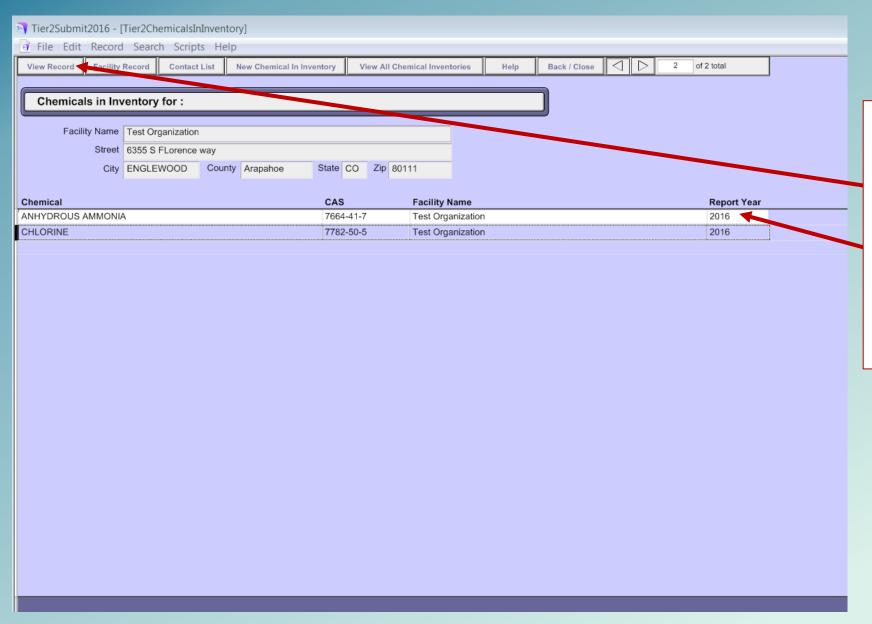




If you want to see all chemicals listed, click on View All Chemical Inventories.

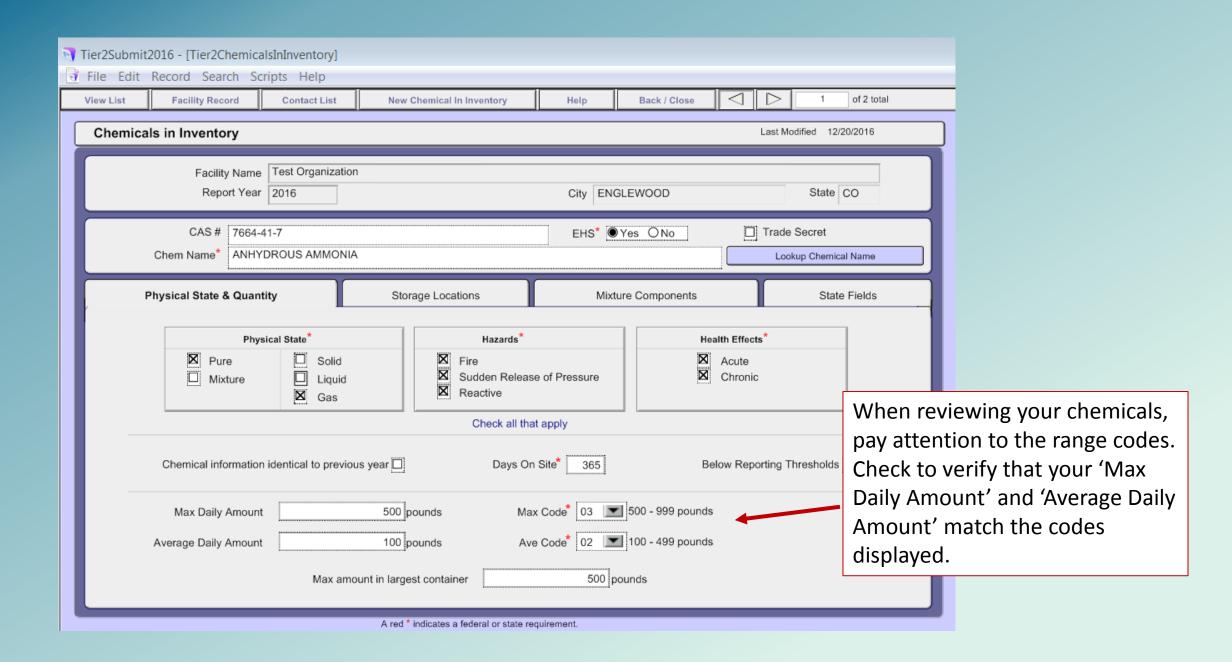


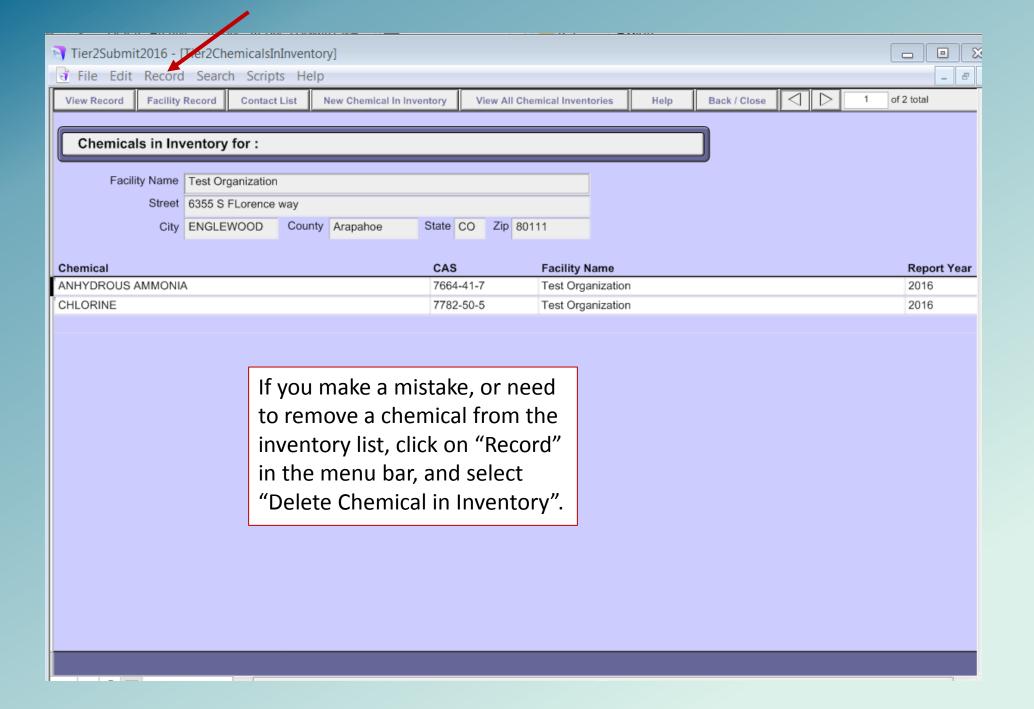
Two chemicals are associated with this facility



Select a chemical to review by clicking on it once to highlight it, and then click on "View Record."

Or simply double click on the chemical.





## Now it is time to verify your Tier II information

- 1. 'Validate' the data
  - This process reviews the data to ensure all required data has been entered.
  - This can be interactive: The 'Validate Record' runs the validation process for a facility until no omissions or errors are detected.
  - Alternatively you can run a 'Validation Report'
- 2. 'Submit' your data after the validation step is completed

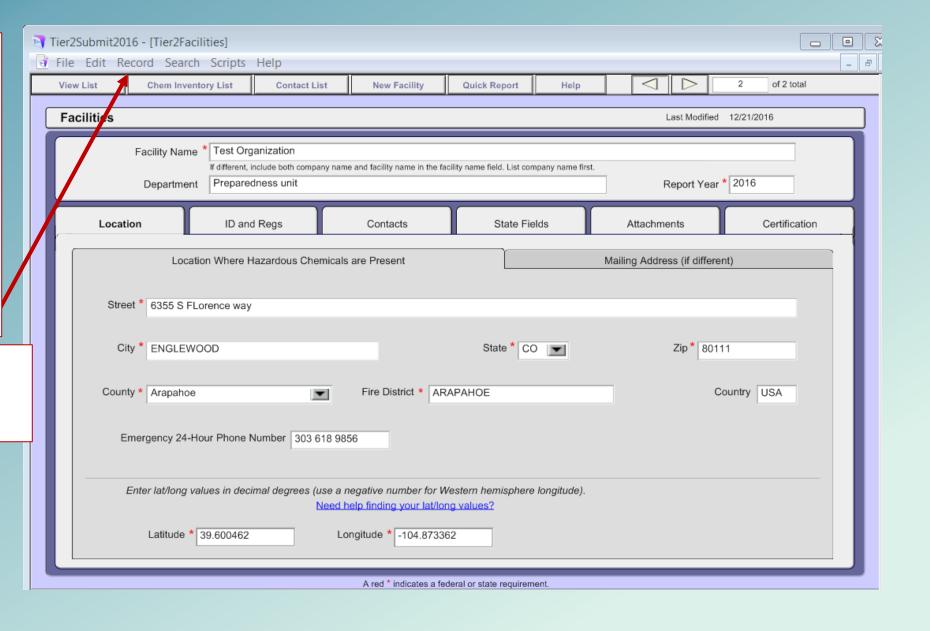
➤ Use the "Help" function in Tier2 Submit as it gives detailed instructions for validation and submission

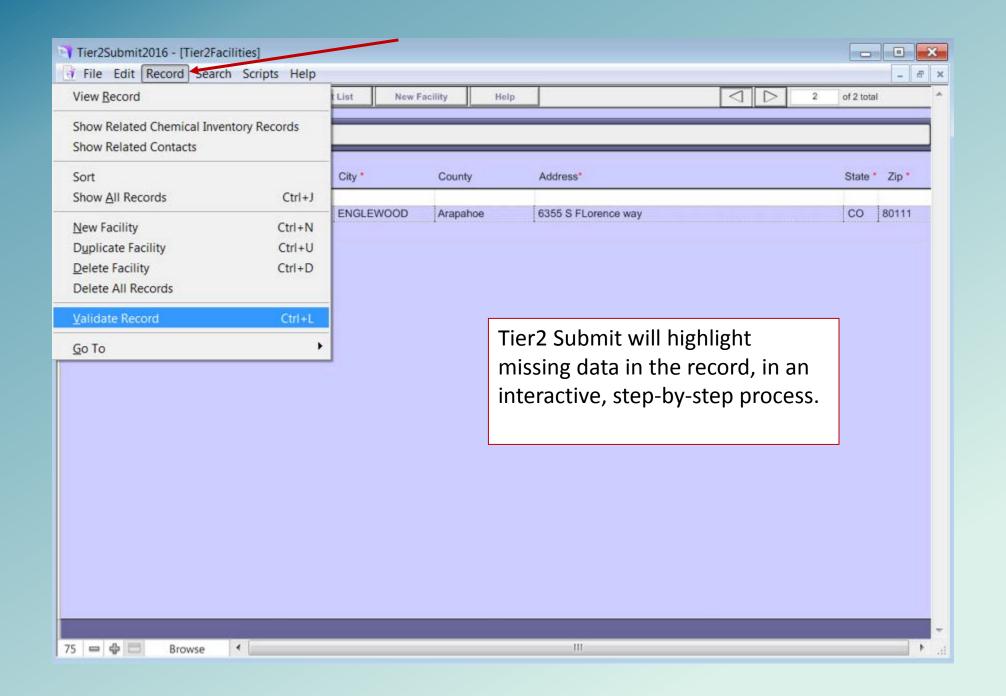
## Validating:

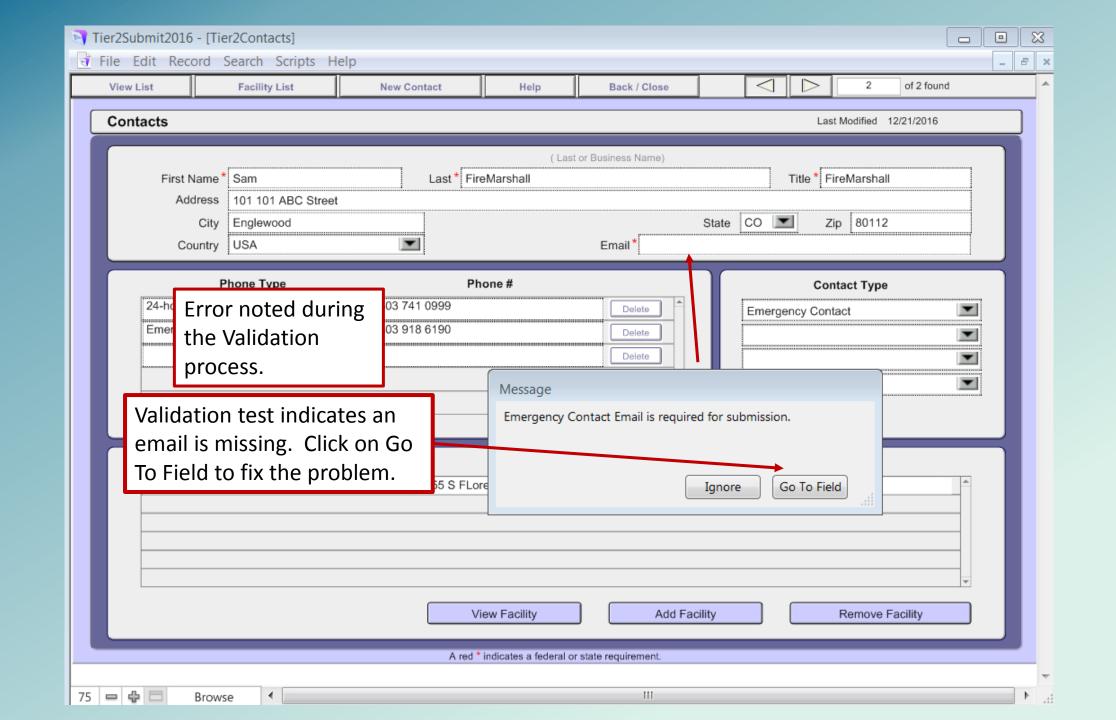
the error checking capabilities in Tier2 Submit.

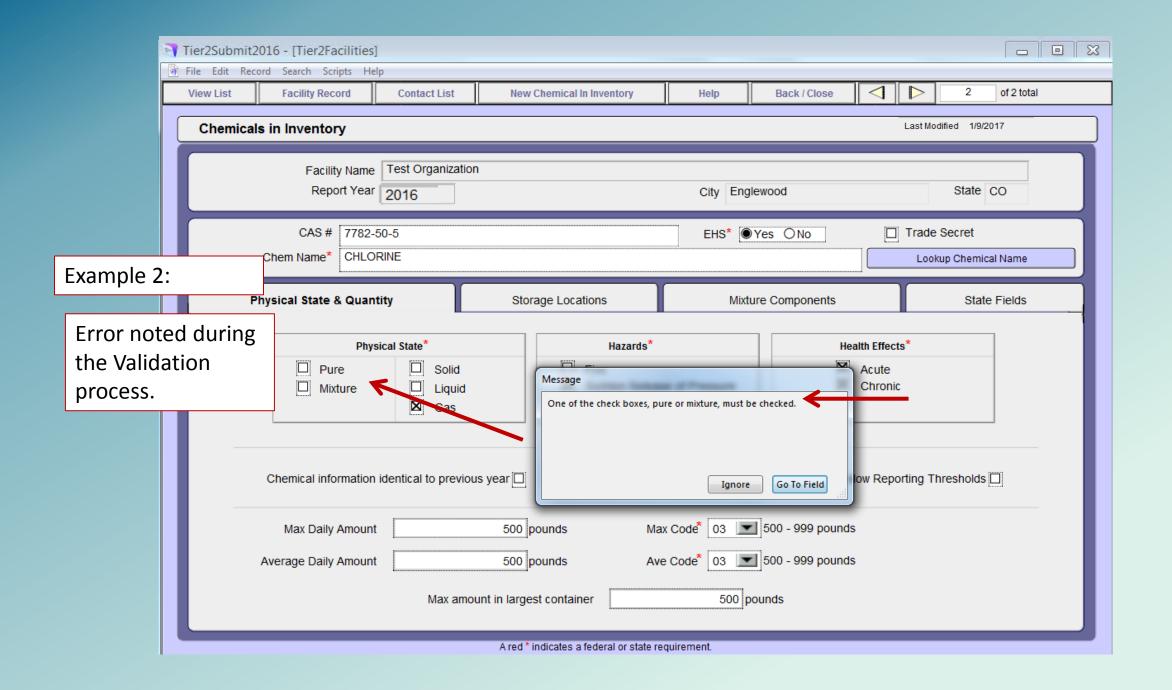
Option 1: Validate Record if you are just validating one facility.

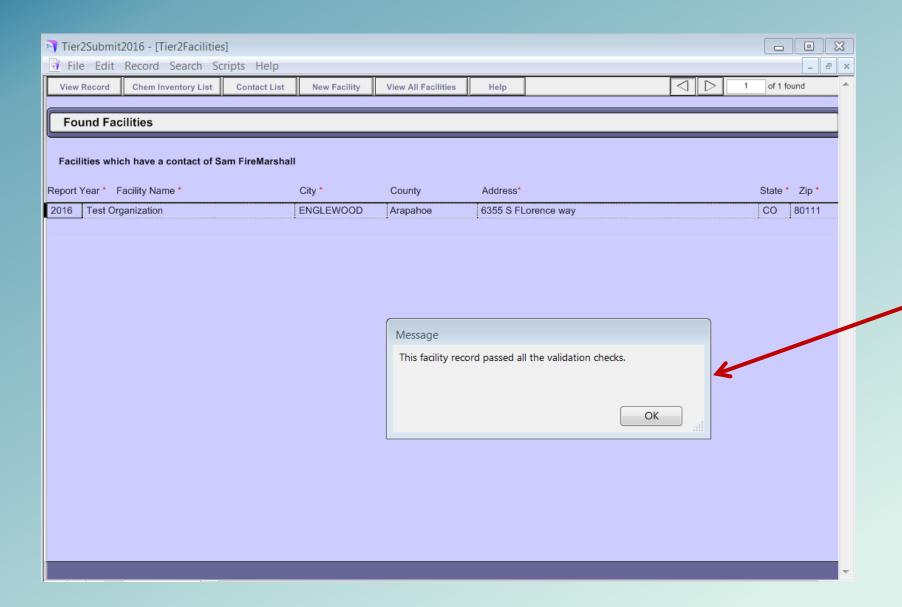
Click on Record for a drop down selection.







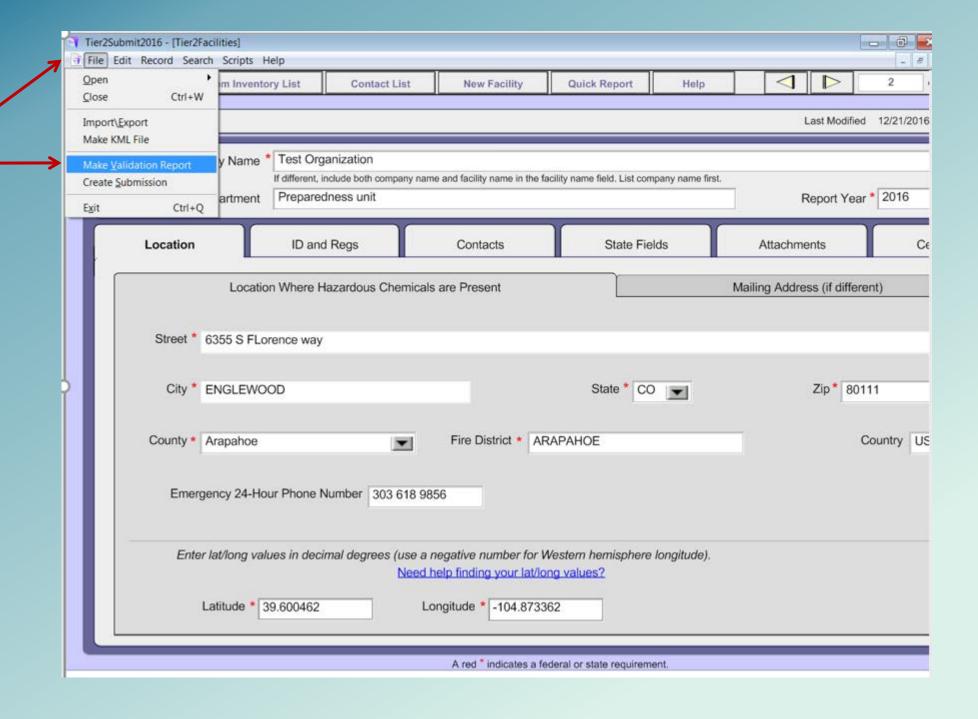


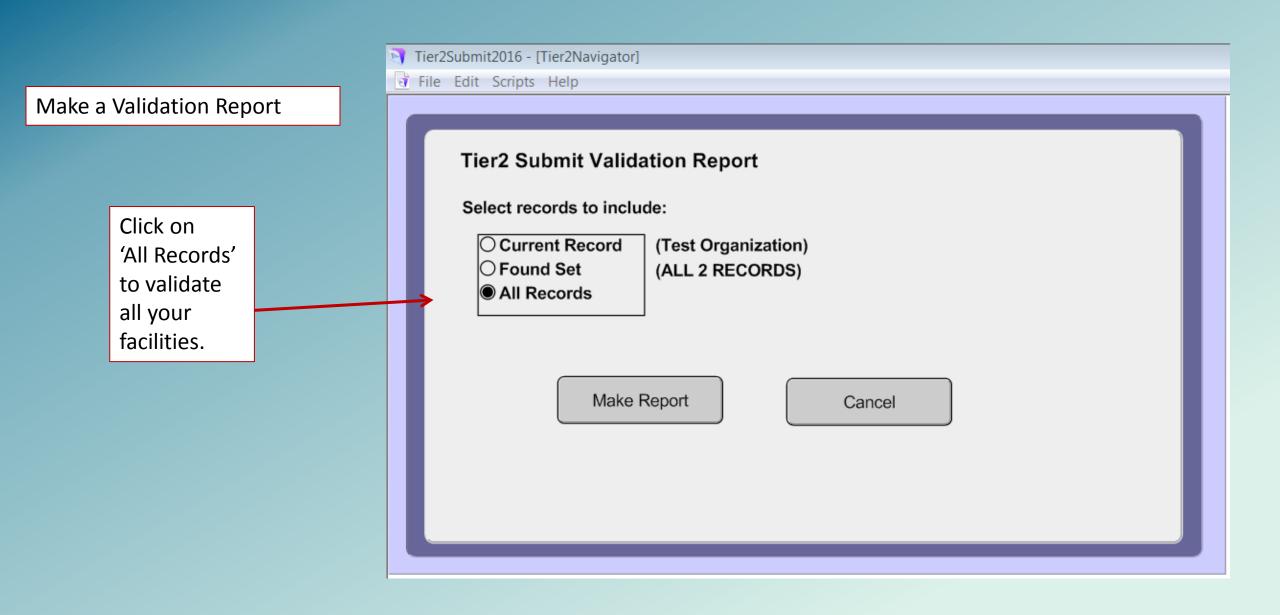


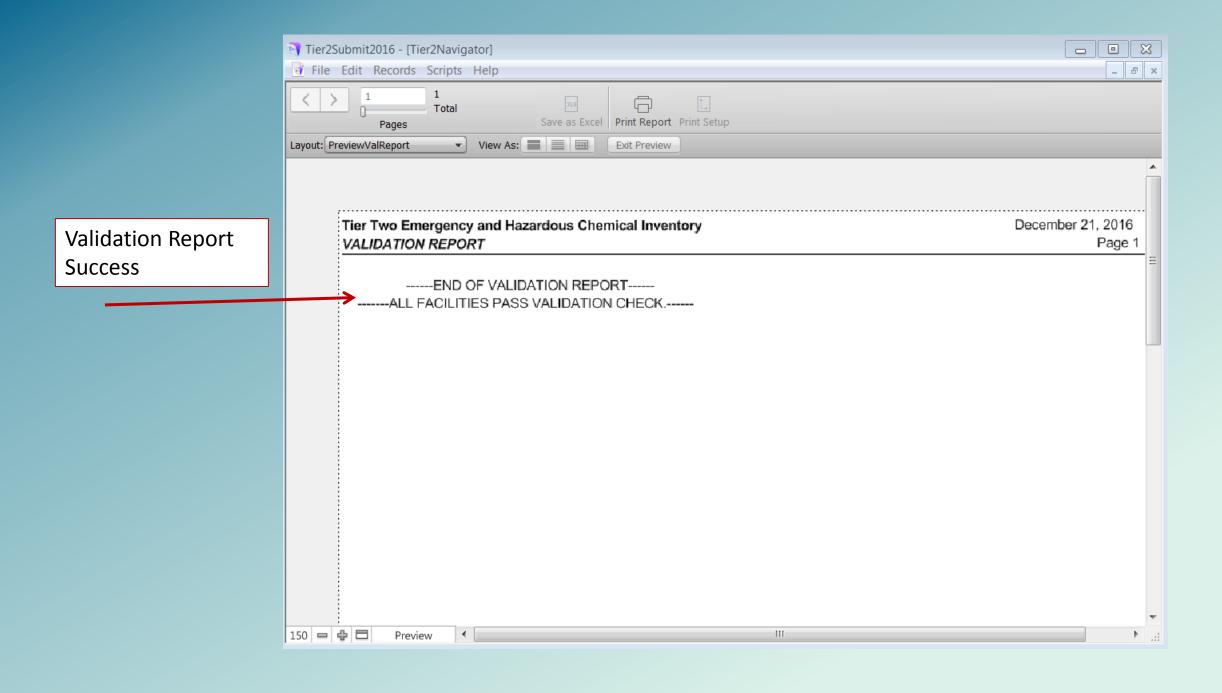
Example 3:

This facility passed validation!

Option 2 Run a Validation **Report** if you have multiple facilities. This can help you identify which facilities have errors, and then you can use Validate Record to focus on any errors in each facility.



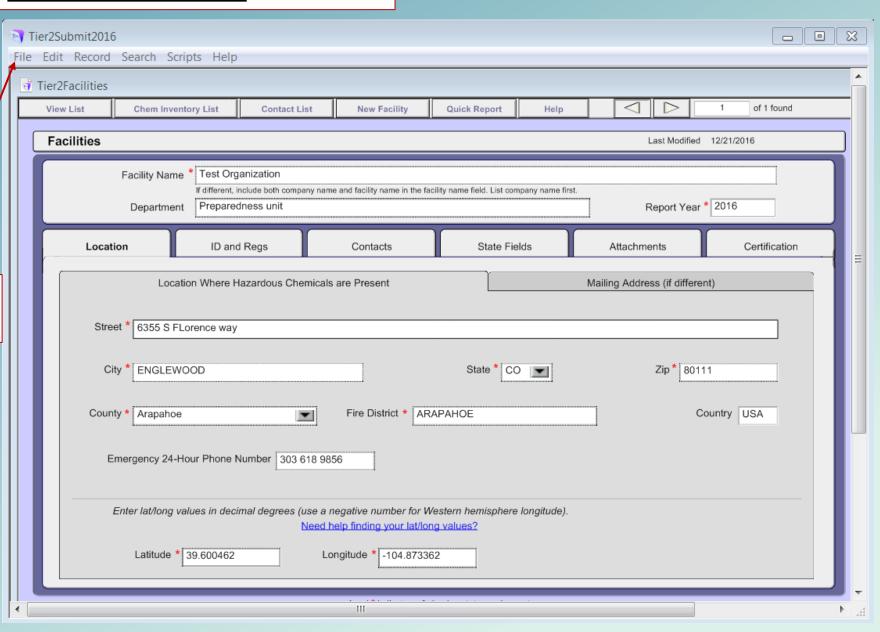


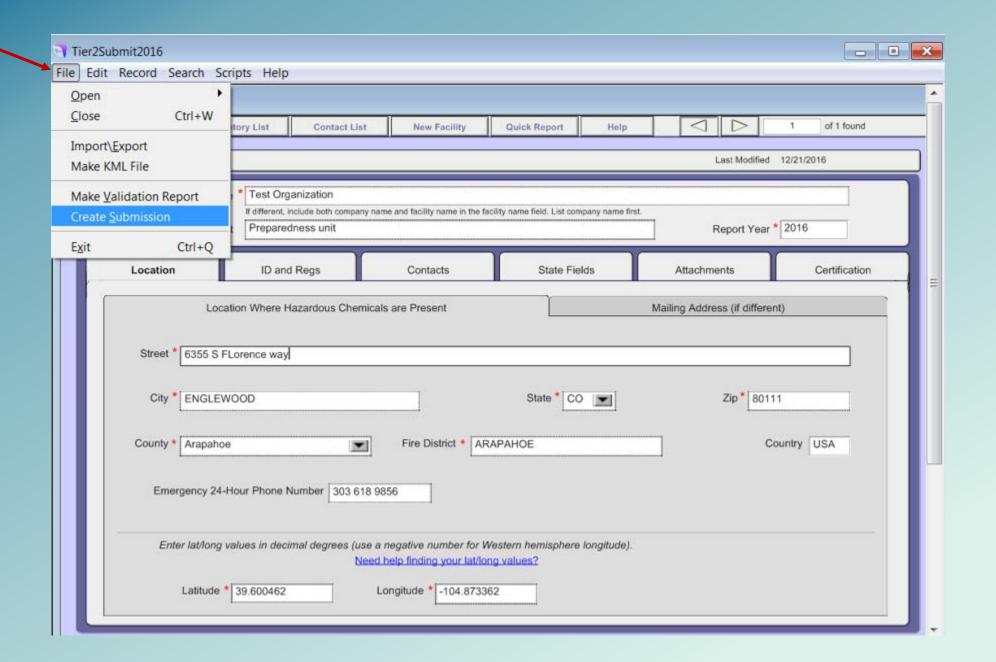


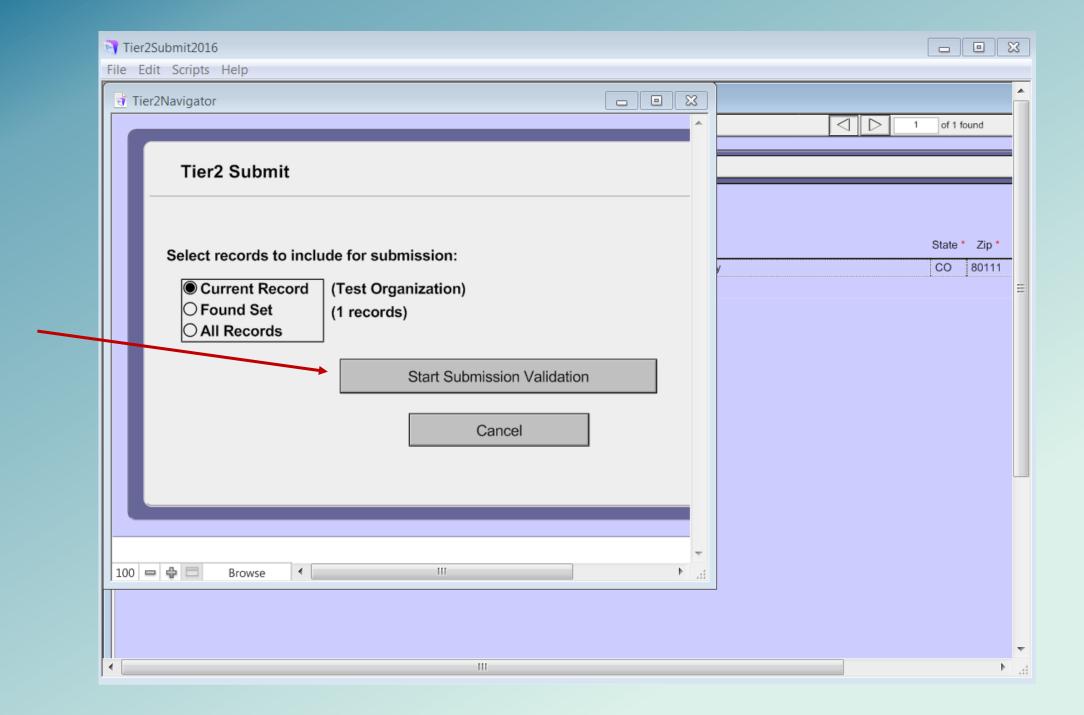
## The final step is to **Create Submission**

"Create Submission" creates the report to send to the state.

Click on 'File' to start the process.







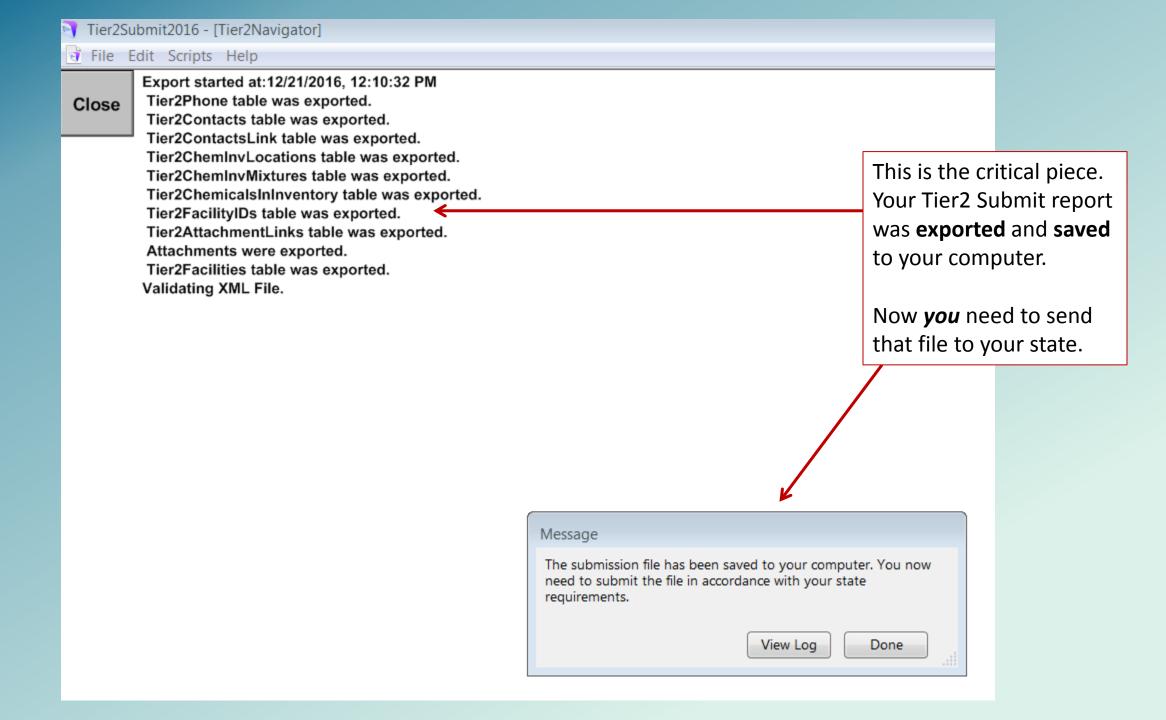
**EPA Website** 

Cancel

The Tier II Inventory Form (PDF) is available from:

Click on Create Electronic Submission File

Tier2 Submit will ask you where, in your computer files, you want to save the Submission file.



You are not finished after you click "Create Electronic Submission File".

You must submit the Tier2 Submit file by sending the file to your state. Specific instructions for your state are <a href="here">here</a>.

Tier2 Submit does not send it anywhere. It stores it on your computer for you to send.

- REMEMBER TO USE THE HELP FUNCTION IN TIER2 SUBMIT
- > FOR OTHER SOURCES OF TIER II INFORMATION:
  - The EPA website has more information at <a href="https://www.epa.gov/epcra">https://www.epa.gov/epcra</a>
  - EPCRA Fact sheet, Office of Emergency Management <a href="https://www.epa.gov/sites/production/files/2013-08/documents/epcra\_fact\_sheet.pdf">https://www.epa.gov/sites/production/files/2013-08/documents/epcra\_fact\_sheet.pdf</a>
  - List of Lists
  - Dun & Bradstreet numbers can be found at <a href="https://iupdate.dnb.com/iUpdate/companylookup.htm">https://iupdate.dnb.com/iUpdate/companylookup.htm</a>
  - For NAICS codes <a href="https://www.naics.com/search/">https://www.naics.com/search/</a>
  - For details on EPCRA implementing regulations, refer to 40 CFR part 370
  - For the actual CERCLA Superfund Title III <u>EPCRA Public Law</u>
  - State-specific requirements

Reminder, the deadline to submit is March 1st of every year.

Now it is your turn.