Emergency and Hazardous Chemical Inventory Reporting
SARA Title III - Sections 311 and 312

Title III of the Superfund Amendments & Reauthorization Act ("SARA Title III") is the Emergency Planning and Community Right-to-Know Act (EPCRA).

Are there chemicals in your inventory for which OSHA requires that you maintain material safety data sheets (MSDS)?

There is NO list of these chemicals.

Is the chemical on site in an amount equal to or greater than 10,000 pounds?

No

STOP
No Emergency & Hazardous Chemical Inventory report required.

Yes

Is the chemical a SARA Title III Extremely Hazardous Substance (EHS)? Refer to "List of Lists" (available on the Internet).

No

Is the EHS ever on site in an amount equal to or greater than its threshold planning quantity (TPQ)? Refer to "List of Lists".

No

Is the EHS ever on site in an amount equal to or greater than 500 pounds?

No

Yes

Notify the Michigan SARA Title III Program and your Local Emergency Planning Committee (LEPC) that the facility is subject to Section 302 Emergency Planning.

Yes

Submit a one-time initial report within 3 months after the chemical first becomes subject to reporting, then submit annual report by March 1st to: the Michigan SARA Title III Program, your LEPC, and your local fire department.

- Initial report = MSDS or list of chemicals and associated hazards.
- Annual report = Tier Two Emergency & Hazardous Chemical Inventory. Some exemptions might apply.

Note: The Michigan SARA Title III Program receives all reports on behalf of the State Emergency Response Commission (SERC).

- Michigan SARA Title III Program
  Department of Environmental Quality
  P.O. Box 30457
  Lansing, Michigan 48909-7957
  Phone: 517-373-8481
  E-mail: deq-ead-sara@michigan.gov

- U.S. Environmental Protection Agency
  EPCRA Call Center
  800-424-9346

- LEPC contact information available on the Internet
Release Reporting  
SARA Title III - Section 304  
Title III of the Superfund Amendments & Reauthorization Act ("SARA Title III") is the Emergency Planning and Community Right-to-Know Act (EPCRA)

Did you have an unpermitted release to the environment?  

No 

Yes 

Was a CERCLA hazardous substance and/or SARA Title III Extremely Hazardous Substance (EHS) released?  
Refer to "List of Lists" (available on the Internet).

No 

Yes 

Was the reportable quantity (RQ) of the substance potentially released to the environment? Refer to "List of Lists."

No 

Yes 

Immediately report the release to:  
- Local Emergency Planning Committee (LEPC) in area(s) potentially affected by the release.  
- DEQ Pollution Emergency Alerting System (PEAS)  
  PEAS 800-292-4706 (Out of state 517-373-7660)  
- U.S. Coast Guard National Response Center (NRC) if a CERCLA hazardous substance is released.  
  NRC 800-424-8802  

Submit a written follow-up report to the LEPC and the Michigan SARA Title III program.  

Note: The Michigan SARA Title III Program receives reports on behalf of the State Emergency Response Commission (SERC).

For SARA Title III information on the Internet, go to:  
- www.michigan.gov/deqsara  
- www.michigan.gov/deqrelease  
- www.michigan.gov/deqemergencyplan

STOP  
No release report required under SARA Title III.
Toxic Chemical Release Inventory Reporting

SARA Title III - Section 313

Title III of the Superfund Amendments & Reauthorization Act ("SARA Title III") is the Emergency Planning and Community Right-to-Know Act (EPCRA).

Does your facility have 10 or more full-time employees or the equivalent (20,000 hours per year)?

**Yes**

Is your facility's primary SIC Code covered under Section 313 reporting? Or is your facility a federal facility?

(See Table 1 of covered SIC codes on next page.)

**No**

**STOP**

No Toxic Chemical Release Inventory report required

**Yes**

Does your facility manufacture, process or otherwise use Section 313 listed toxic chemicals or chemical categories?

(Refer to "List of Lists," available on the Internet.)

**No**

Does the activity (manufacture, process, or otherwise use) exceed any activity thresholds for the chemical (after excluding quantities exempt from activity threshold)?

Activity thresholds are 25,000 lbs. manufactured OR 25,000 lbs. processed OR 10,000 lbs. otherwise used except for chemicals that are persistent, bioaccumulative and toxic (PBT). For PBT chemicals and thresholds, see next page.

**No**

Is the chemical in the dioxin and dioxin-like compound category?

(See PBT chemical list on next page.)

**Yes**

Is the amount manufactured OR processed OR otherwise used, less than or equal to 1 million lbs. AND below annual reportable amount of 5,000 lbs for non-PBT and 500 lbs for PBT chemicals?

**No**

**Yes**

Form R must be submitted to the EPA and Michigan SARA Title III Program for chemical or chemical category.

(Form A not allowed.)

Form A or Form R must be submitted to the EPA and the Michigan SARA Title III Program for chemical or chemical category.
Table 1. TRI Covered Industries by Industry Classification

<table>
<thead>
<tr>
<th>Industry</th>
<th>SIC Codes</th>
<th>NAICS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Manufacturing</td>
<td>20-39</td>
<td>311-339</td>
</tr>
<tr>
<td>Metal Mining</td>
<td>10 (except 1011, 1081, and 1094)</td>
<td>21222, 21229, 21223</td>
</tr>
<tr>
<td>Coal Mining</td>
<td>12 (except 1241)</td>
<td>21211</td>
</tr>
<tr>
<td>Electrical utilities</td>
<td>4911, 4931, and 4939 (limited to facilities that combust coal and/or oil for purpose of generating electricity for distribution in commerce)</td>
<td>22111, 22112</td>
</tr>
<tr>
<td>Treatment, storage, and disposal facilities</td>
<td>4953 (limited to RCRA Subtitle C permitted or interim status facilities)</td>
<td>56221</td>
</tr>
<tr>
<td>Chemical distributors</td>
<td>5169</td>
<td>42469</td>
</tr>
<tr>
<td>Petroleum bulk terminals</td>
<td>5171</td>
<td>42471</td>
</tr>
<tr>
<td>Solvent recovery services</td>
<td>7389</td>
<td>32599</td>
</tr>
<tr>
<td>Federal facilities</td>
<td>Must report by Executive Order 13148.</td>
<td></td>
</tr>
</tbody>
</table>

Table 2. EPCRA Section 313 Listed PBT Chemicals and Activity Thresholds

<table>
<thead>
<tr>
<th>Chemical</th>
<th>Threshold (in pounds unless otherwise noted)</th>
</tr>
</thead>
<tbody>
<tr>
<td>ALDRIN</td>
<td>100</td>
</tr>
<tr>
<td>BENZO(GH)PERYLENE *</td>
<td>10</td>
</tr>
<tr>
<td>CHLORDANE</td>
<td>10</td>
</tr>
<tr>
<td>DIOXIN AND DIOXIN-LIKE COMPOUNDS*</td>
<td>0.1 grams</td>
</tr>
<tr>
<td>HEPTACHLOR</td>
<td>10</td>
</tr>
<tr>
<td>HEXACHLOROBENZENE</td>
<td>10</td>
</tr>
<tr>
<td>ISODRIN</td>
<td>10</td>
</tr>
<tr>
<td>LEAD ** (not contained in stainless steel, bronze, or brass alloy)</td>
<td>100</td>
</tr>
<tr>
<td>LEAD COMPOUNDS **</td>
<td>100</td>
</tr>
<tr>
<td>MERCURY</td>
<td>10</td>
</tr>
<tr>
<td>MERCURY COMPOUNDS</td>
<td>10</td>
</tr>
<tr>
<td>METHOXYCHLOR</td>
<td>100</td>
</tr>
<tr>
<td>OCTACHLOROSTYRENE *</td>
<td>10</td>
</tr>
<tr>
<td>PENDIMETHALIN</td>
<td>100</td>
</tr>
<tr>
<td>PENTACHLOROBENZENE *</td>
<td>10</td>
</tr>
<tr>
<td>POLYCHLORINATED BIPHENYLS</td>
<td>10</td>
</tr>
<tr>
<td>POLYCYCLIC AROMATIC COMPOUNDS ***</td>
<td>100</td>
</tr>
<tr>
<td>TETRABROMOBISPHENOL A (TBPA) *</td>
<td>100</td>
</tr>
<tr>
<td>TOXAPHENE</td>
<td>10</td>
</tr>
<tr>
<td>TRIFLURALIN</td>
<td>100</td>
</tr>
</tbody>
</table>

Note: PBT chemical reporting effective for 2000 report year, except lead and lead compounds which were effective for 2001.
* New chemical subject to EPCRA Section 313 reporting for 2000.
** Thresholds effective for 2001 reporting year.
*** Two new chemicals added to PAC category; 21 chemicals now included.

FOR MORE INFORMATION:

- **Michigan SARA Title III Program**
  Department of Environmental Quality
  P.O. Box 30457
  Lansing, MI 48909-7957
  Phone: 517-373-8481
  E-mail: deq-ead-sara@michigan.gov
  Internet: www.michigan.gov/deqsara

- **U.S. Environmental Protection Agency**
  Superfund, TRI, EPCRA, RMP & Oil information Center
  Phone: 800-424-9346 or 703-412-9810
  TDD 800-553-7672 or 703-412-3323
  Internet: www.epa.gov/tri

Note: Beginning with Report Year 2006, the North American Industrial Classification System (NAICS) will replace the SIC system for reporting. Facilities will report the NAICS code that corresponds to the SIC code in the regulation.