

## SARA Title III Section 312 Emergency & Hazardous Chemical Inventory Tier Two Report Instructions

In April of 2007, Michigan began using an online reporting program called Tier II Manager™. The online database was pre-loaded with facilities that were reporting to the Michigan SARA Title III Program. All Tier Two reports received from 2001 to 2005 were imported into the online database. Information from the most recent report was used to populate the editable database.

See SARA Title III Sections 311 and 312 Requirements for details of who must submit this report, chemical thresholds, and other information that applies to both sections.

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

### Instructions for Completing the Tier Two Report in Tier II Manager™

Refer to the Online Reporting instructions for a site map of Tier II Manager™. Click on “edit” for the report year to go to the “Facility Home Page” where you will update your facility and chemical information and submit your Tier Two report.

#### **Reporting Period**

The reporting period is the *previous* full calendar year. Edit the “Reporting Year” that corresponds to the reporting period.

### Step 1: Review Facility Information (Edit Facility)

#### **Facility Physical Location**

- Enter the company or corporate name.
- Enter the full name of the facility where the chemicals are located.
- Enter the full street address or state road. If a street address is not available, enter other appropriate identifiers that describe the physical location of your facility. Include the city and zip code.
- Choose the county in which the facility is located (from the drop-down box).
- Choose the name of your LEPC that will receive this report.
- Choose the name of the primary Fire Department that will respond to an event at your facility, and that will receive this report. Contact the Michigan SARA Title III Program if your fire department is not listed.
- Enter the facility latitude and longitude coordinates in decimal degrees. You may use the “Locate Lat/Long” utility in Tier II Manager™ to determine these coordinates based on the facility address.
- Enter the facility email address. Notices regarding the online report will be sent to this email address. If the facility does not have an email address, enter the email address of the person who should receive notices regarding this report.
- Enter the facility phone number. If there is no phone at the facility, enter N/A.

#### **Owner/Operator Mailing Address**

- Enter the owner’s or operator’s full name, mailing address, and phone number. This should be a business address, not a home address.

#### **Facility Identification Information**

- Enter the primary Standard Industrial Classification (SIC) code for your facility. If you do not know your SIC code, go to [www.osha.gov/pls/imis/sicsearch.html](http://www.osha.gov/pls/imis/sicsearch.html).

**Mailing Address**

- Enter the mailing address that should be used for correspondence with the owner, operator or other facility personnel regarding this report. This should be completed even if the mailing address is the same as the facility address.

**Emergency Contact Information**

- Enter the name, title, and *work* phone number of a local person or office who can act as a referral if emergency responders need assistance in responding to a chemical accident at the facility.
- Provide an emergency phone number where such emergency information will be available 24 hours a day, everyday. This requirement is mandatory. The facility must make some arrangement to ensure that a 24 hour contact is available.
- Enter at least one back-up emergency contact.
- *SAVE CHANGES*

**Step 2: Review Chemical Inventory**

- Delete chemicals that were removed prior to the previous calendar year, or were not reportable during the previous calendar year. If a chemical was on site in at any time during the previous calendar year, and it equaled or exceeded the threshold, it needs to be included in the Tier Two report.
- Edit or add chemicals that were on site during the previous calendar year. All chemicals must be saved once in the program so that the program recognizes the information submitted for that chemical.

If you are adding a chemical for which you submitted a report under section 311, use the feature in Tier II Manager™ that allows you to select the chemical from the 311 report. This will pull the name and CAS number of the chemical into the Tier Two report.

Remember that you *must* report OSHA hazardous chemicals that met or exceeded the threshold at any time during the previous calendar year. You *may* report OSHA hazardous chemicals that do not meet the threshold, or other hazardous substances (such as RCRA hazardous wastes), if you determine that it would be beneficial for the LEPC or fire department to have this information. Your fire department or LEPC can require that you report chemicals on this report even if they are below threshold.

**Chemical Description**

- Enter the Chemical Abstracts Service (CAS) number. This will be listed on the MSDS. You may use the chemical search function in Tier II Manager™ to help assure that the chemical name matches the CAS number. For mixtures, enter the CAS number of the mixture as a whole if it has been assigned a number distinct from its constituents. For a mixture that has no CAS number, enter N/A.
- Enter the chemical name or common name of the hazardous chemical. Do not enter the trade name. You may use the chemical search function in Tier II Manager™ to help assure that the chemical name matches the CAS number.
- Read the Trade Secret section below before you mark the Trade Secret box.
- Check the EHS box and if the chemical is on the list of Extremely Hazardous Substances (see Appendix A in this guidebook). If the chemical is a mixture containing an EHS, go to “Add Mixture Components” and enter the EHS in that section.
- Choose the EHS name from the drop down box.

- Check boxes for ALL applicable descriptors:
  - Check at least one of the following: pure, mixture.
  - Check at least one of the following: solid, liquid, gas.
- Add MSDS if appropriate. Thousands of MSDSs will be loaded into the program and made available to the planners and responders. If you have an uncommon substance that is unlikely to be included in the MSDS data load, you are encouraged to add the MSDS to your report on this screen.

### **Add Mixture Components**

This section is optional, but some mixtures are best described in terms of their components.

- Enter the CAS number, chemical name, and weight percent (%) of any significant mixture component. Use the “search” function to help assure that the chemical name matches the CAS number.
- If the mixture component is an EHS, mark the EHS box and choose the EHS name from drop-down list.

### **Trade Secret**

Trade Secret information refers to the product or chemical, and should not be confused with MSDSs that claim trade secrecy with regard to the ingredients in a product. If you are withholding the name of a chemical in accordance with criteria specified in section 322 of SARA Title III (it is a trade secret that you have a certain product or chemical on site), enter the generic class or category that is structurally descriptive of the chemical (e.g., list toluene diisocyanate as organic isocyanate) and check the box marked Trade Secret. Trade secret information must be submitted to EPA and must include substantiation. Refer to 53 FR 28772, July 29, 1988, for detailed information on how to submit trade secrecy claims. You can obtain a copy of the Trade Secret Substantiation Form from the Michigan SARA Title III Program. A link to this form and instructions is included in the online program.

### **Physical and Health Hazards**

- Check all physical and health hazards that apply. This information should be on the MSDS.

<b>Hazard Categories and Descriptions for Reporting Under Sections 311 and 312</b>	
These hazards are described in detail in the OSHA Hazard Communication Standard 29 CFR 1910 section 1200	
<i>Fire</i>	Flammable, combustible liquid, pyrophoric, and oxidizer. Flammable liquids have a flash point below 100 °F (37.8 °C). Flammable solids are solids that are liable to cause fire through friction, absorption of moisture, spontaneous chemical change, or retained heat from manufacturing or processing, or which can be ignited readily and when ignited burns vigorously and persistently. Combustible liquids have a flash point at or above 100 °F (37.8 °C) and below 200 °F (93.3 °C). A pyrophoric material can spontaneously ignite in air. An oxidizer initiates or promotes combustion in other materials.
<i>Sudden release of pressure</i>	Explosive, and compressed gas
<i>Reactive</i>	Unstable reactive, organic peroxide, and water reactive
<i>Immediate (acute)</i>	Highly toxic, toxic, irritant, sensitizer, corrosive, and other hazardous chemicals that cause an adverse effect to a target organ and which effect usually occurs rapidly as a result of short term exposure and is of short duration
<i>Delayed (chronic)</i>	Carcinogens and other hazardous chemicals that cause an adverse effect to a target organ and which effect generally occurs as a result of long term exposure and is of long duration

## Inventory

- Maximum Daily Amount:** Estimate the largest amount of the chemical that was present at your facility (in storage and in process) on any single day during the reporting period. *This is the worst case scenario in the event of an emergency at your facility – what is the maximum amount of chemical that could be expected to be involved?* Enter this amount in **pounds**. The amount code from Table I will be entered for you in the online program. If you provided only the amount code in prior year reports, the median amount in pounds was entered into the State database. For example, if you entered amount code 04, an amount of 55,000 pounds was entered into the State database. Please change this and enter an amount that better represents the maximum amount on site.

<b>Table I – REPORTING RANGES</b>		
<i>Range Values</i>	<i>Weight Range in Pounds</i>	
	<i>From:</i>	<i>To:</i>
01	0	99
02	100	999
03	1,000	9,999
04	10,000	99,999
05	100,000	999,999
06	1,000,000	9,999,999
07	10,000,000	49,999,999
08	50,000,000	99,999,999
09	100,000,000	499,999,999
10	500,000,000	999,999,999
11	1 billion	Higher than 1 billion

- Average Daily Amount:** Estimate the amount of the chemical that was present at your facility on an average day during the reporting period. *This is the most likely scenario in the event of an emergency at your facility – how much chemical would generally be expected to be involved?* Enter this amount in pounds. The amount code from Table I will be entered for you in the online program.
- Number of Days On Site:** Enter the number of days that the chemical was on site during the previous full calendar year (the reporting period).

## Storage Codes and Locations

- List the chemical locations, including storage conditions. The storage codes in Tables II and III are incorporated into the online program. Choose the proper storage codes from the drop down lists. Enter a location description on the line following the codes.

<b>Table II – CONTAINER TYPES</b>	
<i>CODES</i>	<i>CONTAINERS</i>
A	Outside above ground tank
B	Below ground tank
C	Tank inside building
D	Steel drum
E	Plastic or non-metallic drum
F	Can
G	Carboy
H	Silo
I	Fiber drum
J	Bag
K	Box
L	Cylinder
M	Glass bottles or jugs
N	Plastic bottles or jugs
O	Tote bin
P	Tank wagon
Q	Rail car
R	Other (describe on location line)

<b>Table III – TEMPERATURE AND PRESSURE CONDITIONS</b>	
<i>CODES</i>	<i>PRESSURE CONDITIONS</i>
1	Ambient pressure
2	Greater than ambient pressure
3	Less than ambient pressure
	<i>TEMPERATURE CONDITIONS</i>
4	Ambient temperature
5	Greater than ambient temperature
6	Less than ambient temperature but not cryogenic
7	Cryogenic conditions

### **Confidential Location**

Under section 324 of SARA Title III, you may withhold location information on a specific chemical from disclosure to the public. The location information includes the storage codes. While the information that you provide on the type and amount of chemical must be made available to the public, you are not required to make storage location information available if doing so might pose a security risk.

- If you choose to keep the location confidential, check the “confidential location” box following the information that you want to be kept confidential.

If the public requests a copy of your Tier Two report, they will receive a hard copy without the confidential location information. The location information that will be kept confidential includes the storage codes.

### **Step 3: Review Attachments**

Attachments are optional but encouraged. If you attach one of these documents as an electronic file, it will remain an attachment for future reports until you delete or replace it. The site map must be attached as an image file (those ending in jpg, bmp, tif, png, gif) so that it can be utilized by LEPCs in the planning module. Other attachments can be in different formats (such as those ending in doc, pdf, xls). Be sure to mark the files as confidential before you attach them if you do not want them made available to the public.

### **Notes**

- Click on the “edit” button to add or edit a note. Notes will print at the end of the Tier Two report, and they will be viewable by the State and any planners or responders with access to the online database.

### **Step 4: Submit Tier II Report**

- Before you submit the report, make sure that all data are complete. You can view and print your report by clicking on “Current Data” at the top of the Facility Home Page.
- Mark the box indicating that this is an annual submission or a revision and click “start.” The program will check many of the report fields for completeness.

If you “exit without save” at this point, your report submittal will remain initiated. You can either complete the submission, or you can contact the Administrator to cancel the initiated submission. Canceling the initiated submission will allow you to make changes to the data and then start the submission process again.

### **Certification**

The owner or operator or the officially designated representative of the owner or operator must certify that all information included in the Tier Two submission is true, accurate, and complete.

- Enter the full name and official title of the person certifying the report and “Submit.”

After submitting the report, you can preview and print the report. You can do this from the final screen in the submittal process, or you can click on the report icon on the Submissions Listing page at any time to preview or print the report.

The report you submit is a snapshot of your inventory. You can update the inventory at any time. Once every year, you are required to certify that the inventory is current and complete. The Tier Two report is that certification.