

INSTRUCTIONS

TIER I INVENTORY FORM

GENERAL INFORMATION

Submission of Tier I form is required under Section 312 of the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA) which was enacted as Title III of the Superfund Amendments and Reauthorization Act, Public Law 99-499, codified at 42 U.S.C. Section 11022.

The purpose of this form is to provide State and local officials and the public with information on the general hazard types and locations of hazardous chemicals present at your facility during the previous calendar year.

CERTIFICATION

The owner or operator or the officially designated representative of the owner or operator must certify that all information included in the Tier I submission is true, accurate, and complete. On the Tier I form, enter your full name and official title. Sign your name and enter the current date. All other pages including all attachments must also contain your signature or signature stamp, the date you signed the certification and the total number of pages in the submission.

YOU MUST PROVIDE ALL INFORMATION REQUESTED ON THIS FORM

You may substitute the Tier II form for this Tier I form. The Tier II form provides detailed information and must be submitted in response to a specific request from State or local officials.

WHO MUST SUBMIT THIS FORM

Section 312 of EPCRA requires that the owner or operator of a facility submit this form if, under regulations implementing the Occupational Safety and Health Act of 1970, the owner or operator is required to prepare or have available Material Safety Data Sheets (MSDS) for hazardous chemicals present at the facility. MSDS requirements are specified in the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (HCS), found in Title 29 of the Code of Federal Regulations (CFR) at Section 1910.1200.

This form does not have to be submitted if all of the chemicals located at your facility are excluded under Section 311(e) of EPCRA or if the weight of each covered hazardous chemical never equals or exceeds the minimum thresholds listed in 40 CFR part 370.

WHAT CHEMICALS ARE INCLUDED

You must report the information required on this form for every hazardous chemical for which you are required to prepare or have available an MSDS under OSHA HCS, unless the chemicals are excluded under Section 311(e) of EPCRA or they are below the reporting thresholds.

WHAT CHEMICALS ARE EXCLUDED

Section 311(e) of EPCRA excludes the following substances:

- 1) Any food, food additive, color additive, drug, or cosmetic regulated by the Food and Drug Administration;
- 2) Any substance present as a solid in any manufactured item to the extent exposure to the substance does not occur under normal conditions of use;
- 3) Any substance to the extent it is used for personal, family, or household purposes, or is present in the same form and concentration as a product packaged for distribution and use by the general public.
- 4) Any substance to the extent it is used in a research laboratory or a hospital or other medical facility under the direct supervision of a technically qualified individual;

- 5) Any substance to the extent it is used in routine agricultural operations or is a fertilizer held for sale by a retailer to the ultimate customer.

OSHA regulations, 29 CFR 1910.1200(b), stipulate exemptions from the requirement to prepare or have available an MSDS.

REPORTING THRESHOLDS

The reporting thresholds are as follows:

For Extremely Hazardous Substances (EHSs) designated under EPCRA section 302, the reporting threshold is 500 pounds (or 227 kg.) or the threshold planning quantity (TPQ) whichever is lower. EHSs and their TPQs are listed in 40 CFR part 355, Appendices A and B.

For gasoline (all grades combined) at a retail gas station, the threshold level is 75,000 gallons (or approximately 283,900 liters), if the tank(s) was stored entirely underground and was in compliance at all times during the preceding calendar year with all applicable Underground Storage Tank (UST) requirements at 40 CFR part 280 or requirements of the State UST program approved by the Agency under 40 CFR part 281.

For diesel fuel (all grades combined) at a retail gas station, the threshold level is 100,000 gallons (or approximately 378,500 liters), if the tank(s) was stored entirely underground and the tank(s) was in compliance at all times during the preceding calendar year with all applicable Underground Storage Tank (UST) requirements

at 40 CFR part 280 or requirements of the State UST program approved by the Agency under 40 CFR part 281.

For all other hazardous chemicals for which facilities are required to have or prepare an MSDS, the reporting threshold is 10,000 pounds (or 4,540 kg.).

You need to report hazardous chemicals that were present at your facility at any time during the previous calendar year at levels that equal or exceed these thresholds. For instructions on threshold determinations for components of mixtures, see “What About Mixtures?” below.

WHEN TO SUBMIT THIS FORM

Owners or operators of facilities that have hazardous chemicals present at the facility in quantities equal to or greater than the reporting thresholds during a calendar year must submit either Tier I or Tier II Form by March 1 of the following calendar year, annually. Facilities should contact their States regarding any additional requirements.

WHERE TO SUBMIT THIS FORM

Send one completed inventory form to each of the following organizations:

- 1) Your State Emergency Response Commission (or Tribal Emergency Response Commission)
- 2) Your local emergency planning committee.
- 3) The fire department with jurisdiction over your facility.

INSTRUCTIONS

Please Read These Instructions Carefully. Print or Type All Responses

You may use the Tier II form as a worksheet for completing Tier I. Filling in the Tier II chemical information section should help you assemble your Tier I responses. If your responses require more than one page, fill in the page number at the bottom of the form.

Note: Currently, all states require facilities to either submit the federal Tier II inventory form or the state-developed inventory form or format, including electronic reporting and/or on-line submission and certification. Contact your state for specific requirements in that state.

REPORTING PERIOD

Enter the appropriate calendar year, beginning January 1 and ending December 31.

IDENTICAL INFORMATION

Check the box located at the top of page one of the Tier I form, if the information being reported is identical to that submitted last year.

FACILITY IDENTIFICATION

Enter the complete name and address of the location of your facility where the hazardous chemicals are stored. Enter the full street address or state road, county, city, state, and zip code.

Provide a general phone number for your facility. This is an optional data element.

Indicate if the facility is manned or unmanned.

Estimate the maximum number of occupants that may be present at any one time at your facility. You should include contractors, vendors and people that may be present for any training or other events as well as employees. If the location is not manned at all times, this may not apply.

Provide the latitude and longitude for the location of your facility.

Enter the primary North American Industry Classification System (NAICS) code and the Dun & Bradstreet number of your facility. The financial officer of your facility should be able to provide the Dun & Bradstreet number. If your firm does not have this information, contact the State or regional office of Dun & Bradstreet to obtain your facility number or have one assigned.

SUBJECT TO EMERGENCY PLANNING

Indicate if your facility is subject to emergency planning notification under section 302 of EPCRA.

SUBJECT TO CHEMICAL ACCIDENT PREVENTION

Indicate if your facility is subject to the chemical accident prevention provisions under section 112(r) of the Clean Air Act (CAA), codified in 40 CFR part 68, also known as the Risk Management Program (RMP).

IDENTIFICATION NUMBERS UNDER TRI AND RMP

If your facility is subject to the Toxic Release Inventory (TRI) program under section 313 of EPCRA, provide the identification number assigned by EPA. If your facility is not subject to this reporting requirement or if your facility has not been assigned a number under this program, check the box marked "N/A".

If your facility is subject to the chemical accident prevention provisions codified in 40 CFR part 68, also known as the Risk Management Program (RMP), provide the RMP facility identification number assigned by EPA. If your facility is not subject to RMP or if your facility has not been assigned a number, check the box marked "N/A".

OWNER/OPERATOR

Enter the owner's or operator's full name, mailing address, email address and phone number.

PARENT COMPANY

Enter the name, mailing address, phone number, email address and the Dun & Bradstreet number of the parent company. These are optional data elements.

FACILITY EMERGENCY COORDINATOR

If applicable, enter the name, title, email address, phone number and 24-hour phone number of the facility emergency coordinator that you are required to provide under EPCRA section 303(d)(1).

Note: Section 303(d)(1) of EPCRA requires facilities subject to the emergency planning notification requirement (including additional facilities designated by the Governor or the SERC under EPCRA section 302(b)(2)) to designate a facility representative who will participate in the local emergency planning process as a facility emergency coordinator. EPA encourages facilities not subject to the emergency planning notification requirement also to provide this information, if available, for effective emergency planning in your community.

TIER I INFORMATION CONTACT

Enter the name, title, email address and phone number of the person completing the information on the Tier I inventory form.

EMERGENCY CONTACT(S)

Enter the name, title, phone number and email address of at least one local person or office that can act as a referral if emergency responders need assistance in responding to a chemical accident at the facility. If there is more than one person assigned to this duty, provide the same information for that person.

Provide an emergency phone number where such emergency information will be available 24 hours a day, every day. This requirement is mandatory. The facility must make some arrangement to ensure that a 24-hour contact is available.

IDENTICAL INFORMATION

Check the box located at the top of page two of the Tier I form, if the information being reported is identical to that submitted last year. Chemical descriptions, hazard types, amounts, and locations must be provided in this year's form, even if the information is identical to that submitted last year.

PHYSICAL AND HEALTH HAZARDS

Descriptions, Amounts, and Locations.

This section requires aggregate information on chemicals by hazard categories as defined in 40 CFR 370.66. The three physical hazard categories and two health hazard categories are a consolidation of the 23 hazard categories defined in the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

Hazard Category Comparison for Reporting Under Sections 311 and 312

EPA's hazard categories	OSHA's hazard categories
Fire Hazard.....	Flammable Combustion Liquid Pyrophoric Oxidizer
Sudden Release of Pressure.....	Explosive Compressed Gas
Reactive.....	Unstable Reactive Organic Peroxide Water Reactive
Immediate (Acute) Health Hazards.....	Highly Toxic Toxic Irritant Sensitizer Corrosive Other hazardous chemicals with an adverse effect with short term exposure.
Delayed (Chronic) Health Hazard.....	Carcinogens Other hazardous chemicals with an adverse effect with long term exposure.

MAXIMUM AMOUNT AND AVERAGE DAILY AMOUNT

For each hazard type, indicate the maximum amount and average daily amount and general locations of all applicable chemicals present at your facility during the past year. The table of range codes and corresponding amounts for reporting maximum amount and average daily amount are presented below.

WEIGHT RANGE IN POUNDS		
Range Codes	From	To
01	0	99
02	100	499
03	500	999
04	1,000	4,999
05	5,000	9,999
06	10,000	24,999
07	25,000	49,999
08	50,000	74,999
09	75,000	99,999
10	100,000	499,999
11	500,000	999,999
12	1,000,000	9,999,999
13	10,000,000	Greater than 10 million

What units should I use?

Calculate all amounts as *weight in pounds*. To convert gas or liquid volume to weight in pounds, multiply by an appropriate density factor.

What about mixtures?

If a hazardous chemical is part of a mixture, *you have the option* of reporting either the weight of the entire mixture or only the portion of the mixture that is a particular hazardous chemical (e.g., if a hazardous solution weighs 100 lbs. but is composed of only 5% of a particular hazardous chemical, you can indicate either 100 lbs. of the mixture or 5 lbs. of the hazardous chemical).

The option used for each mixture at your facility must be consistent with the option used in your Section 311 reporting.

Because EHSs are important to EPCRA Section 303 emergency planning, EHSs have lower reporting thresholds. The amounts of all EHSs at a facility (both pure EHS substances and EHSs in mixtures) must be aggregated to determine if reporting thresholds for EHSs are met, that is, 500 lbs or the TPQ, whichever is less. It is suggested that the aggregation calculation be done as a first step in determining if reporting thresholds have been met. Once you determine whether a threshold has been reached for an EHS, you should report either the total weight of the EHS at your facility, or the weight of each mixture containing the EHSs.

Where do I count a chemical that is a fire and reactive physical hazard and an immediate (acute) health hazard?

Add the chemical's weight to your totals for all three hazard categories and include its location in all three categories. Many chemicals fall into more than one hazard category.

MAXIMUM AMOUNT

The amounts of chemicals you have on hand may vary throughout the year. The peak weights, and the greatest single-day weights during the year are added together in this column to determine the maximum weight for each hazard type. Since the peaks for different chemicals often occur on different days, this maximum amount will seem artificially high.

To complete this and the following sections, you may choose to use the Tier II form as a worksheet.

To determine the Maximum Amount:

List all of your reportable hazardous chemicals individually.

- 1) For each chemical:
 - a. Indicate all physical and health hazards that the chemical presents. Include all chemicals, even if they are present for only a short period of time during the year.
 - b. Estimate the maximum weight in pounds that was present at your facility on any single day of the reporting period.
- 2) For each hazard type, beginning with Fire and repeating for all physical and health hazard types:
 - a. Add the maximum weights of all chemicals you indicated as the particular hazard type.
 - b. Look at the Reporting Ranges at the bottom of the Tier I form. Find the appropriate range value code.
 - c. Enter this range value as the Maximum Amount.

Example: You are using the Tier II form as a worksheet and have listed raw weights in pounds for each of your hazardous chemicals. You have marked an X in the immediate (acute) hazard column for phenol and sulfuric acid. The maximum amount raw weights you listed were 10,000 lbs. and 500 lbs. respectively. You add these together to reach a total of 10,500 lbs. Then you look at the Reporting Range on page two of your Tier I form and find the range code that corresponds to 10,500 lbs. Enter that code as your Maximum Amount for Immediate (acute) hazards materials.

You also marked an X in the Fire hazard box for phenol. When you calculate your Maximum Amount totals for fire hazards, add the 10,000 lb. weight again.

AVERAGE DAILY AMOUNT

This column should represent the average daily amount of chemicals of each hazard type that were present at or above the applicable thresholds at your facility at any point during the year.

To determine this amount:

- 1) List all of your reportable hazardous chemicals individually (same as for Maximum Amount).
- 2) For each chemical:
 - a. Indicate all physical and health hazards that the chemical presents (same as for Maximum Amount).
 - b. Estimate the average weight (in pounds) that was present at your facility throughout the year. To do this, total all daily weights and divide by the number of days the chemical was present on the site.
- 3) For each hazard type, beginning with Fire and repeating for all physical and health Hazards:
 - a. Add the average weights of all chemicals you indicated for the particular hazard type.
 - b. Look at the Reporting Ranges at the bottom of the Tier I form. Find the appropriate range value code.
 - c. Enter this range value as the Average Daily Amount.

Example: If you are using the Tier II form, and have marked an X in the immediate (acute) hazard column for nicotine and phenol. Nicotine is present at your facility 100 days during the year, and the sum of the daily weights is 100,000 lbs. By dividing 100,000 lbs by 100 days on-site, you calculate an Average Daily Amount of 1,000 lbs for nicotine. Phenol is present at your facility 50 days during the year, and the sum of the daily weights is 10,000 lbs. By dividing 10,000 lbs by 50 days on-site, you calculate an Average Daily Amount of 200 lbs. for phenol. You then add the two average daily amounts together to reach a total of 1,200 lbs. Then you look at the Reporting Range on your Tier I form and find that the range code 04 that corresponds to 1,200 lbs. Enter 04 as your Average Daily Amount for Immediate (acute) Hazard. You also marked an X in the Fire hazard column for phenol. When you calculate your Average Daily Amount for fire hazards, use the 200 lb weight for phenol again.

NUMBER OF DAYS ON SITE

Enter the greatest number of days that a single chemical within that hazard category was present on-site.

Example: At your facility, nicotine is present for 100 days and phosgene is present for 150 days. Enter 150 in the space provided.

GENERAL LOCATION

Enter the general location within your facility where each hazard may be found. General locations should include the names or identifications of buildings, tank fields, lots, sheds, or other such areas.

For each hazard type, list the locations of all reportable chemicals. As an alternative, you may also attach a site plan and list the site coordinates related to the appropriate locations. If you do so, check the Site Plan box on page one of the form.

Example: On your worksheet you have marked an X in the Fire hazard column for acetone and butane. You noted that these are kept in steel drums in Room C of the Main Building, and in pressurized cylinders in Storage Shed 13, respectively. You could enter Main Building and Storage Shed 13 as the General Locations of your fire hazards. However, you choose to attach a site plan and list coordinates. Check the Site Plan box on page one of the form and enter site coordinates for the Main Building and Storage Shed 13 under General Locations.

If you need more space to list locations, attach an additional Tier I form and continue your list on the proper line. Number all pages.

OPTIONAL ATTACHMENTS

Indicate at the bottom of page two if you are including any site plan, information on dikes and other safeguards measures, etc.