# FOR COMPLETING THE EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT (EPCRA) REPORTS

# HELPFUL

By Wessler Engineering

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# **Completing EPCRA Reports**

First and foremost, read the directions to understand what type of information the report requires and how to enter the information into the Regulatory Services Portal's online system. You can find EPCRA information online through IDEM or the USEPA. For a better understanding on how to complete the EPCRA reports, we have provided these helpful hints to get you started.

## **Conduct an Inventory**

The initial step is to inventory bulk chemicals that are stored on-site. This would include chemicals in aboveground and underground storage tanks, gas cylinders and tanks, and other chemicals used and stored in large

CHEMICAL	IN/S NEOR	85106	6857	SPICEIC	DEMOT	MARAMOUNT	MAXAMOUNT	REPORTABLE?	RAZARDS	CASE	NOTES
AMINONUM INVERCIBLE	6300 EALEREK TANK	MS	500.025	0.90	7.0	6,590.00	44,309.77	715	ACUIT	7661-45.7	
ANIVERSUS ANIMOREA 32%	650D CALEMER TANK	MS	500185	6.90	2.43	6,580.00	51,642.95	YES	ACUTE	2661-45-7	DNCF HIDHE TO REPORT FOR THE MEN OF THE CHEMICAL
CREDRINE GRS	101 DEN CRIMENS	ns	10185				36,800.09	715	ACUTE, FIRE, SCODEN RELEASE OF PRESSURE	7782-59-5	
DESELFUEL AD	1900 EAL TANK	40	NO	0.85	7.12	1,000.00	7,118.29	VIS	ACUTE, CHRONEC, FER	69476346	VOCUMBABILY REPORT
HIDROFULCIC ACID	4000 CALERIC TANK	50	NO	1.20	10.05	4,090.00	40,855.00	NO.	ACUTL, CHRONIC	15961-83-4	
PERCEIKACD	3.55-GALDRUMS	ns	500.085	3.53	843	165.00	122230	ns	ACUTE, FIRE, REACTIVE	79.21.0	CHEMICAL COMPONENTS MAY HAVE MORE STRENGEN REPORTING
SOBIUM BISULITIE	2 3009-GALBUEK TANKS	MS	NO	1.48	12.15	6,090.00	74,003.09	705	acon	7531-99-5	
SOD WY INDROVIDE	1 TOPE IN USE, 1 STORED, 330 GAL	YES	NO	2.13	17.77	660.00	11,731.49	115	ACUTE, REACTING	1310-73-2	
SODIUM INFOOILORITE	1000 CALERUS TANK	YES	NO		10.00	1,090.00	18,900.09	YES	ACUTE FIRE, REACTIVE	7681-52-9	
SULFUR DIORDE GAS	\$1-70N CYUNDONS	MS	500 185				18,800.08		ACUTE, SUBCON HELEASE OF PRESSURE, CHRONIC	266-09-5	
SULTING: ACID	101-GAL CONTAINEPS	MES	2000 135	1.84	13,15	90.00	153.55	NO	ACUTE CHEONE,	7661-93-9	

quantities (i.e. drums or totes). Be sure to include hazardous chemicals that are frequently used in an on-site laboratory.

# **Determine if the Chemical is Reportable**

Only certain chemicals are subject to reporting. Some Material Safety Data Sheets (MSDS) or Safety Data Sheets (SDS) will identify if a chemical is reportable and the hazards in the Regulatory or Environmental Section. If it does not, I recommend looking at the USEPA's List of Lists. If the chemical is identified on the list, it is reportable. You can search for the chemical in a <u>spreadsheet format</u> or through an Adobe PDF. Be aware the MSDS/SDS might not be up to date and may not identify all the chemicals that are on the List of Lists.

The List of Lists will not identify chemical trade names. Refer to the MSDS/SDS for the chemical compounds that make up the product. If the name of the chemical does not match one in the list, search by the Chemical Abstract Service (CAS) number. The most conservative approach is to report any chemical that has a MSDS/SDS.

# **Calculate Weight of the Chemical**

The MSDS/SDS should provide a Specific Gravity or Density of the chemical. If a Specific Gravity is provided, multiply the number by 8.345 lbs/gal (density of water) to get the Density. Once a density is determined, multiply the gallons of the chemical by the Density to get the amount in pounds. Refer to the spreadsheet (Page 5) for an example of the calculations.



Specific Gravity = 0.83

0.83 x 8.345 lbs/gal = 6.93 lbs/gal Density

Density 6.93 lbs/gal x Max Amount 3,500 gal = 24,255 pounds

[Helpful Hint] Be sure to convert all amounts over to a weight (pounds) for reporting. This is where MSDSs or SDSs are used to obtain the chemical specific gravity or density.

# **Determine if the Amounts are Reportable**

Chemicals are reportable if they are EHSs on-site above the reporting thresholds or if you store 10,000 pounds or more on-site at any one time. If you have one of these chemicals stored at your facility above the amount mentioned, you will need to notify the local emergency response agencies by completing the appropriate form or through the online reporting system. This would include the Section 302 report for EHSs and the Section 311/312 reports for EHSs and other chemicals.

Additionally, these reports are used as a tool for emergency responders when responding to a fire, explosion or chemical release. I recommend reporting more than necessary so emergency personnel can respond in a safe and cautious manner. Even though fuels are not specifically identified on the List of Lists, I will report them on an EPCRA report due to their potential for explosions during a fire.

### **Report Submittal**

Section 302, 311 and 312 Reports are to be submitted via IDEM's Regulatory Service Portal online. Follow the directions on how to sign up and how to submit an electronic signature agreement. A copy of the reports must be sent to the Local Emergency Planning Committee (LEPC) and local fire department. LEPC addresses can be found <u>here.</u>

REPORTS	SUBMITTAL DATE
Section 702	within 30 days of being
Section SUZ	stored on-site
Section 711	within 90 days of being
Section ST	stored on-site
Section 312	March 1

Maintain your computations and all submittals on-site for a period of at least three years.

This is a simplification of the EPCRA reporting requirements; however, hopefully these helpful hints can point you in the right direction.

### **EPCRA Resources:**

- » IDEM CRTK Extremely Hazardous Substances
- » USEPA List of Lists Searchable Database
- » USEPA List of Lists PDF

# **EXAMPLE EPCRA INVENTORY TABLE**

CHEMICAL	INVENTORY	LIST OF LISTS?	EHS?	SPECIFIC GRAVITY	DENSITY (LBS/GAL)	MAX AMOUNT (GAL)	MAX AMOUNT (LBS)	REPORTABLE?	HAZARDS	CAS #	NOTES
AMMONIUM HYDROXIDE	6500 GAL BULK TANK	YES	500 LBS	0.90	7.49	6,500.00	48,709.77	YES	ACUTE	7664-41-7	
ANHYDROUS AMMONIA 30%	6500 GAL BULK TANK	YES	500 LBS	0.90	7.49	6,500.00	14,612.93	YES	ACUTE	7664-41-7	ONLY HAVE TO REPORT FOR THE 30% OF THE CHEMICAL
CHLORINE GAS	10 1-TON CYLINDERS	YES	100 LBS				20,000.00	YES	ACUTE, FIRE, SUDDEN RELEASE OF PRESSURE	7782-50-5	
DIESEL FUEL #2	1000 GAL TANK	NO	NO	0.85	7.12	1,000.00	7,118.29	YES	ACUTE, CHRONIC, FIRE	68476-34-6	VOLUNTARILY REPORT
HYDROFLUORSILICIC ACID	4000 GAL BULK TANK	NO	NO	1.20	10.01	4,000.00	40,056.00	NO	ACUTE, CHRONIC	16961-83-4	
PERACETIC ACID	3 55-GAL DRUMS	YES	500 LBS	1.13	9.43	165.00	1,555.93	YES	ACUTE, FIRE, REACTIVE	79-21-0	CHEMICAL COMPONENTS MAY HAVE MORE STRINGENT REPORTING
SODIUM BISULFITE	2 3000-GAL BULK TANKS	YES	NO	1.48	12.35	6,000.00	74,103.60	YES	ACUTE	7631-90-5	
SODIUM HYDROXIDE	1 TOTE IN USE, 1 STORED, 330 GAL	YES	NO	2.13	17.77	660.00	11,731.40	YES	ACUTE, REACTIVE	1310-73-2	
SODIUM HYPOCHLORITE	1000 GAL BULK TANK	YES	NO		10.00	1,000.00	10,000.00	YES	ACUTE, FIRE, REACTIVE	7681-52-9	
SULFUR DIOXIDE GAS	5 1-TON CYLINDERS	YES	500 LBS				10,000.00	YES	ACUTE, SUDDEN RELEASE OF PRESSURE, CHRONIC	7446-09-5	
SULFURIC ACID	10 1-GAL CONTAINERS	YES	1000 LBS	1.84	15.35	10.00	153.55	NO	ACUTE, CHRONIC, REACTIVE	7664-93-9	

NOTE: CHEMICALS ARE REPORTABLE IF THEY ARE AN EHS OR IF 10,000 LBS OR MORE ARE STORED ONSITE AT ANY ONE TIME.

### **About Wessler**

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- » Industrial

### **About the Author**



EDUCATION Purdue University B.S., Natural Resources and Environmental Science

### CERTIFICATIONS Certified Hazardous Materials Manager (CHMM)

ISO 14001 EMS Lead Auditor

Hazardous Waste Worker Emergency Response Technician (HazWoper)

### **PROFESSIONAL SOCIETIES**

Alliance of Hazardous Materials Professionals (AHMP)

Indiana Association for Floodplain and Stormwater Management (INAFSM)

Indiana Industrial Operators Association (IIOA)



Amy L. Harvell, CHMM, is an environmental scientist with fifteen years experience in the following areas: hazardous waste compliance, reporting and management; air permitting, compliance and management; industrial pretreatment programming; NPDES permitting for industrial activities exposed to stormwater runoff; Storm Water Pollution Prevention Planning; Spill Prevention Control and Countermeasures planning; Hazardous Waste Contingency planning;HazardCommunicationsprograms; Emergency Planning and Community Rightto-Know Act planning and reporting; and implementing and managing ISO 14001 Environmental Management Systems.

### **INSIDER'S SCOOP:**

Amy is an avid reader and a movie aficionado.

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