

7 Tips for Tier II Reporting

TO MAKE COMPLIANCE EASIER

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Environmental compliance can be overwhelming, but it doesn't have to be with Safex at your side. We've created these tips to help you better understand Tier II reporting requirements.

Tip #1

Start your Tier II report early.

Even though the deadline is March 1, January is a great time to get started on your Tier II report. Because the report is based on your facility's chemical information from the previous year, you'll have everything you need to begin in January. Trust us, you don't want to procrastinate on this one.



Tip #2

Electronically submit your report.

Ohio's free software, Tier2 Submit, is easy to use and more efficient than the paper submission process. A new version of Tier2 Submit is released annually in November and an instruction booklet typically follows in early January. [Click here to download the software.](#)



Tip #3

Having 10,000 lbs. of a chemical onsite doesn't automatically require you to report it.

Not all chemicals pose a risk, so you'll want to review the SDS for all chemicals in question. You are required to submit a Tier II report if your facility used or stored:

- A hazardous chemical that's an extremely hazardous substance (EHS), as listed in 40 CFR 355 Appendix A, and it is present at the facility at any one time in an amount greater than 500 lbs. or the threshold planning quantity (TPQ), whichever is less; or
- A hazardous chemical that is not an EHS and it is present at the facility at any one time in an amount greater than 10,000 lbs.

You are not required to report substances for which you are not required to have an SDS or substances that are exempt from hazardous chemical inventory reporting. Section 311(e) of EPCRA outlines the chemicals that are excluded from this reporting. Examples include: additives regulated by the FDA and substances used in routine agricultural operations.

Tip #5

Review your inventory data.

An up-to-date chemical inventory is critical. A few key sets of data that can be used in determining your inventory for the previous year may include:

- Chemical product(s) inventories;
- Chemicals in boilers, refrigerants and cooling towers;
- Large quantities of maintenance chemicals;
- Production line records;
- Purchase orders;
- Shipping receipts/manifests;
- Storage (warehouse) records; and
- Tank inventories.



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

Tip #6

Note chemical locations when conducting your inventory.



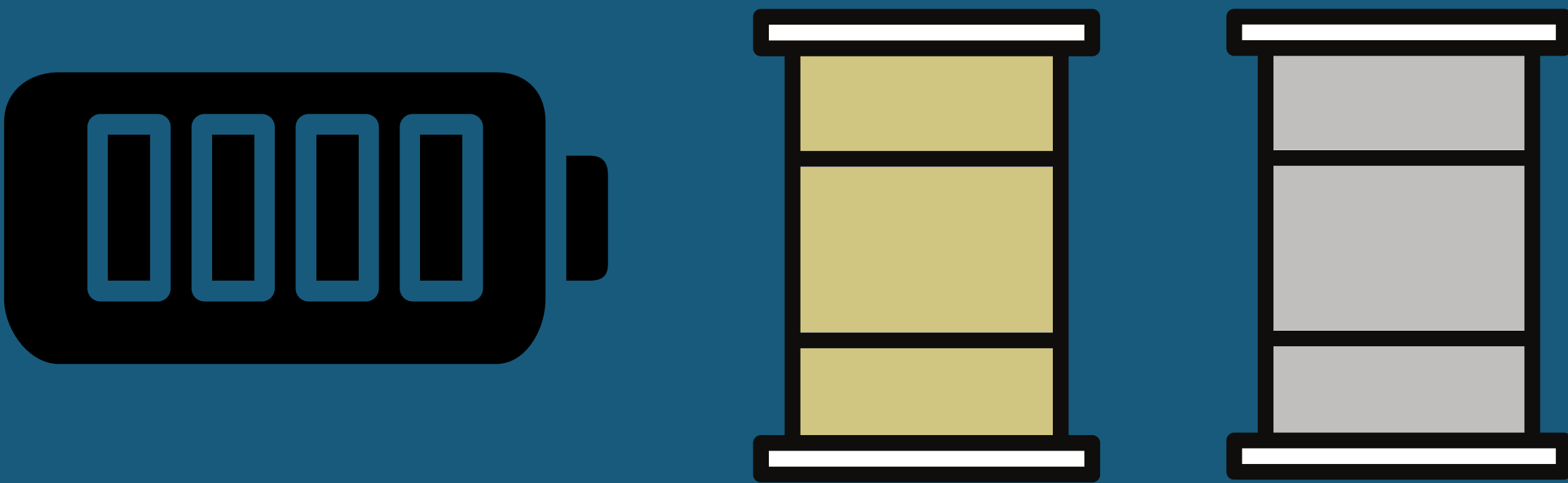
The locations will come in handy later when you're completing the main section of the Tier II form.

Separate fields are provided for reporting both pure chemicals and mixtures of chemicals. Chemical descriptions, hazards, amounts, and locations must be provided even if the information is identical to that submitted last year. (E.g., If a hazardous chemical is part of a mixture, you can either report the entire mixture or only the portion of the mixture that is a particular hazardous chemical. 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 chemical.)

Source EPA

Tip #7

Don't overlook your forklift batteries, ammonia refrigeration systems or diesel fuel.



- Lead and sulfuric acid from forklift or other large battery-operated equipment batteries are not considered *exempt articles*. And because industrial batteries contain chemicals in a different form and concentration as a product packaged for use by the public, these batteries are also not exempt *consumer products*. Contact the equipment manufacturer if you are unsure of the weight of the battery or the lead to acid ratio.
- Ammonia is another commonly overlooked chemical in Tier II reporting. Facilities using ammonia as a refrigerant should remember it is an EHS, with a 500 lb. reporting threshold.
- Because diesel fuel is typically stored in large volumes. Don't overlook it.

Ready to Report?

We hope you found our Tier II reporting tips valuable.

If you're new to Tier II, you'll likely want some support. And if you've done it before, it might be something you want to get off your plate because you know how painstaking it can be. Either way, we'll take the stress out of Tier II reporting. Contact us today if we can help you with Tier II reporting.



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