

To: Oil and Gas Well Owners and Operators

From: State Emergency Response Commission

Date: February 5, 2014

RE: Emergency and Hazardous Chemical Inventory Reporting

Many oil and gas well owners submitted hazardous chemical inventory reports, required under section 312 of EPCRA, in the fall of 2013, following the notice by the SERC dated September 11, 2013. After receiving requests from the oil and gas industry, the SERC explored options to provide oil and gas well owners flexibility for the submission of their 2013 annual chemical inventory reports, due March 1, 2014. **Please be advised that the reporting instructions contained in a memorandum sent to oil and gas well owners/operators on or around January 23, 2014 have been revised to make it easier to report, as outlined below.**

Specifically, the SERC is making the following two changes to its previous instructions to provide flexibility to oil and gas well owners who filed chemical inventory reports in the fall of 2013, and are also required to submit annual chemical inventory reports for calendar year 2013, due March 1, 2014: (1) submission of the facility map is **optional**, and (2) the chemical inventory report may be completed using the abbreviated "CY2013 Short Form." If your previous inventory report filed in 2013 for calendar year 2012 has not changed, you may submit a "short form", which would contain only the additional or modified items added to the reporting form by US EPA, along with a certification that the previously submitted forms is still accurate.

1. Facility Map is Optional

Because the requirement to submit a map or site plan is **optional** under US EPA's regulations (although it is required under Ohio regulations), the owner or operator of a facility that submitted its chemical inventory report for the 2012 reporting year, or has filed a log in accordance with ORC 1509.10 and a production statement in accordance with ORC 1509.11, is **not** required to submit a map with the reports filed with the SERC, LEPC and jurisdictional fire department by March 1, 2014.

2. Chemical Inventory Report Short Form Option

As explained in our prior, January 2014 memorandum, U.S. EPA has revised some existing data elements and added some new data elements that must be addressed in chemical inventory reports for the 2013 calendar year (due by March 1, 2014). Oil and gas well owners and operators who recently filed chemical inventory reports may find that the information submitted on the calendar year (CY) 2012 report, which is still required for their 2013 report, has not changed. The SERC has examined if the oil and gas well owners could incorporate the recently submitted reports by reference within the

new submission. Because the new or modified elements were not submitted on the previous report, the SERC has created a "CY2013 Short Form" which captures the new or modified elements which US EPA adopted, and incorporates the previously submitted form by reference. Please note that US EPA has changed the reporting ranges used to report the quantity of chemical stored onsite and facilities are encouraged to review these range codes carefully when completing the CY2013 report. The "CY2013 Short Form" and the instructions for completing the short form are enclosed with this mailing, and will be available on the SERC webpage at: <http://epa.ohio.gov/dapc/serc.aspx> . If you have questions regarding the report, please contact Ohio EPA's Right to Know Program at (614) 644-2260.