



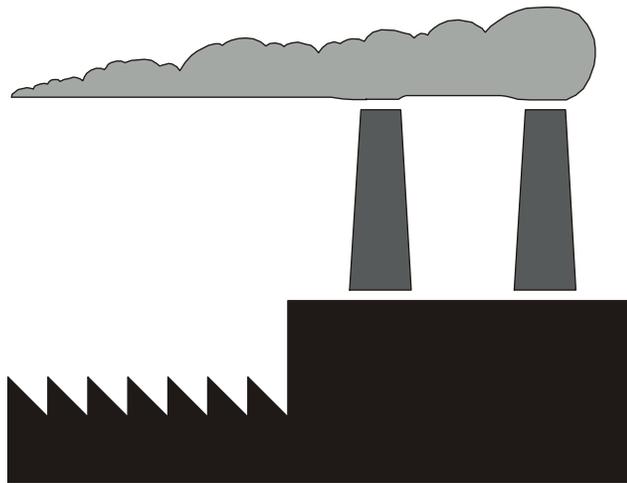
Ohio State Emergency Response Commission
Lazarus Government Center
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

Emergency Planning and Community Right-to-Know

(Ohio Revised Code Chapter 3750)

Facility Reporting Compliance Manual

www.epa.state.oh.us/dapc/serc/index.aspx



If your facility is subject to the OSHA Hazard Communication Standard, and

(1) Stores or uses a hazardous chemical(s) in quantity(ies) of 10,000 pounds or more, or

(2) Stores or uses one or more "extremely hazardous substance(s)" in quantity(ies) of 500 pounds or less

THEN THIS PROGRAM MAY APPLY TO YOUR FACILITY

Instructions for:

- **Facility Identification**
- **Annual Chemical Inventory Reporting**
- **Annual Fee Submission**
- **Reporting Release Incidents**
- ***www.epa.state.oh.us/dapc/serc/index.aspx***

Electronic Reporting Now Available

The State Emergency Response Commission (SERC) has committed to implement an electronic reporting program in Ohio. Regulated facilities may elect to either submit electronically using the guidance stated below or may continue to report via the hard copy format as instructed within this compliance manual.

The Ohio SERC continues to endorse the U.S. EPA "Tier 2 Submit" software program. The software can be downloaded directly onto your computer by visiting www.epa.gov/emergencies/content/epcra/tier2.htm#tierii or www.epa.gov/emergencies/content/epcra/tier2.htm

Hardware Requirements:

PC: Intel-compatible Pentium-class computer.

256 MB RAM

Hard disk with 60 MB of free hard drive space

SVGA color display

Macintosh: Macintosh computer with a G3, G4 or G5 processor.

256 MB RAM

Hard disk drive with 60 MB of free drive space.

Software Requirements:

PC: Windows 2000 (Service Pack 4), or Windows XP (Service Pack 2)

Windows 98 is not compatible

Macintosh: Mac OS 10.3.9 or 10.4

Additional Requirements:

An Internet browser.....Internet Explorer 4.0 or later or Netscape Navigator 4.7 or later.

ALL TIER 2 SUBMIT SOFTWARE ASSISTANCE AND/OR QUESTIONS ARE DIRECTED TO THE U.S. EPA RMP REPORTING CENTER AT (301) 429-5018 OR VIA E-MAIL AT userrmp.usersupport@csc.com

The SERC will rely on the U.S. EPA's web page as the primary mechanism for distributing the reporting software and instructions to all users. Ohio EPA will not mass produce or distribute the software or instructions.

Facilities opting to file electronically may submit their March 1, 2010 report on a 3 ½ inch diskette or CD to both the SERC and the LEPC. A certification letter and site map must be attached to the diskette mailing. A hard copy report, generated off the electronic submission must be submitted to your local jurisdictional fire department.

The annual filing fee worksheet and fee check will continue to be mailed separately to: Ohio EPA, Department L-2711, Columbus, OH 43260-2711.

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Please Call
1-888-644-2260 (toll free)
or
1-614-644-2260

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If you have any questions about these instructions or the state forms included in this booklet call (614) 644-2260 or toll free at 1-888-644-2260 for further information. Please have this booklet where you can use it for reference.
Revised September 2009

Toxic Release Inventory (TRI) Reporting (www.epa.state.oh.us/dapc/tri/tri.html)
(Administered through Division of Air Pollution Control)

Also known as “**Section 313**” or “**Form R**” reporting. TRI information submission includes release, storage, treatment, and recycling data for over “600 listed toxic chemicals.”

A facility is subject to TRI reporting if:
1) Operations are classified within SIC codes 20-39, plus seven non-manufacturing industrial sectors,
2) The company has 10 or more employees,
3) The company manufactures, processes, or otherwise uses at least 10,000 pounds of one or more of the “600 plus listed toxic chemicals or chemical categories.”

TRI Reports are due July 1, for each prior calendar year.
Contact DAPC @ (614) 644-2260 to request TRI instruction books or information.

Send:
(Due March 1, 2010)

**Option 1
Paper Filing**

- (1) Facility Identification Form
- (2) Facility Map
- (3) Chemical Inventory Form(s)

To:

**State Emergency Response
Commission**
c/o Ohio EPA
Lazarus Government Center
50 West Town St., Suite 700
P. O. Box 1049
Columbus, Ohio 43216-1049
Attn: RTK

**Local Emergency Planning
Committee
Information Coordinator
(see pages 20-28)**

**Local Jurisdictional Fire
Department**

**Option 2
Tier 2 Submit Electronic Software**

- (1) Send labeled (name, address and county) diskette(s) or CD, certification statement, and a paper copy of site map to:

**State Emergency Response
Commission** c/o Ohio EPA
Lazarus Government Center
50 West Town St., Suite 700
P. O. Box 1049
Columbus, Ohio 43216-1049
Attn: RTK

**Local Emergency Planning
Committee
Information Coordinator
(see pages 20-28)**

- (2) Send a paper copy generated from the Tier 2 Submit software and site map to:

**Local Jurisdictional Fire
Department**

Send Filing Fee Plus Worksheet to:
(Due no later than March 31, 2010)

Ohio Environmental Protection Agency
Dept. L-2711
Columbus, Ohio 43260-2711

Check Payable to: Treasurer, State of Ohio
(please include Revenue ID# on check)

Reporting Procedures

Background

The Emergency Planning and Community Right-to-Know Act (EPCRA) was passed by Congress in 1986. EPCRA was included as Title III of the Superfund Amendments and Reauthorization Act (SARA) and is sometimes referred to as SARA Title III. EPCRA provides for the collection and availability of information regarding the use, storage, production, and release of hazardous chemicals to the public and emergency responders in your communities. The law promotes a working relationship among government at all levels, business and community leaders, environmental and other public interest organizations, and individual citizens to improve hazard communication and emergency planning.

In 1988, the Ohio General Assembly passed Substitute Senate Bill 367. This law, Chapter 3750, Emergency Planning of the Ohio Revised Code (ORC), provides for the implementation of EPCRA in Ohio. The administrative body for the implementation of Chapter 3750 is the State Emergency Response Commission (SERC). SERC is made up of nine (9) State Agency's (Environmental Protection Agency (EPA); Department of Public Safety; Attorney General's Office (AGO); Health; Department of Natural Resources; Department of Transportation; State Fire Marshal; State Highway Patrol; and Public Utilities Commission of Ohio (PUCO)). Additionally, SERC has ten (10) appointed members (Environmental Advocacy (2); Industry Trade Association (2); Fire Fighting Industry (3); and Local Municipality (3).

SERC appoints members of the Local Emergency Planning Committees (LEPCs) of each emergency planning district. In Ohio, each county has been designated as its own emergency planning district, with the exception of Montgomery and Greene Counties who combined their planning efforts. LEPC members include representatives from each of the following groups or organizations: elected state and local officials; law enforcement personnel; emergency management personnel; fire fighting personnel; first aid personnel; hospital personnel; health personnel; local environmental personnel; transportation personnel; broadcast and/or print media personnel; community groups; and owners and operators of subject facilities. SERC appoints LEPC members to two (2) year terms of office. These LEPCs use your inventory information to develop and exercise their local planning district's emergency response plan(s).

Why Reporting This Information is Required

Under state law, LEPCs must develop a local contingency plan to address responses to hazardous material incidents within their respective planning district. A portion of the plan is to identify and work with officials from facilities that use, store, produce, etc. hazardous substances within the planning district, to obtain key site-specific chemical inventory data including: chemical name(s), volume, storage method, health hazards, etc.; and perform hazard analysis studies on facilities storing or using "extremely hazardous substance(s)". LEPCs must identify what chemicals are in use within their planning district, so that the pre-planning efforts and response coordination to hazardous material incidents can progress in an expedient fashion. Obtaining information and communicating with one another is a must for this program to work.

Secondly, the citizens in your community have a "right-to-know" regarding what chemical(s) are being utilized or stored at a "regulated facility". Under this program, citizens may request access to inventory reports and emergency plans developed under this law. There are disclosure protections for trade secret chemical names and confidential locations.

Reporting Procedures

Complete filing packages are due March 1, of each and every year, for the previous inventory calendar year. Companies can file either in hard copy as in the past using the forms in this manual or electronically by using U.S. EPA's "Tier 2 Submit" software.
(see inside cover for specifics)

FYI:

A complete report includes 1) the Facility Identification form(s), 2) Emergency and Hazardous Chemical Inventory form(s), 3) a Facility Map, and 4) Filing Fees for a calendar year. These must be submitted on or before March 1, of the following year (i.e., the report for calendar year 2009 must be submitted on or before March 1, 2010).

Companies that have previously reported and have no change in inventory submission may submit only the filing fee worksheet plus the appropriate fee, accompanied by the completed facility identification form. Mark an "no change (from last year's)" located on the upper right hand corner of the identification form. The facility is to submit a new complete report every three years even if no changes have occurred at the facility.

If you do/did not have the amount of a hazardous substance(s) on location at your facility at any time during the previous calendar year, that triggers inventory reporting under this program, fill in parts 1.1 through 2.2 of the Facility Identification Form, and mark the "Negative" box in the upper right corner of the form. Return copies of that form to the SERC, LEPC, and jurisdictional fire department.

What a "Tier II Chemical Inventory" Report Includes:

If your facility needs to submit a report under ORC Section 3750.08 (SARA Title III, Community Right-To-Know), the following summarizes what forms should be included in your report and where the report is sent.

If your facility submits a "Negative Report", your facility is not subject to the fee schedule under this program. A Facility Identification Form is requested to be filled out (Sections 1 and 2) completely. Next year you will not receive an instruction book unless you call to request one.

Send Your Completed Forms or Electronic Diskette(s) or CD to:

Option 1 Paper Filing	Option 2 Tier 2 Submit Electronic Software
<p>(1) Facility Identification Form (2) Facility Map (3) Chemical Inventory Form(s)</p> <p>To:</p> <p>State Emergency Response Commission c/o Ohio EPA Lazarus Government Center 50 West Town St., Suite 700 P. O. Box 1049 Columbus, Ohio 43216-1049 Attn: RTK</p> <p>Local Emergency Planning Committee Information Coordinator (see pages 20-28)</p> <p>Local Jurisdictional Fire Department</p>	<p>(1) Send labeled (name, address and county) diskette(s) or CD, certification statement and paper copy of site map to:</p> <p>State Emergency Response Commission c/o Ohio EPA Lazarus Government Center 50 West Town St., Suite 700 P. O. Box 1049 Columbus, Ohio 43216-1049 Attn: RTK</p> <p>Local Emergency Planning Committee Information Coordinator (see pages 20-28)</p> <p>(2) Send a paper copy generated from the Tier 2 Submit software and site map to:</p> <p>Local Jurisdictional Fire Department</p>

Option 1:

A. Please send to: the SERC, the LEPC Information Coordinator, and the Fire Department copies of the forms in this package attached in this order:

1. Facility Identification Form (EPA 0316);
2. Emergency and Hazardous Chemical Inventory Form(s) (EPA 0317);
3. The Facility Map.

Option 2:

B. Facility reports using U.S. EPA's "Tier 2 Submit" electronic software. (see inside cover for details)

1. Send diskette(s) or CD, certification letter and paper copy of site map to the SERC and LEPC.
2. Send a paper copy generated from the Tier 2 submit software, certification letter and site map to jurisdictional fire department. (Note: SERC will be working with statewide fire department toward accepting the electronic version.)

C. Send to the Ohio EPA, Office of Fiscal Administration:

1. The Facility Annual Filing Fee Worksheet (EPA 0320);
2. Multiple Facility Summary Form(s) (if applicable);
3. A check made payable to "**Treasurer, State of Ohio**" attached to the Filing Fee Worksheet.

If you are paying for several facilities owned by the same company with one check, you must use the Multiple Facility Summary Identification Form. The State Emergency Response Commission encourages companies to submit a multiple facility summary list for each separate county (ex. Franklin, Cuyahoga, Lawrence, etc.). A separate Facility Annual Filing Fee Worksheet should be completed for each facility on the Multiple Facility Identification Form.

The Facility Annual Filing Fee Worksheet, Multiple Facility Summary Identification Form (if applicable), and a check for the filing fee should be addressed to:

**Ohio EPA
Dept. L-2711
Columbus, Ohio 43260-2711**

The check should be payable to: **Treasurer, State of Ohio.**

General Instructions

Who Must Report Their Chemical Inventory

The owner or operator of a facility must submit a report when all of the following conditions are met:

1. Facility is subject to the OSHA Hazard Communication Standard; and
2. Facility uses, produces, and/or stores a Hazardous Chemical and/or an “Extremely Hazardous Substance” (EHS); and
3. The quantity of one of these Hazardous Chemicals or Extremely Hazardous Substances is in excess of the “Threshold Quantity” (TQ).

The TQ for Hazardous Chemicals is 10,000 pounds.

If your facility stores or uses more than 10,000 pounds of any one hazardous chemical or mixture containing the TQ of a hazardous chemical at your facility, at any one point in time, on any one given day (24 hours), as defined by the OSHA Hazard Communication Standard. (see pages 3-5 for definitions). **Examples include, but are not limited to, gasoline, diesel fuel, 1,1,1-trichloroethane, paint, methyl ethyl ketone, etc.**

The TQ for Extremely Hazardous Substances is 500 pounds or the listed Threshold Planning Quantity (TPQ), whichever is less. Examples include, but are not limited to, chlorine, ammonia, hydrofluoric acid, nitric acid, etc.. The EHSs are listed (on pages 31-38).

What Chemicals are to be Reported

Under this program, an Extremely Hazardous Substance (EHS) is one of 359 specifically listed chemicals. The EHS list appears on pages 31-38. The list contains the name of the chemical, the Chemical Abstracts Service (CAS) number, and the TQ, Reportable Quantity (RQ), and TPQ. If a chemical does not appear on this list it is not an EHS chemical. There are NO trade names on this list, only specific chemical names. The specific chemical names may appear in the list of active ingredients on the label of a trade-named product/material, or are stated on the Material Safety Data Sheet.

Hazardous Chemicals can not be found on any single list. The term “Hazardous Chemical” refers to any chemical, element, chemical compound(s), or mixture(s) of elements and/or compounds with “hazardous” characteristics. Rather than developing a complete list of Hazardous Chemicals, the law defines five hazardous characteristics. These are: acute, chronic, fire, reactive, and sudden release of pressure. If a chemical exhibits one or more of these characteristics it is considered to be a Hazardous Chemical under this program. Similarly, if a formulation of several chemicals exhibits one or more of these characteristics, the formulation is a hazardous chemical. If you have any chemicals covered by the OSHA Hazard Communications Standard, those chemicals are also regulated under ORC Sections 3750.07 and 3750.08 and SARA Title III.

“**Health hazard**” means a chemical for which there is statistically significant evidence, based on at least one study conducted in accordance with established scientific principles, that acute or chronic health effects may occur in exposed employees. The term “health hazard” includes chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents which act on the hematopoietic system, and agents which damage the lungs, skin, eyes or mucous membranes.

“**Physical hazard**” means a chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, or organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water reactive.

The definitions of hazardous chemical under OSHA classify chemicals into 10 physical hazards and 13 health hazards. For chemical inventory reporting purposes under SARA, Title III section 311 and 312, U.S. EPA proposes to consolidate the 23 OSHA hazard categories into five hazard reporting categories. These are listed below.

“**Hazardous Chemical**” has the meaning given to that term by section 1910.1200(c) of title 29 of the Code of Federal Regulations except that such term does not include the following:

Exemptions under this program

Note: Exemptions do not apply to “extremely hazardous substance(s)” notification under 3750.03 (ORC) and/or release reporting under 3750.06 (ORC).

- (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.

Five Hazardous Characteristics:

(1) Acute (Immediate) Health Hazard

Includes corrosive, highly toxic, irritant, sensitizer, toxic, and other hazardous chemicals which cause an adverse effect to a target organ (as defined under 1910.1200 of Title 29 of the Code of Federal Regulations) and manifests itself within a short period of time following a one-time, high exposure to the substance.

“**Corrosive**” means a chemical that causes visible destruction of, or irreversible alterations in, living tissue by chemical action at the site of contact.

“**Highly toxic**” means a chemical falling within any of the following categories:

- (a) A chemical that has a median lethal dose (LD50) of 50 milligrams or less per kilogram of body weight when ingested.
- (b) A chemical that has a median lethal dose (LD50) of 200 milligrams or less per kilogram of body weight when in contact for 24 hours (or less) with bare skin.
- (c) A chemical that has a median lethal concentration (LC50) in air of 200 parts per million by volume or less of gas or vapor, or 2 milligrams per liter or less of mist, fume, or dust, for one hour (or less).

“**Irritant**” means a chemical which causes a reversible inflammation at the site of contact.

“**Sensitizer**” means a chemical that causes exposed people or animals to develop an allergic reaction after repeated exposure to the chemicals.

“**Toxic**” means a chemical falling within any of the following categories:

- (a) A chemical that has a median lethal dose (LD50) of more than 50 milligrams per kilogram but not more than 500 milligrams per kilogram of body weight when ingested.
- (b) A chemical that has a median lethal dose (LD50) of more than 200 milligrams per kilogram but not more than 1,000 milligrams per kilogram of body weight when in contact for 24 hours (or less) with the bare skin.
- (c) A chemical that has a median lethal concentration (LC50) in air of more than 200 parts per million but not more than 2,000 parts per million by volume of gas or vapor, or more than two milligrams per liter but not more than 20 milligrams per liter of mist, fume, or dust, for one hour (or less).

(2) Chronic (Delayed) Health Hazard

Includes carcinogens and other hazardous chemicals which cause an adverse effect to the target organ (as defined under 1910.1200 of Title 29 of the Code of Federal Regulations) and manifests itself after a long period of time following or during repeated contacts with the substance.

Carcinogen: A chemical is considered to be a carcinogen if:

- (a) it has been evaluated and found to be a carcinogen or potential carcinogen; or
- (b) it is listed as a carcinogen or potential carcinogen;
- (c) it is regulated by OSHA as a carcinogen.

A chemical is considered to affect a target organ if it produces signs or symptoms of an effect on an organ of the body. Such signs or symptoms include, but are not limited to, the following effects which are listed as examples.

- (a) Chemicals which produce liver damage (hepatotoxin).
- (b) Chemicals which produce kidney damage (nephrotoxin).
- (c) Chemicals which affect the nervous system (neurotoxin).
- (d) Agents which act on the blood (hematopoietic agent).
- (e) Agents which damage the lung (pulmonary agent).
- (f) Chemicals which affect reproductive capabilities (reproductive toxins).
- (g) Chemicals which affect skin (cutaneous hazards).
- (h) Chemicals which affect the eye (eye hazard).

(3) Fire Hazard

Includes combustibles, flammables, oxidizers, and pyrophorics as defined under 1910.1200 of Title 29 of the Code of Federal Regulations.

“Combustible liquid” means any liquid having a flash point at or above 100°F (37.8°C), but below 200°F (93.3°C)

“Flammable” means a chemical that falls into one of the following categories:

- (a) “Aerosol, flammable” means an aerosol that yields a flame projection exceeding 18 inches or a flashback (a flame extending back to the valve).
- (b) “Gas, flammable” means a gas that forms a flammable mixture with air.
- (c) “Liquid, flammable” means any liquid having a flash point below 100°F (37.8°C).
- (d) “Solid, flammable” means a solid that is liable to cause fire through friction, absorption of moisture, spontaneous chemical change, retained heat, or which when ignited burns vigorously and persistently.
- (e) “Oxidizer” means a chemical that initiates or promotes combustion in other materials thereby causing a fire.
- (f) “Pyrophoric” means a chemical that will ignite spontaneously in air at a temperature of 130°F (54.4°C) or below.

(4) Reactive Hazard

Includes organic peroxides, unstable reactives, and water reactives as defined under 1910.1200 of Title 29 of the Code of Federal Regulations.

“Organic peroxide” means an organic compound that contains the bivalent -O-O- structure and which may be considered to be a structural derivative of hydrogen peroxide.

“Unstable (reactive)” means a chemical which will vigorously polymerize, decompose, condense, or will self-react due to shock, pressure, or temperature.

“Water-reactive” means a chemical that reacts with water to release a flammable gas or a health hazard.

(5) Sudden Release of Pressure Hazards

Includes compressed gas and explosives as defined under 1910.1200 of Title 29 of the Code of Federal Regulations.

“Compressed gas” means a gas or mixture of gases having, in a container:

- (a) An absolute pressure exceeding 40 psi at 70°F (21.1°C); or
- (b) An absolute pressure exceeding 104 psi at 130°F (54.4°C); or
- (c) A liquid having a vapor pressure exceeding 40 psi at 100°F (37.8°C).

“Explosive” means a chemical that causes a sudden, almost instantaneous release of pressure, gas, and heat when subjected to sudden shock, pressure, or high temperature.

Calculation of Quantity in Storage

Step 1

In order to determine if you have a TQ (the amount that triggers inventory reporting) of a Hazardous Chemical or Extremely Hazardous Substance **you must first inventory your chemicals**. If you are in compliance with the OSHA Hazard Communication Standard, you already have your Material Safety Data Sheets (MSDS) gathered and know what chemicals you have. If you have not done this, you need to collect this information.

NOTE: MSDSs without a date were published prior to 1985. Facilities which have old MSDSs, or no MSDS for a chemical, should call their supplier and request a new one. Suppliers are required by law to provide updated copies on request.

Step 2

Now you need to determine how much (ie. volume in pounds) of the Hazardous Chemical(s) or Extremely Hazardous Substance(s) your facility has on site. One of the easier ways to do this is to make a spreadsheet by listing all of the trade names or pure chemicals you stored down one side of the page with the maximum amount of that substance in storage next to it. Then across the page start listing the ingredients (components) and the percentage in the material. If the ingredient appears as a range, use the highest percentage shown. You may want to follow the model used in **Example 1**. When two or more trade names or mixtures contain the same ingredient, list the amount of the ingredient (components) in the same column to facilitate adding the quantities together. When your inventory is done, **figure the ingredient weight in pounds** and add the columns to give the total weight of each *individual* ingredient.

NOTE: Any hazardous ingredient present in amounts of one percent or more in a mixture or compound must be listed. If the ingredient is a carcinogen (which should be listed on an updated MSDS and labeled as a carcinogen), you must list the chemical if it is present in excess of 0.1 percent. It does not matter if a hazardous ingredient is listed as active or inert; it must be included in your calculations. Hazardous inert ingredients include, as examples: flammable or toxic solvents as a carrier, compressed gas as a propellant, or contaminants. If you have knowledge of an ingredient in the product which is hazardous but is not listed on the MSDS, you are responsible for getting the weight percent of that ingredient from the manufacturer or supplier.

Reporting Components or Mixtures

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

You must decide which of two options to use when reporting your chemical inventory. Under this program, inventories may be reported either by reporting the weight of the entire mixture as a whole or only the portions of the mixture that are hazardous chemicals (e.g.. if a hazardous mixture weighs 12,000 pounds, but is composed of only 20 percent of a particular hazardous chemical, you can report either the 12,000 pounds of hazardous mixture or the 2,400 pounds of hazardous chemical).

Example 2, a company selecting Option 1 to report their inventory by reporting the pure chemicals/mixture trade name(s), would have to report: AAA Safety Solvent; Zip Etch 50 (contains the TO of Nitric Acid, an EHS); and unleaded gasoline since these mixtures are in excess of the 10,000 pound TO.

Option 2 would involve reporting by the total aggregate amount of pure chemicals/chemical components of all mixtures or pure chemicals being stored, manufactured, or utilized at the facility. Reporting under Option 2 results in reporting the chemical inventory for all pure chemicals/chemical components in quantities of 10,000 pounds or more for non-extremely hazardous substances. If a facility has an Extremely Hazardous Substance and the total quantity present in all mixtures and pure forms within the facility equals or exceeds the TPQ or 500 pounds, whichever is lower, the facility must report that EHS. Thus, utilizing the inventory spreadsheet outlined in

Example 3, a facility utilizing Option 2 for reporting must report: toluene (10,092 aggregate pounds); xylene (10,028 aggregate pounds); and nitric acid (550 pure aggregate EHS pounds). Additionally, utilizing Option 2 and reviewing the example inventory spreadsheet, the facility must report the toluene component at all four storage locations; xylene at three locations; and nitric acid at one location.

Please review Examples 2 & 3 which display how to accurately report all information required (Option 1 or 2) under this program.

Section 3750.08 of the ORC requires reporting of volume and location inventory information. This report is due annually on March 1, following the calendar year in which the chemicals were stored.

Sample copies of completed forms are included with these instructions.

Information should be typed or printed clearly.

Please make copies of the blank forms before you fill in the information.

Instructions for Completing Specific Sections of the Report Forms

Facility Identification Form (EPA 0316)

If you have filed a report under this program within the last three years and all of the information reported is still the same and still accurate, you may mark the box “ No change (from last year’s)” in the upper right hand corner of the Facility Identification Form (EPA 0316). Also, the facility must complete sections 1.1, 1.2, 2.1, 2.2, and 3.0 of the form. Return the Facility Identification Form to the SERC, county designated LEPC, and jurisdictional fire department. Submit the Annual Filing Fee Calculation worksheet (EPA 0320) with the correct filing fee for the chemicals from your prior report to Ohio EPA, Dept. L-2711, Columbus, Ohio 43260-2711.

A complete report must be filed if you, a) did not file last year, or b) if you have filed “no change” for the past two (2) years. You must complete all sections of this report and submit them by the March 1 reporting deadline.

The Facility Identification Form identifies your facility and provides information required by SARA Title III, Section 303(d). Please be sure to send a copy of this form with any report you are submitting for Sections 3750.07 and 3750.08 of the ORC or any updates of these reports. This Facility Identification Form must be submitted even if you are using federal reporting forms, as it contains information required by Chapter 3750 of the ORC.

Filing date: Indicate the filing due date the form is being prepared for. This *is not* the date you are actually sending it to the SERC. For example: if the report is for calendar year 2009 or is an update to the report submitted for 2009, the filing date at the top of the Facility Identification Form should read 03/01/10.

County: Fill in the name of the county in which the facility is located. If the facility is located in more than one county list both counties. List the county which contains the largest portion of the facility first.

Filing Status Box Instructions

(upper right-hand corner)

Please check, as applicable

- **EHS reported** ; check if facility is reporting one or more “extremely hazardous substances”.
- **HC reported** ; check if facility is reporting one or more “hazardous chemical(s)”.
- **No change (from last year’s)** ; check if facility has previously reported within last two years and has no change to inventory submission.

- **Exempt** ; check if facility is publicly owned and/or operated (i.e., city, towns, villages, etc...) and/or facility meets one or more of five listed exemptions.

- **Negative** ; check if facility has chemical inventory below the required volumes that trigger a complete report.

- **Ownership change** ; check if facility has undergone an ownership change.

- **First time filer** ; check if facility is reporting for the first-time (i.e...submitting facility identification form; emergency and hazardous chemical inventory report; site map; and filing fee.

1.0 Parent Company Information

Each facility must provide this information on its parent company. For purposes of this form, parent company is defined as a company which directly owns at least 50 percent of the voting stock of another company. For example: if Company A owns 51 percent of Company B and Company B owns 51 percent of Company C, then Company A is the parent of Company C.

1.1 Name of Parent Company

The name of the corporation or other business entity that is the parent company must be entered in this space. If your parent company information is the same as 2.0, Facility Identification (see below), enter “same” on Line 1.1.

1.2 Mailing Address of Parent Company

Enter the mailing address of the parent company or the address of the American corporate headquarters if the company is owned by an international or foreign company. If the mailing address includes a post office box or drawer, it may be used in this part of the form. If an international or foreign company does not have an American headquarters, list the country and postal codes next to the city.

1.3 Parent Company’s Dun & Bradstreet Number

The Dun & Bradstreet number for your parent company must be entered. If your number begins with place-holding zeros, you must use them. The number may be obtained from the treasurer or financial officer of the company. If you do not think the company has a Dun & Bradstreet number, call Dun & Bradstreet and confirm that it does not.

2.0 Facility Identification

This section is for information which is specific to the Ohio facility for which you are reporting.

2.1 Operating Division Name

If the facility is part of a subsidiary or division of the parent company which operates several facilities, enter the name of the subsidiary or division in the space marked "Operating Division Name". If the facility is the only facility operating under the parent company within this name, enter not applicable (N/A) in the space 2.1. In the example for Section 1.0, Company B could be entered as the operating division for Company C, or if Company C has several facilities, it could be listed as the operating division.

2.2 Facility Name and Location

The name of your facility (plant site name or appropriate facility designation), street location, mailing address, city, county, state, and zip code must be entered in the spaces provided. You may not use a post office box number for the street location. If the facility's location is not a mailing address then the post office box or mailing address would be given on the mailing address line. The street location given should be the address where the chemicals are stored, manufactured, processed, or otherwise used. If there is no street number (for example; a remote storage tank) give the nearest cross-roads such as: on Beattie Street east of Water Drive. **NOTE:** If no street number is used, you must give latitude and longitude in Section 2.7.

2.3 Facility Dun & Bradstreet Number

The number assigned by Dun & Bradstreet for your facility or each establishment within your facility must be entered. Dun & Bradstreet assigns a different number to each facility which has the same root number as the parent company. This should be available from your facility's financial office. If none of your establishments have been assigned Dun & Bradstreet Numbers, indicate this by entering not applicable (N/A) in box 2.3.

If more than one Dun & Bradstreet Number is assigned to the facility, use the number assigned as superior to the establishment numbers for that facility. Use leading place holding zeros.

2.3a North American Industry Classification System (NAICS) Code

The Standard Industrial Classification (SIC) Code was replaced by the North American Industry Classification System (NAICS) Code. NAICS uses a six (6) digit coding system to classify all economic activity into twenty (20) sectors. If you are not sure what your NAICS code is, crosswalk tables between SIC and NAICS codes are provided for public use at the U.S. Census Bureau web site at: www.census.gov/naics.

2.3b 24-Hour Emergency Telephone Number

A phone number where an emergency contact may be reached after business hours must be listed. This may be any phone that rings to a person who can reach your facility emergency staff and have them activated immediately during a chemical release.

2.4 Emergency Contact

The name or position of the facility emergency contact and a business-hours telephone number for that person must be listed. **Optional: please provide the e-mail address and fax number designated by the facility emergency coordinator.** This person should be familiar with emergency procedures which may be necessary in case of an accident or release of a chemical from its primary containment, and be able to commit resources to respond to an emergency release. The person should be able to arrive on scene quickly during an emergency.

2.5 Alternate Contact

Enter the name or position of a different person than that listed on line 2.4 with a business-hours telephone number in case the primary emergency contact is unavailable. This person also should be familiar with emergency procedures which may be necessary in case of an accident or release of a chemical from its primary containment and also be able to commit resources to respond to an emergency release. This person also should be able to arrive on scene quickly during an emergency.

2.6 Fire Department Name

The name and *seven-digit emergency* phone number (NOT 911) of the local fire department with jurisdiction at your facility must be provided. This should be the same fire department that receives a copy of this report. The phone number of the fire department should be listed on the inside front cover or under the appropriate government listing of the local phone book. The law which established 911 Service requires maintenance of a seven-digit emergency number. If you are filing this form for a different location, contact the plant manager for directory assistance.

2.7 Latitude and Longitude

If there is no street number given in 2.2 for street location, you must enter the latitude and longitude coordinates of your facility. Sources of these data include: your deed or title, U.S. EPA permits, county property records, facility blueprints, site plans, and U.S. Geological Survey Topographic Maps.

2.7a to 2.10 Additional Facility Information

While the above information must be completed, the remainder of Section 2 is requested for emergency use and to help coordinate the Community Right-To-Know program with other Ohio EPA offices.

2.7a Number of Employees

Enter the number of employees usually at the facility during the shift when the most employees are there. Use whole numbers.

2.8 RCRA Identification Number (Hazardous Waste)

If your facility has been assigned U.S. EPA Identification Numbers, enter those numbers. The U.S. EPA I.D. Number is a 12-digit number assigned to facilities covered by hazardous waste regulations under the Resource Conservation and Recovery Act (RCRA). Facilities not covered by RCRA which generate less than 100 kilograms of hazardous waste per month are not likely to have an assigned U.S. EPA I.D. Number. If this is the case, enter "not applicable" (N/A) in the box. If your facility has more than two numbers, enter the oldest active number held by the facility.

2.8a NPDES Permit Number (Wastewater Discharge)

Enter the number of any permit your facility holds under the National Pollutant Discharge Elimination System (NPDES). This permit number is assigned to your facility by U.S. EPA or the state under the authority of the Clean Water Act. If the facility has more than one primary number, enter the oldest active permit you hold. If your facility does not have a permit, enter "not applicable" (N/A) in the box.

2.9 State Wastewater Facility Number

If you have a permitted wastewater discharge directly to a waterway or which is not an NPDES Permit (see 2.8a), enter the number here. If you have more than one of these numbers, enter the oldest active permit number. Use leading place-holding zeros. If you do not have this permit, write "not applicable" (N/A) in this space.

2.9a Pretreatment Number

If you have an indirect discharge via a publicly owned treatment works, write the pretreatment identification number for the indirect discharge. If you have more than one of these numbers, use the oldest active number. Use leading place holding zeros. If your facility does not have an indirect industrial discharge to a sanitary sewage plant and no pretreatment number, write "not applicable" (N/A) in this space.

2.10 Air Permit Facility Number

If you have an air emissions permit to install or a permit to operate, write the number here. If you have more than one permit, write in the primary number or the oldest active permit number. Use leading place-holding zeros. If you do not have an air permit enter "not applicable" N/A in this space.

2.10a Other Facility Permit Numbers

If you have more than one facility permit number for lines 2.8, 2.9, or 2.10, check this box and attach a list of the other numbers to this form.

3.0 Certification (Required Annually)

3.1 Print or type the name and title of the person who signs the statement in the space provided. This certification statement applies to all the information supplied and should be signed only after the form has been completed.

3.2 The certification statement must be signed by the owner or operator, or a senior official with management responsibility at this facility for the person (or persons) completing the form. The owner, operator, or official must certify the accuracy and completeness of the information reported on the form by signing and dating the certification statement.

Each report submitted to the SERC must contain an original signature on this form.

Facility Maps

Maps which indicate the storage locations of chemicals at your facility are required. The map(s) help fire departments and the Local Emergency Planning Committee (LEPC) prepare for any unexpected event at your business. Your map(s) should show any fixed storage tanks and other permanent storage rooms or locations which you inventoried while calculating the TQs of your reportable chemicals. Copies of the map(s) must accompany the chemical inventory reports sent to the fire department, LEPC, and SERC.

A. How to Draw the Map

Show the outline of any storage structure, buildings and interior walls; building openings, major fixed equipment, and other outdoor use and storage locations. Room dimensions, tank diameters or other use and storage locations should be no smaller than 1/4-inch for visibility and clarity. Lettered labels (see part B of this section) as large as those printed by a standard typewriter are recommended. If this results in large maps, they need to be folded into a 8-1/2 by 11-inch package. Please include the locations of drive-thru gates, bordering streets or access roads. Indicate surrounding land use (residential, farmland, industrial, etc.); and the location of the fire lock box, if applicable.

North (directional marking) should be shown on all maps, and each map should be labeled with the facility name and street address. The scale of the map should be shown near the address; (the number of feet represented by an inch on the map). For buildings with more than one floor, draw the upper floor(s) or basement(s) to the same scale as the first floor map and label the drawings to show buildings and floor. Remember to show the locations of permanent inside storage tanks and vats. Instructions for labeling the map(s) to match the Inventory Form are given below. A sample map is shown in our example.

B. How to Label the Map

Information, which should appear on all maps submitted as part of your facility annual inventory report is listed below:

___ Name and address of the facility;

___ North arrow;

___ Scale indication;

___ Surrounding land use; and

___ Date and signature.

1. **Identify each building with the letter “B”** and a number or letters as you have them marked at your facility (limit of 4 numbers or letters after the B). Example: B-123 or BMAIN.

2. **Identify each outside storage tank**, including both above ground and below ground tanks, with the letter “T” and a number or letters (limit 4 characters). A “tank,” as used in this section, is a totally enclosed container.

3. **Identify each inside storage tank** with the letter “C” and a number or letters. Any permanent open-top container which stores chemicals prior to or between use is a vat. Identify each vat with the letter V and a number or letters. Do not repeat numbers of tanks already used in 2 above.

4. **Identify each outside storage area** where hazardous chemicals are present, with the letter “A” and a number or letters. A dike may be identified as an area if all the tanks within it contain the same chemical. If you have chemicals which are in portable containers that are not stored in a permanent place outside, label all the places they may be found as a single large area on the map. (See the instructions for Storage Type U (for ubiquitous) under “Location of Chemicals”, Paragraph b.) You need not mark individual portable containers on the map.

Please Note: If buildings, outside and inside storage tanks and outside storage areas already have pre-assigned letters or numbers, you may use those letters or numbers as long as you use the appropriate prefix letters: (A)-areas, (B)-buildings, (C)-inside tanks,

(T)-outside tanks, and (V)-vats. Do not duplicate assignment of tank numbers. For example: Two tanks labeled as 01 is not acceptable, i.e. outside and inside tanks T01 and C01 *is not* acceptable. However, T01a and C01b would be acceptable.

5. If a room or portion of a room in a building is used as a warehouse where chemicals may be moved frequently to accommodate storage incidental to shipping, indicate the room or portion of the room as a “warehouse” on the map. If it is part of a larger room highlight the area used with dashed lines.

6. Identify each room in which hazardous chemicals are stored in a building with letters or numbers using either existing room numbers or beginning with “A”, “B”, “C”, or “1”, “2”, “3” etc. You may use up to four characters to identify each room. (It is not necessary to label offices, restrooms, or other rooms which are not used for chemical storage.) Every building has at least one room. Please label that room and any others on the drawing which contain chemicals that you are reporting.

7. Supply any other structural or safety information which the fire department or LEPC may ask for as part of the pre-planning process.

8. Your map is to include all the above information found in Sections (A), and (B) must be submitted to the SERC, LEPC, and the fire department, unless otherwise negotiated and agreed to by the LEPC or the fire department having jurisdiction over the facility. A letter signed by the fire department or LEPC representative must be attached to the map stating that they have agreed to the attached map. Information requested under (7) must be supplied not withstanding any agreement entered into under (8).

Emergency and Hazardous Chemical Inventory Form (EPA 0317)

The Emergency and Hazardous Chemical Inventory Form (EPA 0317) contains information about chemicals present at your facility. This information allows the LEPC and the Fire Department to make community contingency plans in case a chemical emergency should occur at the facility. It is important that someone who is familiar with the facility fill this information in.

Facilities which prefer to utilize the federal 312 (tier II) report form for the Chemical Inventory and Location reporting under Sec. 3750.02 (B)(1)(e) of the ORC may copy those forms from the Federal Register at the nearest library which holds that publication. If you have any questions about the federal forms call U.S. EPA’s helpline at 1-800-424-9346 (toll free) or visit U.S. EPA’s web site at www.epa.gov/emergencies/content/epcra/index.htm.

Identification and Status

Number your Emergency and Hazardous Chemical Inventory Form pages in the upper right hand corner starting with page 1. If you are only submitting one page, it is page 1 of 1.

4.1 Facility Identification

Enter the facility name and location in this space exactly as you entered it on the Facility Identification Form (2.1).

4.2 Filing Date

Enter the filing date for which this report is being prepared. Note that this is not necessarily the same date as the preparation or mailing date. Unless you are filing for other than the previous calendar year, the date will be March 1 of the current year (2008).

4.3 Confidential Location

If you wish the location of hazardous chemicals on this page to be considered as confidential business information then you must check the box marked "storage location and facility map are confidential" and print in block capital letters "CONFIDENTIAL FORM" in the space provided. If this space is not filled, information on this page of the form will be filed with the pages available for public inspection. The SERC will not be responsible for confidential location information if this procedure is not followed. See the instructions (on page 14) under "Confidential Location" for more information.

4.4 Revision

Check the box if this is a revision to a previously submitted Section 3750.07 or 3750.08 report (311/312). You must update inventory data on file within 90 days of adding a hazardous chemical to your inventory.

4.5 Map Attachments

Check this space if you wish your map or maps to be confidential information in accordance with the instructions in section 5.C.f "Confidential Location".

Chemical Inventory and Location

If you had any hazardous chemical that OSHA requires an MSDS present at your facility at any time in the previous calendar year, at or above the threshold quantity (500 pounds or the TPQ if it is less for an EHS, or 10,000 pounds for any other hazardous chemical) you are subject to Chemical Inventory Reporting. Please follow these instructions carefully. For ORC Section 3750.07 (EPCRA, Section 311) reports and updates, the appropriate columns under the headings "Chemical Description" and "Hazard Class" must be filled in. Complete the line in Section 5.0 with information for all four major headings constitutes a Section 3750.08 (312) submission for each chemical and use/storage location. If more than one use/storage type or location is used for that chemical, then more than one line must be filled in on the inventory form. Note: The inventory fee is based on the total number of different chemicals reported, not the number of locations where a chemical is stored.

5.0 Chemical Description

For each chemical identified as a hazardous chemical or EHS which exceeds its assigned TQ, complete the following sections on the Chemical Inventory Form. Information for a chemical use/stored in more than one location or use/storage type must be repeated on a separate line for each location (you may use ditto marks to repeat repetitive chemical names). If reporting of the chemical requires more than one page, *all* the information must be entered in its entirety on the top line of each form needed to list its use/storage locations.

a. Chemical Abstract Services (CAS) Registry Numbers

Determine the CAS number and report it for each reported hazardous chemical and/or hazardous component of a mixture. Leave this field blank for reported mixture name(s), unless the mixture has been assigned a CAS Registry Number. This number is usually found on the MSDS for the product. If it is not, then contact the manufacturer for this number.

b. Specific Chemical Name

Record the chemical name for each hazardous chemical, extremely hazardous substance, or component to be reported. If the mixture option was selected, enter the common name of the mixture. (Example: Floor stripper is a mixture of several chemicals. Bleach is a common name for a specific chemical, Sodium Hypochlorite, which should be listed with its CAS number).

If you have selected to report by mixture name and the mixture contains an EHS, list the EHS name(s) below the mixture name on the shaded line.

Physical Status

This section provides instructions for completing the boxes to the right of the Specific Chemical Name under 5.0 **Chemical Description**.

c. Pure

For any pure hazardous chemical or Extremely Hazardous Substance which is not a mixture or a component of a mixture, place an "X" in the section labeled PURE.

d. Mixture

For any blend of elements, chemicals, or compounds forming a mixture in which the components retain their individual chemical properties that must be reported according to the general instructions, place an "X" in the section labeled MIXTURE. (If you decide to report by mixture, you cannot report components).

e. Component

For any of the elements or chemicals present in a mixture determined to be a hazardous chemical or Extremely Hazardous Substance for which your facility elected to utilize the component method of reporting, place an "X" in the section labeled COMPONENT. If pure chemicals were used in determining the quantity of a component, also mark the PURE section. (If you are reporting by component, you cannot also report by mixture).

f. EHS Chemicals

For any pure, mixture or component which is identified as being an Extremely Hazardous Substance, place an "X" in the section labeled EHS CHEMICAL. (See pages 31 to 38)

g. Solid/Liquid/Gas

The physical state (solid, liquid or gas) of each reported chemical or mixture should be described by placing an "X" in the appropriate section. If a reported chemical is present in different physical states and different containers at the same location, a separate chemical entry should be made for each physical state. (Example: If you have lye as a solid and a liquid it should be listed on two lines of the form, i.e. once as a solid and once as a liquid. Liquified gasses in a pressure tank are only to be listed once.)

A **solid** is a state of matter characterized by definite shape and volume.

A **liquid** is a substance where the molecules move freely among themselves but remain in one mass, a fluid.

A **gas** is a form of matter having extreme molecular mobility and capable of diffusing and expanding rapidly in all directions.

h. Trade Secrets

If you are withholding the name of a chemical in accordance with criteria specified in EPCRA, Section 322, and have submitted a request for trade secret designation in accordance with 40 CFR 350, enter the generic chemical class (e.g. list Toluene diisocyanate as organic isocyanate) and check the box marked TRADE SECRET.

Trade secret information submitted to U.S. EPA must include a substantiation. Please refer to Section 3750.08 (B)(6) and 3750.09 (ORC), or the Federal Register of October 15, 1987 40 CFR part 350 for detailed information on how to comply with a trade secret request. *Note: You are still required to submit notification that you have a chemical and indicate its general characteristics. A treating physician or emergency responder may receive trade secret information in emergency situations.*

Hazard Class

Mark the appropriate box(es) that indicates which of the five hazard classes the chemical or mixture falls into. This information is detailed in the general instructions section of this booklet, pages 4 and 5.

a. Acute

An acute or immediate health hazard from a one-time exposure.

b. Chronic

A chronic or long-term health hazard, including carcinogens, resulting from one or more exposures.

c. Fire

A fire hazard includes chemicals or mixtures which burn, those which accelerate burning, or which cause a fire by reaction with other materials.

d. Reactive

A reactive hazard includes, but is not limited to, unstable chemicals which can spontaneously react with themselves or with other material, and anything which will react with water.

e. Sudden Release of Pressure

A pressure hazard includes, but is not limited to, compressed gasses, aerosol cans, and explosives.

Location of Chemicals

For each chemical listed on the Emergency and Hazardous Chemical Inventory Form, identify each location and use/storage type for this chemical at your facility present at or above the TQ at anytime during the reporting calendar year. If a chemical is used/stored in more than one use/storage type location, then each storage type and location must be entered on a separate line.

a. Building (or building-like structure), Outside Use/Storage Tanks or Outside Use/Storage Areas.

This space is only for structures and objects which can typically be seen from outdoors on the plant property. This also includes underground storage tanks. Record the letter and number of the building (B), outside use/storage tank (T), or outside use/storage area (A), which is on the facility map you prepared. (Please note: Do Not list inside use/storage tanks or vats in this column; only list the building letter and number where the inside tank is stationed.)

Buildings, outside tanks and outside areas which are numbered 1 through 9 should be recorded with the number zero preceding the designated number, (e.g., B01, T09, A06, etc). Up to four characters may be used with the letter designated.

b. Division or Room Location

For buildings, record the corresponding letter or number of the room or division from your facility map. For outside tanks and outside use/storage areas, leave this space blank. Inside use/storage tanks are located by the Division or Room Letter. You may use up to four characters in this column. Use/storage code U (Ubiquitous) is to be used when a chemical is found in all portions of a building, room, warehouse, or outside use/storage area in portable or hand-carried containers which change location frequently.

c. Floor

This identifies whether the chemical substance is used/stored above ground or below ground level. For buildings record the following:

- first floor or floor at grade "1"
- second floor "2", etc.
- first floor below grade "A", one floor below street-level entrance of the normal access to the building.
- second floor below grade "B", etc.

Do not use 1/2 floor markings, pick the next floor up or the next floor down.

Outside use/storage tanks and areas do not have a floor location in a building unless they are on a building roof. In this case they should be listed as Building #, Room is "ROOF", Floor #, C##, etc.

d. Use/Storage Type Code

For each chemical or substance and location which you have listed, indicate the code from Table 1 (page 13) for the particular type of containment used for the chemical substance at that place. If more than one storage type is used for a location in a room or on a floor, indicate repeated information on the next line. When listing inside storage tanks use Code "C" and record assigned inside tank numbers with this code (e.g., C23). Up to four characters may be used with letter designations "C", "H", and "V".

Table 1. Codes for Storage Container Type

Codes	Types of Storage
A	Above-ground outside tank
B	Below-ground outside 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 bottle or jugs
N	Plastic bottle or jugs
O	Tote bin
P	Tank wagon
Q	Rail car
R	Other
U	Ubiquitous
V	Vat or other open-top vessel

e. Pressure and Temperature Conditions

For each use/storage type, record the pressure and temperature condition from Table 2 under which each chemical is used/stored. Separate the pressure and temperature with a comma (e.g. 1,4).

Table 2. Codes for Use/Storage Conditions

Code	Pressure Conditions
1	Ambient Pressure (1 atmosphere)
2	Greater than ambient pressure
3	Less than ambient pressure
Code	Temperature Conditions
4	Ambient temperature (natural)
5	Temperature maintained by heating
6	Temperature maintained by cooling
7	Cryogenic conditions

f. Confidential Location

Section 3750.09 of the ORC and EPCRA Section 324 allows you to designate the location information on a specific chemical as “confidential” from release to the public. *However, you must still report this information to the SERC, LEPC, and local fire department.* If you choose to request “confidential location status”, you will need to submit two chemical inventory forms to each of the above groups; one is a “public” copy and one is an “emergency responders” copy.

(1) On the “public” copy place an “X” in the column labeled Location Confidential and *do not* fill in the other location information blanks. You need to fill in only one line per chemical on your public form. Do not check box 4.3, “Confidential Form” on the public copy.

(2a) On the “emergency responders” copy you must label at the top of the Emergency and Hazardous Chemical Inventory Form “CONFIDENTIAL FORM” and check box 4.3. If you fail to do this, you are responsible for accidental release of your information. “Confidential” Chemical Inventory Forms should be submitted in a separate envelope clearly marked “CONFIDENTIAL LOCATION FORMS” attached to your Facility Identification Form.

(2b) Enter the information for each chemical you are requesting confidential location status as you did for the other chemicals. Any chemical information on this page(s) will not be released to the public. Check the location confidential blank for each line you use.

(3) Attach your envelope of Confidential Chemical Inventory Forms to the Non-Confidential Chemical Inventory Forms. This separates confidential locations from other information that may be disclosed to the public. Those correctly identified form(s) will be placed in a separate locked file along with the facility map, which also will be designated as a “confidential location” item if you provide an envelope for it. Check the map attachment box number 4.5.

(4) Note that amount appears on both forms, but it is not considered confidential in range code quantity. You must still report range code quantity on the public form(s) and specific amounts on the confidential form(s).

Amount

a. Maximum

For each substance/chemical being reported, estimate the maximum amount of the chemical present at your facility at any one time during of the reporting year.

The amount you report may be measured in pounds or gallons rounded up to two significant whole figures. Rounding up in this recommended style is strongly recommended to provide a margin of safety for emergency responders and planners. Two significant figures means the two left-most digits in a number followed by zeros to keep place.

Exact Amount	Reported Amount
34,582 lbs.	35,000 lbs.
164,280 lbs.	170,000 lbs.
6,466 gal.	6,500 gal.
11 gal.	11 gal.

If you want to keep the actual quantity of a chemical confidential, use a maximum and average range code for each location and storage type. **The range codes must refer to pounds.** If you need to convert gallons to pounds, take water which weighs approximately 8.34 pounds per gallon, multiply it by the chemicals specific gravity to get an approximate value for the weight of chemical in pounds per gallon. Then multiply by the total number of gallons of the chemical in inventory.

Table 3. Inventory Range Codes

* to be used when electing not to use actual quantity

RANGE CODE	WEIGHT RANGE IN POUNDS	
	FROM....	TO....
01	0 -	99
02	100 -	999
03	1000 -	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

Each location and use/storage type has its own maximum quantity. Do not total the amounts of the same chemical together, except on a public form for confidential locations, and to determine if you have a TQ.

b. Average Code

For each substance/chemical reported at each use/storage location, estimate the average amount that was present at your facility during the year. To do this, total all daily amounts and divide by the number of days the chemical was present at that location. You *must* use the same unit of measure for average amount as you did for maximum amount. Do not total the average amounts of the same chemical together except on the public form for confidential locations.

c. Units

The units that were used to measure the amounts which were listed under MAXIMUM and AVERAGE must be indicated in this section. Please use:

“P”	for pounds
“G”	for gallons
“C”	for range code

d. Number of Days On-Site

Enter the number of days for the reporting calendar year that the chemical substance was found at each location.

6.0. Certification

This must be completed by the owner or operator, or the officially designated representative of the owner or operator. Type or print your full name and official title on each page of this form and enter the current date. Each inventory form page must contain an original signature.

7.0 Filing Fee Calculation Form

The owner or operator of a facility required to annually file a report under Section 3750.08 of the Revised Code shall submit a Facility Annual Chemical Inventory Filing Fee Worksheet (EPA 0320) and a filing fee for each facility reporting. To calculate the correct fee count all the *different* chemicals on your Chemical Inventory Form. If you have listed the same chemical more than once at a single facility because of storage type or location, do not count it a second time—it is still only one chemical.

The State Emergency Response Commission (SERC) revised the filing fee schedule (September 4, 2001). The revised fee schedule is:

- **Inventory Form Filing Fee (Base) \$150.00**
- **Inventory Form Filing Fee (Additional) \$20.00 per hazardous substance reported.**
- **Inventory Form Filing Fee (Additional) \$150.00 per extremely hazardous substance reported.**
- **Facility fee cap, not to exceed \$2,500.00**
- **Late fees received after March 31, shall be subject to 10 percent late fee charge.**

The facility annual chemical inventory filing fee worksheet has been adopted by SERC to assist your facility in calculating, step by step, your filing fee. Please follow the fee worksheet instructions carefully when calculating your fee. If you have any questions, please call 614-644-2260 or 1-888-644-2260 (toll free).

Send:
(Due March 1, 2010)

**Option 1
Paper Filing**

- (1) Facility Identification Form
- (2) Facility Map
- (3) Chemical Inventory Form(s)

To:

**State Emergency Response
Commission**
c/o Ohio EPA
Lazarus Government Center
50 West Town St., Suite 700
P. O. Box 1049
Columbus, Ohio 43216-1049
Attn: RTK

**Local Emergency Planning
Committee
Information Coordinator
(see pages 20-28)**

**Local Jurisdictional Fire
Department**

**Option 2
Tier 2 Submit Electronic Software**

- (1) Send labeled (name, address and county) diskette(s) or CD, certification statement, and a paper copy of site map to:

**State Emergency Response
Commission** c/o Ohio EPA
Lazarus Government Center
50 West Town St., Suite 700
P. O. Box 1049
Columbus, Ohio 43216-1049
Attn: RTK

**Local Emergency Planning
Committee
Information Coordinator
(see pages 20-28)**

- (2) Send a paper copy generated from the Tier 2 Submit software and site map to:

**Local Jurisdictional Fire
Department**

Send Filing Fee Plus Worksheet to:
(Due no later than March 31, 2010)

Ohio Environmental Protection Agency
Dept. L-2711
Columbus, Ohio 43260-2711

Check Payable to: Treasurer, State of Ohio
(please include Revenue ID# on check)

Release Reporting of a Hazardous Substance

The State Emergency Response Commission (SERC) finalized a set of eight (8) release reporting rules (3750-25-01; 3750-25-05; 3750-25-10; 3750-25-12; 3750-25-13; 3750-25-15; 3750-25-20; and 3750-25-25), effective June 30th, 1993. The purpose of this section is to make you aware of your reporting obligations in case of a discharge or release.

All verbal notifications made under these rules are to be reported to the Ohio EPA's Emergency Response Section, Local Emergency Planning District(s) which may be affected, and the jurisdictional fire department(s).

An owner or operator is required to report a release or discharge under 3750.06 of the Ohio Revised Code anytime there is a release or spill of a regulated chemical which exceeds its assigned Reportable Quantity (RQ) and leaves the facility property line. The regulated substances subject to the release reporting requirements are reference below:

Materials Subject to Release Reporting

- **Extremely Hazardous Substances 40 CFR; Part 355; Appendix A and B,**
- **CERCLA Hazardous Substances 40 CFR Part 302; Table 302.4, and**
- **Oil (definition includes without limitation to, gasoline, petroleum, fuel oil, sludge, oil refuse, and oil mixed with wastes other than dredged spoil).**
 - a) **The Reportable Quantity (RQ) for the discharge of oil including crude oil into or upon navigable waters is an amount which causes a visible film or sheen upon the surface of the water;**
 - b) **The RQ for the release of oil into the environment, excluding navigable waters, is an amount of 25 gallons or more; and**
 - c) **The RQ for the release of crude oil from an oil and gas extraction storage facility into the environment, excluding navigable waters, is 210 gallons.**

Verbal Notification Requirement

The verbal notification to the fire department, LEPC, and Ohio EPA shall be made within 30 minutes of knowledge of the release, unless notification within that timeframe is impractical due to uncertain circumstances. In addition, calls to The National Response Center (NRC) shall be made for those reportable quantity releases involving CERCLA hazardous substances or oil to navigable waters as soon as possible. The National Response Center (NRC) 24-hour number is 1-800-424-8802.

The release notification for 24-hour reporting of spills in the State of Ohio is:

In Ohio call:

1-800-282-9378

If the 1-800 number does not work, call:

614-224-0946

In addition, facility must call:

- LEPC emergency coordinator
- Jurisdictional fire department

Be prepared to relay as much of the information listed below as is known or can be estimated at the time of reporting. Please remember this is an initial report and estimates can be corrected in your follow-up emergency notice report.

- Name and phone number of the person to contact for further information;
- Location and source(s) of the release or discharge;
- Chemical name or identity of any substance(s) involved in the release or discharge;
- Is the substance an extremely hazardous substance;
- Estimate of the quantity (gallons or pounds) discharged into the environment;
- Time and duration of the release or discharge;
- The environmental medium or media into which the substance was released or discharged;
- Potential health effects associated with the release or discharge of the substance; and
- Report precautions taken, including evacuation, remediation, or other proposed response actions.

This information is required under ORC Section 3750.06(C) and Rule 3750-25-25(A)(1) of the Ohio Administrative Code (OAC).

Written Follow-up Requirements

After the release or discharge, **written follow-up emergency notice must be submitted within 30 days to the Ohio EPA Emergency Response Section and the local planning committee of the planning district(s) in which the release or discharge occurred**, unless the release was from a vessel, then the report is sent only to the SERC. This follow-up emergency notice is your company's opportunity to explain in its own words the circumstances and actions relating to the release of pollutants to the environment. Your written emergency notice should follow the question sequence as indicated below. If any of the questions are not applicable to your incident, indicate N/A (not applicable) for that item.

1. Who

(a) Complete facility name, address and telephone number of the facility from which the release occurred. Complete name of owner and/or operator.

2. When

(a) Actual time, date, and duration of the discharge or release.

(b) Actual time and date of discovery of the release or discharge.

(c) Actions taken to respond to and contain the release or discharge.

(d) Indicate the spill number assigned by Ohio EPA. (If you do not know this number, call a duty officer during business-hours and ask. The telephone number is 614-644-3194). If the National Response Center was notified, please provide their assigned case number.

3. Location

(a) Location of facility from which the release or discharge occurred.

(b) Location of release: county, township, and city.

(c) Longitude and latitude of the release, if known.

(d) Distance and direction from nearest intersection or milepost if it was a transportation related release or discharge.

4. Product Release

(a) Common and/or technical name(s) of the material(s) released or discharged and CAS Numbers(s).

(b) What was the quantity and duration of the discharge? Indicate volume(s) in gallons or pounds.

5. Environmental Impact

(a) Name of the environmental medium or media affected (i.e. navigable waters, land, and/or air). If navigable waters, please identify.

(b) What was the length of area of the navigable waterway affected?

(c) What was the ground surface area (square feet or yards) and depth of soil contamination?

(d) To the extent information is available, identify damage to wildlife and/or vegetation.

(e) To the extent information is available, identify impact to human health and safety (i.e. evacuations, exposure, etc..)

(f) Where appropriate, identify medical advice provided for exposed individuals and or local medical personnel.

6. Monitoring and Detection

(a) If the release or discharge was monitored, indicate the method of detection and concentrations detected.

(b) If the release was air-borne, how was the wind direction and speed determined?

(c) Was the public warned, and if so, how?

7. Mitigation, Containment Action

(a) How much product or waste was recovered or neutralized?

(b) How was the material recovered or neutralized?

(c) Were any other actions taken to reduce the impact of the discharge (containment, adsorbents, on-site treatment, etc.)?

8. Prevention Measures

Please provide plans to prevent recurrence of the discharge or release which may occur at this specific source. This may include: employee training, replacement of equipment, construction, or security measures such as lighting, fencing or locks.

9. Health Risks

List known or anticipated acute and chronic health risks of exposure associated with the substances which were released.

10. Permit Numbers

(a) Indicate any air, water, or other permit numbers which may be pertinent to this incident (voluntary information).

(b) If this is a NPDES/air permit, please enclose a copy of your current effluent/emission limitations.

11. Chronology

Provide a chronological review of the incident. Include a chronology of communications with state and local government.

12. Documentation

Provide any reports or other documents which pertain to the incident (e.g. accident reports, manifest, bills of lading, laboratory analyses).

13. Causes

Describe any extenuating circumstances which caused the discharge.

14. Economic Impact

(This information is voluntary)

(a) Estimate the dollar value, if any, of the spilled product.

(b) What was the equipment damage cost (estimate)?

(c) What was the cost of spill cleanup (estimate)?

(d) What are the estimated costs of spill prevention to eliminate possible reoccurrence of this event?

This information is required pursuant to ORC Section 3750.06(D) and OAC Rule 3750-25-25(A)(2).

The written emergency notice must be submitted within 30 days of the release or discharge to:

(a) Ohio EPA, DERR—ER
Lazarus Government Center
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049
ATTN: ER Records Mgmt.
SERC Report

(b) County LEPC
Emergency Coordinator
(see pages 20 to 28)

The statute provides that if significant additional information regarding the mandatory or voluntary information submitted becomes known during the period between submission of the written report and one (1) year after the release or discharge, the owner or operator shall submit to the LEPC and the Ohio EPA an updated written notice within three (3) days after learning of the additional information.

If this is the second oil spill release at this location within a 12 month period, or a release of over 1,000 gallons which has reached water, then you must submit a copy of your Spill Prevention Control and Counter-measure Plan (SPCC) to the U.S. EPA Regional Administrator and to Ohio EPA within 60 days from the time of the discharge as required by 40 CFR 112.4. Your SPCC plan may be submitted with your response to the 30-day written follow-up report. You may obtain SPCC information from U.S. EPA, by contacting their Hotline Center at 800-424-9346.

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