

CEPAC NEWSBREAK

CHEMICAL EMERGENCY PREPAREDNESS ADVISORY COUNCIL NEWSLETTER

PROVIDED BY COLUMBUS PUBLIC HEALTH. THE COUNCIL IS APPOINTED BY THE FRANKLIN COUNTY COMMISSIONERS.

TIER 2 REPORTS DUE MARCH 1, 2018

It is Tier 2 reporting season, so please take time to review reporting requirements. CEPAC will hold two Tier 2 workshops the last week of January 2018 to familiarize those who are responsible for Tier 2 reporting with the EPA/SERC requirements. Workshop attendees also will have the opportunity to network and discuss common and unique reporting requirements for different Tier 2 reporting facilities.

Electronic Tier 2 reporting is the preferred reporting method and you can download the Tier 2- 2017 submit software at www.epa.gov/epcra/tier2-submit-software. (Paper reports are still accepted.) The SERC Compliance Manual and Forms can be found at www.epa.ohio.gov/dapc/serc/informs.aspx. When you submit electronically, you can send one e-mail to all three reporting places at once. (Reports can be sent as pdfs, zip files, compressed files or other electronic attachments).

Reports go to:

1. State Emergency Response Commission, c/o Ohio EPA, Lazarus Government Center, 50 W. Town St., Suite 700, P.O. Box 1049, Columbus, OH 43216 (SERC@epa.ohio.gov)
2. CEPAC, 240 Parsons Ave., Columbus, OH 43215 (pjkowal@columbus.gov)
3. The jurisdictional fire department for your facility. A separate list of all Franklin County Fire Departments will be sent out to all Tier 2 filing facilities.

Send your fee sheet and payment no later than March 31, 2018 to: Ohio EPA, Dept. L-2711, Columbus, OH 43260.



CHANGES TO TIER II REPORTING

By March 1 of each calendar, facilities that use, process, manufacture or store hazardous materials or extremely hazardous substances must report the presence of such materials to the following:

- The Local Fire Department with jurisdiction where the facility is located,
- The Local Emergency Planning Committee (LEPC), and
- The State Emergency Response Commission (SERC).

On March 26, 2012, the Occupational Safety and Health Administration (OSHA) revised the Hazard Communication Standard (HCS) by adopting the United Nations Globally Harmonized System of Classification and Labeling of Chemicals (GHS). The USEPA has incorporated these changes to the classification of hazardous chemicals in the reporting requirements under Sections 311 and 312 of EPCRA effective on January 1, 2018 and cover inventory reports from Calendar Year 2017.

These revisions will affect the way Tier II Chemical Inventory Reports must be completed. The Fact Sheet accompanying this letter describes the hazard classification information your facility will need to identify for Reporting Year 2017. Franklin County LEPC advises reporting facilities of the coming changes as significant pre-work may be required. The information required for the revised report can be obtained from Section 2 of the chemical's Safety Data Sheet (SDS). If you are not able to gain the information from your existing Material Safety Data Sheet (MSDS), it is recommended that you contact the manufacturer or supplier of the chemical and request an updated SDS.

Because substantial changes are being made to the report requirements, use of previous years' versions of the Tier II Chemical Inventory Report forms will not be acceptable for the March 1, 2018 filing and you may be at risk of filing an incomplete report. You will be required to download the new forms or use the electronic software for reports submitted in 2018. Franklin County's Chemical Emergency Preparedness Advisory Council (CEPAC) recommends that facilities consider using the electronic software for Tier II Reports and submit the electronic "t2s" file to the LEPC.

Additional information on the OSHA rule can be obtained by visiting the United States Department of Labor's Hazard Communication page at www.osha.gov/dsg/hazcom/. If you need assistance or further information, please contact CEPAC' Program Manager at 614-645-6275.

The OSHA hazard classifications will affect how facilities report the physical and health hazards associated with their chemicals. The previous standard required reporting facilities to identify 5 hazard classifications associated with a hazardous substance. The OSHA classification system divides the hazard classes into two categories with several sub-categories associated with each. The EPA Tier II reporting will require identification of each hazardous chemical according to its sub-category.

Pre-2018 Tier II Reporting Hazard Classifications

Physical Hazards

- Flammable
- Pressure
- Reactive

Health Hazards

- Acute
- Chronic

New Tier II Reporting Hazard Classifications

(effective January 1, 2018)

Physical Hazards

- Explosive
- Flammable (gases, aerosols, liquids, or solids)
- Oxidizer (liquid, solid, or gas)
- Self-reactive
- Pyrophoric (liquid or solid)
- Pyrophoric gas
- Self-heating
- Organic Peroxide
- Corrosive to metal
- Gas under pressure (compressed gas)
- In contact with water emits flammable gas
- Combustible dust
- Hazard not otherwise classified

Health Hazards

- Acute toxicity (any route of exposure)
- Skin corrosion or irritation
- Serious eye damage or eye irritation
- Respiratory or skin sensitization
- Germ cell mutagenicity
- Carcinogenicity
- Reproductive toxicity
- Specific target organ toxicity (single or repeated exposure)
- Aspiration hazard
- Simple asphyxiant
- Hazard not otherwise classified