

# EPCRA: LEPC Reporting Overview for Industry Partners



# LEPC Reporting Overview for Industry Partners

This document is being provided to Facility Emergency Response Coordinators and describes the reporting obligations for industry and other sites that store chemicals to the Tuscaloosa County LEPC as required under the applicable sections of Title III of the Superfund Amendments and Reauthorization Act (SARA).

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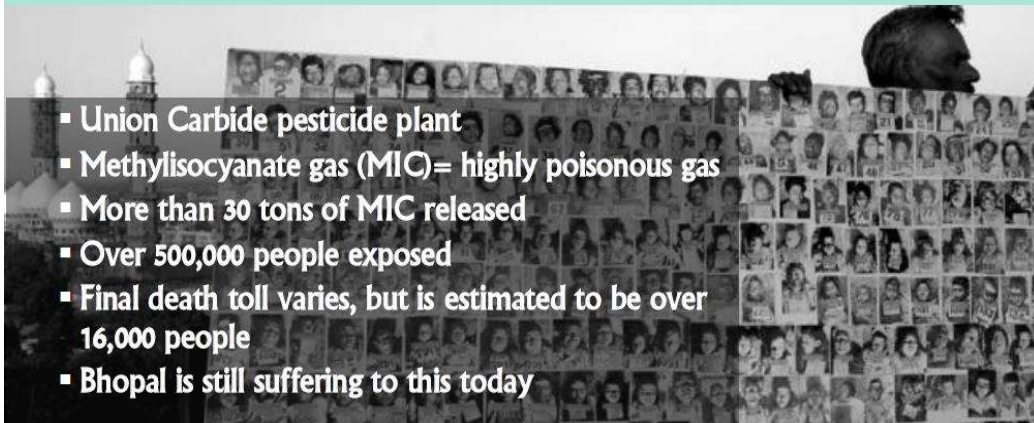
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If you have questions about this document, please reach out to the LEPC at [lepc@tuscco.com](mailto:lepc@tuscco.com).

# EPCRA: What/When/Why?

- Emergency Planning and Community Right-to-Know Act = EPCRA
- Passed by Congress in 1986 as Title III of the Superfund Amendments and Reauthorization Act (SARA)
- Significant incidents leading up to SARA passage:

## History: Bhopal, India- December 3, 1984



- Union Carbide pesticide plant
- Methylisocyanate gas (MIC)= highly poisonous gas
- More than 30 tons of MIC released
- Over 500,000 people exposed
- Final death toll varies, but is estimated to be over 16,000 people
- Bhopal is still suffering to this today

## Institute, West Virginia- August 11, 1985

- Union Carbide manufactured and stockpiled MIC
- 4,000 lbs of toxic chemicals were released
- ~136 people hospitalized



# EPCRA: Purpose

- Help communities prepare to respond to chemical emergencies
- Increase the public's knowledge of the types of chemicals and releases that are at individual facilities
- Empower responders to use the information to improve chemical safety and protect the public and environment
- Create State Emergency Response Commissions (SERCs)

→ The SERCs appoint and supervise the LEPCs

## ADEM

- EPCRA Data Repository
  - Beth Woodfin- 334-394-4306 / [beth.woodfin@adem.alabama.gov](mailto:beth.woodfin@adem.alabama.gov)
- ADEM Emergency Response Questions
  - Grady Springer- 334-260-2717 / [gspringer@adem.alabama.gov](mailto:gspringer@adem.alabama.gov)



## AEMA

- Appoint and supervise LEPCs
- Emergency Planning Districts
- Emergency Plan Preparation/Implementation
  - Reginald Marshall- 205-280-2284 / [reginald.marshall@ema.alabama.gov](mailto:reginald.marshall@ema.alabama.gov)



# SARA Title III Sections & Terms

Emergency  
Planning

Emergency  
Release

Hazardous  
Chemical  
Storage

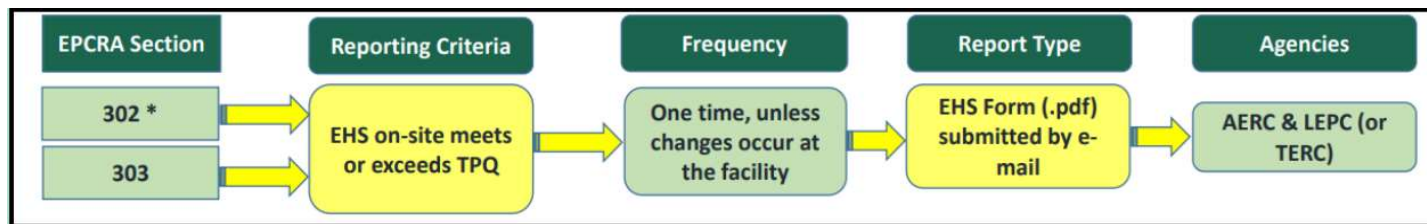
Toxics Release  
Inventory

- **302-** Extremely Hazardous Substance (EHS) Notification
- **303-** Designate a Facility Emergency Response Coordinator who participates in local emergency planning process
- **304-** Emergency Release & Continuous Release Notifications
- **311-** Hazardous Chemical Safety Data Sheet (SDS)
- **312-** Hazardous Chemical Inventory- Tier II Reporting
- **313-** Toxics Release Inventory (TRI)



# Initial Reports: Sections 302/303 EHS Notification

- If a facility has an EHS on-site at or above its threshold planning quantity (TPQ), must submit notification and designate a Facility Emergency Response Coordinator
- One time report, unless changes occur at the facility
- Fill out the form at URL below from ADEM website:
  - <http://adem.alabama.gov/DeptForms/Form534.pdf>
- Submit form to AERC and to Tuscaloosa County LEPC
  - [AL312@adem.alabama.gov](mailto:AL312@adem.alabama.gov) (AERC)
  - [lepc@tuscco.com](mailto:lepc@tuscco.com) (LEPC)
- LEPC may reach out to the Facility Emergency Response Coordinator for additional information to assist with emergency planning

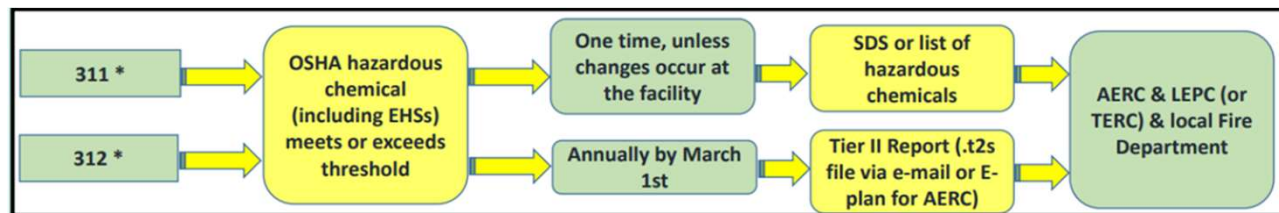


# Initial Reports:

## Section 311

### Community Right-To-Know

- Facilities that have any hazardous chemicals (including EHS) subject to OSHA HazCom standard 1910.1200 must submit a hazardous chemical inventory report
- New facilities have three months after becoming subject to the OSHA regulations to submit their documents
- Includes list of hazardous chemicals and/or copies of SDS's
- Include the facility name, year, and "Section 311" in the subject line
- Submit inventory report to:
  - [lepc@tuscco.com](mailto:lepc@tuscco.com) (LEPC)
  - [AL312@adem.alabama.gov](mailto:AL312@adem.alabama.gov) (AERC)
  - [tier2reports@tuscaloosa.com](mailto:tier2reports@tuscaloosa.com) (Tuscaloosa Fire)
  - [rpotter@cityofnorthport.org](mailto:rpotter@cityofnorthport.org) (Northport Fire)

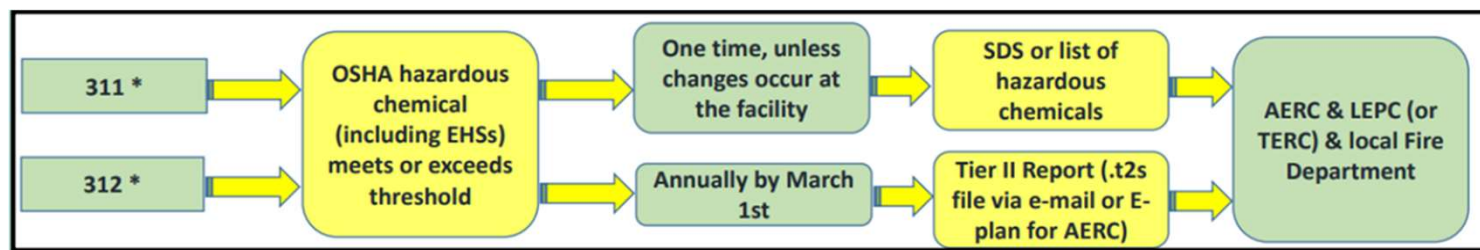


# Annual Reports:

## Section 312

### Hazardous Chemical Inventory Reporting

- Facilities subject to 302/303/311 must submit annual hazardous chemical inventories via Tier II reports
- Tier II reports must be submitted by March 1<sup>st</sup> each year
- Electronic filing is required through E-plan or Tier2Submit
  - E-plan is the preferred format for Tuscaloosa County LEPC and the local fire departments
- Visit the ADEM SARA Title III page for specific instructions on electronic submissions of Tier II reports to the AERC:  
<http://adem.alabama.gov/MoreInfo/saraIII.cnt>
- Send email notification when e-plan has been submitted (or a copy of your Tier II report in .pdf if using Tier2Submit) to:
  - [lepc@tuscco.com](mailto:lepc@tuscco.com) (LEPC)
  - [tier2reports@tuscaloosa.com](mailto:tier2reports@tuscaloosa.com) (Tuscaloosa Fire)
  - [rpotter@cityofnorthport.org](mailto:rpotter@cityofnorthport.org) (Northport Fire)





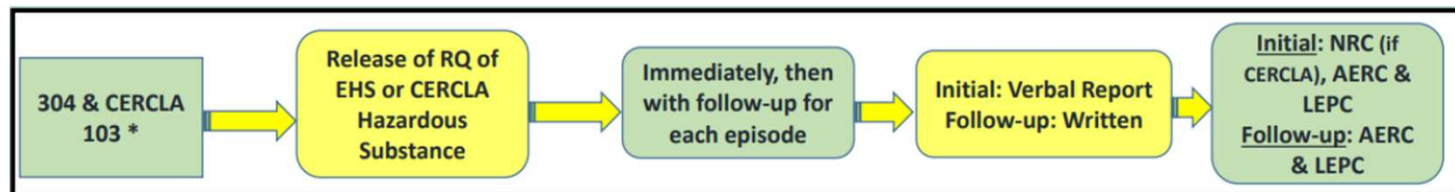
# Release Notifications:

## Section 304

### Initial reports

- Under EPCRA section 304, facilities are required to provide emergency release notification to the appropriate SERC and LEPC of any areas that could be affected by a release of any EHS above the reportable quantity (RQ)
  - Also required for hazardous substances listed under Section 302.4 of CERCLA to National Response Center (NRC)
- Release notification must occur within 15 minutes of when the release becomes reportable
- Reduced reporting options are available for facilities who release EHS in a manner that is continuous and stable in quantity and rate; see EPA's reporting requirements for continuous release notifications:

<https://www.epa.gov/epcra/cercla-and-epcra-continuous-release-reporting#epcra>

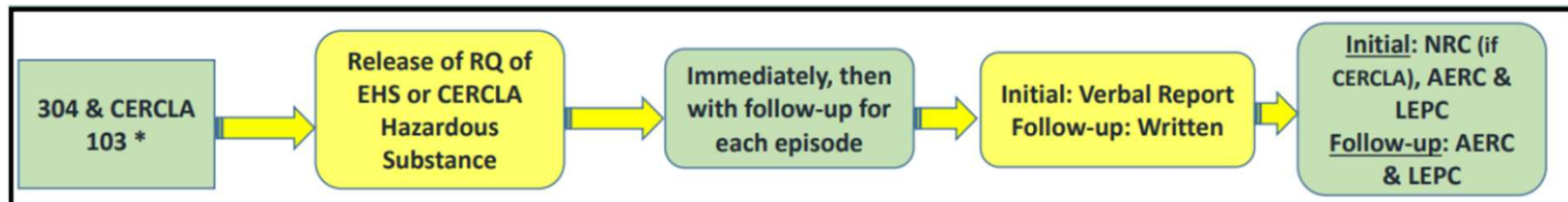


# Release Notifications:

## Section 304

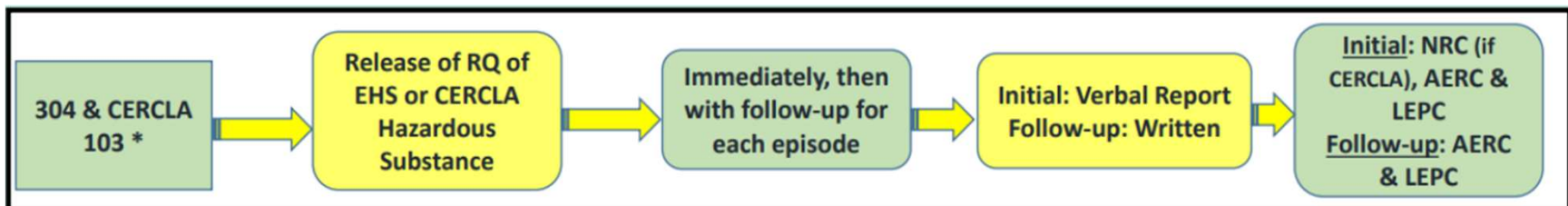
### Initial reports

- The initial report should include:
  - The chemical name
  - An indication of whether the substance is extremely hazardous
  - An estimate of the quantity released into the environment
  - The time and duration of the release
  - Whether the release occurred into air, water, and/or land
  - Any known or anticipated acute or chronic health risks associated with the emergency, and where necessary, advice regarding medical attention for exposed individuals
  - Proper precautions, such as evacuation or sheltering in place
  - Name and telephone number of contact person
- Initial verbal reports should be made to the following:
  - LEPC via Tuscaloosa County EMA @ **205-349-0150**
  - AERC via Alabama State Warning Point (AEMA) @ **(800) 843-0699**
  - National Response Center (NRC) @ **(800) 424-8802** (if applicable)



# Release Notifications: Section 304 Follow up reports

- A follow up report should be submitted as soon as practicable (within 30 days)
  - Update initial report including quantities if known
  - Provide information on actual response actions taken
  - Any known or anticipated acute or chronic health risks associated with the release
- Submit follow up report (.pdf) to:
  - [lepc@tuscco.com](mailto:lepc@tuscco.com) (LEPC)
  - [AL312@adem.alabama.gov](mailto:AL312@adem.alabama.gov) (AERC)



# Summary

## Agencies and their corresponding EPCRA documents

### Fire Department

- Safety Data Sheets
- Tier II Reports

### Local Emergency Planning Committee (LEPC)

- Extremely Hazardous Substance Notifications
- Emergency Release Notifications
- Safety Data Sheets
- Tier II Reports

### Alabama Emergency Response Commission (AERC)

- Extremely Hazardous Substance Notifications
- Emergency Release Notifications
- Safety Data Sheets
- Tier II Reports
- Toxics Release Inventory (TRI)

# What else should I do?

- Are you attending LEPC meetings?
- Are hospitals and other community organizations educated on the chemical hazards at your facility?
- Does your community know what to do during emergencies?



# For more information

## List of EHS:

- 40 CFR Part 355 – Appendix A List of EHS and Their Threshold Planning Quantities

## ADEM EPCRA Site:

- <http://adem.alabama.gov/MoreInfo/saraIII.cnt>

## Tier2Submit:

- <https://www.epa.gov/epcra/tier2-submit-software>
- Tier2Submit Tutorial: <https://www.epa.gov/epcra/tier2-submit-tutorial>

## E-Plan:

- <https://erplan.net>
- E-Plan Users Guide: <https://erplan.net/news/Tier2SubmitUsersGuide/UsersGuide.html>

## EPA's EPCRA Site:

- <https://www.epa.gov/epcra>