

KELLER'S  
**INDUSTRIAL SAFETY**  
REPORT

FEBRUARY 1994

VOLUME 4

NUMBER 2

•SPECIAL REPORT•

**COMMUNITY  
RIGHT TO  
KNOW**

CTL023300

J. J. KELLER & ASSOCIATES, INC.

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# INDUSTRIAL SAFETY REPORT

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CTL023301

# INDUSTRIAL SAFETY REPORT

## SPECIAL REPORT ON COMMUNITY RIGHT TO KNOW

### FEATURED THIS MONTH

This SPECIAL REPORT focuses on SARA Title III - Community Right to Know. The first half of the report discusses the Tier I and Tier II reporting that is due March 1. The second half of the report focuses on the Form R reporting

which is due July 1. In this Special Report, we will answer: who must report; what chemicals are regulated; where do reports get sent; and what changes can be expected in this year's reporting.



### Community Right To Know

#### What Is Community Right To Know?

The Superfund Amendments Reauthorization Act (SARA), Title III, was developed in 1987 by EPA to address concerns that communities have over the possibilities of emergencies due to the inplant storage and/or release of hazardous chemicals. This community concern was triggered by the thousands of deaths related to a Bhopal, India chemical release.

SARA, also known as Community Right To Know, is a complicated collection of regulations that establishes new authorities for emergency planning and preparedness, emergency release notification, community right to know reporting, and toxic chemical release reporting.

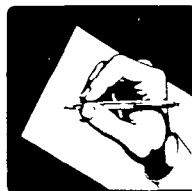
SARA requires companies to report what hazardous substances they have in plant and to provide safety and health information related to these substances. The data is intended to help communities focus on the substances and facilities of the most immediate concern for emergency planning and response.

This Special Report is primarily concerned with Sections 312 and 313 of SARA, Title III. Under Section 312, all facilities affected by the Hazard Communication Standard that have hazardous chemicals at or above the

reporting thresholds must submit a Tier I or Tier II inventory form. This submission is due annually on March 1.

Under Section 313, manufacturers with 10 or more employees handling a "statutory quantity" of a toxic chemical must submit a Form R, the Toxic Chemical Release Inventory Reporting Form, to the EPA. Form R reports are due July 1 of each year.

Penalties for noncompliance are quite severe. Fines could be as much as \$25,000 per day. Each day that a violation continues is considered a separate violation.



### Right To Know Reporting

#### Tier One and Tier Two Reporting

Any facility which must prepare or have available material safety data sheets under OSHA's Hazard Communication Standard is subject to Tier One/Tier Two reporting. Under Section 312, there are two categories of regulated substances.

First, there are extremely hazardous substances (EHSs) - 360 chemicals found in Part 355, Appendix A and B. Second, there are hazardous chemicals - any chemical regulated by OSHA under Hazard Communication, probably 55,000 to 60,000 chemicals.

You must report on all hazardous chemicals that you have 10,000 pounds or more of, now or at any time during the preceding year, and any of the Extremely Hazardous Substances in amounts over 500 pounds (or 55 gallons) or the threshold planning quantity, whichever is less.

On the Tier One form, chemicals must be grouped in OSHA hazard categories, as to:

- A. Estimated ranges of the maximum amount, in each of 5 hazard categories, present during the preceding calendar year;
- B. Estimated ranges of the average daily amount, in each category, present during the preceding calendar year;
- C. The general location of hazardous chemicals in each category.

Tier Two forms normally need only be submitted upon request from the local emergency planning committee, state commissions, and/or local fire departments.

However, nearly every state requests the Tier Two form for the March 1 reporting. See the State Emergency Response Commission Contact List later in this report to determine whether your state requires the Tier One or Tier Two form to be filed.

Some states have developed their own versions of the Tier One and Tier Two reporting forms, while other states require the federal forms to be used.

The contact list will also enable you to determine whether a state form or the federal form must be filed. You may wish to check with your state agency for additional details.

Tier Two forms, whether state or federal, require specific information on each hazardous chemical at the facility, a description of its storage, and the exact location of the hazardous chemical. Tier Two forms must be submitted within 30 days of the receipt of a request for submission.

Under uniform deadlines set in 1990, all facilities that have regulated amounts of hazardous chemicals must submit a Tier One or a Tier Two on March 1 of each year.

## **Tier One/Two Form Changes**

According to government sources, there are no changes to the federal Tier One and Tier Two forms from last year. Copies of the current federal forms follow. If your state requires a state form to be filed, check with your state for changes. There also have been no changes to the list of Extremely Hazardous Substances. The list of EHSs and the threshold planning quantities follows.

## **Questions And Answers On Tier One And Tier Two Reporting**

### **Does Tier One/Tier Two reporting apply only to manufacturers?**

Definitely not. Any facility which must prepare or have available material safety data sheets as required by OSHA's Hazard Communication Standard (1910.1200) may be required to submit a Tier One or Tier Two. Reporting is triggered if the facility has 10,000 pounds or more of a hazardous chemical or if the facility has 500 pounds or the threshold planning quantity, whichever is less, of an EHS at any time during the year.

### **How do I know if I need to submit a Tier One/Two Form?**

Determining your reporting requirements can be a time-consuming process. It involves detailed information on your chemical inventory. You need to know what chemicals you have and the maximum amount at any one time. Then you will need to compare your inventory with the EHS list to see if you have any EHS chemicals in the regulated quantities.

Following that, you will take all the rest of your hazardous chemicals, and determine if you ever have 10,000 pounds of any one chemical at one time. If the answer is yes in either case, then you must submit an inventory report on every chemical that is over the regulated quantity.

### **Where do I have to send the Tier One or Two?**

Copies of the forms must be submitted to three places. The first is the State Emergency Response Commission; the second is the Local

Emergency Planning Committee; and the third is your local fire department. Addresses for the State Commissions can be found later in this Report.

**Most of the chemicals my company uses are mixtures. How do I report on mixtures?**

If a chemical is part of a mixture, you have the option of reporting either the weight of the entire mixture or only the portion that is a particular hazardous chemical. For example, if a hazardous solution, ABC, weighs 100 pounds but is composed of only 10% sulfuric acid, you can indicate in your reporting either 100 pounds of ABC or 10 pounds of sulfuric acid.

**IMPORTANT NOTE:** Extremely Hazardous Substances (those 360 specific chemicals) are treated a little differently than the general hazardous chemical. The amount of an EHS at a facility (both pure substances and EHSs in mixtures) must be aggregated for purposes of threshold determination. Once you determine whether a threshold for an EHS has been reached, you should report either the total

weight of the EHS at your facility, or the weight of each mixture containing the EHS.

**Both the Tier One and Tier Two ask me to check off physical and health hazards that apply. Where do I find this information?**

The reporting required under Sections 311 and 312 asks that you break down your chemicals into 5 categories - two health hazards, three physical hazards. These five hazard categories are a consolidation of the 23 hazard categories defined in the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

Examine the MSDS for the substance you are reporting on. Using the chart below, you should be able to convert the hazard information on the MSDS into the hazard information that EPA is looking for.

Remember, you will often have multiple hazards to check off for one substance. For instance, a hazardous substance might be both flammable and highly toxic. Looking at the chart, you see that you must check "Fire Hazard" and "Immediate (Acute) Health Hazards."

### HAZARD CATEGORY CONVERSION

#### EPA's Hazard Categories

Fire Hazard

Sudden Release of Pressure

Reactive

Immediate (Acute) Health Hazards

Delayed (Chronic) Health Hazards

#### OSHA's Hazard Categories

Flammable  
Combustion Liquid  
Pyrophoric  
Oxidizer

Explosive  
Compressed Gas

Unstable Reactive  
Organic Peroxide  
Water Reactive

Highly Toxic  
Toxic  
Irritant  
Sensitizer  
Corrosive  
Other hazardous chemicals with an adverse effect with short-term exposure.

Carcinogens  
Other hazardous chemicals with an adverse effect with long-term exposure.

Page \_\_\_\_\_ of \_\_\_\_\_ pages  
Form Approved OMB No. 2050-0072

Revised June 1990

**Tier One****EMERGENCY AND HAZARDOUS  
CHEMICAL INVENTORY**  
Aggregate Information by Hazard Type**FOR  
OFFICIAL  
USE  
ONLY**

ID # \_\_\_\_\_

Date Received \_\_\_\_\_

*Important: Read instructions before completing form*

Reporting Period From January 1 to December 31, 19 \_\_\_\_\_

**Facility Identification**Name \_\_\_\_\_  
Street \_\_\_\_\_  
City \_\_\_\_\_ County \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_SIC Code  Dun & Brad Number **Owner/Operator**Name \_\_\_\_\_  
Mail Address \_\_\_\_\_  
Phone ( ) \_\_\_\_\_**Emergency Contacts**

Name \_\_\_\_\_

Title \_\_\_\_\_

Phone ( ) \_\_\_\_\_

24 Hour Phone ( ) \_\_\_\_\_

Name \_\_\_\_\_

Title \_\_\_\_\_

Phone ( ) \_\_\_\_\_

24 Hour Phone ( ) \_\_\_\_\_

☐ Check if information below is identical to the information submitted last year.

| Hazard Type      | Max Amount*                | Average Daily Amount*                     | Number of Days On-Site                    | General Location                                                                    | <input type="checkbox"/> Check if site plan is attached |
|------------------|----------------------------|-------------------------------------------|-------------------------------------------|-------------------------------------------------------------------------------------|---------------------------------------------------------|
|                  |                            |                                           |                                           |                                                                                     |                                                         |
| Physical Hazards | Fire                       | <input type="text"/> <input type="text"/> | <input type="text"/> <input type="text"/> | <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> |                                                         |
|                  | Sudden Release of Pressure | <input type="text"/> <input type="text"/> | <input type="text"/> <input type="text"/> | <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> |                                                         |
|                  | Reactivity                 | <input type="text"/> <input type="text"/> | <input type="text"/> <input type="text"/> | <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> |                                                         |

|                |                   |                                           |                                           |                                                                                     |  |
|----------------|-------------------|-------------------------------------------|-------------------------------------------|-------------------------------------------------------------------------------------|--|
| Health Hazards | Immediate (acute) | <input type="text"/> <input type="text"/> | <input type="text"/> <input type="text"/> | <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> |  |
|                | Delayed (Chronic) | <input type="text"/> <input type="text"/> | <input type="text"/> <input type="text"/> | <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> |  |

**Certification (Read and sign after completing all sections)**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages one through \_\_\_\_\_ and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate and complete.

Name and official title of owner/operator OR owner/operator's authorized representative

Signature \_\_\_\_\_

Date signed \_\_\_\_\_

**\*Reporting Ranges**

| Range Code | Weight Range in Pounds |
|------------|------------------------|
| From...    | To...                  |
| 01         | 0                      |
| 02         | 100                    |
| 03         | 1000                   |
| 04         | 10,000                 |
| 05         | 100,000                |
| 06         | 1,000,000              |
| 07         | 10,000,000             |
| 08         | 50,000,000             |
| 09         | 100,000,000            |
| 10         | 500,000,000            |
| 11         | 1 billion              |
|            | 99                     |
|            | 999                    |
|            | 9,999                  |
|            | 99,999                 |
|            | 999,999                |
|            | 9,999,999              |
|            | 49,999,999             |
|            | 99,999,999             |
|            | 499,999,999            |
|            | 999,999,999            |
|            | higher than 1 billion  |

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| <b>Tier Two</b><br><b>EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY</b><br><i>Specific Information by Chemical</i>                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Facility Identification</b><br>Name _____<br>Street _____<br>City _____ County _____ State _____ Zip _____<br>SIC Code <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> Dun & Brad Number <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> |                                                                                                                                                                                                                  | <b>Owner/Operator Name</b><br>Name _____ Phone ( ) _____<br>Mail Address _____                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                         |             |          |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |                          |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>FOR OFFICIAL USE ONLY</b><br>ID # _____<br>Date Received _____                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                  | <b>Emergency Contact</b><br>Name _____ Title _____<br>Phone ( ) _____ 24 Hr Phone ( ) _____<br>Name _____ Title _____<br>Phone ( ) _____ 24 Hr Phone ( ) _____                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                         |             |          |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |                          |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Important: Read all instructions before completing form         Reporting Period From January 1 to December 31, 19 _____ <input type="checkbox"/> Check if information below is identical to the information submitted last year.                                                                                                                                                                                              |                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                         |             |          |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |                          |
| <b>Chemical Description</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Physical and Health Hazards</b><br><small>(check all that apply)</small>                                                                                                                                                                                                                                                                                                                                                    | <b>Inventory</b>                                                                                                                                                                                                 | <b>Storage Codes and Locations (Non-Confidential)</b><br><small>Storage Locations</small>                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Optional</b>                                                                                                                                                                                                                                                         |             |          |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |                          |
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| <b>Certification (Read and sign after completing all sections)</b><br>I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages one through _____ and that based on my inquiry of those individuals responsible for obtaining the information I believe that the submitted information is true, accurate and complete<br>Name and official title of owner operator OR owner operator's authorized representative _____ Signature _____ Date signed _____ |                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Optional Attachments</b><br><input type="checkbox"/> I have attached a site plan<br><input type="checkbox"/> I have attached a list of site coordinate abbreviations<br><input type="checkbox"/> I have attached a description of dikes and other safeguard measures |             |          |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |                          |

J. J. KELLER & ASSOCIATES, INC.

CTI023306

FEBRUARY 1994

CTL023307

## LIST OF EXTREMELY HAZARDOUS SUBSTANCES AND THEIR THRESHOLD PLANNING QUANTITIES

[Alphabetical Order]

| CAS NO.    | Chemical Name                                                                                                                      | Notes | Reportable quantity* (pounds) | Threshold planning quantity (pounds) |
|------------|------------------------------------------------------------------------------------------------------------------------------------|-------|-------------------------------|--------------------------------------|
| 75-86-5    | Acetone cyanohydrin                                                                                                                |       | 10                            | 1,000                                |
| 1752-30-3  | Acetone thiosemicarbazide                                                                                                          | e     | 1                             | 1,000/10,000                         |
| 107-02-8   | Acrolein                                                                                                                           |       | 1                             | 500                                  |
| 79-06-1    | Acrylamide                                                                                                                         | d,l   | 5,000                         | 1,000/10,000                         |
| 107-13-1   | Acrylonitrile                                                                                                                      | d,l   | 100                           | 10,000/10,000                        |
| 814-68-6   | Acrylyl chloride                                                                                                                   | e,h   | 1                             | 100                                  |
| 111-69-3   | Adiponitrile                                                                                                                       | e,l   | 1                             | 1,000                                |
| 116-06-3   | Aldicarb                                                                                                                           | c     | 1                             | 100/10,000                           |
| 309-00-2   | Aldrin                                                                                                                             | d     | 1                             | 500/10,000                           |
| 107-18-6   | Allyl alcohol                                                                                                                      |       | 100                           | 1,000                                |
| 107-11-9   | Allylamine                                                                                                                         | e     | 1                             | 500                                  |
| 20859-73-8 | Aluminum phosphide                                                                                                                 | b     | 100                           | 500                                  |
| 54-62-6    | Aminopterin                                                                                                                        | e     | 1                             | 500/10,000                           |
| 78-53-5    | Amiton                                                                                                                             | e     | 1                             | 500                                  |
| 3734-97-2  | Amiton oxalate                                                                                                                     | e     | 1                             | 100/10,000                           |
| 7664-41-7  | Ammonia                                                                                                                            | l     | 100                           | 500                                  |
| 300-62-9   | Amphetamine                                                                                                                        | e     | 1                             | 1,000                                |
| 62-53-3    | Aniline                                                                                                                            | d,l   | 5,000                         | 1,000                                |
| 88-05-1    | Aniline, 2,4,6-trimethyl-                                                                                                          | e     | 1                             | 500                                  |
| 7783-70-2  | Antimony pentafluoride                                                                                                             | e     | 1                             | 500                                  |
| 1397-94-0  | Antimycin A                                                                                                                        | c,e   | 1                             | 1,000/10,000                         |
| 86-88-4    | ANTU                                                                                                                               |       | 100                           | 500/10,000                           |
| 1303-28-2  | Arsenic pentoxide                                                                                                                  | d     | 1                             | 100/10,000                           |
| 1327-53-3  | Arsenous oxide                                                                                                                     | d,h   | 1                             | 100/10,000                           |
| 7784-34-1  | Arsenous trichloride                                                                                                               | d     | 1                             | 500                                  |
| 7784-42-1  | Arsine                                                                                                                             | e     | 1                             | 100                                  |
| 2642-71-9  | Azinphos-ethyl                                                                                                                     | e     | 1                             | 100/10,000                           |
| 86-50-0    | Azinphos-methyl                                                                                                                    |       | 1                             | 10/10,000                            |
| 98-87-3    | Benzal chloride                                                                                                                    | d     | 5,000                         | 500                                  |
| 98-16-8    | Benzenamine, 3-(trifluoromethyl)-                                                                                                  | e     | 1                             | 500                                  |
| 100-14-1   | Benzene, 1-(chloromethyl)-4-Nitro-                                                                                                 | e     | 1                             | 500/10,000                           |
| 98-05-5    | Benzeneearsonic acid                                                                                                               | e     | 1                             | 10/10,000                            |
| 3615-21-2  | Benzimidazole, 4,5-dichloro-2-(trifluoromethyl)-                                                                                   | e,g   | 1                             | 500/10,000                           |
| 98-07-7    | Benzotrichloride                                                                                                                   | d     | 10                            | 500                                  |
| 100-44-7   | Benzyl chloride                                                                                                                    | d     | 100                           | 500                                  |
| 140-29-4   | Benzyl cyanide                                                                                                                     | e,h   | 1                             | 500                                  |
| 15271-41-7 | Bicyclo(2.2.1)heptane-2-carbonitrile, 5-chloro-6-(((methylamino) carbonyl) oxyimino)-(1s-(1-alpha, 2-beta, 4-alpha, 5-alpha, 6E))- | e     | 1                             | 500/10,000                           |
| 534-07-6   | Bis(chloromethyl) ketone                                                                                                           | e     | 1                             | 10/10,000                            |
| 4044-65-9  | Bitoscanate                                                                                                                        | e     | 1                             | 500/10,000                           |
| 10294-34-5 | Boron trichloride                                                                                                                  | e     | 1                             | 500                                  |
| 7637-07-2  | Boron trifluoride                                                                                                                  | e     | 1                             | 500                                  |
| 353-42-4   | Boron trifluoride compound with methyl ether (1:1)                                                                                 | e     | 1                             | 1,000                                |
| 28772-56-7 | Bromadiolone                                                                                                                       | e     | 1                             | 100/10,000                           |
| 7726-95-6  | Bromine                                                                                                                            | e,l   | 1                             | 500                                  |
| 1306-19-0  | Cadmium oxide                                                                                                                      | e     | 1                             | 100/10,000                           |
| 2223-93-0  | Cadmium stearate                                                                                                                   | c,e   | 1                             | 1,000/10,000                         |
| 7778-44-1  | Calcium arsenate                                                                                                                   | d     | 1                             | 500/10,000                           |
| 8001-35-2  | Campechlor                                                                                                                         | d     | 1                             | 500/10,000                           |
| 56-25-7    | Cantharidin                                                                                                                        | e     | 1                             | 100/10,000                           |
| 51-83-2    | Carbachol chloride                                                                                                                 | e     | 1                             | 500/10,000                           |
| 26419-73-8 | Carbamic acid, methyl-, O-(((2,4-Dimethyl-1, 3-Dithiolan-2-yl) Methylene)Amino)-                                                   | e     | 1                             | 100/10,000                           |
| 1563-66-2  | Carbofuran                                                                                                                         |       | 10                            | 10/10,000                            |
| 75-15-0    | Carbon disulfide                                                                                                                   | l     | 100                           | 10,000/10,000                        |
| 786-19-6   | Carbophenothion                                                                                                                    | e     | 1                             | 500                                  |
| 57-74-9    | Chlordane                                                                                                                          | d     | 1                             | 1,000                                |
| 470-90-6   | Chlorfenvinfos                                                                                                                     | e     | 1                             | 500                                  |
| 7782-50-5  | Chlorine                                                                                                                           |       | 10                            | 100                                  |
| 24934-91-6 | Chlormephos                                                                                                                        | e     | 1                             | 500                                  |
| 999-81-5   | Chlormequat chloride                                                                                                               | e,h   | 1                             | 100/10,000                           |
| 79-11-8    | Chloroacetic acid                                                                                                                  | e     | 1                             | 100/10,000                           |
| 107-07-3   | Chloroethanol                                                                                                                      | e     | 1                             | 500                                  |
| 627-11-2   | Chloroethyl chloroformate                                                                                                          | e     | 1                             | 1,000                                |
| 67-66-3    | Chloroform                                                                                                                         | d,l   | 10                            | 10,000                               |

## LIST OF EXTREMELY HAZARDOUS SUBSTANCES AND THEIR THRESHOLD PLANNING QUANTITIES, Continued

| CAS NO.    | Chemical Name                                                                                    | Notes | Reportable quantity* (pounds) | Threshold planning quantity (pounds) |
|------------|--------------------------------------------------------------------------------------------------|-------|-------------------------------|--------------------------------------|
| 542-88-1   | Chloromethyl ether                                                                               | d,h   | 10                            | 100                                  |
| 107-30-2   | Chloromethyl methyl ether                                                                        | c,d   | 10                            | 100                                  |
| 3691-35-8  | Chlorophacinone                                                                                  | e     | 1                             | 100/10,000                           |
| 1982-47-4  | Chloroxuron                                                                                      | e     | 1                             | 500/10,000                           |
| 21923-23-9 | Chlorthiophos                                                                                    | e,h   | 1                             | 500                                  |
| 10025-73-7 | Chromic chloride                                                                                 | e     | 1                             | 1/10,000                             |
| 10210-68-1 | Cobalt carbonyl                                                                                  | e,h   | 1                             | 10/10,000                            |
| 62207-76-5 | Cobalt, ((2,2'-(1,2-ethanediylbis (nitrilomethylidyne)) bis(6-fluoro-phenolato)) (2-N,N',O,O'))- | e     | 1                             | 100/10,000                           |
| 64-86-8    | Colchicine                                                                                       | e,h   | 1                             | 10/10,000                            |
| 56-72-4    | Coumaphos                                                                                        |       | 10                            | 100/10,000                           |
| 5836-29-3  | Coumatetralyl                                                                                    | e     | 1                             | 500/10,000                           |
| 95-48-7    | o-Cresol(s)                                                                                      | d     | 1,000                         | 1,000/10,000                         |
| 535-89-7   | Crimidine                                                                                        | e     | 1                             | 100/10,000                           |
| 4170-30-3  | Crotonaldehyde                                                                                   |       | 100                           | 1,000                                |
| 123-73-9   | Crotonaldehyde (E)                                                                               |       | 100                           | 1,000                                |
| 506-68-3   | Cyanogen bromide                                                                                 |       | 1,000                         | 500/10,000                           |
| 506-78-5   | Cyanogen iodide                                                                                  | e     | 1                             | 1,000/10,000                         |
| 2636-26-2  | Cyanophos                                                                                        | e     | 1                             | 1,000                                |
| 675-14-9   | Cyanuric fluoride                                                                                | e     | 1                             | 100                                  |
| 66-81-9    | Cycloheximide                                                                                    | e     | 1                             | 100/10,000                           |
| 108-91-8   | Cyclohexylamine                                                                                  | e,l   | 1                             | 10,000/10,000                        |
| 17702-41-9 | Decaborane (14)                                                                                  | e     | 1                             | 500/10,000                           |
| 8065-48-3  | Demeton                                                                                          | e     | 1                             | 500                                  |
| 919-86-8   | Demeton-s-methyl                                                                                 | e     | 1                             | 500                                  |
| 10311-84-9 | Dialifos                                                                                         | e     | 1                             | 100/10,000                           |
| 19287-45-7 | Diborane                                                                                         | e     | 1                             | 100                                  |
| 111-44-4   | Dichloroethyl ether                                                                              | d     | 10                            | 10,000                               |
| 149-74-6   | Dichloromethylphenylsilane                                                                       | e     | 1                             | 1,000                                |
| 62-73-7    | Dichlorvos                                                                                       |       | 10                            | 1,000                                |
| 141-66-2   | Dicrotophos                                                                                      | e     | 1                             | 100                                  |
| 1464-53-5  | 1,2,3,4-Diepoxybutane                                                                            | d     | 10                            | 500                                  |
| 814-49-3   | Diethyl chlorophosphate                                                                          | e,h   | 1                             | 500                                  |
| 1642-54-2  | Diethylcarbamazine citrate                                                                       | e     | 1                             | 100/10,000                           |
| 71-63-6    | Digitoxin                                                                                        | c,e   | 1                             | 100/10,000                           |
| 2238-07-5  | Diglycidyl ether                                                                                 | e     | 1                             | 1,000                                |
| 20830-75-5 | Digoxin                                                                                          | e,h   | 1                             | 10/10,000                            |
| 115-26-4   | Dimefox                                                                                          | e     | 1                             | 500                                  |
| 60-51-5    | Dimethoate                                                                                       |       | 10                            | 500/10,000                           |
| 2524-03-0  | Dimethyl phosphorochloridothioate                                                                | e     | 1                             | 500                                  |
| 77-78-1    | Dimethyl sulfate                                                                                 | d     | 100                           | 500                                  |
| 99-98-9    | Dimethyl-p-phenylenediamine                                                                      | e     | 1                             | 10/10,000                            |
| 75-78-5    | Dimethyldichlorosilane                                                                           | e,h   | 1                             | 500                                  |
| 57-14-7    | 1,1-Dimethylhydrazine                                                                            | d     | 10                            | 1,000                                |
| 644-64-4   | Dimetilan                                                                                        | e     | 1                             | 500/10,000                           |
| 534-52-1   | Dinitrocresol                                                                                    |       | 10                            | 10/10,000                            |
| 88-85-7    | Dinoseb                                                                                          |       | 1,000                         | 100/10,000                           |
| 1420-07-1  | Dinoterb                                                                                         | e     | 1                             | 500/10,000                           |
| 78-34-2    | Dioxathion                                                                                       | e     | 1                             | 500                                  |
| 82-66-6    | Diphacinone                                                                                      | e     | 1                             | 10/10,000                            |
| 152-16-9   | Diphosphoramidate, octamethyl-                                                                   |       | 100                           | 100                                  |
| 298-04-4   | Disulfoton                                                                                       |       | 1                             | 500                                  |
| 514-73-8   | Dithiazanine iodide                                                                              | e     | 1                             | 500/10,000                           |
| 541-53-7   | 2,4-Dithiobiuret                                                                                 |       | 100                           | 100/10,000                           |
| 2104-64-5  | EPN                                                                                              | e     | 1                             | 100/10,000                           |
| 316-42-7   | Emetine, dihydrochloride                                                                         | e,h   | 1                             | 1/10,000                             |
| 115-29-7   | Endosulfan                                                                                       |       | 1                             | 10/10,000                            |
| 2778-04-3  | Endothion                                                                                        | e     | 1                             | 500/10,000                           |
| 72-20-8    | Endrin                                                                                           |       | 1                             | 500/10,000                           |
| 106-89-8   | Epichlorohydrin                                                                                  | d,l   | 100                           | 1,000                                |
| 50-14-6    | Ergocalciferol                                                                                   | c,e   | 1                             | 1,000/10,000                         |
| 379-79-3   | Ergotamine tartrate                                                                              | e     | 1                             | 500/10,000                           |
| 1622-32-8  | Ethanesulfonyl chloride, 2-chloro-                                                               | e     | 1                             | 500                                  |
| 10140-87-1 | Ethanol, 1,2-dichloro-, acetate                                                                  | e     | 1                             | 1,000                                |
| 563-12-2   | Ethion                                                                                           |       | 10                            | 1,000                                |
| 13194-48-4 | Ethoprophos                                                                                      | e     | 1                             | 1,000                                |

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## LIST OF EXTREMELY HAZARDOUS SUBSTANCES AND THEIR THRESHOLD PLANNING QUANTITIES, Continued

| CAS NO.    | Chemical Name                                 | Notes | Reportable quantity* (pounds) | Threshold planning quantity (pounds) |
|------------|-----------------------------------------------|-------|-------------------------------|--------------------------------------|
| 542-90-5   | Ethyl thiocyanate                             | e     | 1                             | 10,000/10,000                        |
| 538-07-8   | Ethylbis(2-chloroethyl)amine                  | e,h   | 1                             | 500                                  |
| 371-62-0   | Ethylene fluorohydrin                         | c,e,h | 1                             | 10                                   |
| 75-21-8    | Ethylene oxide                                | d,l   | 10                            | 1,000                                |
| 107-15-3   | Ethylenediamine                               |       | 5,000                         | 10,000/10,000                        |
| 151-56-4   | Ethylenimine                                  | d     | 1                             | 500                                  |
| 22224-92-6 | Fenamiphos                                    | e     | 1                             | 10/10,000                            |
| 122-14-5   | Fenitrothion                                  | e     | 1                             | 500                                  |
| 115-90-2   | Fensulfothion                                 | e,h   | 1                             | 500                                  |
| 4301-50-2  | Fluometil                                     | e     | 1                             | 100/10,000                           |
| 7782-41-4  | Fluorine                                      | k     | 10                            | 500                                  |
| 640-19-7   | Fluoroacetamide                               | j     | 100                           | 100/10,000                           |
| 144-49-0   | Fluoroacetic acid                             | e     | 1                             | 10/10,000                            |
| 359-06-8   | Fluoroacetyl chloride                         | c,e   | 1                             | 10                                   |
| 51-21-8    | Fluorouracil                                  | e     | 1                             | 500/10,000                           |
| 944-22-9   | Fonofos                                       | e     | 1                             | 500                                  |
| 50-00-0    | Formaldehyde                                  | d,l   | 100                           | 500                                  |
| 107-16-4   | Formaldehyde cyanohydrin                      | e,h   | 1                             | 1,000                                |
| 23422-53-9 | Formetanate                                   | e,h   | 1                             | 500/10,000                           |
| 2540-82-1  | Formothion                                    | e     | 1                             | 100                                  |
| 17702-57-7 | Formparanate                                  | e     | 1                             | 100/10,000                           |
| 21548-32-3 | Fosthietan                                    | e     | 1                             | 500                                  |
| 3878-19-1  | Fuberidazole                                  | e     | 1                             | 100/10,000                           |
| 110-00-9   | Furan                                         |       | 100                           | 500                                  |
| 13450-90-3 | Gallium trichloride                           | e     | 1                             | 500/10,000                           |
| 77-47-4    | Hexachlorocyclopentadiene                     | d,h   | 10                            | 100                                  |
| 4835-11-4  | Hexamethylenediamine, N,N'-dibutyl-           | e     | 1                             | 500                                  |
| 302-01-2   | Hydrazine                                     | d     | 1                             | 1,000                                |
| 74-90-8    | Hydrocyanic acid                              |       | 10                            | 100                                  |
| 7647-01-0  | Hydrogen chloride (gas only)                  | e,l   | 5,000                         | 500                                  |
| 7664-39-3  | Hydrogen fluoride                             |       | 100                           | 100                                  |
| 7722-84-1  | Hydrogen peroxide (conc. greater than 52%)    | e,l   | 1                             | 1,000                                |
| 7783-07-5  | Hydrogen selenide                             | e     | 1                             | 10                                   |
| 7783-06-4  | Hydrogen sulfide                              | l     | 100                           | 500                                  |
| 123-31-9   | Hydroquinone                                  | l     | 1                             | 500/10,000                           |
| 13463-40-6 | Iron, Pentacarbonyl-                          | e     | 1                             | 100                                  |
| 297-78-9   | Isobenzan                                     | e     | 1                             | 100/10,000                           |
| 78-82-0    | Isobutyronitrile                              | e,h   | 1                             | 1,000                                |
| 102-36-3   | Isocyanic acid, 3,4-dichlorophenyl ester      | e     | 1                             | 500/10,000                           |
| 465-73-6   | Isodrin                                       |       | 1                             | 100/10,000                           |
| 55-91-4    | Isofluorophate                                | c     | 100                           | 100                                  |
| 4098-71-9  | Isophorone diisocyanate                       | b,e   | 1                             | 100                                  |
| 108-23-6   | Isopropyl chloroformate                       | e     | 1                             | 1,000                                |
| 119-38-0   | Isopropylmethylpyrazolyl dimethylcarbamate    | e     | 1                             | 500                                  |
| 78-97-7    | Lactonitrile                                  | e     | 1                             | 1,000                                |
| 21609-90-5 | Leptophos                                     | e     | 1                             | 500/10,000                           |
| 541-25-3   | Lewisite                                      | c,e,h | 1                             | 10                                   |
| 58-89-9    | Lindane                                       | d     | 1                             | 1,000/10,000                         |
| 7580-67-8  | Lithium hydride                               | b,e   | 1                             | 100                                  |
| 109-77-3   | Malononitrile                                 |       | 1,000                         | 500/10,000                           |
| 12108-13-3 | Manganese, tricarbonyl methylcyclopentadienyl | e,h   | 1                             | 100                                  |
| 51-75-2    | Mechlorethamine                               | c,e   | 1                             | 10                                   |
| 950-10-7   | Mephosfolan                                   | e     | 1                             | 500                                  |
| 1600-27-7  | Mercuric acetate                              | e     | 1                             | 500/10,000                           |
| 7487-94-7  | Mercuric chloride                             | e     | 1                             | 500/10,000                           |
| 21908-53-2 | Mercuric oxide                                | e     | 1                             | 500/10,000                           |
| 10476-95-6 | Methacrolein diacetate                        | e     | 1                             | 1,000                                |
| 760-93-0   | Methacrylic anhydride                         | e     | 1                             | 500                                  |
| 126-98-7   | Methacrylonitrile                             | h     | 1,000                         | 500                                  |
| 920-46-7   | Methacryloyl chloride                         | e     | 1                             | 100                                  |
| 30674-80-7 | Methacryloyloxyethyl isocyanate               | e,h   | 1                             | 100                                  |
| 10265-92-6 | Methamidophos                                 | e     | 1                             | 100/10,000                           |
| 558-25-8   | Methanesulfonyl fluoride                      | e     | 1                             | 1,000                                |
| 950-37-8   | Methidathion                                  | e     | 1                             | 500/10,000                           |
| 2032-65-7  | Methiocarb                                    |       | 10                            | 500/10,000                           |
| 16752-77-5 | Methomyl                                      | h     | 100                           | 500/10,000                           |

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LIST OF EXTREMELY HAZARDOUS SUBSTANCES AND THEIR THRESHOLD PLANNING QUANTITIES, *Continued*

| CAS NO.    | Chemical Name                                                                    | Notes | Reportable quantity* (pounds) | Threshold planning quantity (pounds) |
|------------|----------------------------------------------------------------------------------|-------|-------------------------------|--------------------------------------|
| 151-38-2   | Methoxyethylmercuric acetate                                                     | e     | 1                             | 500/10,000                           |
| 80-63-7    | Methyl 2-chloroacrylate                                                          | e     | 1                             | 500                                  |
| 74-83-9    | Methyl bromide                                                                   | l     | 1,000                         | 1,000                                |
| 79-22-1    | Methyl chloroformate                                                             | d,h   | 1,000                         | 500                                  |
| 60-34-4    | Methyl hydrazine                                                                 |       | 10                            | 500                                  |
| 624-83-9   | Methyl isocyanate                                                                | f     | 1                             | 500                                  |
| 556-61-6   | Methyl isothiocyanate                                                            | b,e   | 10                            | 500                                  |
| 74-93-1    | Methyl mercaptan                                                                 | l     | 100                           | 500                                  |
| 3735-23-7  | Methyl phenkapton                                                                | e     | 1                             | 500                                  |
| 676-97-1   | Methyl phosphonic dichloride                                                     | b,e   | 1                             | 100                                  |
| 556-64-9   | Methyl thiocyanate                                                               | e     | 1                             | 10,000/10,000                        |
| 78-94-4    | Methyl vinyl ketone                                                              | e     | 1                             | 10                                   |
| 502-39-6   | Methylmercuric dicyanamide                                                       | e     | 1                             | 500/10,000                           |
| 75-79-6    | Methyltrichlorosilane                                                            | e,h   | 1                             | 500                                  |
| 1129-41-5  | Metolcarb                                                                        | e     | 1                             | 100/10,000                           |
| 7786-34-7  | Mevinphos                                                                        |       | 10                            | 500                                  |
| 315-18-4   | Mexacarbate                                                                      |       | 1,000                         | 500/10,000                           |
| 50-07-7    | Mitomycin C                                                                      | d     | 10                            | 500/10,000                           |
| 6923-22-4  | Monocrotophos                                                                    | e     | 1                             | 10/10,000                            |
| 2763-96-4  | Muscimol                                                                         |       | 1,000                         | 500/10,000                           |
| 505-60-2   | Mustard gas                                                                      | e,h   | 1                             | 500                                  |
| 13463-39-3 | Nickel carbonyl                                                                  | d     | 10                            | 1                                    |
| 54-11-5    | Nicotine                                                                         | c     | 100                           | 100                                  |
| 65-30-5    | Nicotine sulfate                                                                 | e     | 100                           | 100/10,000                           |
| 7697-37-2  | Nitric acid                                                                      |       | 1,000                         | 1,000                                |
| 10102-43-9 | Nitric oxide                                                                     | c     | 10                            | 100                                  |
| 98-95-3    | Nitrobenzene                                                                     | l     | 1,000                         | 10,000/10,000                        |
| 1122-60-7  | Nitrocyclohexane                                                                 | e     | 1                             | 500                                  |
| 10102-44-0 | Nitrogen dioxide                                                                 |       | 10                            | 100                                  |
| 62-75-9    | N-Nitrosodimethylamine                                                           | d,h   | 10                            | 1,000                                |
| 991-42-4   | Norbormide                                                                       | e     | 1                             | 100/10,000                           |
|            | Organorhodium complex (PMN-82-147)                                               | e     | 1                             | 10/10,000                            |
| 630-60-4   | Ouabain                                                                          | c,e   | 1                             | 100/10,000                           |
| 23135-22-0 | Oxamyl                                                                           | e     | 1                             | 100/10,000                           |
| 78-71-7    | Oxetane, 3,3-bis(chloromethyl)-                                                  | e     | 1                             | 500                                  |
| 2497-07-6  | Oxydisulfoton                                                                    | e,h   | 1                             | 500                                  |
| 10028-15-6 | Ozone                                                                            | e     | 1                             | 100                                  |
| 1910-42-5  | Paraquat                                                                         | e     | 1                             | 10/10,000                            |
| 2074-50-2  | Paraquat methosulfate                                                            | e     | 1                             | 10/10,000                            |
| 56-38-2    | Parathion                                                                        | c,d   | 10                            | 100                                  |
| 298-00-0   | Parathion-methyl                                                                 | c     | 100                           | 100/10,000                           |
| 12002-03-8 | Paris green                                                                      | d     | 1                             | 500/10,000                           |
| 19624-22-7 | Pentaborane                                                                      | e     | 1                             | 500                                  |
| 2570-26-5  | Pentadecylamine                                                                  | e     | 1                             | 100/10,000                           |
| 79-21-0    | Peracetic acid                                                                   | e     | 1                             | 500                                  |
| 594-42-3   | Perchloromethylmercaptan                                                         |       | 100                           | 500                                  |
| 108-95-2   | Phenol                                                                           |       | 1,000                         | 500/10,000                           |
| 4418-66-0  | Phenol, 2,2'-thiobis(4-chloro-6-methyl)-                                         | e     | 1                             | 100/10,000                           |
| 64-00-6    | Phenol, 3-(1-methylethyl)-, methylcarbamate                                      | e     | 1                             | 500/10,000                           |
| 58-36-6    | Phenoxarsine, 10,10'-oxydi-                                                      | e     | 1                             | 500/10,000                           |
| 696-28-6   | Phenyl dichloroarsine                                                            | d,h   | 1                             | 500                                  |
| 59-88-1    | Phenylhydrazine hydrochloride                                                    | e     | 1                             | 1,000/10,000                         |
| 62-38-4    | Phenylmercury acetate                                                            |       | 100                           | 500/10,000                           |
| 2097-19-0  | Phenylsilatrane                                                                  | e,h   | 1                             | 100/10,000                           |
| 103-85-5   | N-Phenylthiourea                                                                 |       | 100                           | 100/10,000                           |
| 298-02-2   | Phorate                                                                          |       | 10                            | 10                                   |
| 4104-14-7  | Phosacetim                                                                       | e     | 1                             | 100/10,000                           |
| 947-02-4   | Phosfolan                                                                        | e     | 1                             | 100/10,000                           |
| 75-44-5    | Phosgene                                                                         | l     | 10                            | 10                                   |
| 732-11-6   | Phosmet                                                                          | e     | 1                             | 10/10,000                            |
| 13171-21-6 | Phosphamidon                                                                     | e     | 1                             | 100                                  |
| 7803-51-2  | Phosphine                                                                        |       | 100                           | 500                                  |
| 2703-13-1  | Phosphonothioic acid, methyl-, O-ethyl O-(4-(methylthio)phenyl)ester             | e     | 1                             | 500                                  |
| 50782-69-9 | Phosphonothioic acid, methyl-, S-(2-(bis(1-methylethyl)amino)ethyl)O-ethyl ester | e     | 1                             | 100                                  |

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## LIST OF EXTREMELY HAZARDOUS SUBSTANCES AND THEIR THRESHOLD PLANNING QUANTITIES, Continued

| CAS NO.    | Chemical Name                                                   | Notes | Reportable quantity* (pounds) | Threshold planning quantity (pounds) |
|------------|-----------------------------------------------------------------|-------|-------------------------------|--------------------------------------|
| 2665-30-7  | Phosphonothioic acid, methyl-,O-(4-nitrophenyl) O-phenyl ester  | e     | 1                             | 500                                  |
| 3254-63-5  | Phosphoric acid, dimethyl 4-(methylthio) phenyl ester           | e     | 1                             | 500                                  |
| 2587-90-8  | Phosphorothioic acid, O,O-dimethyl-s-(2-methylthio) ethyl ester | c,e,g | 1                             | 500                                  |
| 7723-14-0  | Phosphorus                                                      | b,h   | 1                             | 100                                  |
| 10025-87-3 | Phosphorus oxychloride                                          | d     | 1,000                         | 500                                  |
| 10026-13-8 | Phosphorus pentachloride                                        | b,e   | 1                             | 500                                  |
| 1314-56-3  | Phosphorus pentoxide                                            | b,e   | 1                             | 10                                   |
| 7719-12-2  | Phosphorus trichloride                                          |       | 1,000                         | 1,000                                |
| 57-47-6    | Physostigmine                                                   | e     | 1                             | 100/10,000                           |
| 57-64-7    | Physostigmine, salicylate (1:1)                                 | e     | 1                             | 100/10,000                           |
| 124-87-8   | Picrotoxin                                                      | e     | 1                             | 500/10,000                           |
| 110-89-4   | Piperidine                                                      | e     | 1                             | 1,000                                |
| 23505-41-1 | Pirimifos-ethyl                                                 | e     | 1                             | 1,000                                |
| 10124-50-2 | Potassium arsenite                                              | d     | 1                             | 500/10,000                           |
| 151-50-8   | Potassium cyanide                                               | b     | 10                            | 100                                  |
| 506-61-6   | Potassium silver cyanide                                        | b     | 1                             | 500                                  |
| 2631-37-0  | Promecarb                                                       | e,h   | 1                             | 500/10,000                           |
| 106-96-7   | Propargyl bromide                                               | e     | 1                             | 10                                   |
| 57-57-8    | Propiolactone, beta-                                            | e     | 1                             | 500                                  |
| 107-12-0   | Propionitrile                                                   |       | 10                            | 500                                  |
| 542-76-7   | Propionitrile 3-chloro-                                         |       | 1,000                         | 1,000                                |
| 70-69-9    | Propiophenone, 4-amino-                                         | e,g   | 1                             | 100/10,000                           |
| 109-61-5   | Propyl chloroformate                                            | e     | 1                             | 500                                  |
| 75-56-9    | Propylene oxide                                                 | l     | 100                           | 10,000/10,000                        |
| 75-55-8    | 1,2-Propylenimine                                               | d     | 1                             | 10,000/10,000                        |
| 2275-18-5  | Prothoate                                                       | e     | 1                             | 100/10,000                           |
| 129-00-0   | Pyrene                                                          | c     | 5,000                         | 1,000/10,000                         |
| 140-76-1   | Pyridine, 2-methyl-5-vinyl-                                     | e     | 1                             | 500                                  |
| 504-24-5   | Pyridine, 4-amino-                                              | h     | 1,000                         | 500/10,000                           |
| 1124-33-0  | Pyridine, 4-nitro-, 1-oxide                                     | e     | 1                             | 500/10,000                           |
| 53558-25-1 | Pyriminil                                                       | e,h   | 1                             | 100/10,000                           |
| 14167-18-1 | Salcomine                                                       | e     | 1                             | 500/10,000                           |
| 107-44-8   | Sarin                                                           | e,h   | 1                             | 10                                   |
| 7783-00-8  | Selenious acid                                                  |       | 10                            | 1,000/10,000                         |
| 7791-23-3  | Selenium oxychloride                                            | e     | 1                             | 500                                  |
| 563-41-7   | Semicarbazide hydrochloride                                     | e     | 1                             | 1,000/10,000                         |
| 3037-72-7  | Silane, (4-aminobutyl)diethoxymethyl-                           | e     | 1                             | 1,000                                |
| 7631-89-2  | Sodium arsenate                                                 | d     | 1                             | 1,000/10,000                         |
| 7784-46-5  | Sodium arsenite                                                 | d     | 1                             | 500/10,000                           |
| 26628-22-8 | Sodium azide                                                    | b     | 1,000                         | 500                                  |
| 124-65-2   | Sodium cacodylate                                               | e     | 1                             | 100/10,000                           |
| 143-33-9   | Sodium cyanide                                                  | b     | 10                            | 100                                  |
| 62-74-8    | Sodium fluoroacetate                                            |       | 10                            | 10/10,000                            |
| 13410-01-0 | Sodium selenate                                                 | e     | 1                             | 100/10,000                           |
| 10102-18-8 | Sodium selenite                                                 | h     | 100                           | 100/10,000                           |
| 10102-20-2 | Sodium tellurite                                                | e     | 1                             | 500/10,000                           |
| 900-95-8   | Stannane, Acetoxytriphenyl-                                     | e,g   | 1                             | 500/10,000                           |
| 57-24-9    | Strychnine                                                      | c     | 10                            | 100/10,000                           |
| 60-41-3    | Strychnine, sulfate                                             | e     | 10                            | 100/10,000                           |
| 3689-24-5  | Sulfotep                                                        |       | 100                           | 500                                  |
| 3569-57-1  | Sulfoxide, 3-chloropropyl octyl                                 | e     | 1                             | 500                                  |
| 7446-09-5  | Sulfur dioxide                                                  | e,l   | 1                             | 500                                  |
| 7783-60-0  | Sulfur tetrafluoride                                            | e     | 1                             | 100                                  |
| 7446-11-9  | Sulfur trioxide                                                 | b,e   | 1                             | 100                                  |
| 7664-93-9  | Sulfuric acid                                                   |       | 1,000                         | 1,000                                |
| 77-81-6    | Tabun                                                           | c,e,h | 1                             | 10                                   |
| 13494-80-9 | Tellurium                                                       | e     | 1                             | 500/10,000                           |
| 7783-80-4  | Tellurium hexafluoride                                          | e,k   | 1                             | 100                                  |
| 107-49-3   | TEPP                                                            |       | 10                            | 100                                  |
| 13071-79-9 | Terbufos                                                        | e,h   | 1                             | 100                                  |
| 78-00-2    | Tetraethyl lead                                                 | c,d   | 10                            | 100                                  |
| 597-64-8   | Tetraethyltin                                                   | c,e   | 1                             | 100                                  |
| 75-74-1    | Tetramethyl lead                                                | c,e,l | 1                             | 100                                  |
| 509-14-8   | Tetranitromethane                                               |       | 10                            | 500                                  |

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## LIST OF EXTREMELY HAZARDOUS SUBSTANCES AND THEIR THRESHOLD PLANNING QUANTITIES, Continued

| CAS NO.    | Chemical Name                                                                          | Notes | Reportable quantity* (pounds) | Threshold planning quantity (pounds) |
|------------|----------------------------------------------------------------------------------------|-------|-------------------------------|--------------------------------------|
| 10031-59-1 | Thallium sulfate                                                                       | h     | 100                           | 100/10,000                           |
| 6533-73-9  | Thallous carbonate                                                                     | c,h   | 100                           | 100/10,000                           |
| 7791-12-0  | Thallous chloride                                                                      | c,h   | 100                           | 100/10,000                           |
| 2757-18-8  | Thallous malonate                                                                      | c,e,h | 1                             | 100/10,000                           |
| 7446-18-6  | Thallous sulfate                                                                       |       | 100                           | 100/10,000                           |
| 2231-57-4  | Thiocarbazine                                                                          | e     | 1                             | 1,000/10,000                         |
| 39196-18-4 | Thiofanox                                                                              |       | 100                           | 100/10,000                           |
| 297-97-2   | Thionazin                                                                              |       | 100                           | 500                                  |
| 108-98-5   | Thiophenol                                                                             |       | 100                           | 500                                  |
| 79-19-6    | Thiosemicarbazide                                                                      |       | 100                           | 100/10,000                           |
| 5344-82-1  | Thiourea, (2-chlorophenyl)-                                                            |       | 100                           | 100/10,000                           |
| 614-78-8   | Thiourea, (2-methylphenyl)-                                                            | e     | 1                             | 500/10,000                           |
| 7550-45-0  | Titanium tetrachloride                                                                 | e     | 1                             | 100                                  |
| 584-84-9   | Toluene 2,4-diisocyanate                                                               |       | 100                           | 500                                  |
| 91-08-7    | Toluene 2,6-diisocyanate                                                               |       | 100                           | 100                                  |
| 110-57-6   | Trans-1,4-dichlorobutene                                                               |       | 1                             | 500                                  |
| 1031-47-6  | Triamphos                                                                              | e     | 1                             | 500/10,000                           |
| 24017-47-8 | Triazofos                                                                              | e     | 1                             | 500                                  |
| 1558-25-4  | Trichloro(choromethyl)silane                                                           | e     | 1                             | 100                                  |
| 27137-85-5 | Trichloro(dichlorophenyl)silane                                                        | e     | 1                             | 500                                  |
| 76-02-8    | Trichloroacetyl chloride                                                               | e     | 1                             | 500                                  |
| 115-21-9   | Trichloroethylsilane                                                                   | e,h   | 1                             | 500                                  |
| 327-98-0   | Trichloronate                                                                          | e,k   | 1                             | 500                                  |
| 98-13-5    | Trichlorophenylsilane                                                                  | e,h   | 1                             | 500                                  |
| 998-30-1   | Triethoxysilane                                                                        | e     | 1                             | 500                                  |
| 75-77-4    | Trimethylchlorosilane                                                                  | e     | 1                             | 1,000                                |
| 824-11-3   | Trimethylolpropane phosphite                                                           | e,h   | 1                             | 100/10,000                           |
| 1066-45-1  | Trimethyltin chloride                                                                  | e     | 1                             | 500/10,000                           |
| 639-58-7   | Triphenyltin chloride                                                                  | e     | 1                             | 500/10,000                           |
| 555-77-1   | Tris(2-chloroethyl)amine                                                               | e,h   | 1                             | 100                                  |
| 2001-95-8  | Valinomycin                                                                            | c,e   | 1                             | 1,000/10,000                         |
| 1314-62-1  | Vanadium pentoxide                                                                     |       | 1,000                         | 100/10,000                           |
| 108-05-4   | Vinyl acetate monomer                                                                  | d,l   | 5,000                         | 1,000                                |
| 81-81-2    | Warfarin                                                                               |       | 100                           | 500/10,000                           |
| 129-06-6   | Warfarin sodium                                                                        | e,h   | 100                           | 100/10,000                           |
| 28347-13-9 | Xylylene dichloride                                                                    | e     | 1                             | 100/10,000                           |
| 1314-84-7  | Zinc phosphide                                                                         | b     | 100                           | 500                                  |
| 58270-08-9 | Zinc, dichloro(4,4-dimethyl-5((((methylamino)carbonyl)oxy)imino)pentanenitrile)-(T-4)- | e     | 1                             | 100/10,000                           |

\*Only the statutory or final RQ is shown. For more information, see 40 CFR Table 302.4

## Notes:

a This chemical does not meet acute toxicity criteria. Its TPO is set at 10,000 pounds.

b This material is a reactive solid. The TPO does not default to 10,000 pounds for non-powder, non-molten, non-solution form.

c The calculated TPO changed after technical review as described in the technical support document.

d Indicates that the RQ is subject to change when the assessment of potential carcinogenicity and/or other toxicity is completed

e Statutory reportable quantity for purposes of notification under SARA section 304(a)(2)

f The statutory 1 pound reportable quantity for methyl isocyanate may be adjusted in a future rulemaking action.

g New chemicals added that were not part of the original list of 402 substances

h Revised TPO based on new or re-evaluated toxicity data.

i TPO is revised to its calculated value and does not change due to technical review as in proposed rule

k The TPO was revised after proposal due to calculation error.

l Chemicals on the original list that do not meet toxicity criteria but because of their high production volume and recognized toxicity are considered chemicals of concern ("Other chemicals").

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## STATE EMERGENCY RESPONSE COMMISSIONS CONTACT LIST

Title III of the Superfund Amendments and Reauthorization Act (SARA) requires every state to set up an emergency response agency. Here is a complete listing of those agencies. The symbols following the name of each state indicate which form is to be filed and whether a fee must be submitted with the filing.

### Key to Symbols

\* - File federal Tier One form

+ - File federal Tier Two form

# - File state Tier One form

@ - File state Tier Two form

\$ - fee for filing

#### Alabama +

Mr. Leigh Pegues, Co-Chair  
Alabama Emergency Response Commission  
Director, Alabama Department of  
Environmental Management  
1751 Congressman W.L. Dickson Drive  
Montgomery, Alabama 36130  
(205) 271-7700

#### Alaska +

Camille Stevens  
Alaska State Emergency Response Commission  
410 Willoughby, Suite 105  
Juneau, Alaska 99801  
(907) 465-5050

#### Arizona +

Ethel DeMarr, Assistant Director  
Arizona Emergency Response Commission  
Division of Emergency Management  
5636 East McDowell Road  
Phoenix, Arizona 85008  
(602) 221-6221

#### Arkansas +

Randall Mathis, Director  
Arkansas Hazardous Materials Emergency  
Response Commission  
Arkansas Department of Pollution Control & Ecology  
P.O. Box 9583  
8001 National Drive  
Little Rock, Arkansas 72219  
(501) 562-7444

#### California #

California Emergency Response Commission  
Hazardous Materials  
2800 Meadow View Road  
Sacramento, California 95832  
(916) 262-1750

#### Colorado +

Richard Bardsley  
Colorado Emergency Planning & Community  
Right to Know Commission  
Division of Disaster Emer. Services  
Camp George West  
Golden, Colorado 80401  
(303) 273-1624

#### Connecticut +

Sue Vaughn  
Connecticut Emergency Response Commission  
79 Elm St., 4th Floor  
Hartford, Connecticut 06106  
(203) 566-4017

#### Delaware \*, +, \$

Clifford Graviot, Acting Secretary  
Department of Public Safety  
Administration Center  
P.O. Box 818  
Dover, Delaware 19903  
(302) 739-4321

#### District of Columbia +

Pam Thurber  
Office of Emergency Preparedness  
2000 14th Street, NW  
8th Floor  
Washington, DC 20009  
(202) 727-6161

#### Florida @, \$

Bob Nave, Director  
Florida Emergency Response Commission  
2740 Centerview Drive  
Tallahassee, Florida 32399  
(904) 488-1472

#### Georgia @

Michelle Ivuy  
Georgia Emergency Response Commission  
Environmental Protection Division  
7 Martin Luther King Jr. Drive, Suite 139  
Atlanta, Georgia 30334  
(404) 656-6905

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**Hawaii +**

Rhonda Goyke  
Hawaii Emergency Response Commission  
Hawaii Department of Health  
Environmental Epidemiology Program  
P.O. Box 3378  
Honolulu, Hawaii 96801  
(808) 586-4249

**Idaho @**

Margaret Ballard, Chief of Staff  
Idaho Emergency Response Commission  
Department of Health & Welfare  
State House  
Boise, Idaho 83720  
(208) 334-3263

**Illinois \*, +**

Ovan Robinson  
Illinois Emergency Response Commission  
Illinois Emergency Service & Disaster Agency  
110 E Adams Street  
Springfield, Illinois 62706  
(217) 782-4694

**Indiana +, \$**

Denise Nichols  
Indiana Department Of Environmental  
Management  
Emergency Response Management  
105 South Meridian Street  
P.O. Box 6015  
Indianapolis, Indiana 46206  
(317) 233-6372

**Iowa +**

Ellen Gordon, Chair  
Iowa Emergency Response Commission  
Iowa Office of Disaster Services  
Hoover Building, Room A-29  
Des Moines, Iowa 50319  
(515) 281-6175

**Kansas +, \$**

John Flint  
Kansas Emergency Response Commission  
Kansas Department of Health and Environment  
Topeka, Kansas 66620  
(913) 296-1690

**Kentucky @, \$**

James R. Everett, Director  
Kentucky Emergency Response Commission  
Executive Director, Kentucky Disaster and  
Emergency Services  
Boone National Guard Center  
Frankfort, Kentucky 40601  
(502) 564-8682

**Louisiana @, \$**

Floyd Cox  
Louisiana Emergency Response Commission  
Department of Public Safety & Correction  
Office of Public Safety  
P.O. Box 66614  
Baton Rouge, Louisiana 70896  
(504) 925-6113

**Maine @, \$**

Rayna Leibowitz  
Maine Emergency Management Agency  
State Office Building, Station 72  
Augusta, Maine 04333  
(207) 287-4080

**Maryland +**

George Harman  
Governor's Emergency Management  
Advisory Council  
State Emergency Response Commission  
2500 Broening Highway  
Baltimore, Maryland 21224  
(410) 631-3814

**Massachusetts +**

Mr. Arnold Sapenter  
Title III Emergency Response Commission  
Department of Environmental Quality Engineering  
One Winter Street  
Boston, Massachusetts 02108  
(617) 292-5944

**Michigan +**

Chris Brown  
Michigan Department Natural Resources  
Environmental Response Division  
Title III Notification  
P.O. Box 30028  
Lansing, Michigan 48909  
(517) 373-4112

**Minnesota \*, \$**

Paul Aasen, Director  
Minnesota Emergency Response Commission  
Division of Emergency Services  
Room B-5  
State Capitol  
St. Paul, Minnesota 55155  
(612) 643-3000

**Mississippi +**

J.E. Maher, Chair  
Mississippi Emergency Response Commission  
Director, Mississippi Management Agency  
P.O. Box 4501  
Fondran Station  
Jackson, Mississippi 39216-0501  
(601) 352-9100

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**Missouri @, \$**

Dean Martin  
Missouri Emergency Response Commission  
Missouri Department of Natural Resources  
Box 176  
Jefferson City, Missouri 65102  
(314) 526-3349

**Montana \* or +**

Mr. Tom Ellerhoff  
Montana Water Quality Bureau  
Department of Health & Environmental Sciences  
P.O. Box 200901  
Helena, Montana 59620  
(406) 444-3948

**Nebraska @**

John Stienauer  
Nebraska Emergency Response Commission  
Nebraska Department of Environmental Control  
P.O. Box 98922  
State House Station  
Lincoln, Nebraska 68509  
(402) 471-2186

**Nevada @**

Kathy Esparza, Program Officer  
Division of Emergency Management  
2525 S. Carson St.  
Carson City, NV 89710  
(702) 687-4240

**New Hampshire @**

George Iverson  
State Emergency Management Agency  
State Office Park South  
107 Pleasant Street  
Concord, New Hampshire 03301  
(603) 271-2231

**New Jersey @**

New Jersey Emergency Response Commission  
SARA Title III Project  
Department of Environmental Protection  
Division of Environmental Quality  
CN-405  
Trenton, New Jersey 08625  
(609) 292-6714

**New Mexico +, \$**

New Mexico Emergency Response Commission  
New Mexico State Police  
Hazardous Materials Bureau  
P.O. Box 1628  
Santa Fe, New Mexico 87504-1628  
(505) 827-9223

**New York +**

Lee Battes, Supervisor  
New York Emergency Response Commission  
New York State Department of Environmental  
Conservation  
Bureau of Spill Prevention & Response  
50 Wolf Road  
Room 340  
Albany, New York 12233-3510  
(518) 457-9987

**North Carolina +**

Emily Kilpatrick  
North Carolina Emergency Response Commission  
116 W. Jones Street  
Raleigh, North Carolina 27603-1335  
(919) 733-3867

**North Dakota \* or +, \$**

Ron Affeldt, Director  
North Dakota State Department of Health  
1200 Missouri Avenue  
P.O. Box 5520  
Bismarck, North Dakota 58502-5520  
(701) 224-2370

**Ohio @, \$**

Ken Schultz, SARA Title III Coordinator  
Ohio Emergency Response Commission  
Ohio Environmental Protection Agency  
Office of Emergency Response  
P.O. Box 1049  
Columbus, Ohio 43266-0149  
(614) 644-3063

**Oklahoma +, \$**

Monty Elder  
Emergency Response Commission  
Office of Civil Defense  
1000 N.E. 10th Street  
Oklahoma City, Oklahoma 73117-1212  
(405) 271-4468

**Oregon @, \$**

Oregon Emergency Response Commission  
c/o State Fire Marshal  
4750 Portland Road, N.E.  
Attn: Survey Section  
Salem, Oregon 97305-1760  
(503) 378-3473

**Pennsylvania +, \$**

Pennsylvania Emergency Response Commission  
SARA Title III Officer  
FEMA Response & Recovery  
P.O. Box 3321  
Harrisburg, Pennsylvania 17105  
(717) 783-8150/8193

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**Rhode Island +**

John Aucott  
Rhode Island Emergency Response Commission  
Rhode Island Emergency Management Agency  
State House, Room 27  
Providence, Rhode Island 02903  
(401) 421-7333

**South Carolina @**

Pete Saussy, Coordinator  
South Carolina Emergency Response Commission  
Division of Public Safety Programs  
Office of the Governor  
2600 Bull Street  
Columbia, South Carolina 29201  
(803) 935-6444

**South Dakota +, \$**

LeeAnn Smith  
South Dakota Response Commission  
Department of Water & Natural Resources  
Joe Foss Building  
523 East Capitol  
Pierre, South Dakota 57501-3181  
(605) 773-3151

**Tennessee +**

Betty Eaves  
Tennessee Emergency Response Council  
Tennessee Emergency Management Agency  
3041 Sidco Drive  
Nashville, Tennessee 37204  
(615) 741-0001 or (800) 258-3300

**Texas @, \$**

David Haun  
Texas Emergency Response Commission  
Division of Emergency Management  
P.O. Box 13087  
Austin, Texas 78711-3087  
(512) 908-2508

**Utah +**

Neil Taylor  
Utah Hazardous Chemical Emergency  
Response Commission  
Department of Health  
150 N. 1950 West  
Salt Lake City, Utah 84116  
(801) 536-4100

**Vermont +, \$**

Department of Health  
Community Right-to-Know Program  
108 Cherry Street  
P.O. Box 70  
Burlington, Vermont 05402  
(802) 244-8721

**Virginia +**

Virginia Department of Emergency Services  
310 Turner Road  
Richmond, Virginia 23225-6491  
(804) 674-2400  
(800) 468-8892 (Emergency)

**Washington @**

James Phillips  
Washington Emergency Response Commission  
Department of Ecology  
P.O. Box 47600  
Olympia, Washington 98504-8711  
(206) 923-4973

**West Virginia +**

Carl Bradford  
West Virginia Emergency Response Commission  
Director, Department of Natural Resources  
Capitol Building - Room EB-80  
1900 Kanawha Blvd. East  
Charleston, West Virginia 25305  
(304) 558-5380

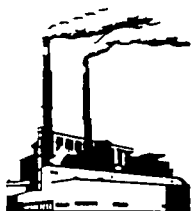
**Wisconsin @, \$**

Richard I. Braund  
Department of Emergency Government  
4802 Sheboygan Avenue  
Room 99A  
Madison, Wisconsin 53707  
(608) 266-1899  
(608) 266-3232 (Emergency)

**Wyoming +**

Joseph Daly, Coordinator  
Wyoming Emergency Response Management  
Comprehensive Emergency Management  
5500 Bishop Blvd.  
P.O. Box 1709  
Cheyenne, Wyoming 82003  
(307) 777-7566

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# Toxic Chemical Release Reporting

## Form R Reporting

Facilities which meet all of the following criteria are considered covered facilities for the purposes of reporting:

1. The facility has 10 or more fulltime employees.
2. The facility falls within Standard Industrial Classification (SIC) Codes 20-39 (manufacturers).
3. The facility handles a statutory quantity of a "toxic chemical."

The list of toxic chemicals which are the subject of reporting are found in the regulation at 40 CFR Section 372.65. The list contains approximately 400 regulated chemicals and 22 regulated categories of chemicals.

Reporting is triggered based on the amount of the toxic chemical manufactured, processed, or used during the calendar year. A facility that manufactures or processes 25,000 or more pounds of a listed toxic chemical in a year must submit a Form R report. Also, any facility that otherwise uses 10,000 or more pounds of a designated chemical during the calendar year must report.

The Toxic Chemical Release Inventory Reporting Form, the Form R, serves two purposes. It is both a toxic chemical inventory form and a form to report releases to the environment of those toxic chemicals listed on the inventory portion of the form. Releases include spills and leaks, but also include discharges, emissions, and shipments of toxic chemicals off site.

Every covered facility must annually, on July 1, submit a completed Form R to both the EPA and to the state indicating inventory and releases of each toxic chemical handled in excess of the threshold quantity in the calendar year. One copy of the Form R should be sent to:

EPCRA Reporting Center  
c/o Computer Based Systems, Inc.  
4301 North Fairfax Drive, Suite 650  
Arlington, VA 22203

A second copy should be sent to the state-designated Section 313 contact. A list of these state contacts may be found later in this report.

If the facility is owned by one person but operated by another, then either person may report. However, if a report is not submitted for a covered facility, the EPA could hold both persons liable for any applicable penalties. Each facility submitting a Form R report must retain a copy of the report and all supporting materials and documentation used to complete the report for 3 years.

## Chemicals Listed For 1995 Reports

There have been 33 chemicals and two chemical categories added to section 372.65 for the 1994 reporting year. Eleven of the those chemicals are hydrochlorofluorocarbons (HCFCs), which are considered to be ozone-depleting substances. These chemicals must be included on your 1995 reports, not the reports filed this year.

Following are the chemicals added by final rules published in the December 1, 1993, issue of the Federal Register.

| <u>Chemical</u>            | <u>CAS No.</u> |
|----------------------------|----------------|
| Acetophenone               | 98-62-2        |
| Amitrole                   | 61-82-5        |
| Bis(2-chloroethoxy)methane | 111-91-1       |
| 1,4-Dichloro-2-butene      | 764-41-0       |
| Dihydrosafrole             | 94-58-6        |
| Ethylidene dichloride      | 75-34-3        |
| Formic acid                | 64-18-6        |
| Hexachlorophene            | 70-30-4        |
| Hydrogen sulfide           | 7783-06-4      |
| Malononitrile              | 109-77-3       |
| Methacrylonitrile          | 126-98-7       |
| Methyl chlorocarbonate     | 79-22-1        |
| Methyl mercaptan           | 74-93-1        |
| 2-Methylpyridine           | 109-06-8       |
| 5-Nitro-o-toluidine        | 99-55-8        |
| Paraldehyde                | 123-63-7       |
| Pentachloroethane          | 76-01-7        |
| Pronamide                  | 23950-58-5     |
| 1,1,1,2-Tetrachloroethane  | 630-20-6       |
| Thiram                     | 137-26-8       |
| Typan Blue                 | 72-57-1        |

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**Hydrochlorofluorocarbons    CAS No.**

|                                                         |            |
|---------------------------------------------------------|------------|
| 1-Chloro-1,1-difluoroethane<br>(HCFC-142B).....         | 75-68-3    |
| Chlorodifluoromethane<br>(HCFC-22) .....                | 75-46-6    |
| Chlorotetrafluoroethane .....                           | 63938-10-3 |
| 1-Chloro-1,1,2,2-<br>tetrafluoroethane (HCFC-124a)..... | 354-25-6   |
| 2-Chloro-1,1,1,2-<br>tetrafluoroethane (HCFC-124).....  | 2837-89-0  |
| 1,1-Dichloro-1-fluoroethane<br>(HCFC 141b).....         | 1717-00-6  |
| Dichlorotrifluoroethane .....                           | 34077-87-7 |
| Dichloro-1,1,2-trifluoroethane .....                    | 90454-18-5 |
| 1,1-Dichloro-1,2,2-<br>trifluoroethane (HCFC-123b)..... | 812-04-4   |
| 1,2-Dichloro-1,1,2-<br>trifluoroethane (HCFC-123a)..... | 354-32-4   |
| 2,2-Dichloro-1,1,1-<br>trifluoroethane (HCFC-123) ..... | 306-83-2   |

**Chemical Categories**

Ethylenebisdithiocarbamic acid, salts and esters  
Warfarin and salts

**Avoid Common Form R Errors**

Ever since EPA began collecting data annually for the Toxic Release Inventory (TRI), agency staff and industry have been working with EPA's Form R. Last year, agency staff compiled a list of the errors most commonly found on the form. Take a look at these 12 errors before starting to fill out Form R this year:

**1. Invalid chemical identification.** The CAS number and chemical name reported on page 3 of Form R must exactly match the listed CAS number and chemical name. Chemical categories should not be reported with a CAS number. A generic chemical name should be provided only if you are claiming the Section 313 chemical identity as trade secret. Chemical names should be taken directly from the list published with the annually updated Form R and instruction package. Mixture names should be entered in part III, section 1.4, if they are the sole identification.

**2. Failure to consider a listed chemical qualifier.** A number of chemicals are required to be reported only if they exist in certain forms. For example, aluminum, vanadium, and zinc are qualified as "fume or dust." Isopropyl alcohol and saccharin have manufacturing qualifiers. Ammonium nitrate and ammonium sulfate are qualified as solutions. Phosphorus is qualified as yellow or white. Asbestos is qualified as friable.

Check the Form R package for a complete list of these chemicals, which must be reported with the appropriate qualifier in parentheses.

**3. Missing certification signature.** An original certification signature must appear on page 1 of every Form R submitted to EPA.

**4. Incomplete forms.** A complete Form R report for any toxic chemical category consists of at least five pages stapled together. Pages 1 and 2 may be photocopied to complete each report only if the information on page 1 and 2 is the same for each report submitted.

An original certification signature is required on each page 1, even if the rest of the information is photocopied. Any package that is sent containing a page 1 and a page 2 with several page 3s, 4s, or 5s will result in a Notice of Noncompliance.

**5. Missing or invalid reporting year.** The reporting year is the calendar year during which the reported data were collected; it is not the year in which the form is sent to EPA. Forms are due to EPA by July 1, 1994, for the chemicals manufactured, processed, or otherwise used during calendar year 1993.

A Form R cannot contain data for more than one year; "1992/1993" is not correct. Also, it is essential that the reporting year be provided by the submitter. Omission of information will result in a Notice of Noncompliance.

**6. Maximum amount on-site left blank.** Leaving part III, section 4, on page 3 of Form R blank will result in a Notice of Technical Error.

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**7. Questionable data.** Data submitted to EPA are checked by machine. Frequently flagged mistakes include the following:

- Zip codes are missing or do not correspond to the city and county reported.
- County names are missing or misspelled.
- SIC codes are incorrectly reported with alphabetic characters rather than the correct four-digit numeric code.
- Dun and Bradstreet numbers for both the reporting facility and the parent company are frequently reported in alphabetic characters or in a format that does not correspond to the Dun and Bradstreet number format.
- Information about Publicly Owned Treatment Works (POTWs) is often missing or does not include street address, county, and zip code. In addition, releases to POTWs are often reported on page 4 when there is no POTW listed on page 2.
- Release information must be reported in pounds; facilities often report it in tons, gallons, or other units of measure.

**8. Incorrect completion of trade secret information.** The responses to trade secret questions must be complete and consistent. If trade secrecy is indicated, the submission must be accompanied by a trade secret Form R, a sanitized Form R, trade secret substantiation, and sanitized substantiation.

Failure to provide complete trade secret information will result in a Notice of Noncompliance.

**9. Revisions not identified.** Facilities submitting revisions to previously submitted data should provide them to EPA in the following manner: (a) make corrections in red ink on a photocopy of the Form R that was originally submitted; (b) mark the photocopy "VOLUNTARY REVISION" in the space marked "FOR YOUR OPTIONAL USE" on page 1 of the form; (c) include the original certification signature on the revision; and (d) send the photocopy to the EPCRA Reporting Center.

Failure to correctly identify a revision may result in EPA's entering it in the database as a new submission, leading to the appearance of increased emissions from the facility.

A copy of the revision must also be sent to the appropriate state organization.

**10. Duplicate submissions not identified.** Facilities sometimes send EPA multiple copies of the same Form R to ensure that it is received. Duplicate submissions must be identified by printing "DUPLICATE" in red ink on page 1 in the space marked "FOR YOUR OPTIONAL USE ONLY."

Failure to correctly identify a duplicate report may result in duplication of the data in the database and appearance of increased emissions from the facility.

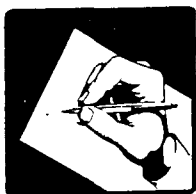
**11. Reporting for delisted chemicals or chemicals not on the section 313 list.** The reporting package for the current year always contains an updated list of the chemicals for which TRI data must be reported.

Although "over-reporting" will not result in a Notice of Non-compliance or Notice of Technical Error, data reported for chemicals not on the current TRI list are not entered in the TRI database. Therefore, it does not serve any purpose to report this information to EPA.

**12. Data "linkages" are not identified.** Some of the information reported on pages 1 and 2 is related to information reported on pages 3, 4, and 5.

For example, stream names are reported on page 1 as streams A, B, or C; releases of the chemical to the streams are reported on page 3, in section 5, blocks 5.3.1, 5.3.2, and 5.3.3. It is necessary for the submitter to enter the stream code (A, B or C) in the appropriate box, next to the corresponding release value reported on page 3.

The same is true for off-site locations and POTWs that are reported on page 2, with corresponding releases reported on page 4. Failure to enter the codes to establish these linkages may result in a Notice of Technical Error.



## **Additional Information**

The EPA has established a toll-free hotline to answer your Community Right To Know questions. The hotline is staffed Monday through Friday from 8:30 to 5:00 (Eastern Standard Time). the number is 1-800-535-0202. Hotline staff will be able to respond to Tier One and Tier Two reporting questions.

You may also contact your regional EPA office for information.

### **EPA REGIONAL OFFICES**

**EPA Region 1**

John F. Kennedy Federal Building  
Room 2203, 1 Congress St.  
Boston, MA 02203  
617/565-3420

**EPA Region 6**

1445 Ross Avenue  
Suite 1200  
Dallas, TX 75202  
214/655-6444

**EPA Region 2**

26 Federal Plaza, Room 900  
New York, NY 10278  
212/264-2657

**EPA Region 7**

726 Minnesota Avenue  
Kansas City, KS 66101  
913/551-7000

**EPA Region 3**

841 Chestnut Street  
Philadelphia, PA 19107  
215/597-9800

**EPA Region 8**

1860 Lincoln Street  
Denver, CO 80295  
303/293-1603 or 1-800-227-8917

**EPA Region 4**

345 Courtland Street, N.E.  
Atlanta, GA 30365  
404/347-4727

**EPA Region 9**

215 Fremont Street  
San Francisco, CA 94105  
415/744-1305

**EPA Region 5**

230 South Dearborn Street  
Chicago, IL 60604  
312/353-2000

**EPA Region 10**

1200 Sixth Avenue  
Seattle, WA 98101  
206/553-4973

CTL023321

## STATE DESIGNATED SECTION 313 CONTACTS

(Note: Use the appropriate address for submission of Form R reports to your State)

**Alabama**

Mr. E. John Williford, Chief of Operations  
Alabama Emergency Response Commission  
Alabama Department of  
Environmental Management  
Field Operations Division  
1751 Congressman W.L. Dickinson Drive  
Montgomery, AL 36130  
(205) 260-2700

**Alaska**

Amy Skilbred  
Alaska Emergency Response Commission  
Department of Environmental Conservation  
410 Willoughby, Suite 105  
Juneau, AK 99801  
(907) 465-5050

**American Samoa**

Mr. Pati Faiai, Director  
American Samoa EPA  
Office of the Governor  
Pago Pago, AS 96799  
International Number (684) 633-2304

**Arizona**

Mr. Carl F. Funk, Executive Director  
Arizona Emergency Response Commission  
5636 East McDowell Road  
Phoenix, AZ 85008  
(602) 231-6326

**Arkansas**

Anna Brannon  
Depository of Documents  
Arkansas Department of Labor  
10421 West Markham  
Little Rock, AR 72205  
(501) 682-4523

**California**

Mr. Charles M. Shulock  
Office of Environmental Information  
555 Capitol Mall, Suite 235  
Sacramento, CA 95814  
Attn: Section 313 Reports  
(916) 324-9924  
(916) 322-7236  
(Completed Form R information)

**Colorado**

Wilfred Bromley  
Colorado Department of Health  
4300 Cherry Creek Drive South  
Denver, CO 80222-1530  
(303) 331-4843

**Commonwealth of the Northern Marianas Islands**

Mr. Russell Meecham, III  
Division of Environmental Quality  
P.O. Box 1304  
Saipan, CNMI 96950  
(670) 234-6984

**Connecticut**

Ms. Sue Vaughn  
State Emergency Response Commission  
Department of Environmental Protection  
79 Elm St., 4th Floor  
Hartford, CT 06106-5127  
(203) 566-4856

**Delaware**

Mr. Robert French  
Air Resource Section  
Department of Natural Resources and  
Environmental Control  
P.O. Box 1401  
Dover, DE 19903  
(302) 739-4791

**District of Columbia**

Stephen E. Rickman  
Environmental Planning Specialist  
Office of Emergency Preparedness  
2000 14th Street, NW, 8th Floor  
Washington, DC 20009  
(202) 727-6161

**Florida**

Jim Loomis  
Florida Emergency Response Commission  
Secretary, Florida Department of  
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Tallahassee, FL 32399-2149  
(904) 488-1472  
(in Florida 800-635-7179)

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Georgia Department of Natural Resources  
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(404) 656-6905

**Guam**

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Agana, GU 96910  
(671) 646-8863

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Hawaii State Department of Health  
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Honolulu, HI 96801-9904  
(808) 586-4249

**Idaho**

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Idaho Emergency Response Commission  
State House, 1109 Main Street  
Boise, ID 83720  
(208) 334-5888

**Illinois**

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Emergency Planning Unit  
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**Indiana**

Mr. Philip Powers, Director  
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**Iowa**

Department of Natural Resources  
Iowa Emergency Response Commission  
900 E. Grand Avenue  
Des Moines, IA 50319  
(515) 281-8852

**Kansas**

Right-to-Know Program  
Kansas Emergency Response Commission  
Forbes Field, Building 740  
Topeka, KS 66620-0001  
(913) 296-1660

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Baton Rouge, LA 70804-9094  
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State House Station 72  
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(207) 289-4080  
(In Maine 800-452-8735)

**Maryland**

Ms. Marsha Ways  
Toxics Information Center-SARA Title III  
Maryland Department of the Environment  
2500 Broening Highway  
Baltimore, MD 21224  
(301) 631-3800

**Massachusetts**

Mr. A. David Rodham, Director  
c/o Title III Emergency Response Commission  
Department of Environmental  
Quality Engineering  
400 Worcester Road  
Framington, MA 01701  
(508) 820-2000

**Michigan**

Michigan Department of Natural Resources  
Environmental Response Division  
Title III Notification  
P.O. Box 30028  
Lansing, MI 48909  
(517) 373-8481

**Minnesota**

Mr. Steve Tomlyanovich  
Minnesota Emergency Response Commission  
Division of Emergency Management  
State Capitol, Room B-5  
St. Paul, MN 55104  
(612) 282-5396

**Mississippi**

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Mississippi Emergency Response Commission  
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P.O. Box 4501  
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Jackson, MS 39296-4501  
(601) 352-9100

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Jefferson City, MO 65102  
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Department of Health and Environmental Sciences  
1400 Broadway  
P.O. Box 200901  
Helena, MT 59620-0901  
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**Nebraska**

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Division of Emergency Management  
2525 South Carson Street  
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**New Hampshire**

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State Emergency Management Agency  
State Office Park South  
107 Pleasant Street  
Concord, NH 03301  
(603) 271-2231

**New Jersey**

Department of Environmental Protection  
Division of Environmental Quality  
Bureau of Hazardous Waste Information  
SARA Title III Project  
401 East State Street, CN-405  
Trenton, NJ 08625  
(609) 292-6714

**New Mexico**

Mr. Max Johnson  
New Mexico Emergency Response  
Commission  
New Mexico Department of Public Safety  
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(505) 827-9222

**New York**

New York Department of Environmental  
Conservation  
Bureau of Spill Response  
SARA Title III Section 313  
50 Wolf Road  
Albany, NY 12233-3510  
(518) 457-4107

**North Carolina**

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North Carolina Division of Emergency Management  
116 West Jones Street  
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(919) 733-3867

**North Dakota**

North Dakota Emergency Response Commission  
North Dakota State Department of  
Health and Consolidated Laboratories  
1200 Missouri Avenue  
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Bismarck, ND 58502-5520  
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Emergency Response Commission  
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Oklahoma City, OK 73117-1212  
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**Oregon**

Oregon Emergency Response Commission  
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4760 Portland Road, N.E.  
Salem, OR 97305-1760  
(503) 378-3473

**Pennsylvania**

Mr. James Tinney  
Bureau of Right-to-Know  
Labor and Industry Bldg.-Room 1503  
7th and Foster Streets  
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(717) 783-2071

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SERC Commissioner  
Title III - SARA Section 313  
Puerto Rico Environmental Quality Board  
P.O. Box 11488  
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**Rhode Island**

Department of Environmental Management  
Division of Air and Hazardous Materials  
291 Promenade Street  
Providence, RI 02908-5767  
Attn: Toxic Release Inventory  
(401) 277-2808

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**Tennessee**

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Austin, TX 78711-3087  
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**Virgin Islands**

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NOTES

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•SPECIAL REPORT•

# COMMUNITY RIGHT TO KNOW



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*"International Publishers of Transportation Guides and Forms"*



# Highlight on Publications —

## Compliance Audits

Essential Checklists for  
OSHA, EPA & Other Key Agencies

### Compliance Need

The complexity of complying with OSHA and EPA regulations requires constant auditing. This unique manual makes the auditing process easier and more comprehensive.

### Product Information

Organized by work-area or typical work situation, this manual has three sections:

1. A "pull-out/carry-along" section for the in-plant audit, consisting of multi-part forms: An original for the auditor file, copy for maintenance/repair, and a copy to verify repair.
2. An "office-based" audit section to verify compliance with planning and recordkeeping requirements.
3. A reference section with explanatory material. The recordkeeping section covers emergency response plans, Hazard communication plans, training and similar items.

### Specifications

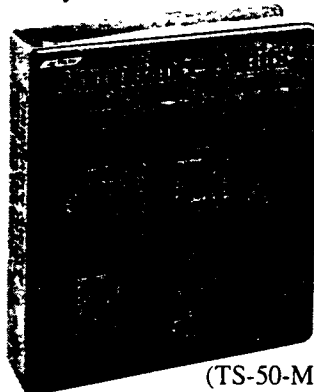
- ▼ 17 area-specific 4-part forms and 1 generic form in front pocket of binder. (Includes pad holder).
- ▼ EPA and OSHA checklists for work areas, including: Warehouse, Welding Area, Compressed Gas Storage Area, Spray Paint Area, Plant Maintenance Area, etc.
- ▼ Hazard Communication written program; Process Safety Management of Highly Hazardous Chemicals; Emergency Action Plan; employee training records and much more.
- ▼ Loose-leaf 3-ring binder, tab divided, 192 pages.
- ▼ Update Service available separately.

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## Training & Recordkeeping

OSHA/EPA/DOT  
Crossreference Manual

### Compliance Need

When dealing with multiple regulatory agencies such as OSHA, EPA, and DOT, there is an overriding need for coordinating the massive recordkeeping and training requirements while eliminating overlapping efforts. Records should also be easily accessible.

### Product Information

This "one-stop" reference helps save time by consolidating compliance requirements for OSHA/EPA/DOT training and recordkeeping. It clearly explains requirements and how to handle them to avoid duplicating compliance efforts. It also provides a unified, comprehensive approach to recordkeeping to help assure successful compliance as well as proper documentation in the event of a lawsuit or agency enforcement action. Samples of forms, logs and other support documentation are included.

### Specifications

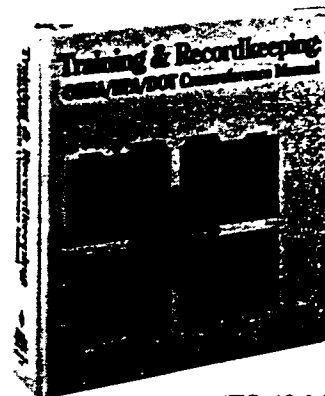
- ▼ Addresses training, as required under OSHA, EPA and DOT: Lists of required training; forms and certificates to be used; compliance tips; checklists; and recordkeeping.
- ▼ Loose-leaf 3-ring binder, tab-divided.
- ▼ Approximately 450 pages.
- ▼ Update Service available separately.

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# Highlight on Training —

## Lockout/Tagout Safety Training

### A Video Training Kit

#### Compliance Need

29 CFR 1910.147 requires that employees involved in certain processes must be provided with a specific training program, on lockout/tagout.

#### Product Information

A full-color video shows employees practicing proper lockout/tagout procedures in an actual manufacturing plant. It includes employee handbooks filled with the exact training information called for in 29CFR, Part 1910.147. the kit focuses on energy sources - how to identify them, what procedures are required to avoid life threatening situations, how to ensure a "Zero Energy State", when to use tags, what rules to follow for using multiple locks, and other information. It includes the proper paperwork for meeting documentation requirements. Each kit contains enough material to train up to 10 employees. Additional materials can be ordered separately.

#### Specifications

- ▼ 1 VHS, full-color, 13-minute Video
- ▼ 1 Instructors Guide (20 pages)
- ▼ 10 Employee Handbooks (20 pages each; pre- and post-training quizzes included)
- ▼ 1 Training Log
- ▼ 10 Wallet Cards

## Safe Forklift Operations

### A Video Training Kit

#### Compliance Need

1910.178(1) states that anyone who operates a powered industrial truck (forklift) must be trained.

#### Product Information

This ready-to-use program covers everything the forklift operator needs to know based on OSHA's Part 1910.178 training requirements. The full-color training video shows professional forklift drivers in different warehouse situations. Topics covered include: inspecting the forklift, picking up and traveling with loads, stacking and dropping loads, working with smaller lift devices, and proper procedures for using hand trucks and other equipment. The kit comes in an attractive clamshell binder for convenient storage of components. Each kit contains enough material to train up to 10 employees. Additional materials can be ordered separately.

#### Specifications

- ▼ 1 VHS, full-color 18-minute Video
- ▼ 1 Instructor's Guide (8 pages)
- ▼ 10 Employee Handbooks (20 pages each; pre- and post-training quizzes included)
- ▼ 1 Training Log
- ▼ 10 Wallet Cards

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