

EPCRA / TURA Update

February 2009

Requirement	Chemical List	Threshold	Reporting Requirement	Report Schedule
EPCRA Section 302 Emergency Response Planning	Extremely Hazardous Substances (EHSs)	Threshold Planning Quantity (TPQ)	Emergency planning notification to Local Emergency Planning Committee & State Emergency Response Commission and designation of emergency planning representative	Within 60 days of exceeding EHS thresholds and within 30 days for changes in the facility related to emergency planning
EPCRA Section 311 Hazardous Chemical Reporting	EHSs and Occupational Safety and Health Administration (OSHA) Hazardous Chemicals	EHSs =TPQ or 500 lbs (whichever is less) OSHA Hazardous Chemicals = 10,000 lbs	Submit Material Safety Data Sheets (MSDSs) or chemical list to SERC, LEPC and Local Fire Department (LFD)	Within 90 days of having to maintain an MSDS per OSHA requirements and re-submit when changes in MSDS information occur
EPCRA Section 312 Hazardous Chemical Reporting	EHSs and OSHA Hazardous Chemicals	EHSs =TPQ or 500 lbs (whichever is less) OSHA Hazardous Chemicals = 10,000 lbs	Submit Hazardous Chemical Reports (Tier II Forms) to SERC, LEPC, and LFD	Annually by March 1 or within 60 days if the threshold is triggered for an EHS and within 90 days if threshold is triggered for an OSHA Hazardous Chemical
EPCRA Section 313 Toxic Release Inventory	EPCRA 313 Chemical List	Manufactured = 25,000 lbs Processed = 25,000 lbs Otherwise used = 10,000 lbs Persistent Bioaccumulative Toxins (PBTs) = various lower thresholds	Submit a Toxics Chemical Release Inventory Form (Form R) electronically for each chemical that trips a threshold	Annually by July 1st
TURA	EPCRA 313 List and Comprehensive Environmental Response Compensation and Liability Act (CERCLA) List	Manufactured = 25,000 lbs Processed = 25,000 lbs Otherwise used = 10,000 lbs PBTs = various lower thresholds Selected TUR chemicals now are higher hazard substances with lower thresholds	Submit a Toxics Use Report (Form S) for each chemical that trips a threshold	Annually by July 1

Please contact Lucy Servidio at (508)970-0033 extension 114 or lservidio@capaccio.com or Linda Swift at extension 119 or lswift@capaccio.com with questions about or assistance with complying to these notification or reporting requirements.