



SARA Tier Reporting

The regulations for submitting SARA Tier I and Tier II Reports establish requirements that provide the public with important information on the hazardous chemicals in the community. The purpose is for enhancing community awareness of chemical hazards and facilitating development of state and local emergency response plans. Tier Reports are covered under SARA Title III, otherwise known as the Emergency Planning and Community Right to Know Act. FacTS™ generates these reports as a feature in the Environmental Reporting Suite.

THRESHOLD DETERMINATION

Tier reporting falls under section 311 and 312 of Title III. Hazardous chemicals covered by section 312 are ones that facilities have to prepare or have available an MSDS under OSHA's Hazard Communication Standard, and that were present at the facility at any time during the previous calendar year above specified thresholds or contain an extremely hazardous chemical ingredient.

Daily, monthly, quarterly or yearly inventory information can be downloaded from a purchasing or ERP system into FacTS, or entered manually. The Inventory Rollup Utility calculates yearly inventory levels from this daily, monthly, or quarterly information. Different versions of the same product, or similar products such as maintenance paints or paint thinners, can be grouped together and yearly totals for the group automatically calculated.



The Regulatory Roll-up Utility is the next step in using FacTS for SARA Tier Reporting. The Regulatory Roll-up first aggregates the various 302 chemical inventory levels across the facility and creates special 302 EHS (extremely hazardous substances) Yearly Usage records for each of the 302 chemicals. It then determines which products are Tier Reportable by looking at MSDS data and the list of 302 chemicals, and creates the Tier I, Tier I Location, Tier II, Tier II EHS, and Tier II Location records required for Tier I and Tier II reporting. The records can be view or modified from the Tier I and Tier II Collection data entry activities. Location information can be copied from inventory transactions, or from last year's Tier data along with storage/pressure/temperature codes. The information stored in these records print on the Tier I and Tier II reports.

FACTS INTEGRATION

Summary and detail data can be cross-referenced across all FacTS features. Many Federal lists (302, 311, 312, 313, 112b, 112r, etc) are provided with the system for generating reports for site data analysis and reporting. The **List of Lists** feature provides users the ability to create custom lists if needed to meet local or internal regulations. Since FacTS is an integrated relational database, there is no need to create separate libraries of cross-reference data. Cross-referenced information is generated by running reports listings that reference the relationships between data elements.



The Tier functionality aggregates chemicals based on the constituent percentages defined in the Base System and inventory Information. This is done according to the rules defined by the EPA (average for ranges). The user can override the aggregate values if appropriate.

STANDARD REPORTS

The Tier I Worksheet provides you with information that is required for Tier I Reporting. It is different from the Tier I Report both in form and function. It allows Tier I information to be viewed for non-reportable products as well as reportable ones. It breaks down the yearly inventory levels of products into the five EPA Hazard Categories. It displays each product falling into this category and its maximum and average inventory level during the year. It also shows all the locations at which the product was stored. You may designate which of the EPA categories to view, or to only list products over a certain inventory level.

The Tier II Worksheet provides you with information that is required for Tier II Reporting. It is different from the Tier II Report both in form and in the fact that it allows Tier II information to be viewed for non-reportable products as well as reportable ones. For each product it shows the EPA Hazard Categories, the ingredient composition (marking the extremely hazardous ingredients), the average and maximum yearly inventory levels, and the locations in which the product was stored. You may choose to see information for a given facility and reporting year, or only products at a given maximum yearly inventory level.

The Tier II Threshold Comparison Worksheet compares last year's maximum daily quantities of a chemical to the current year's quantity. If large discrepancies between the maximum daily quantities are noted, you can investigate the differences before submitting the final report. Tier II Yearly Comparison Report compares the maximum daily quantity of material stored at each location to the previous year's record. It displays whether or not the chemical was reportable and the percentage at each location, of the total quantity of the product at the facility. Unexpected differences can be investigated before the report is completed and submitted.

The Tier II Worksheet for Groups & Items shows the groups and items and the products in each along with the maximum and average quantities. It also lists if the group or item is Tier reportable, if it contains any EHS chemicals, and the EPA Hazards flags. Tier II EHS Worksheet for Groups & Items details for each extremely hazardous substance at the facility, the items/groups that have products with that EHS and the details of quantities to show why an EHS is Tier reportable or not.

Maximum Storage By List Report shows the maximum levels of EHS chemicals for a given facility and year. The report first finds the most current 302 (EHS Chemicals) List of List. For each chemical on the list, the report finds all the products containing the given chemical, the percent of chemical in the product, and the maximum amount of these products during the given year. Using this information, FacTS calculates the maximum level of the chemical.