

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, and is an approved vendor for both SARA 312 Community Right-to-Know Reporting and SARA 313 Toxic Release Reporting.**

The Emergency Planning and Community Right to Know Act of 1986 establishes requirements for Federal, State, and local governments and industry regarding emergency planning and Community Right-to-Know reporting on hazardous and toxic chemicals. This law builds upon EPA's Emergency Preparedness Program (CEPP) and numerous state and local programs aimed at helping communities to better meet their responsibilities in regard to potential chemical emergencies. The Community Right to know provisions help to increase the public's knowledge and access to information on the presence of hazardous chemicals in their communities and releases of these chemicals into the environment.

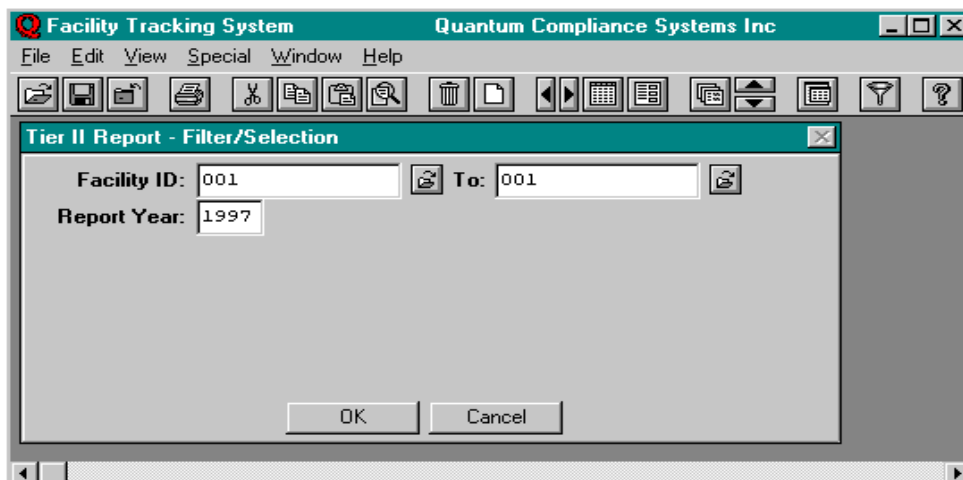
The Emergency Planning and Community Right to Know Act (also known as SARA Title II or EPCRA) has four major sections: Emergency Planning (section 301-303), Emergency release notification (section 304), Community Right to Know Reporting requirements (sections 311 and 312) and toxic release reporting (section 313). Reporting under section 312 requires a facility to submit an emergency and hazardous chemical inventory form to the LEPC, the SERC, and the local fire department with jurisdiction over the facility. Hazardous chemicals covered by section 312 are those for which facilities are required 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.

Reporting Procedures

The EPA published a uniform format for the inventory forms on October 15, 1987. However, because many state commissions have additional requirements or have incorporated the federal contents in their own forms, Tier I/II forms should be obtained from the SERC. The Tier I information must be submitted for covered facilities annually.

The Tier II form may be sent by the facility instead of a Tier I form. EPA believes that Tier II reports provide emergency planners and communities with more useful information and encourages facilities to submit Tier II forms. The public may also request Tier II information from the SERC and the LEPC. The information submitted by facilities under Sections 311 and 312 must generally be made available to the public by LEPCs and SERCs during normal working hours.

The above information is originally based upon the EPA SARA Title III Fact Sheet, EPA Document 550-F93-002, January 1993, Series 9, No. 3.



FacTS Reporting Features

Summary and detail data can be cross-referenced across all modules. Most 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 module** provides users the ability to create other lists as needed. 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 and listings that reference the relationships between data elements.

The software is capable of calculating the average concentration of the TRI chemical using percentage ranges from an MSDS. The Tier module 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 aggregate values can be overridden by the user.

Features

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 (Fire, Immediate Health Hazard, Delayed Health Hazard, Sudden Release of Pressure, and Reactivity). It displays each product falling into this category, its maximum inventory level and its average inventory level during the year. It also shows all the locations at which the product was stored. You may also designate which of the EPA categories to view, whether you wish to see all products or only Tier Reportables, and all products over a certain inventory level.

The **Maximum Storage By List Report** shows the maximum levels of EHS chemicals for a given facility and year. For each EHS chemical, it finds all the products containing that EHS chemical, the percentage of that chemical in the product, the maximum inventory level for the product, and the corresponding maximum level for the EHS chemical. The report first finds the most current list record that is of type 302 (EHS Chemicals). 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 each product and the chemical.

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 for the product, the ingredients contained in the product; marking the extremely hazardous ingredients, the average and maximum yearly inventory levels of the product, and the locations in which the product is stored. You may choose to see Tier II Worksheet information for a given facility and reporting year. You may also choose to see only Tier Reportable products, or only products at a given maximum yearly inventory level.

Rollup Functionality

The Regulatory Roll-up is one of the major steps in using FacTS for SARA Tier Reporting. It not only determines what products are Tier Reportable, but also creates the various Tier records required for both Tier I and Tier II reporting. The Regulatory Roll-up first aggregates the various 302 chemical inventory levels across the facility and creates special 302 EHS Yearly Usage records for each of the 302 chemicals. A fact then determines Tier Reportables.

FacTS has built-in triggers which draw from all information within the system to automatically generate lists for Tier Reports. After determining what products require Tier Reporting, the Roll-up then creates Tier I, Tier I Location, Tier II, Tier II EHS, and Tier II Location records. These are the records that store the actual Tier Reporting information. They can be view or modified from the Tier I and Tier II Collection data entry activities on the menu. The information stored in these records is used by the Tier I and Tier II reports.

