



Massachusetts Chemistry & Technology Alliance

Tier II – RY2017

Changes from EPA and its impact

Tier II – Report for First Responders/Community

- Established in 1986
- Part of the Emergency Planning and Community Right to Know Act (EPCRA)
 - Also established the requirement for LEPC and SERC
 - Focus was to provide information of hazards in a community to first responders and state resources.
- EPCRA was a direct response to the Union Carbide disaster in Bhopal India.
 - December 2-3, 1984
 - Methyl Isocyanate (MIC) – approx. 40 metric tons released
 - Immediate deaths = 3,787 with another 8,000 or more dying of gas-related conditions since.
 - 558,125 injuries, both partial and severe disabilities.
- The changes to the report for RY2017 are reflective of OSHA's update to the Global Harmonization System and Safety Data Sheets.

Who Reports?



- Any material that **REQUIRES** an SDS under OSHA is potentially subject to reporting under Tier II
- Materials are listed via CAS #
- Generally viewed as an inventory report
 - 10,000 lbs. threshold
 - For Extremely Hazardous Substances (EHSs) designated under EPCRA Section 302 the reporting threshold is 500 pounds (or 227 kg.) or the threshold planning quantity (TPQ), whichever is lower.
- **DUE MARCH 1**, each year

NOT REQUIRED for reporting...

○ WHAT CHEMICALS ARE EXCLUDED?

- 1) Any food, food additive, color additive, drug, or cosmetic regulated by the Food and Drug Administration
- 2) Any substance present as a solid in any manufactured item to the extent exposure to the substance does not occur under normal conditions of use
- 3) Any substance to the extent it is used for personal, family, or household purposes, or is present in the same form and concentration as a product packaged for distribution and use by the general public
- 4) Any substance to the extent it is used in a research laboratory or a hospital or other medical facility under the direct supervision of a technically qualified individual
- 5) Any substance to the extent it is used in routine agricultural operations or is a fertilizer held for sale by a retailer to the ultimate customer.

Tier II Information

- Requirements for reports can vary state by state. However, the EPA makes certain requirements mandatory:
 - Certified by signature
 - Health and Physical Hazards must be identified, using the criteria provided.
 - Location and storage areas to be documented.
- These reports are subject to public “right-to-know” laws.
- Submitted to the LEPC/REPC, the SERC and the Emergency manager for the municipality.
- There are multiple Tier II software systems.
 - EPA & Connecticut uses Tier II Submit (Compatible with CAMEO)
 - Massachusetts SERC uses Tier II Manager
 - There is an export feature to create a Tier II Submit report and/or PDF for other submissions.



Physical & Health Hazards Before...

- Acute
- Chronic
- Reactive
- Flammable
- Corrosive

Physical & Health Hazards Now...

Physical Hazards	Health Hazards
Flammable (gases, aerosols, liquids, or solids)	Carcinogenicity
Gas under pressure	Acute toxicity (any route of exposure)
Explosive	Reproductive toxicity
Self-heating	Skin Corrosion or Irritation
Pyrophoric (liquid or solid)	Respiratory or Skin Sensitization
Oxidizer (liquid, solid or gas)	Serious eye damage or eye irritation
Organic peroxide	Specific target organ toxicity (single or repeated exposure)
Self-reactive	Aspiration Hazard
Pyrophoric gas	Germ cell mutagenicity
Corrosive to metal	Simple Asphyxiant
In contact with water emits flammable gas	Hazard Not Otherwise Classified (HNOC)
Combustible Dust	
Hazard Not Otherwise Classified (HNOC)	

Final Thoughts

- Plan ahead with the time it will take, some additional research and time will be needed to complete this year's Tier II.
- OSHA Contacts:
 - North Boston: (978) 837-4460
 - South Boston: (617) 565 6924
 - Springfield: (413) 785-0123
 - JKF Federal Building: (617)565-9860
- CT Specific Questions:
<http://www.ct.gov/serc/cwp/view.asp?a=2590&q=315308>

