

February, 2019:

Tier II Reporting

The deadline for submitting your 2018 Tier II Hazardous Chemical Inventory report is March 1, 2019. It is the same process as last year, where it now includes the hazard information on Safety Data Sheets (replaced Material Safety Data Sheets) under GHS Hazard Communication.

Report if chemicals stored meet or exceed threshold quantities.

Facilities that used or stored hazardous chemicals above established thresholds at any time during 2018 must submit a Tier II report. Hazardous chemicals are any substances that require a facility to maintain a safety data sheet. The thresholds above which these chemicals must be reported remain:

- 500 pounds (lb) or the threshold planning quantity, whichever is lower, for extremely hazardous substances listed in 40 CFR 355 Appendices A and B (sulfuric acid in batteries for us); *or*
- 10,000 lb for all other hazardous chemicals (gasoline and diesel fuel for us).

Hazard category designations

As part of a Tier II inventory report, you must designate the physical or health hazards associated with each hazardous chemical. The U.S. Environmental Protection Agency has aligned the hazardous chemical inventory reporting regulations to make the categories of physical and health hazards more consistent with those outlined under the Occupational Safety and Health Administration's Hazard Communication Standard. As a result, on the Tier II report you submit by March 1, 2019, choose from among 13 possible physical hazards and 11 possible health hazards.

<u>Physical Hazards</u>	<u>Health Hazards</u>
<ul style="list-style-type: none"> • Explosive • Flammable (gases, aerosols, liquids, or solids) • Oxidizer (liquid, solid, or gas) • Self-reactive • Pyrophoric (liquid or solid) • Pyrophoric gas • Self-heating • Organic peroxide • Corrosive to metal • Gas under pressure (compressed gas) • In contact with water emits flammable gas • Combustible dust • Hazard not otherwise classified 	<ul style="list-style-type: none"> • Acute toxicity (any route of exposure) • Specific target organ toxicity (single or repeated exposure) • Skin corrosion or irritation • Serious eye damage or eye irritation • Respiratory or skin sensitization • Germ cell mutagenicity • Carcinogenicity • Reproductive toxicity • Aspiration hazard • Simple asphyxiant • Hazard not otherwise classified

Section 2 of the SDS should help you determine which of these hazards are associated with a given chemical.

Tier II reporting is done at the state level. To conform to the specific requirements of your jurisdiction, go to: <https://www.epa.gov/epcra/state-tier-ii-reporting-requirements-and-procedures>.

For assistance, please contact David Templeman @412.642.5055 or email: david.templeman@cbs.com.