

Industry Highlights- EPCRA Updates

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Alabama Emergency Response Commission (AERC) Updates



Alabama will have two options for filing Tier II forms going forward: 1) a .t2s file generated from EPA's software [Tier2Submit](#), or 2) online submission through [E-plan](#). If facilities do not file in one of the two aforementioned formats, your Tier II files can be rejected. Please see the reminder section below for more information. Regardless of which format you choose to file with, you must contact your LEPC and Fire Department to determine which format they require.

The "cost of complacency" has been a recurring topic throughout training events recently. Complacency is not usually associated with EPCRA. However, some Tier II filers inherit their program from someone else and a narrative that is heard on many occasions is, "I am new to this position and never thought to double check the data on these forms". As a reminder to everyone this filing season, the EPCRA regulations were put into place predominately for the welfare of not only the communities you live and work in, but also your First Responders who would be responding to a chemical event at your facilities. The data is relevant only when it is accurate. If you haven't double checked your 911 address, your entrance latitude and longitudes, or reviewed a site map recently, now would be a great time to do so! If First Responders cannot locate your facility due to outdated or inaccurate data; what would the cost of that kind of complacency look like for you and your community? Please be vigilant about the quality of the data you are providing.

The U.S. Chemical Safety & Hazard Investigation Board touches on a similar topic in their newsletter, [Safety Digest: Preparing Equipment and Instrumentation for Cold Weather Operations](#). "This digest summarizes three CSB investigations where ineffective freeze protection practices and programs were found to be causal to the incident." Please take a moment to read through the digest and analyze where your facility may be able to become better equipped for safety challenges this winter season.

Regulatory Updates



-There was a new category of chemicals (NPEs) added to TRI reporting. Please see EPA's [website](#) for more information.

-No significant Tier II changes were found on the Federal level for the 2018 reporting Cycle.

-Please note if you submit a Tier II Form that is lacking any required categories/fields, it can be considered invalid. Your Master ID and a valid e-mail address for proof-of-receipt are state required fields. Your form can be rejected if you do not have accurate or missing information.

Reminders



-The ADEM [SARA Title III Webpage](#), is updated periodically throughout the year and contains FAQs and useful information on EPCRA reporting requirements.

-TRI forms are due July 1st.

-Tier II forms are due by March 1st. Any forms received after March 1st are considered late and puts you out compliance with EPCRA.

-Tier2Submit is a form creator program developed by the EPA and can be downloaded from their [website](#) for free. The software generates a Tier II form in the required .t2s format. Facilities will then need to [e-mail](#) the .t2s files to the AERC. Proof of receipt is e-mailed after the files are processed. The Tier2Submit software is updated annually so you need to download the new version of the software each year.

-[E-plan](#) is an online web service maintained by UT Dallas. There is a small fee to file with E-plan. Data is maintained from year to year and can be easily updated for the new filing year. If you plan on using E-plan, there is no need to create a new Access ID if you have previously filed Tier II forms. [Contact](#) E-plan to obtain your E-plan Access ID. Once you have your Access ID, you can login and access data, make updates, and submit through the webpage. Proof of receipt for E-plan is the payment confirmation. Be wary of ad/spam websites. If the web address does not contain, "erplan.net" you are not in the right place!

Training Opportunities



-E-plan offers free [webinars](#) in January and February.

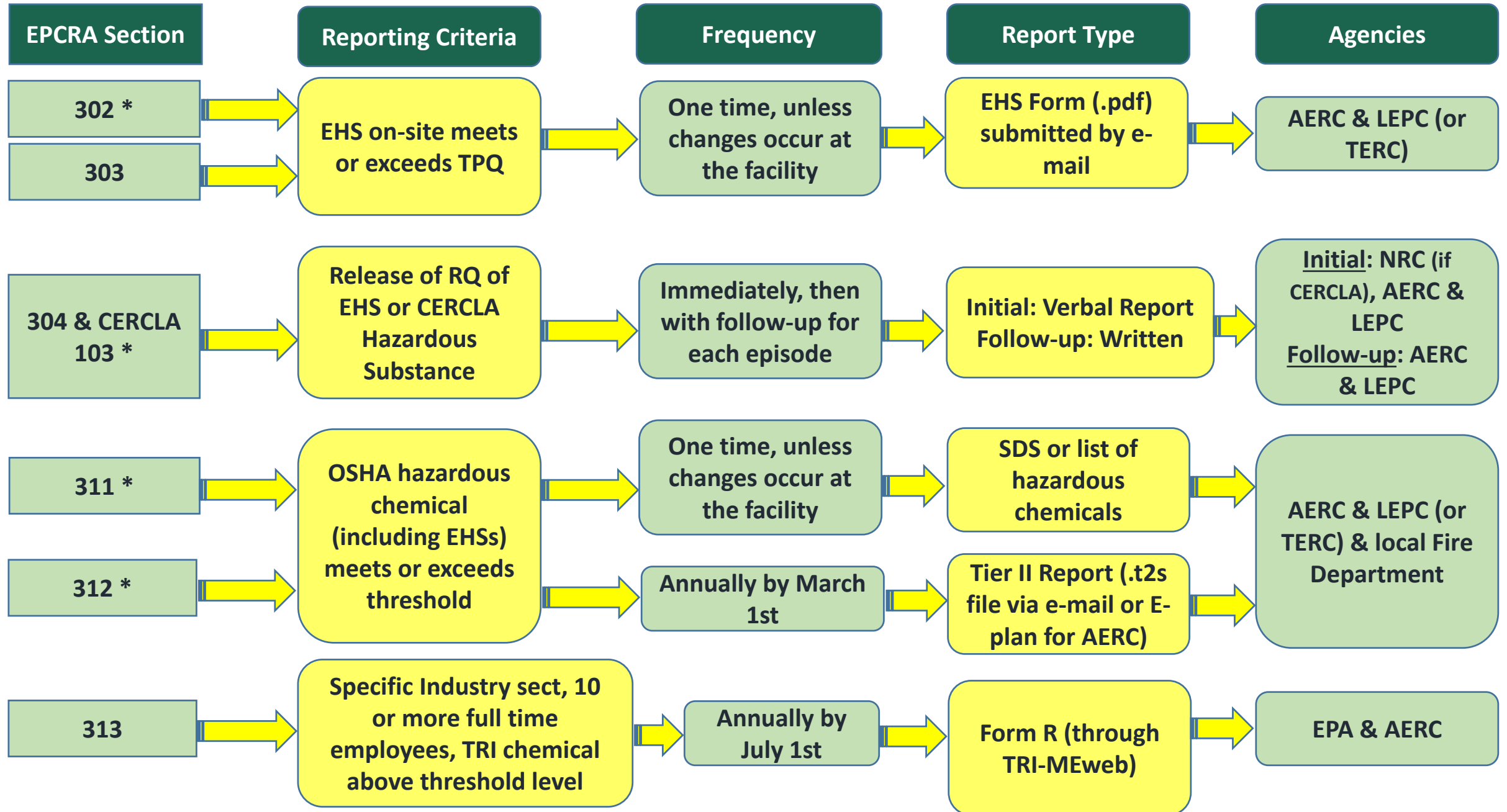
-Technical assistance on Tier2Submit and/or E-plan can be provided for facilities upon request. If there is enough interest, classes (no more than 6-8 per class) will be held at ADEM. Please contact Beth Woodfin (information below) to express interest/discuss scheduling.

-Free on-line training is available for TRI submission through [EPA's TRI website](#).

A yearly newsletter brought to you by the Alabama Emergency Response Commission (AERC).

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EPCRA Reporting Requirements Summary- Alabama



*These forms can be filed via E-plan. Contact E-plan for registration and pricing information.