Industry Highlights- EPCRA Updates VOL 3. Issue 1 / January 2020

Alabama Emergency Response Commission (AERC) Updates

This newsletter is distributed via e-mail for ease of distribution and to reduce paper waste. Any words in blue throughout this document are hyperlinks that can be clicked on for additional information. The link will open in a different window. Sometimes popup blockers will disable links from opening. If this occurs, hold down the "CTRL" button while clicking on the hyperlink to bypass this issue. If you need further assistance, contact **Beth Woodfin**. Please feel free to forward this information to other stakeholders.

The AERC met on 2/6/19 and 11/20/19. The Director of the Alabama Emergency Management Agency stressed the importance of industries working together with emergency management agencies to help foster working relationships long before disasters and emergencies arise. The AERC encourages facilities who are subject to EPCRA to attend their Local Emergency Planning Committees (LEPC) as often as possible.

A representative from the Chemical Facility Anti-Terrorism Standards (CFATS) program discussed the importance of chemical facilities having security measures in place to reduce risks associated with hazardous chemicals, particularly those that may be exploited in a terrorist attack. CFATS has 300 chemicals of interest, many of which are on the EPA list-of-lists and are subject to ECPRA reporting. CFATS regulation applies to facilities across many different types of industry some of which include: chemical manufacturing/storage/distribution, utilities, and agriculture. For more information on CFATS and program requirements click **here**.

For those who submit documents through **AL312@adem.alabama.gov**, please be aware that there can be a delay up to 8 hours for the auto-response message that confirms your document was received. A second e-mail will be sent after the document has been processed and approved that will serve as your "proof-of-receipt". Please note the signature block is no longer included. Reports are processed in the order they were received; please do not send duplicate messages.

Regulatory Updates

-EPA's **Tier2Submit Software** underwent major revisions! The software has been updated to make reporting more intuitive and easier to submit. If you choose to import an older .t2s file into the new software make sure you import the file from 2018 to avoid compatibility issues. Tier2Submit users are strongly encouraged to begin the filing process early this year due to the significant updates to the program. If you run into any issues please contact the **EPCRA, RMP & Oil Information Center** and/or **Beth Woodfin** for assistance.

-The facility Master ID number and a valid e-mail address are state required fields.

-The America's Water Infrastructure Act (AWIA) amended EPCRA and added provisions that requires SERCs and LEPCs to provide EPCRA data to the State Water Primacy Agency. If you would like to know more about these changes and how they might affect you, click **here**. All Tier II Facilities are encouraged to work closely with your local water municipalities and LEPCs as they work together to create and update Risk Assessments/Emergency Response Plans to follow-up with the provisions of the AWIA.

-Certain **per- and polyfluoroalkyl substances (PFAS)** have recently been added to the reporting requirements of the TRI Program.

Reminders

-The ADEM **SARA Title III Webpage** is updated periodically throughout the year and contains FAQs and useful information on EPCRA reporting requirements.

-For all EPCRA reporting, you must check with your LEPC and Local Fire Department (if applicable) to see what format they require and comply. Retain proof-of-receipt from all three entities.

-The AERC requires all EPCRA correspondence to be submitted electronically either through **AL312@adem.alabama.gov** or E-Plan.

-The only two acceptable forms of submission for Tier II reporting to the AERC are **Tier2Submit** or **E-Plan**.

-Tier II forms are due by March 1st. All forms received after March 1st are considered late.

-Verify all street addresses and latitude and longitude coordinates! If you do not have a street address, please register a 911 address so that First Responders can easily locate your facility.

-Please note: if you submit a Tier II Form that is lacking <u>any</u> required categories/fields or contains inaccurate information, it can be considered invalid and rejected. If a document is rejected, please make accurate and timely corrections as soon as possible, and resubmit.

-TRI forms are due July 1st and must be filed through EPA's **TRI-MEweb** system.

Training Opportunities

-E-Plan offers free **webinars** in January and February.

-Tier2Submit 2019 tutorial is available **here**.