Tier2 Submit

A PRIMER

HOW TO FILL OUT YOUR TIER II FORM

USING TIER2 SUBMIT SOFTWARE

Notice

This document provides guidance to facilities with EPCRA Tier II reporting requirements. The statutory provisions and EPA regulations described in this guidance presentation contain legally binding requirements. This guidance presentation does not substitute for those provisions or regulations nor is it a regulation in itself. In the event of a conflict between the discussion in this presentation and any statute or regulation, this presentation would not be controlling. The guidance does not impose legally binding requirements on EPA or the regulated community, and might not apply to a particular situation based upon circumstances. For specific requirements and details, refer to the implementing regulations of 40 CFR – Chapter I subchapter J Part 370 EPCRA (42 U.S. Code § 11022).

A few things you need before you get started…

- EPA Tier II acronyms
- Your chemicals
- Industry codes
- Your facility contacts
- Thresholds for reporting
- Your state requirements

EPA Tier II Terminology

- **EHS**: Extremely Hazardous Substance
- **TPQ**: Threshold Planning Quantity
- **SDS**: Safety Data Sheet (formerly MSDS)
- **Tier2 Submit:** the software provided for free from the EPA
- **Tier II Report:** the actual report to be submitted to your state

You need to know your chemicals

- It is a **Hazardous Chemical**…

  …if OSHA requires a Safety Data Sheet (SDS).

- It may also be an **Extremely Hazardous Substance (EHS)**…

  …if it is listed in 40 CFR part 355, Appendix A and Appendix B.

- Note that EHSs have more stringent reporting thresholds.

- **Check to verify both: first, if it is Hazardous Chemical and then if it is also an Extremely Hazardous Substance.**

TPQ ➡ Threshold Planning Quantity

- TPQs are for Extremely Hazardous Substances (EHSs).
- TPQs are established by the EPA.
- TPQs are identified in the List of Lists and 40 CFR Part 355, Appendix A and Appendix B.
- CAMEO Chemicals can be used to search for TPQs of chemicals.
- TPQs vary from chemical to chemical; you need to check your particular chemicals.

You need to know…

- The names of chemicals stored at the facility
- Their CAS numbers
- If they are Hazardous Chemicals (these include Extremely Hazardous Substances listed in 40 CFR part 355)
- The maximum quantity present at the facility, in pounds, at any time during the ***previous*** calendar year

You need to know…

- The Dun & Bradstreet number for your company
  - If you don't know your number or don't have one, visit the Dun & Bradstreet website
- The NAICS code for your industry
  - If you don't know your code, look it up on the NAICS website or the US Census website
- The correct latitude and longitude location for the facilities you are reporting (Tier2 Submit will help you determine this)

You need to know…

- Contact information for:
  - An emergency contact (including two phone numbers, one of which is a 24 hour phone number)
  - The owner or operator
  - The Tier II information contact

Do you need to submit a Tier II report?

Non-EHS

- It's a hazardous chemical but not an EHS if it is…
  - Required to have an SDS under OSHA HCS
  - Over 10,000 Pounds

Extremely Hazardous Substance (EHS)

- It's a hazardous chemical and also an Extremely Hazardous Substance (EHS) if it is…
  - Required to have an SDS under OSHA HCS
  - On the List of Lists or 40 CFR part 355 Appendix A or B
  - Over the TPQ or 500 pounds (whichever is less)

Tier II Report required

Diesel or Gasoline

- It's reportable diesel or gasoline if it is…
  - Retail
  - Stored in an underground storage tank
  - Over 100,000 gallons of diesel
  - Over 75,000 gallons of gasoline

Tier2 Submit requires reporting on…

- **Facility**: information about name and location
- **Contacts**: owner, emergency, and Tier II contact details
- **Chemicals in Inventory**: information on chemicals stored at your facility during the previous year

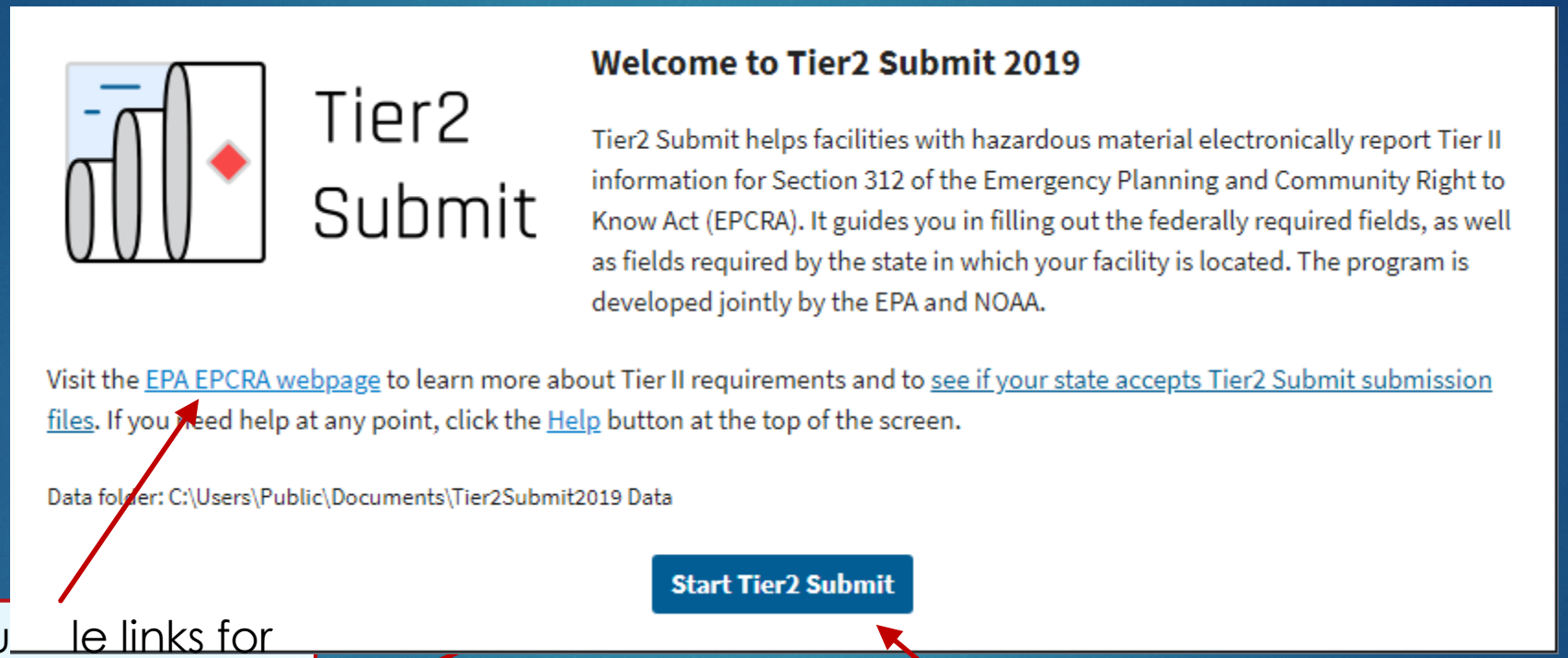
Getting Started

(Steps below are for Windows users; steps differ slightly for Mac users.)

1. Download the free Tier2 Submit software for the latest reporting year from the EPA Tier2 Submit site.
2. Install the program, or have your administrator install it.
3. The Tier2 Submit icon will appear on your computer.
4. Click on the icon to start the program.

Getting Started

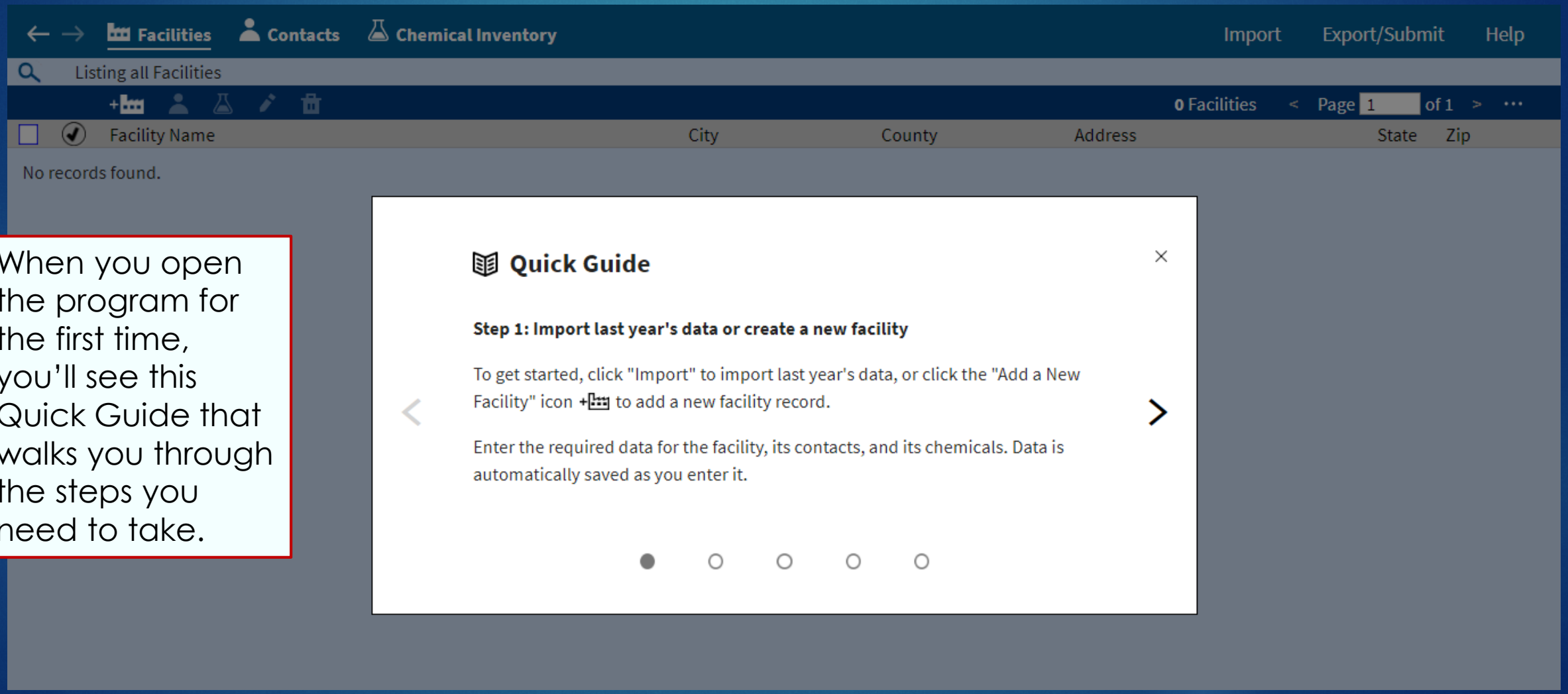
This is what you see when you open Tier2 Submit.



Here are valu le links for more information about Tier II reporting and your state's requirements.

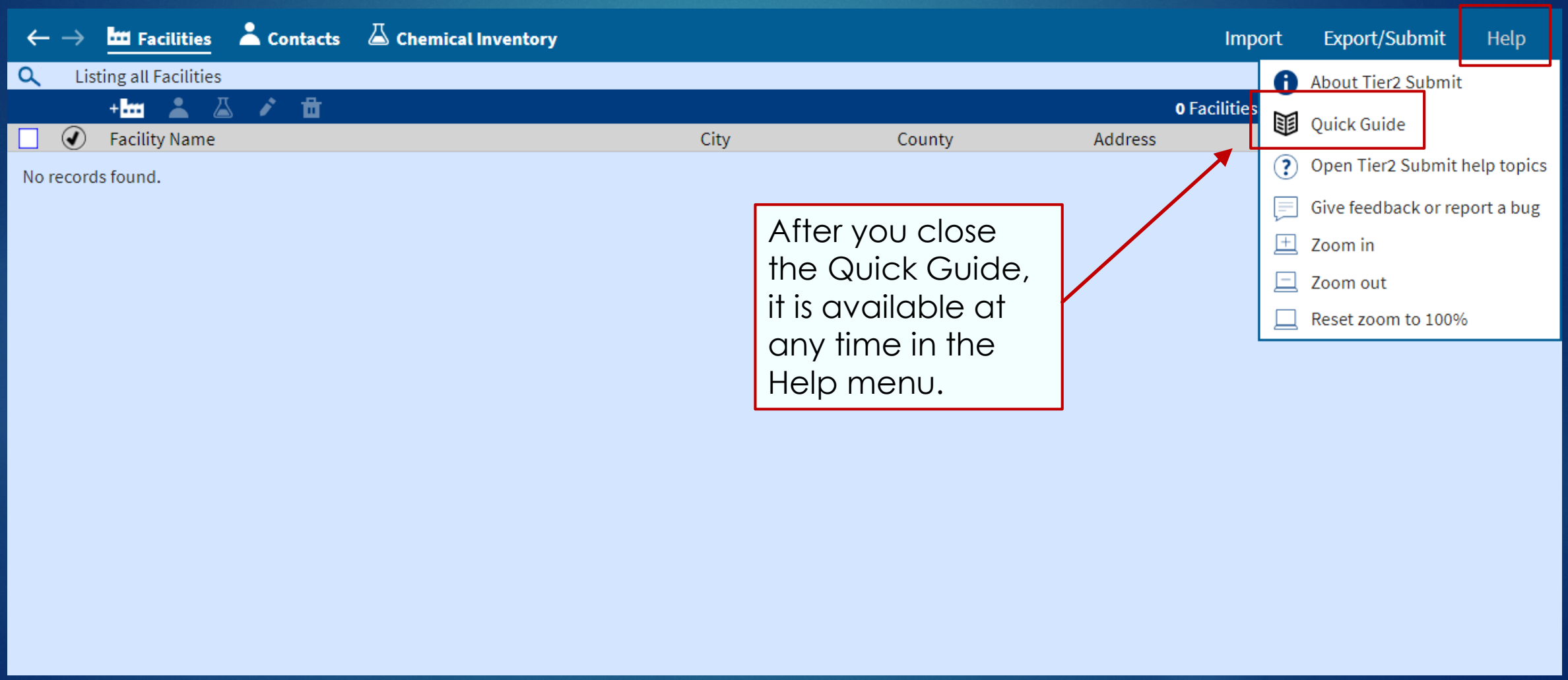
Click here to start creating your own Tier II report.

Getting Started

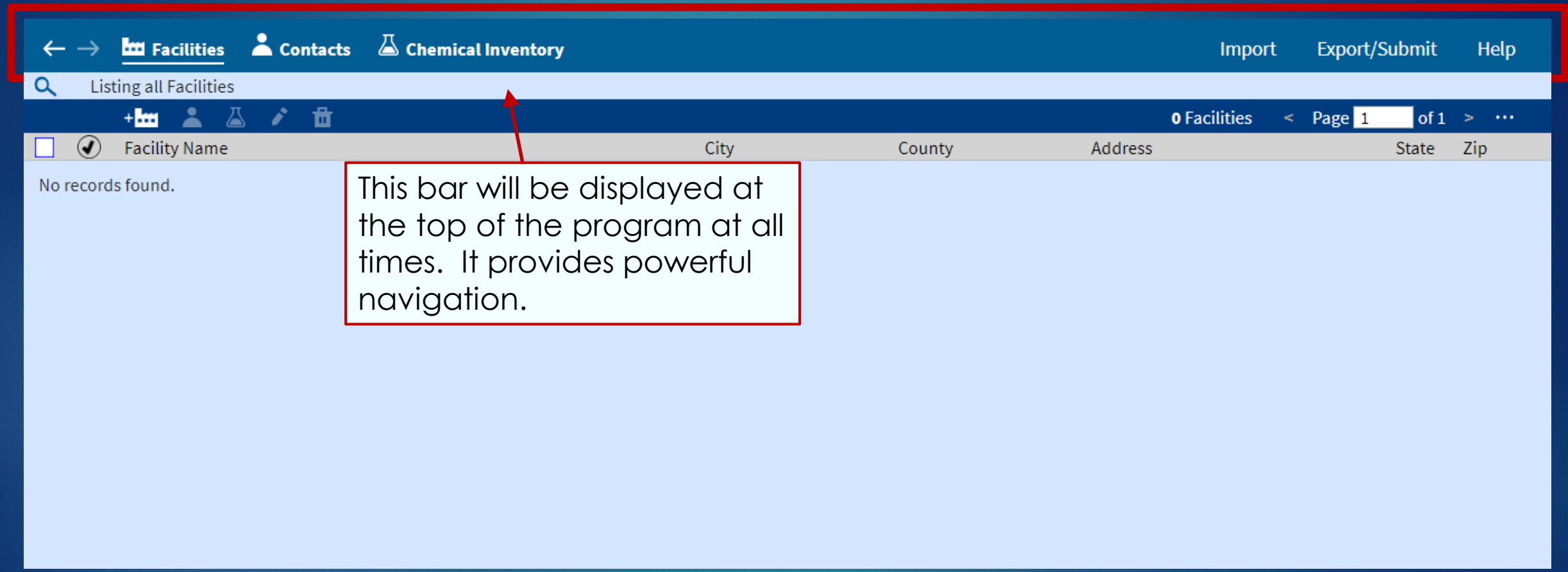


When you open the program for the first time, you'll see this Quick Guide that walks you through the steps you need to take.

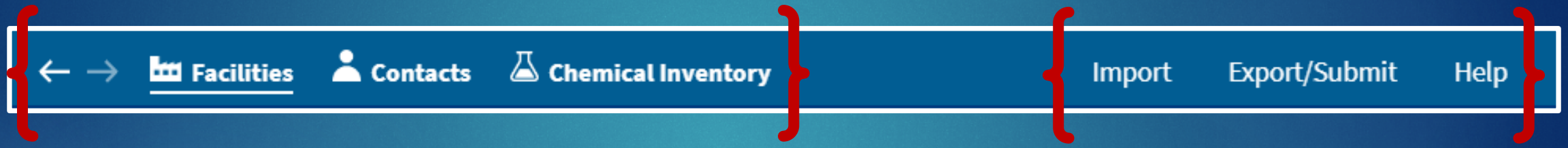
Getting Started



Tier2 Submit Page Layout



Navigation in Tier2 Submit

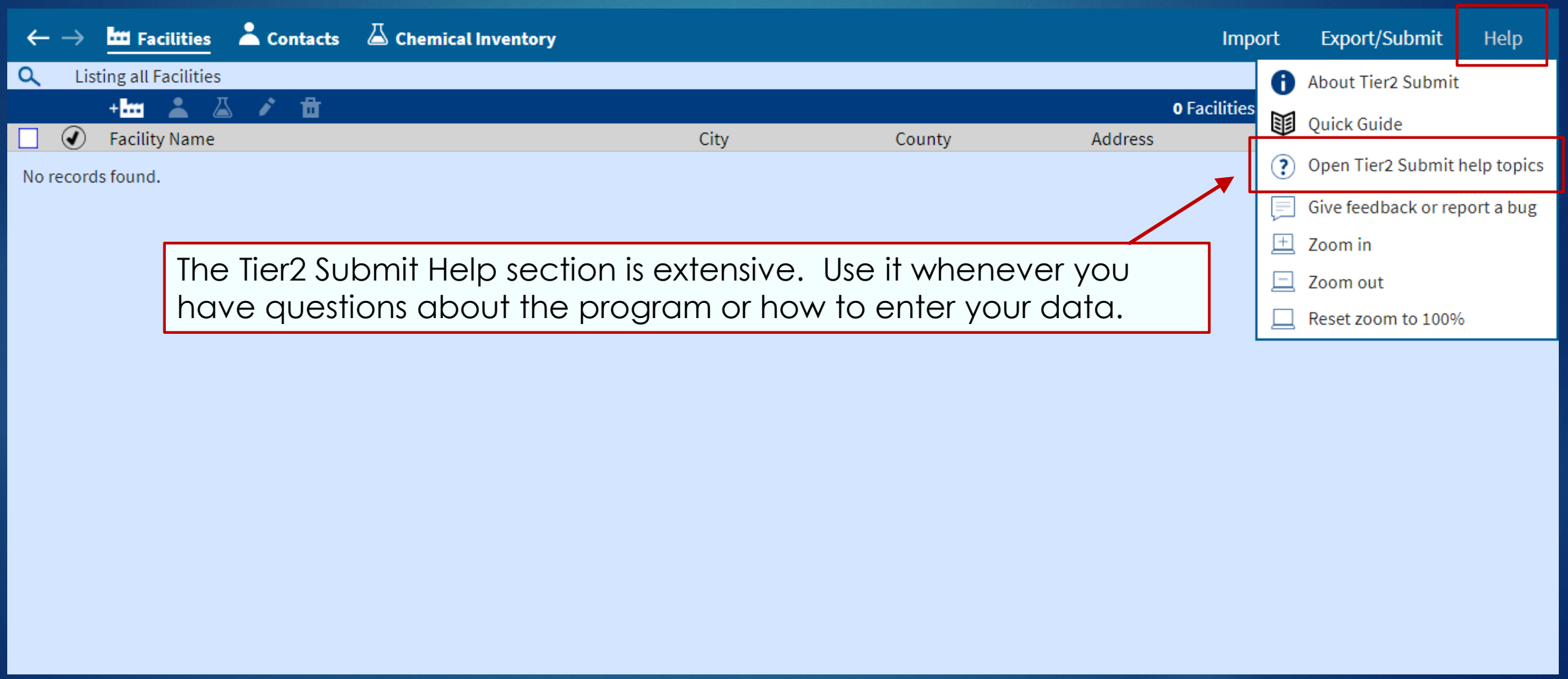


The left side of the bar indicates which part of Tier2 Submit you are in by the white underline.

The right side displays actions you may wish to take.

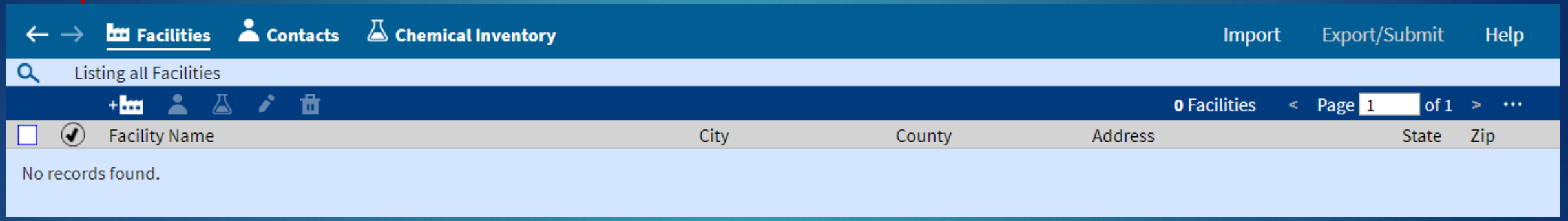
In Tier2 Submit, your data is automatically saved as you type it. There is no "Save" command.

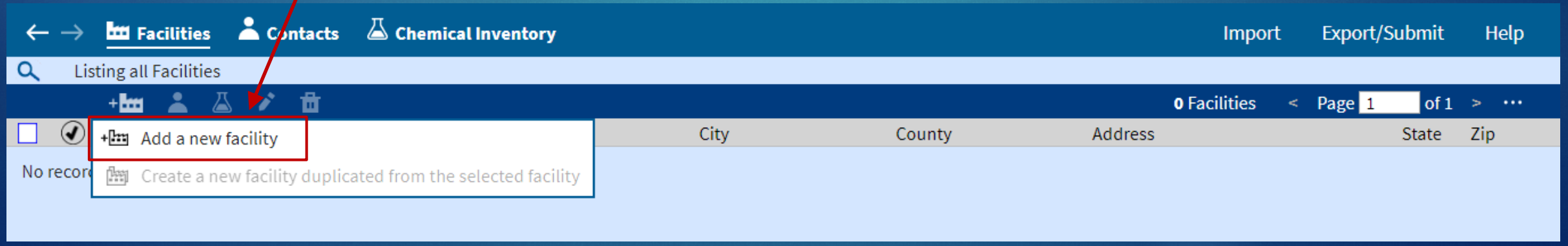
Navigation in Tier2 Submit



Creating a new facility

If this is your first time filing a Tier II report, you can make a new facility by clicking the **facility icon** and then clicking **Add a new facility**.

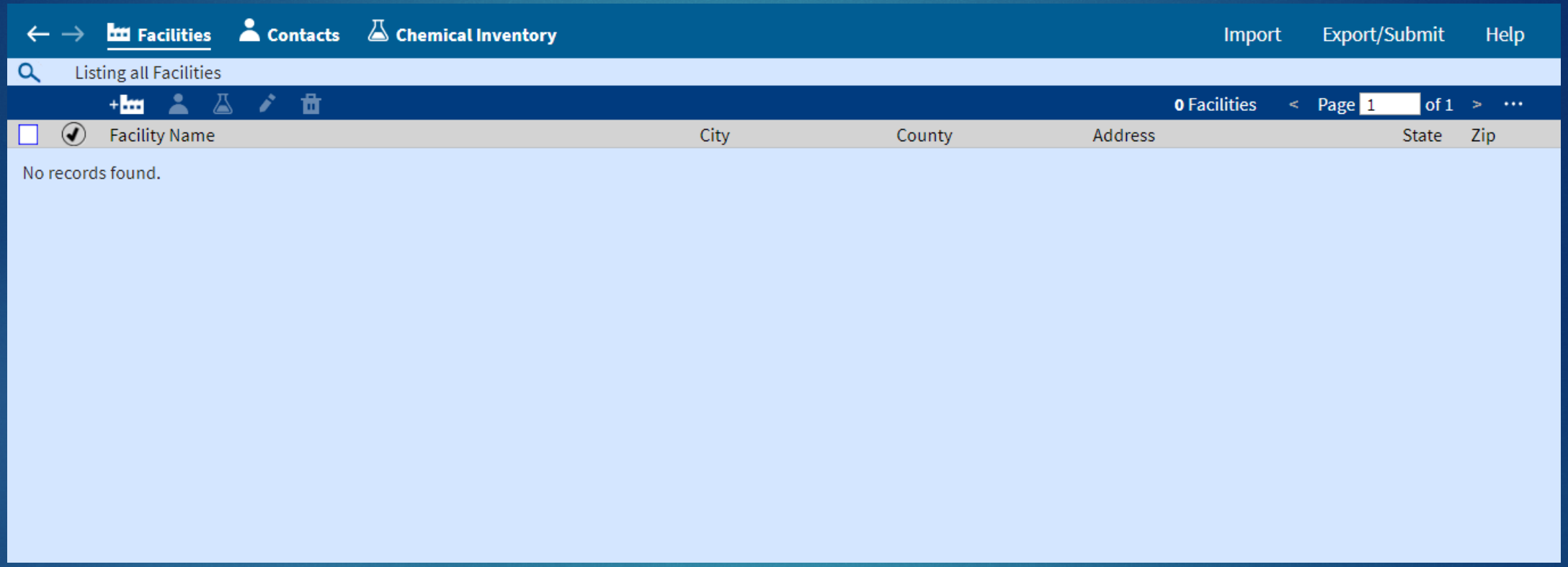




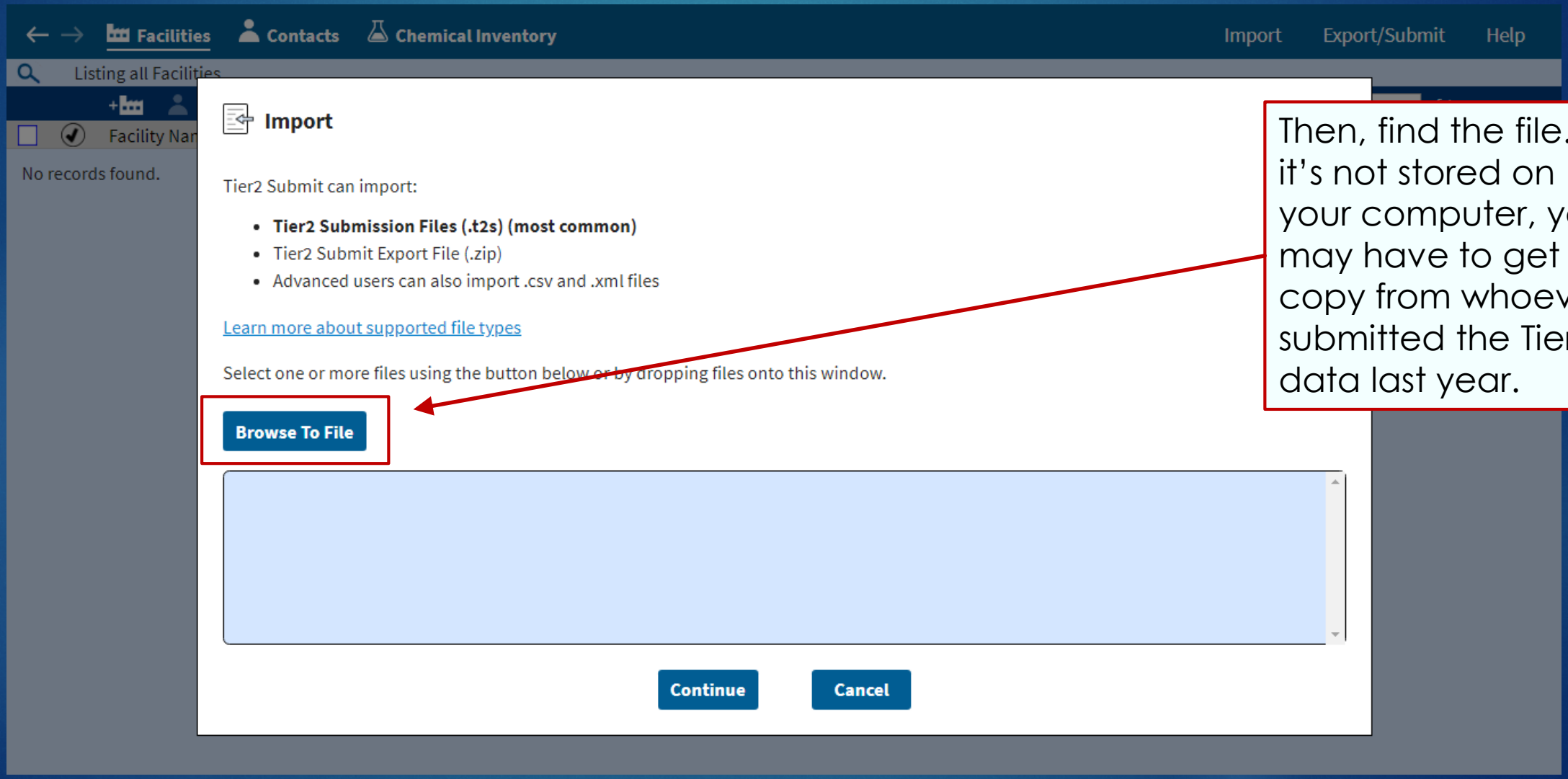
Did your facility use Tier2 Submit last year?

- If so, that data is available to modify, and update, and can be used for this year's filing.
- Tier2 Submit provides the process to import that data.
- Locate last year's data file, and use that path to import the data into Tier2 Submit.
- You may be able to get the file in electronic format from your state if you don't have it.

Importing a file from last year

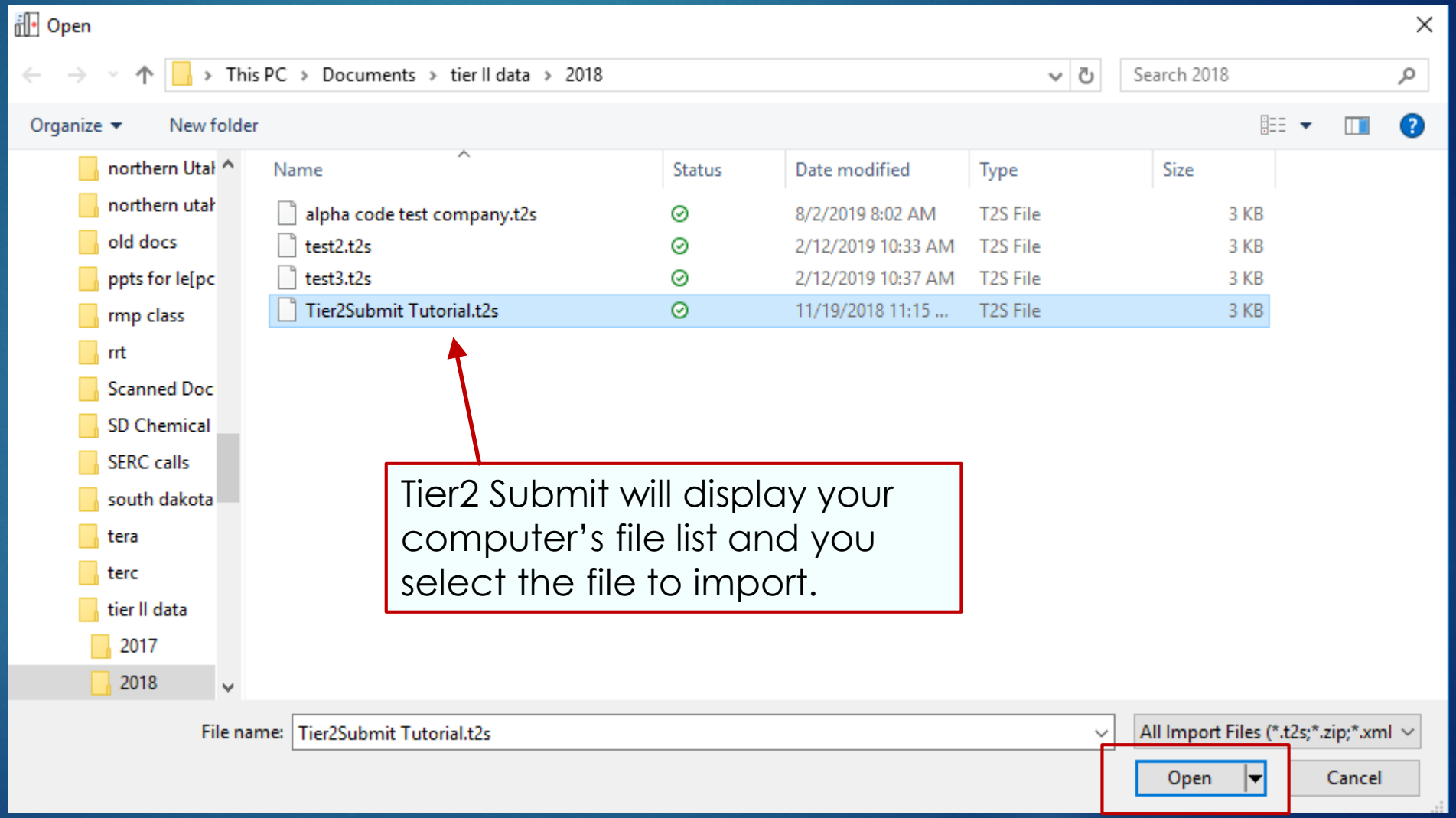


Importing a file from last year

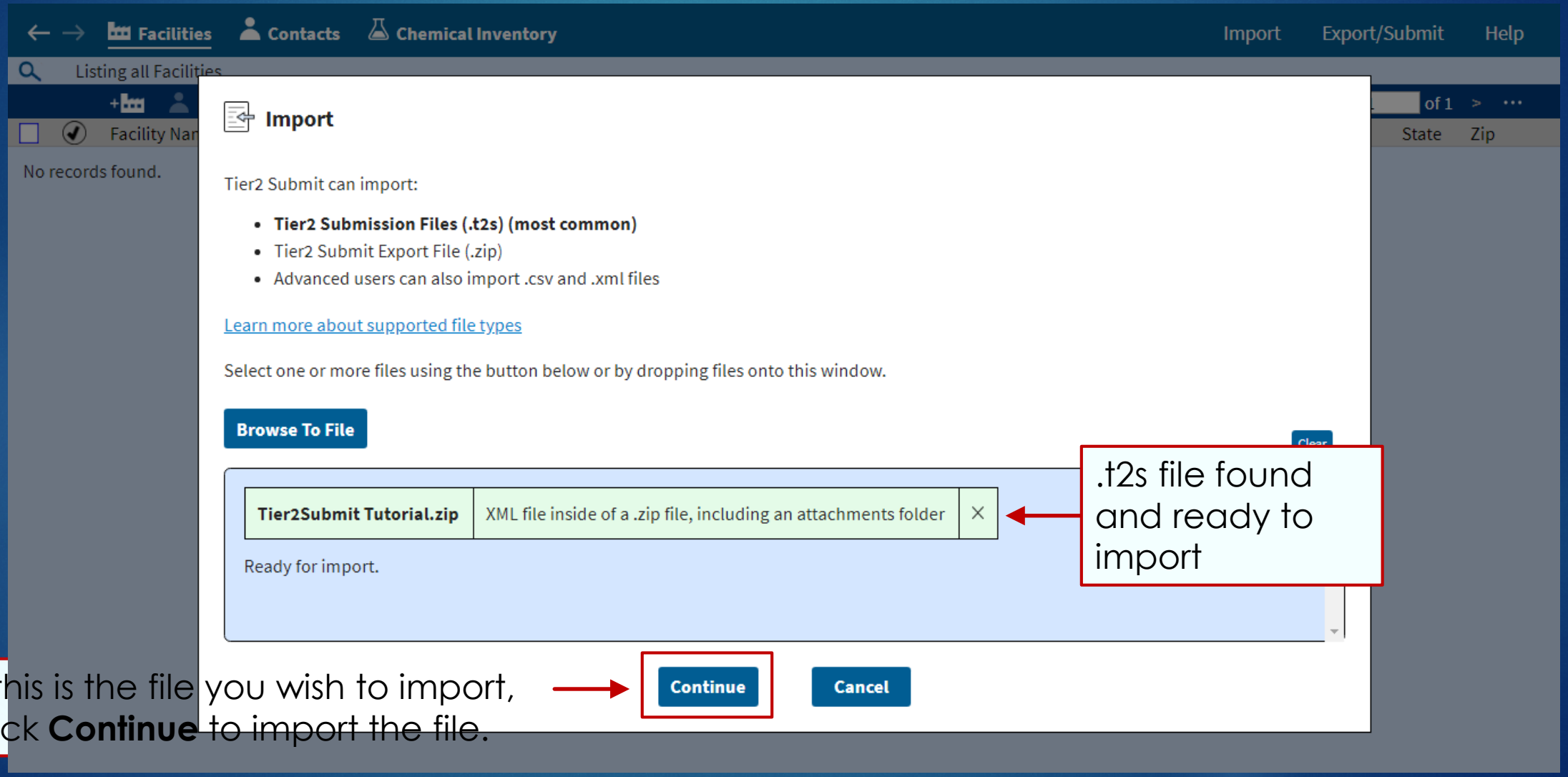


Importing a file from last year

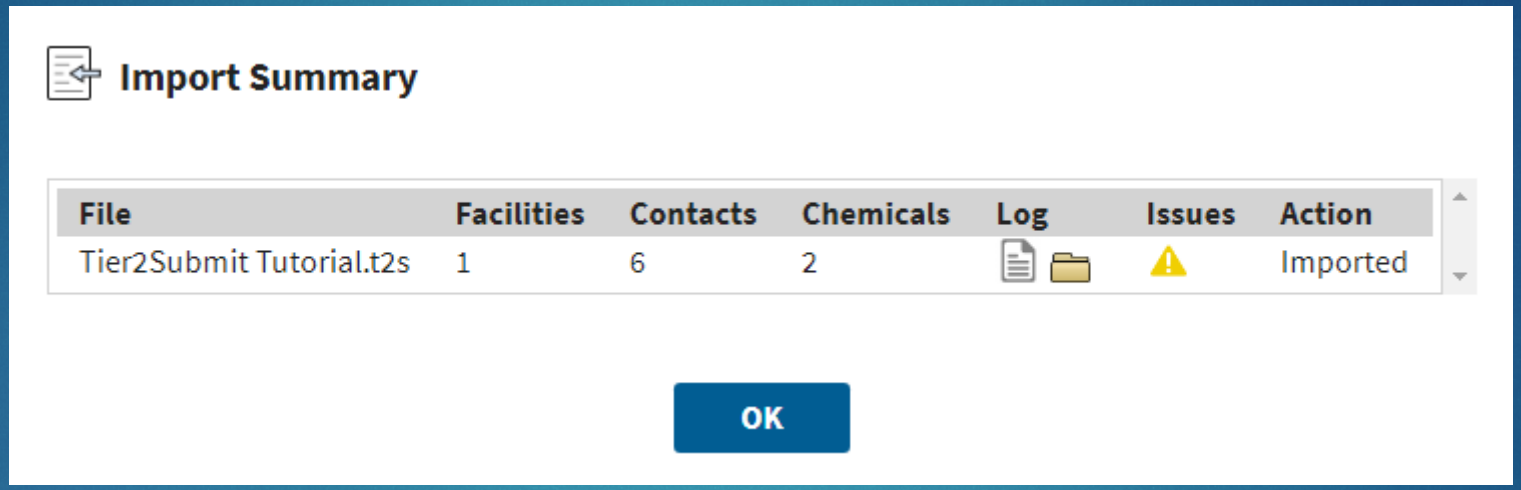
Browse to your files on your computer, and find last year's Tier2 Submit file. It will probably have a .t2s extension.



Importing a file from last year

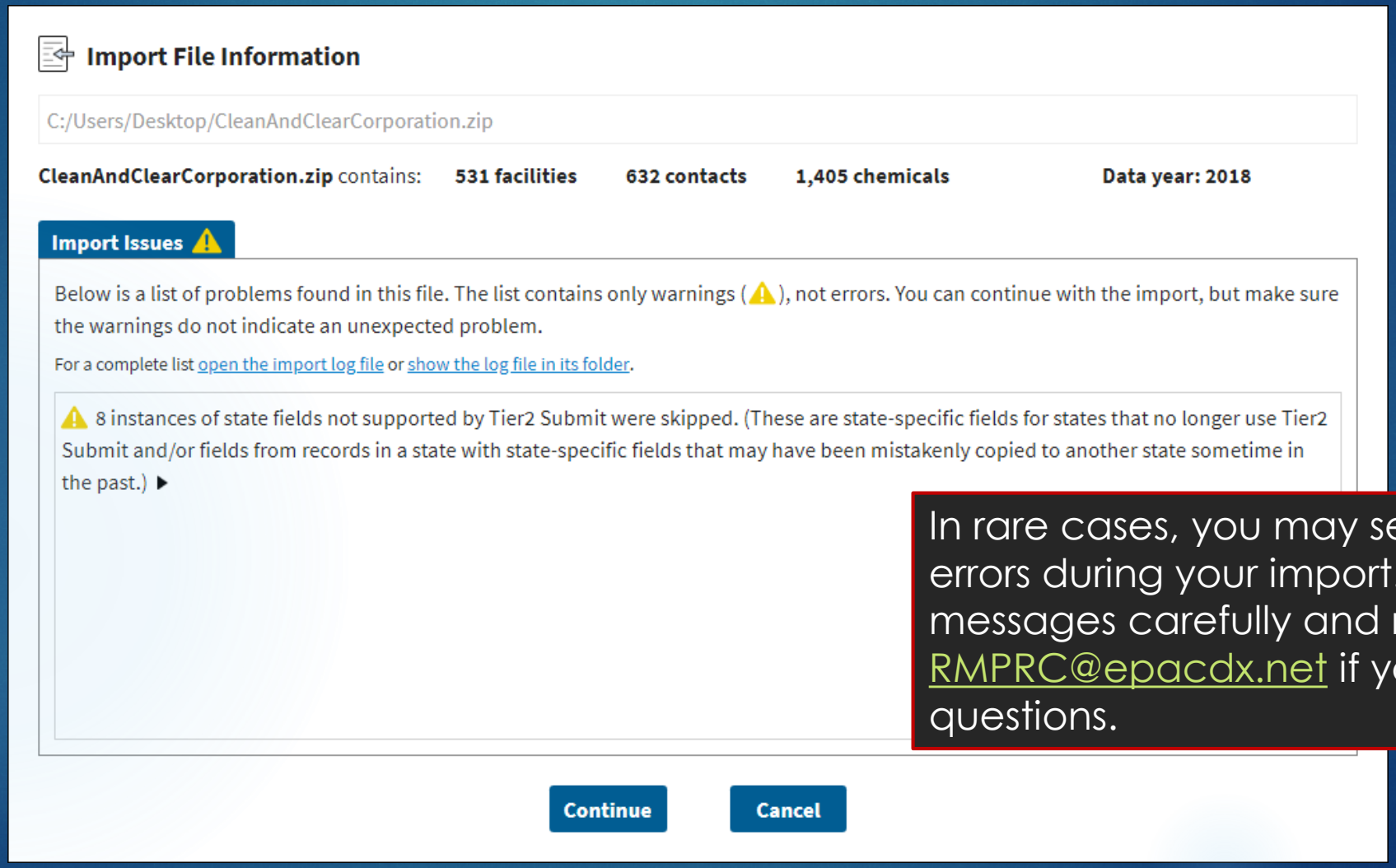


Importing a file from last year



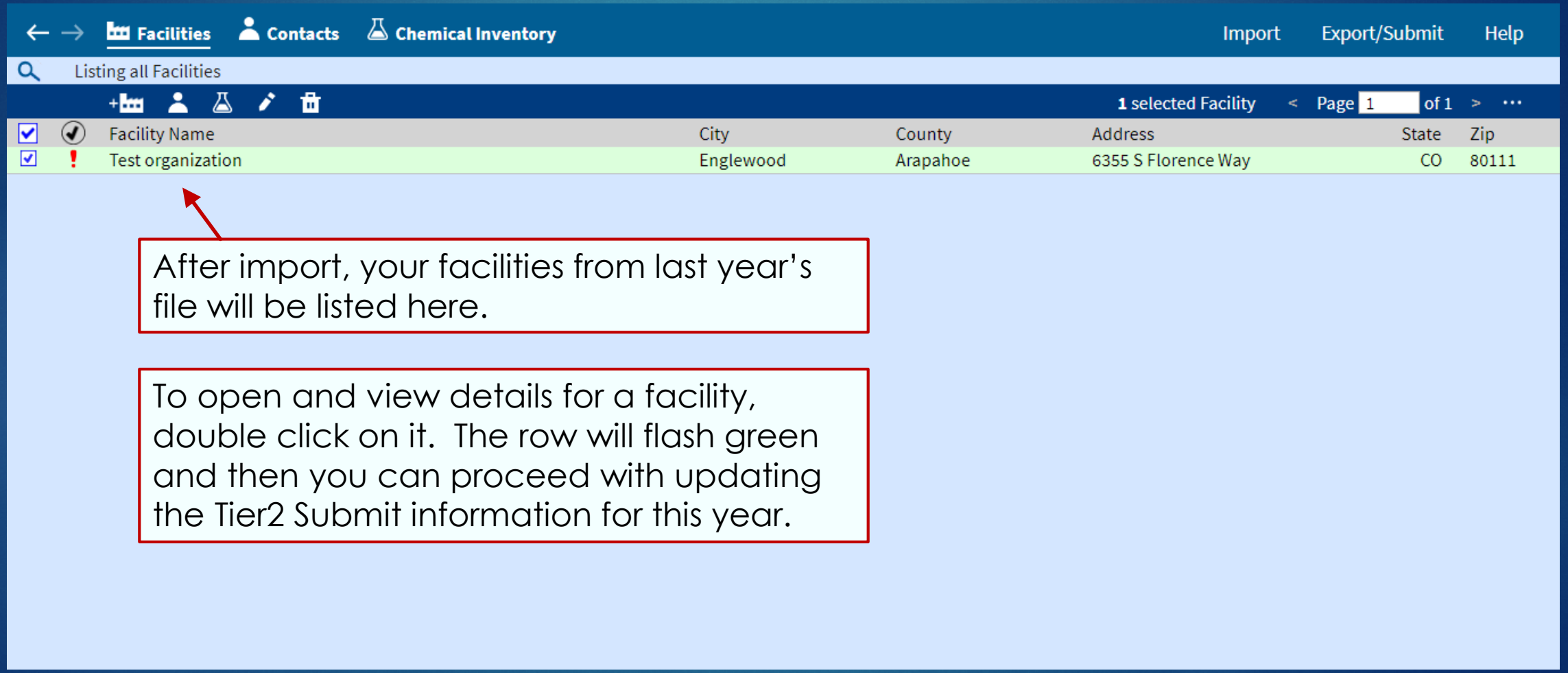
Successful import!

Importing a file from last year

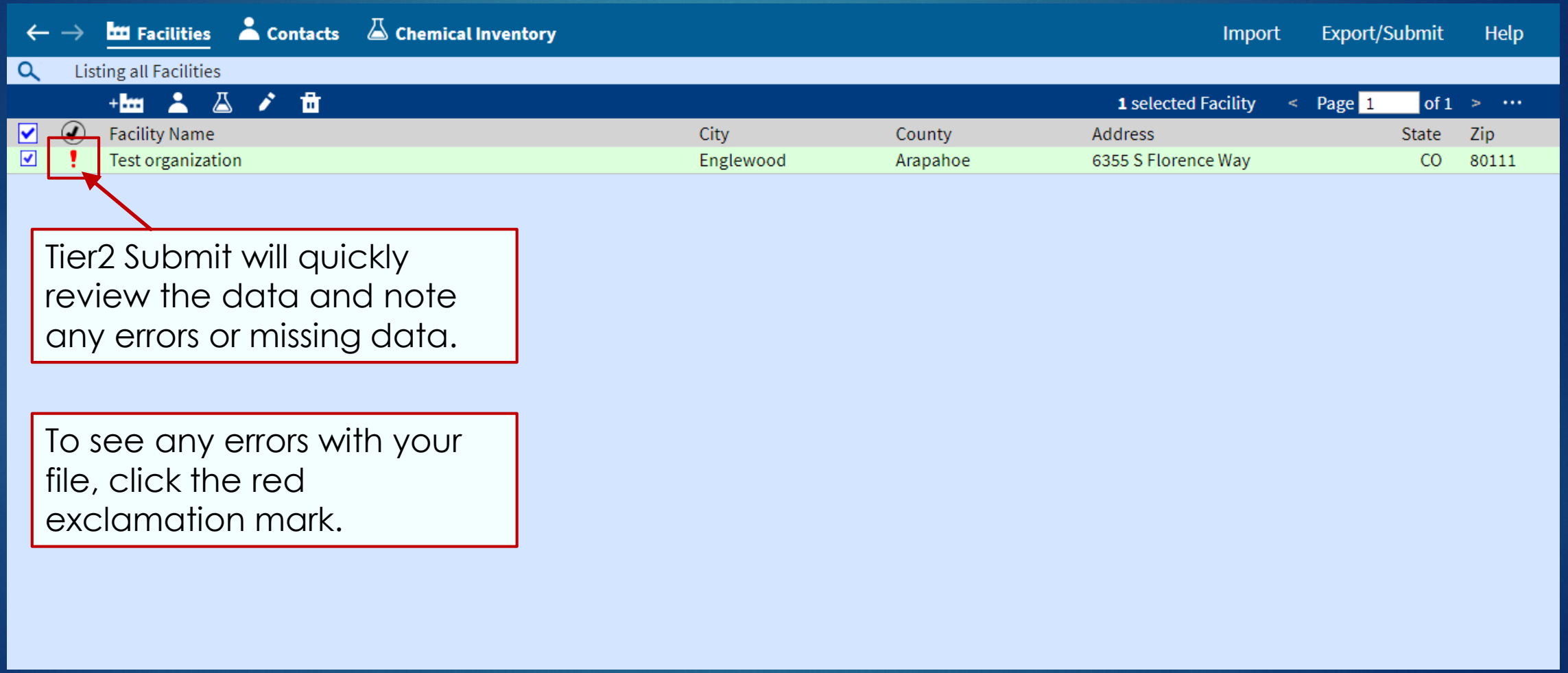


In rare cases, you may see warnings or errors during your import. Read the messages carefully and reach out RMPRC@epacdx.net if you have questions.

Importing a file from last year



Importing a file from last year



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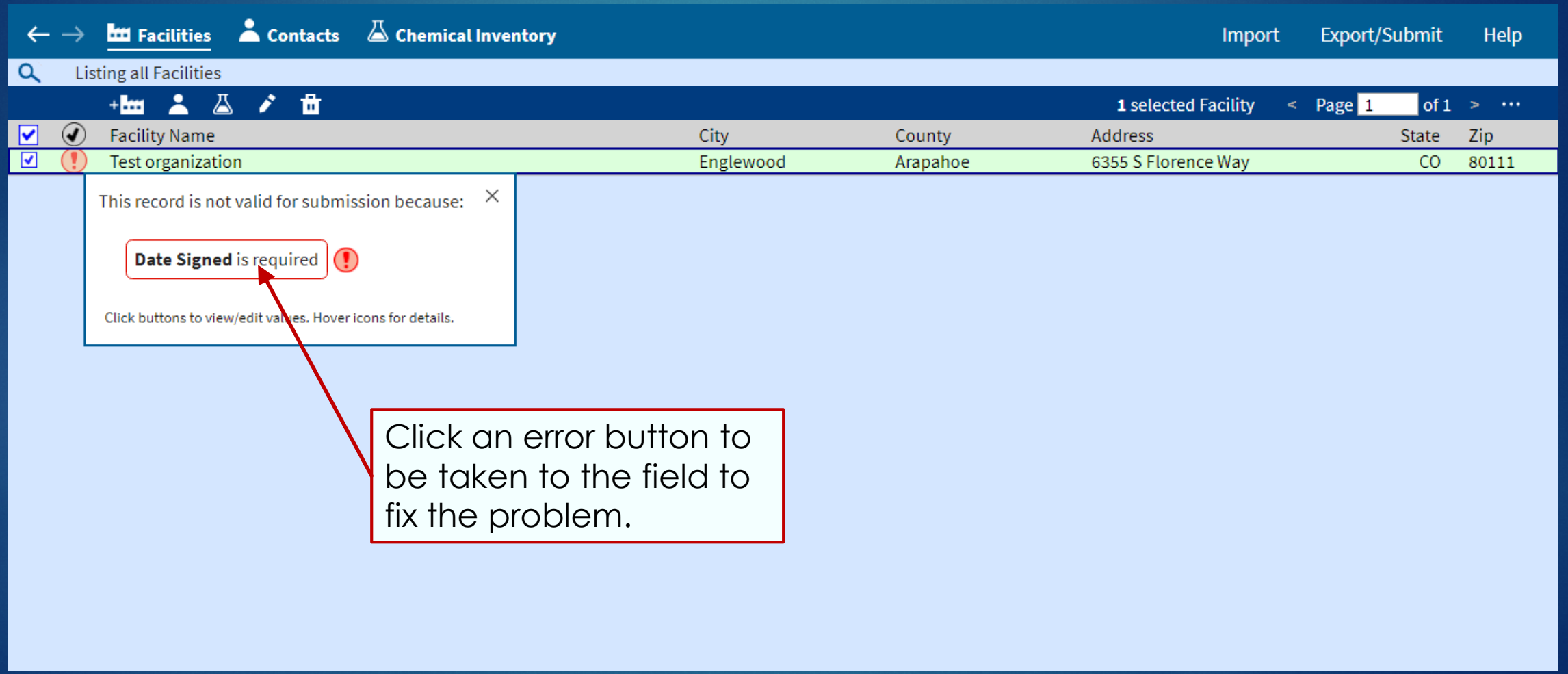
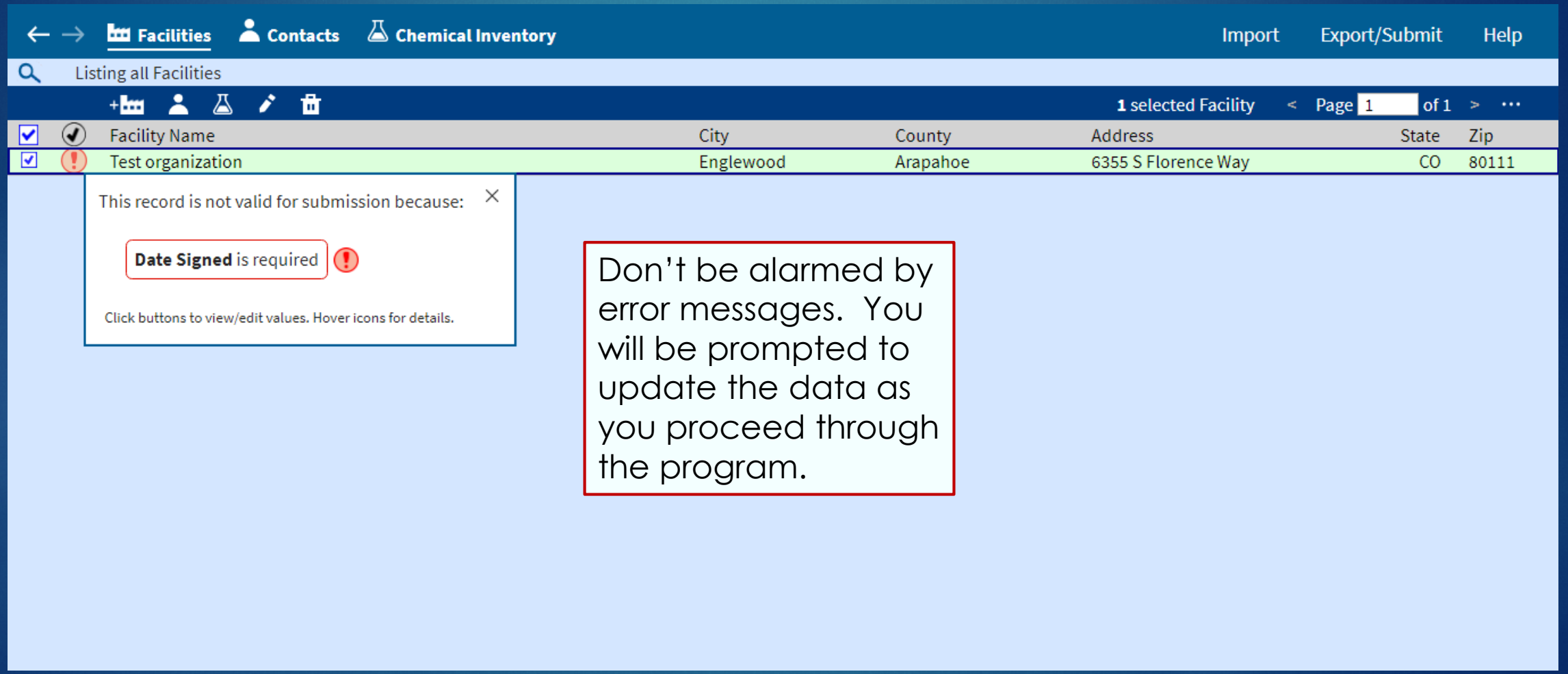


Importing a file from last year

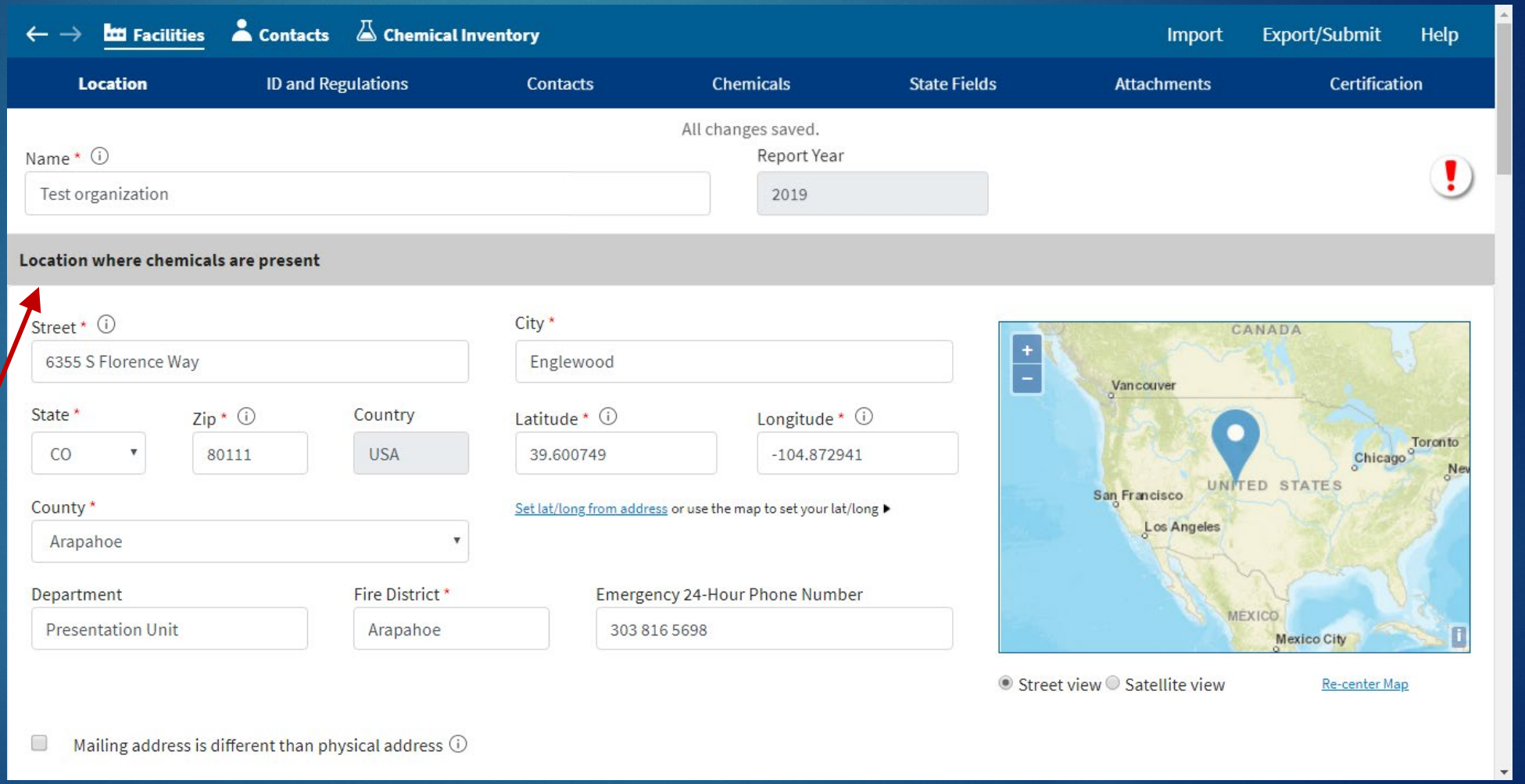


Don't be alarmed by error messages. You will be prompted to update the data as you proceed through the program.

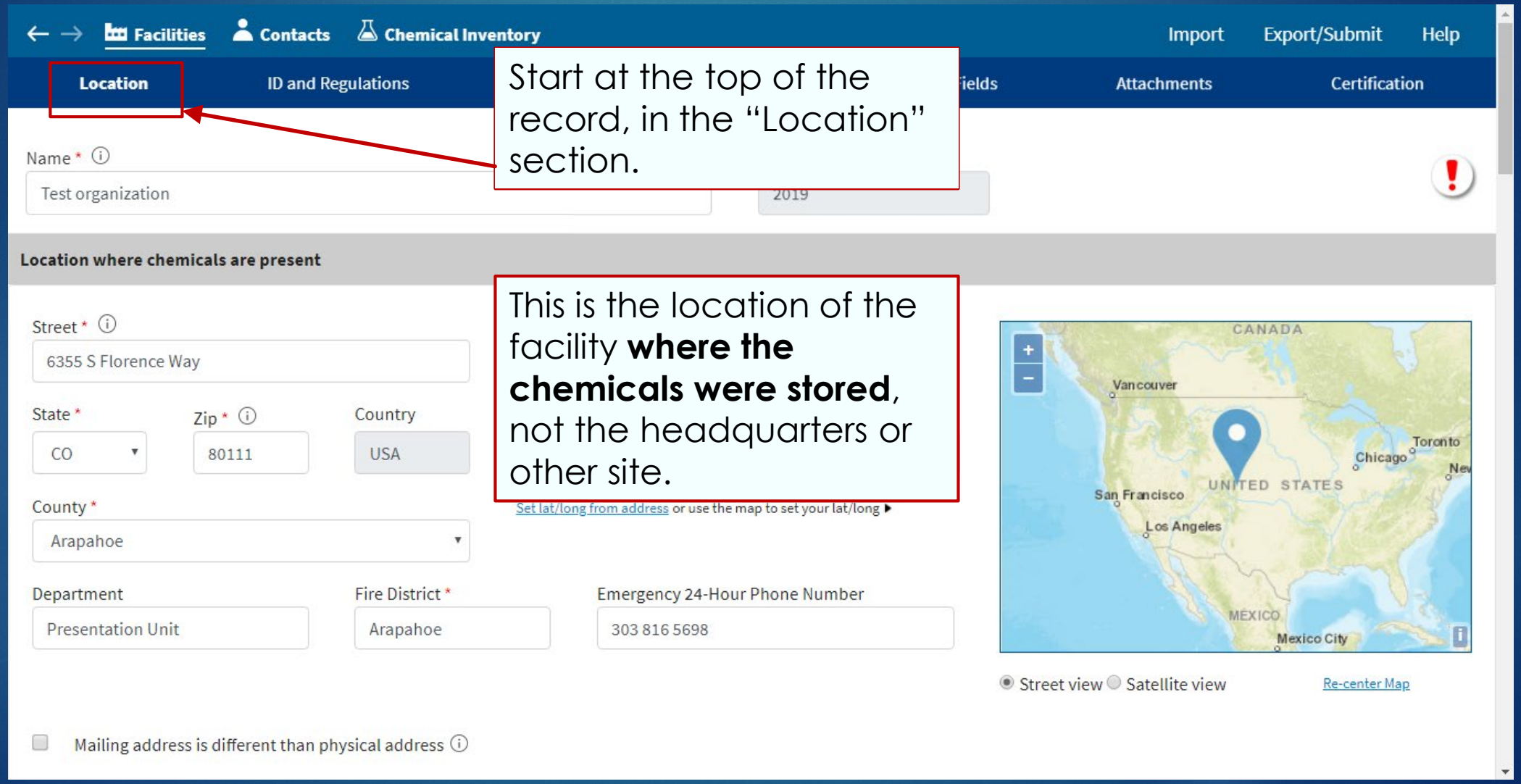
Navigation in Tier2 Submit

When you open a record, the dark blue toolbar represents segments of each Tier2 Submit record.

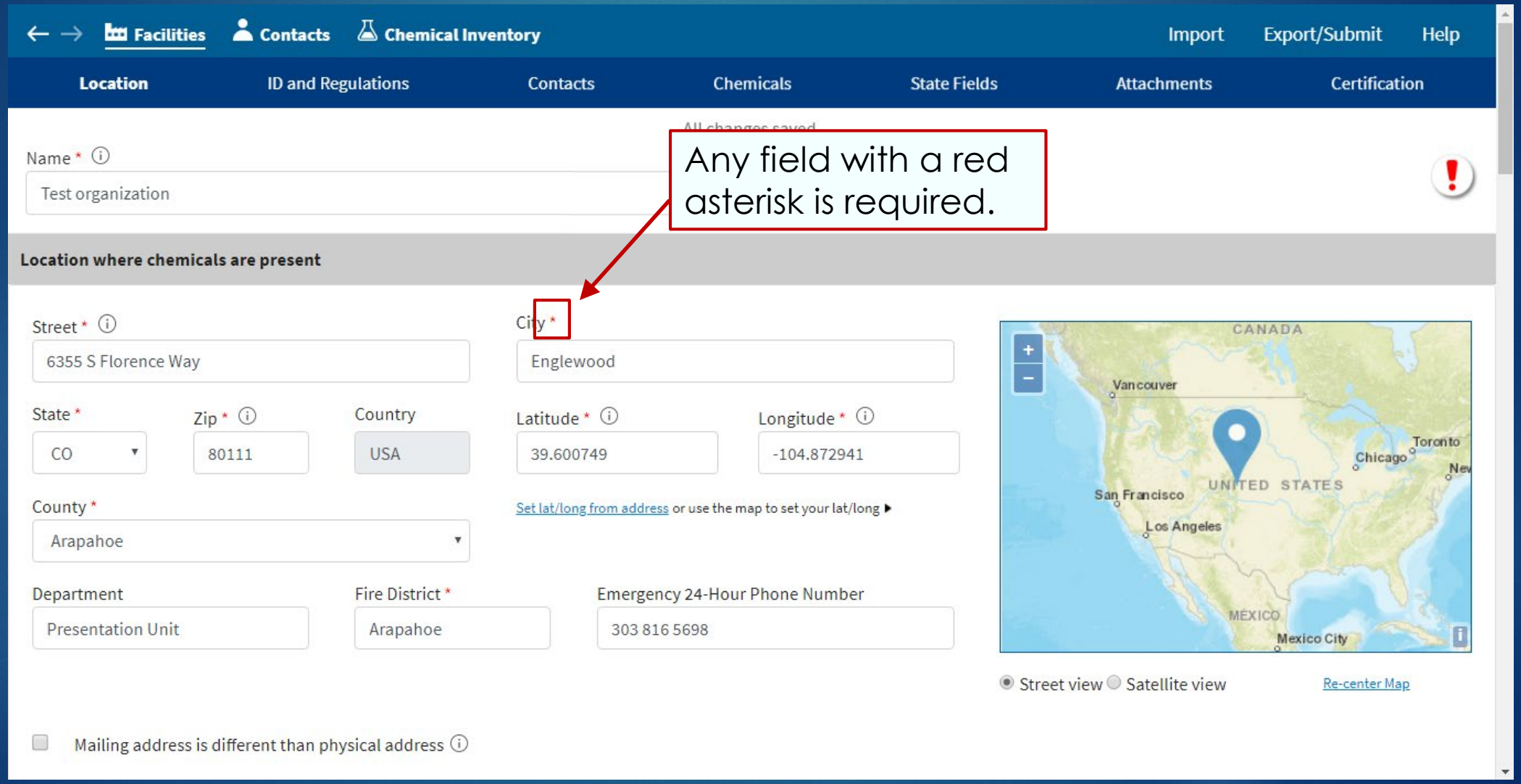
The gray bars correspond to those sections.



Location


Facilities
Contacts
Chemical Inventory
Import
Export/Submit
Help
Location
ID and Regulations
Attachments
Certification
Start at the top of the record, in the "Location" section.
Name *
Test organization
2019
Location where chemicals are present
This is the location of the facility **where the chemicals were stored**, not the headquarters or other site.
Street *
6355 S Florence Way
State *
CO
Zip *
80111
Country
USA
County *
Arapahoe
Set lat/long from address or use the map to set your lat/long
Department
Presentation Unit
Fire District *
Arapahoe
Emergency 24-Hour Phone Number
303 816 5698
CANADA
Vancouver
Toronto
Chicago
UNITED STATES
San Francisco
Los Angeles
MEXICO
Mexico City
Street view
Satellite view
Re-center Map
Mailing address is different than physical address

Location


Facilities
Contacts
Chemical Inventory
Import
Export/Submit
Help
Location
ID and Regulations
Contacts
Chemicals
State Fields
Attachments
Certification
Name *
Test organization
Any field with a red asterisk is required.
Location where chemicals are present
Street *
6355 S Florence Way
City *
Englewood
State *
CO
Zip *
80111
Country
USA
Latitude *
39.600749
Longitude *
-104.872941
Set lat/long from address or use the map to set your lat/long
County *
Arapahoe
Department
Presentation Unit
Fire District *
Arapahoe
Emergency 24-Hour Phone Number
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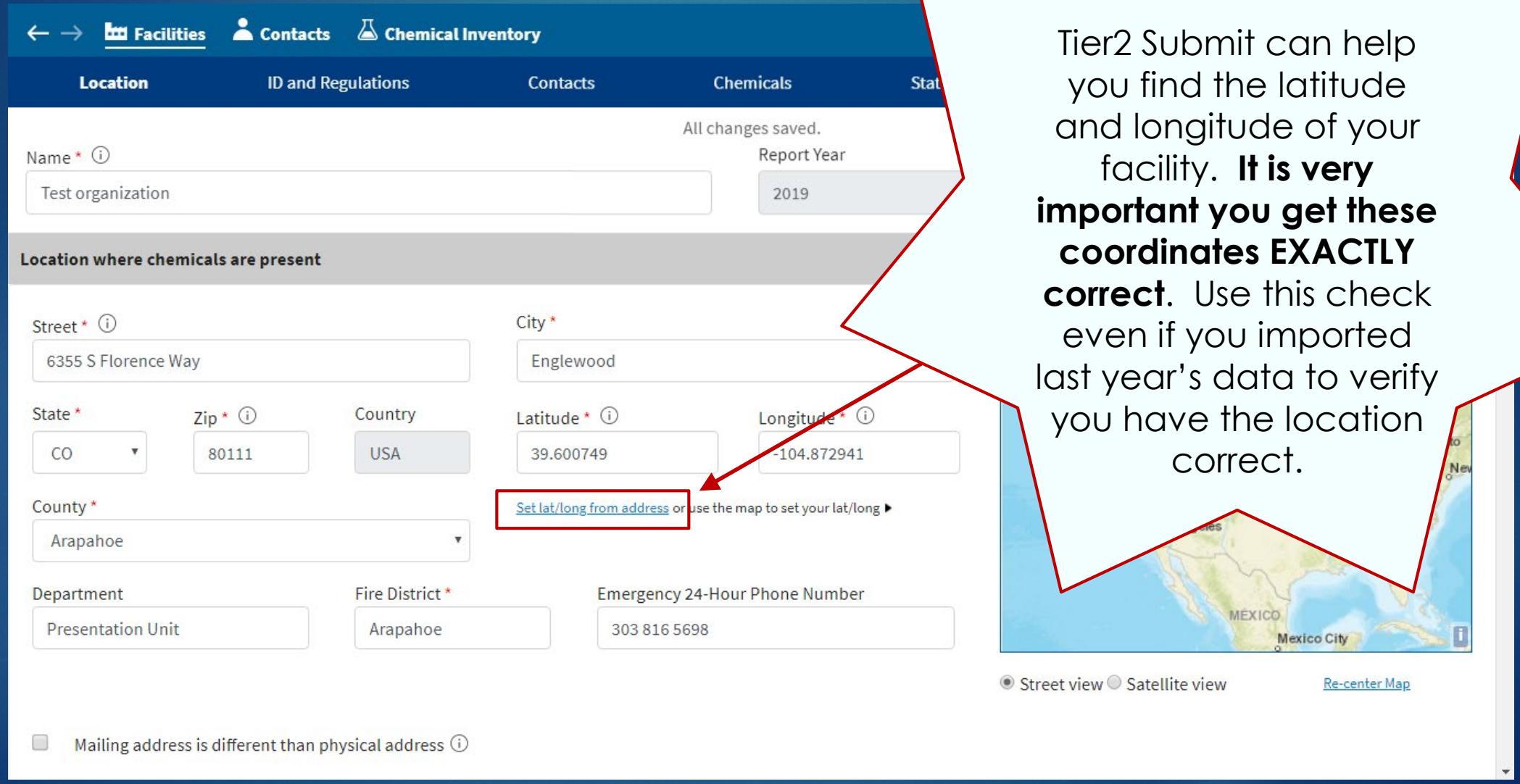
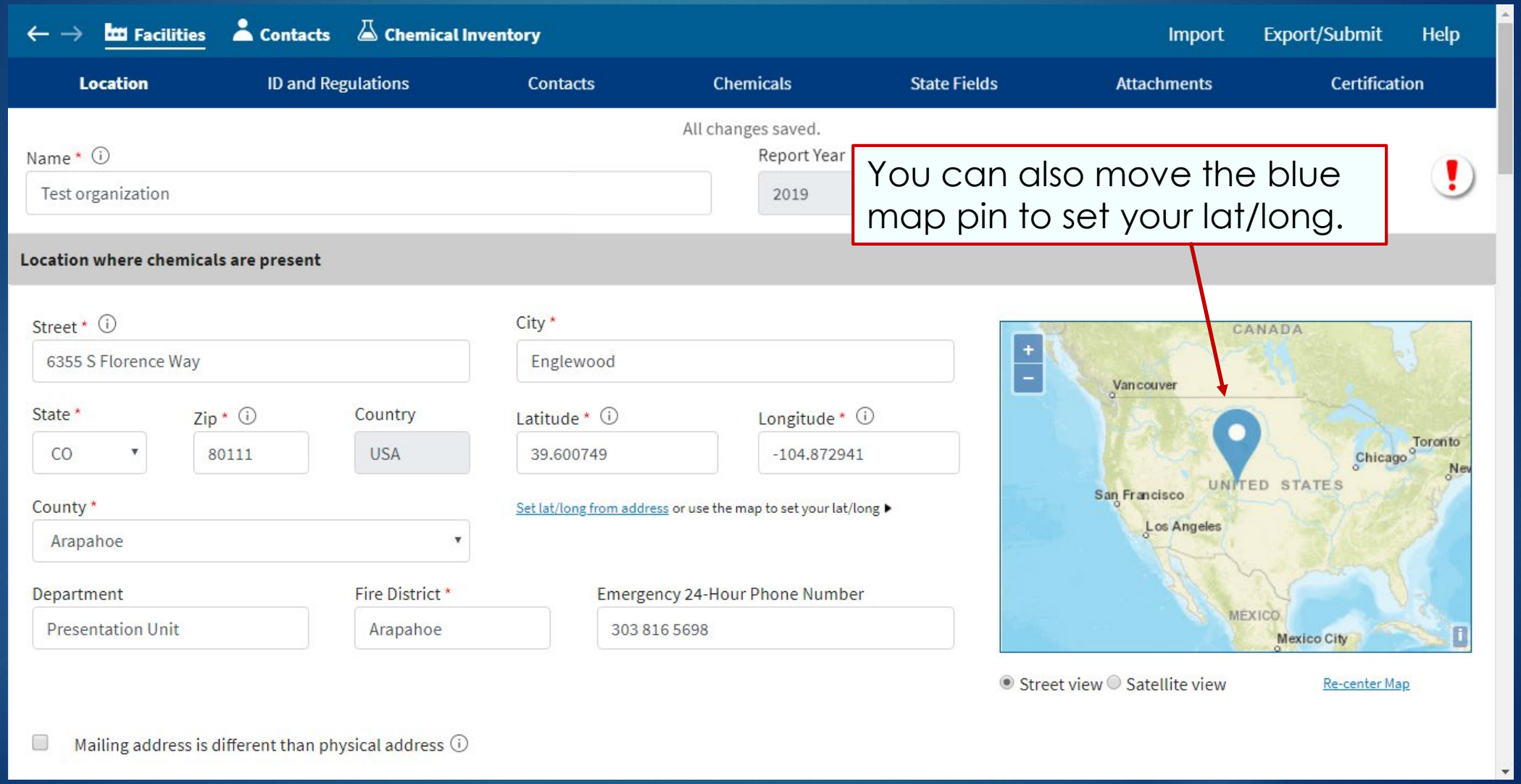
Mexico City
Street view
Satellite view
Re-center Map
Mailing address is different than physical address

Location



Tier2 Submit can help you find the latitude and longitude of your facility. **It is very important you get these coordinates EXACTLY correct.** Use this check even if you imported last year's data to verify you have the location correct.

Location


Facilities
Contacts
Chemical Inventory
Import
Export/Submit
Help
Location
ID and Regulations
Contacts
Chemicals
State Fields
Attachments
Certification
All changes saved.
Name *
Test organization
Report Year
2019
You can also move the blue map pin to set your lat/long.
Location where chemicals are present
Street *
6355 S Florence Way
City *
Englewood
State *
CO
Zip *
80111
Country
USA
Latitude *
39.600749
Longitude *
-104.872941
Set lat/long from address or use the map to set your lat/long
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Street view
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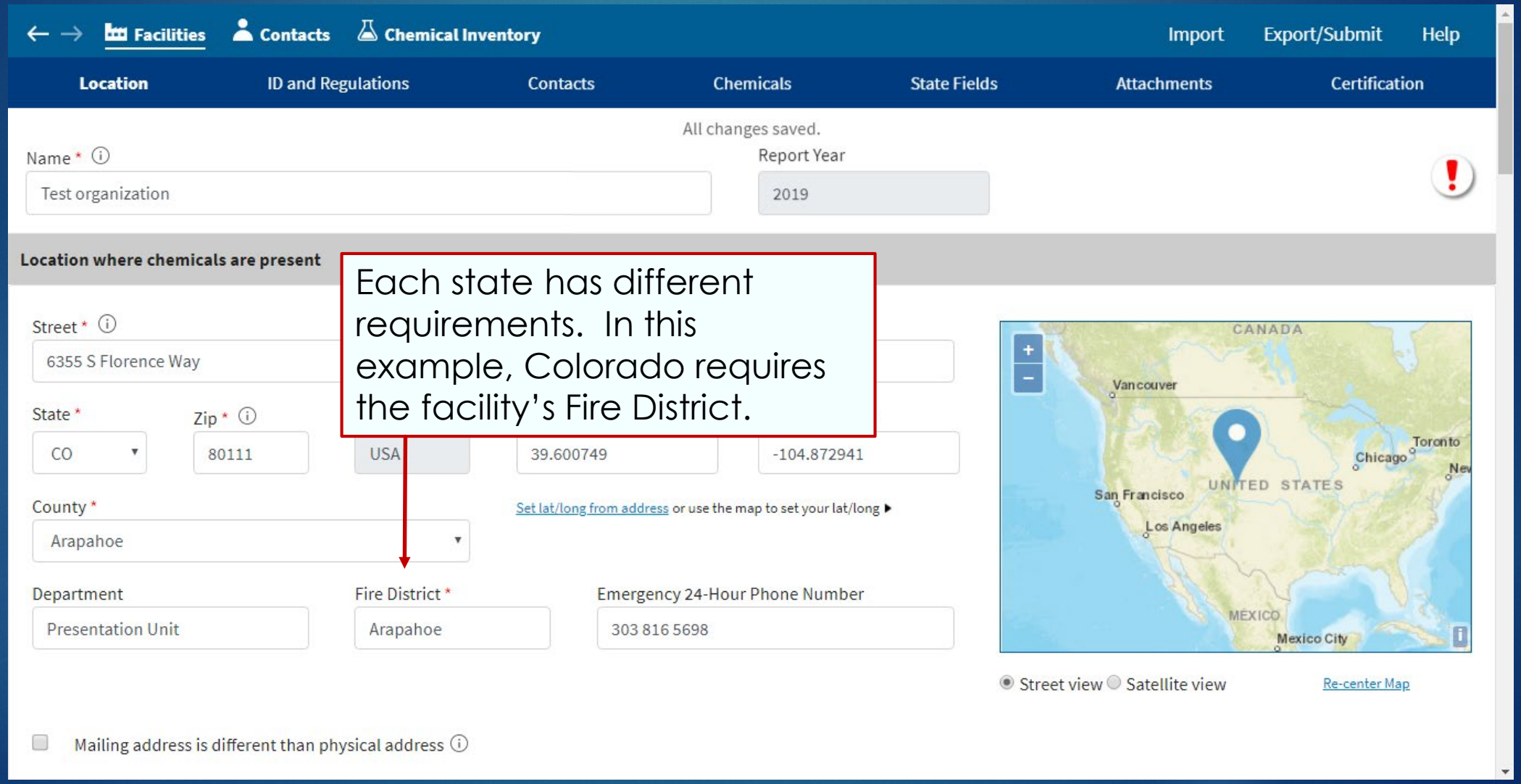
Re-center Map
Mailing address is different than physical address

Location


Facilities
Contacts
Chemical Inventory
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Export/Submit
Help
Location
ID and Regulations
Contacts
Chemicals
State Fields
Attachments
Certification
All changes saved.
Name *
Test organization
Report Year
2019
Location where chemicals are present
Each state has different requirements. In this example, Colorado requires the facility's Fire District.
Street *
6355 S Florence Way
State *
CO
Zip *
80111
USA
39.600749
-104.872941
County *
Arapahoe
Set lat/long from address or use the map to set your lat/long
Department
Presentation Unit
Fire District *
Arapahoe
Emergency 24-Hour Phone Number
303 816 5698
CANADA
Vancouver
Toronto
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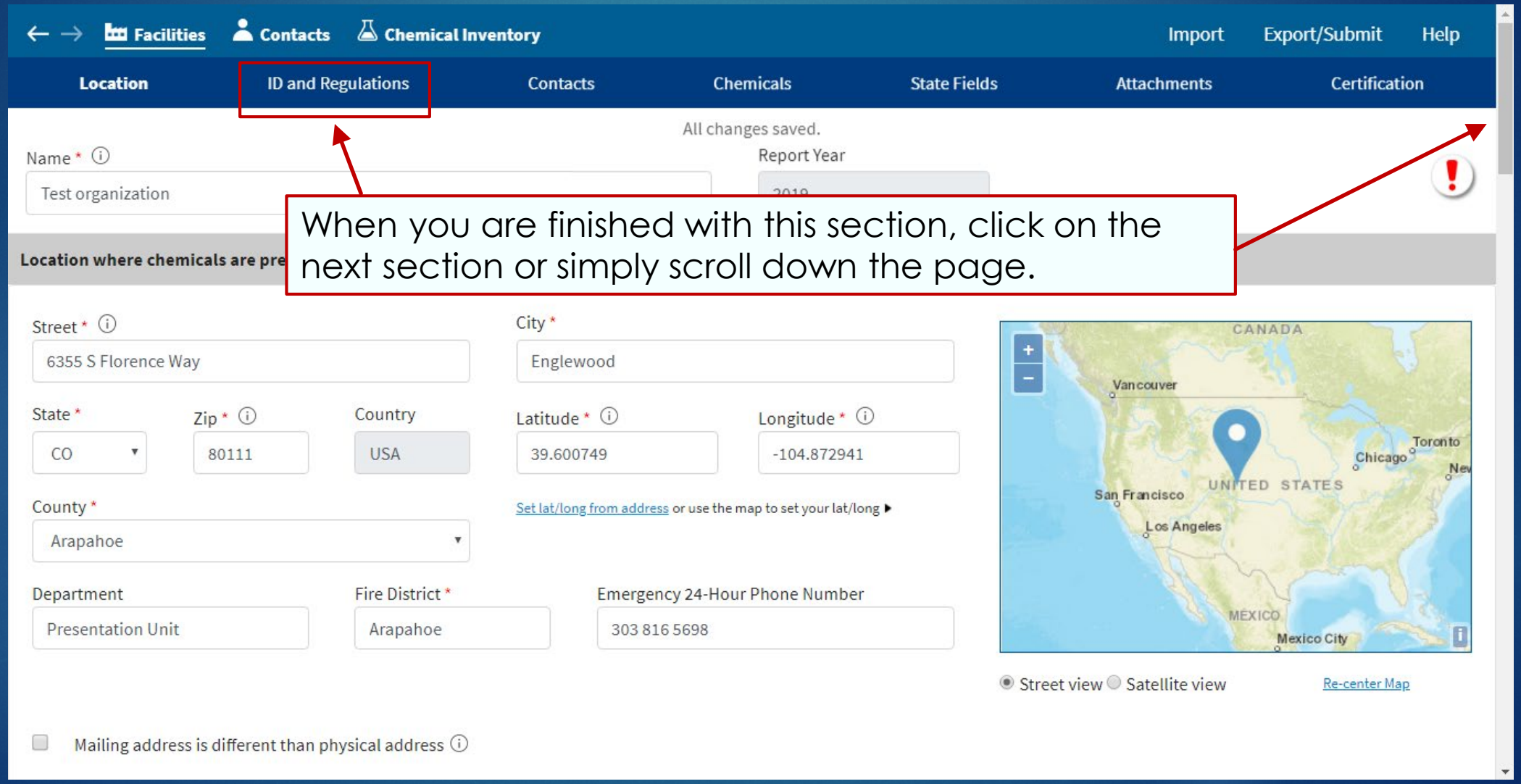
UNITED STATES
San Francisco
Los Angeles
MEXICO
Mexico City
Street view
Satellite view
Re-center Map
Mailing address is different than physical address

Location


Facilities
Contacts
Chemical Inventory
Import
Export/Submit
Help
Location
ID and Regulations
Contacts
Chemicals
State Fields
Attachments
Certification
All changes saved.
Name *
Test organization
Report Year
When you are finished with this section, click on the next section or simply scroll down the page.
Location where chemicals are pre
Street *
6355 S Florence Way
City *
Englewood
State *
CO
Zip *
80111
Country
USA
Latitude *
39.600749
Longitude *
-104.872941
Set lat/long from address or use the map to set your lat/long
County *
Arapahoe
Department
Presentation Unit
Fire District *
Arapahoe
Emergency 24-Hour Phone Number
303 816 5698
CANADA
Vancouver
Toronto
Chicago
UNITED STATES
San Francisco
Los Angeles
MEXICO
Mexico City
Street view
Satellite view
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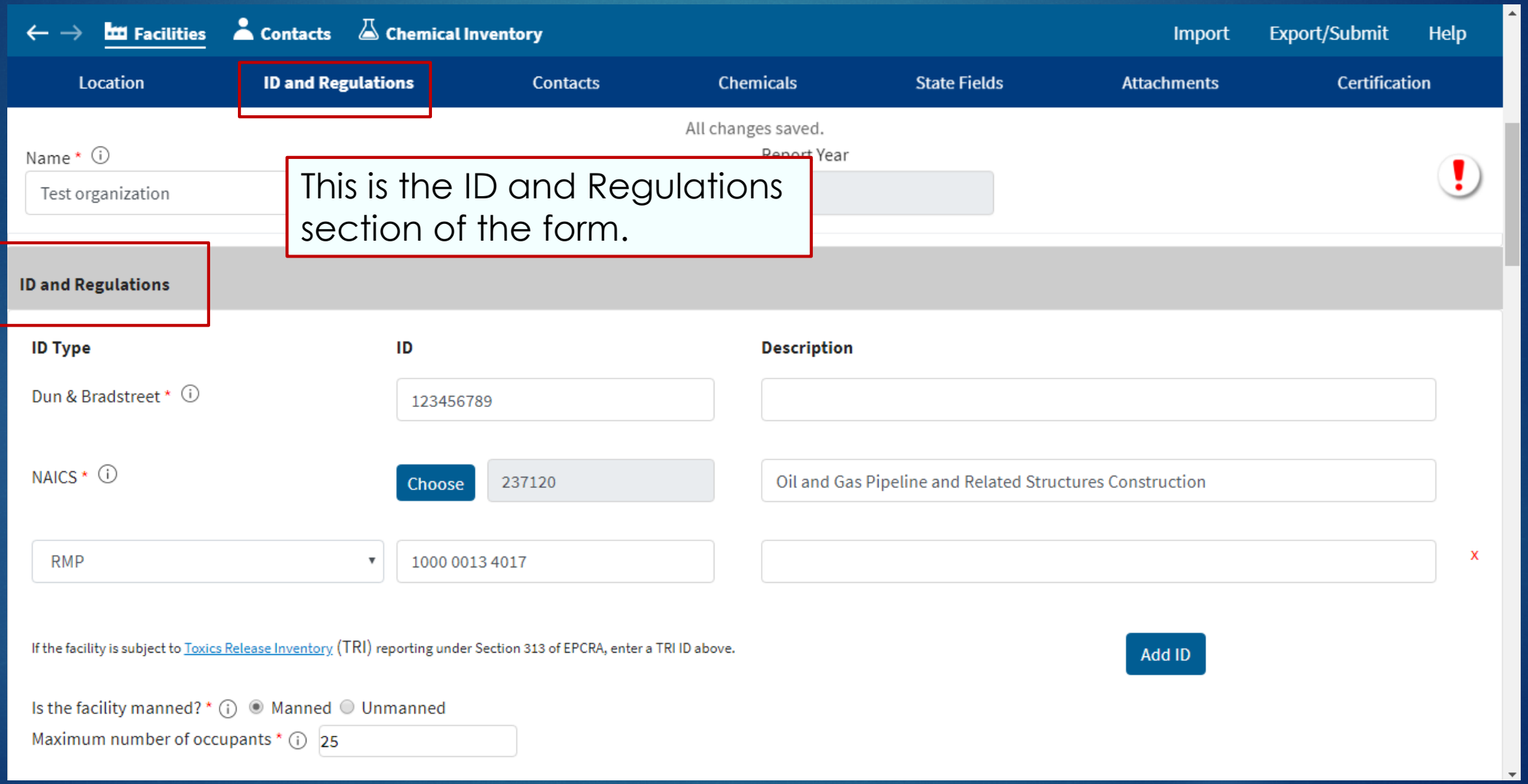
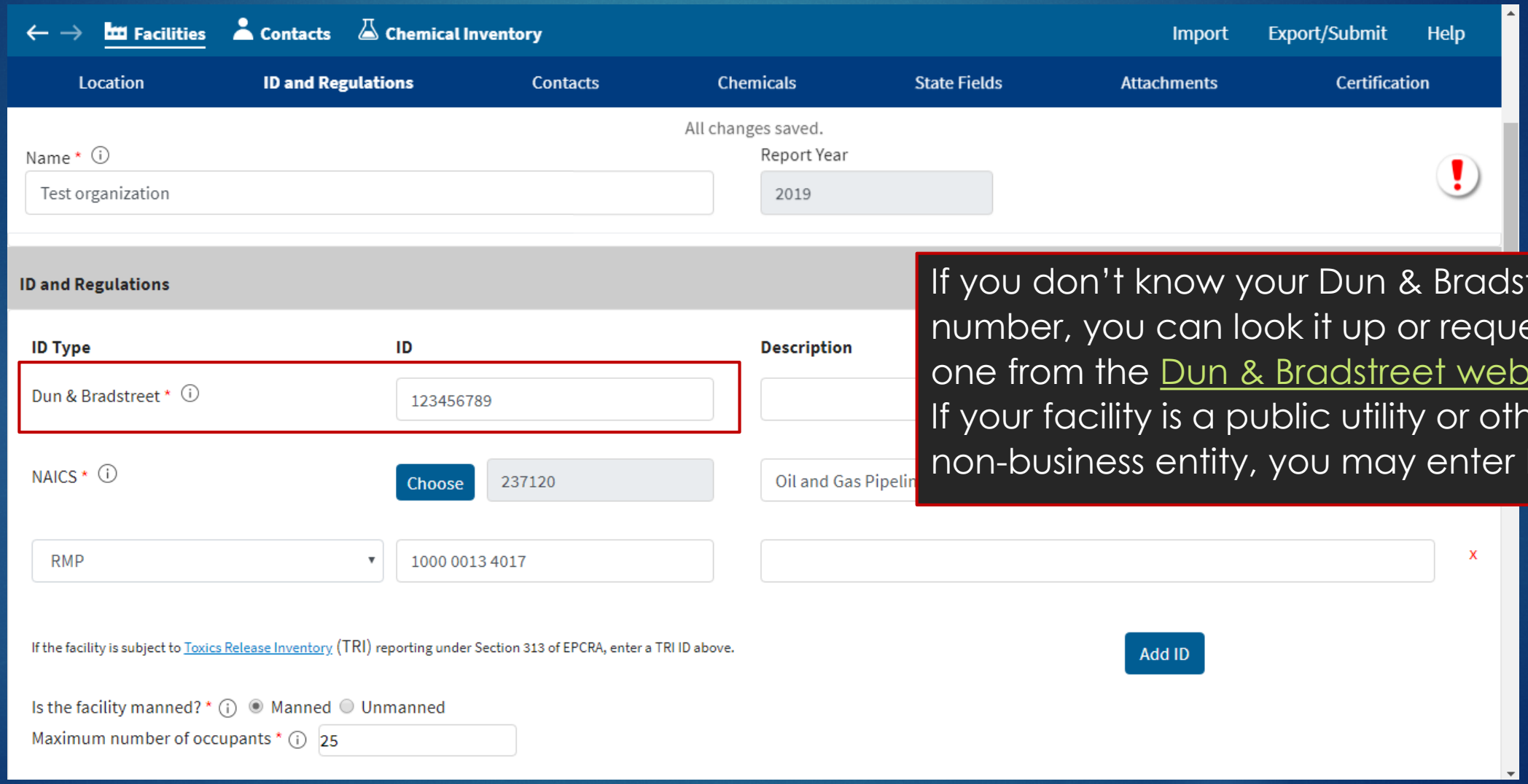
ID and Regulations

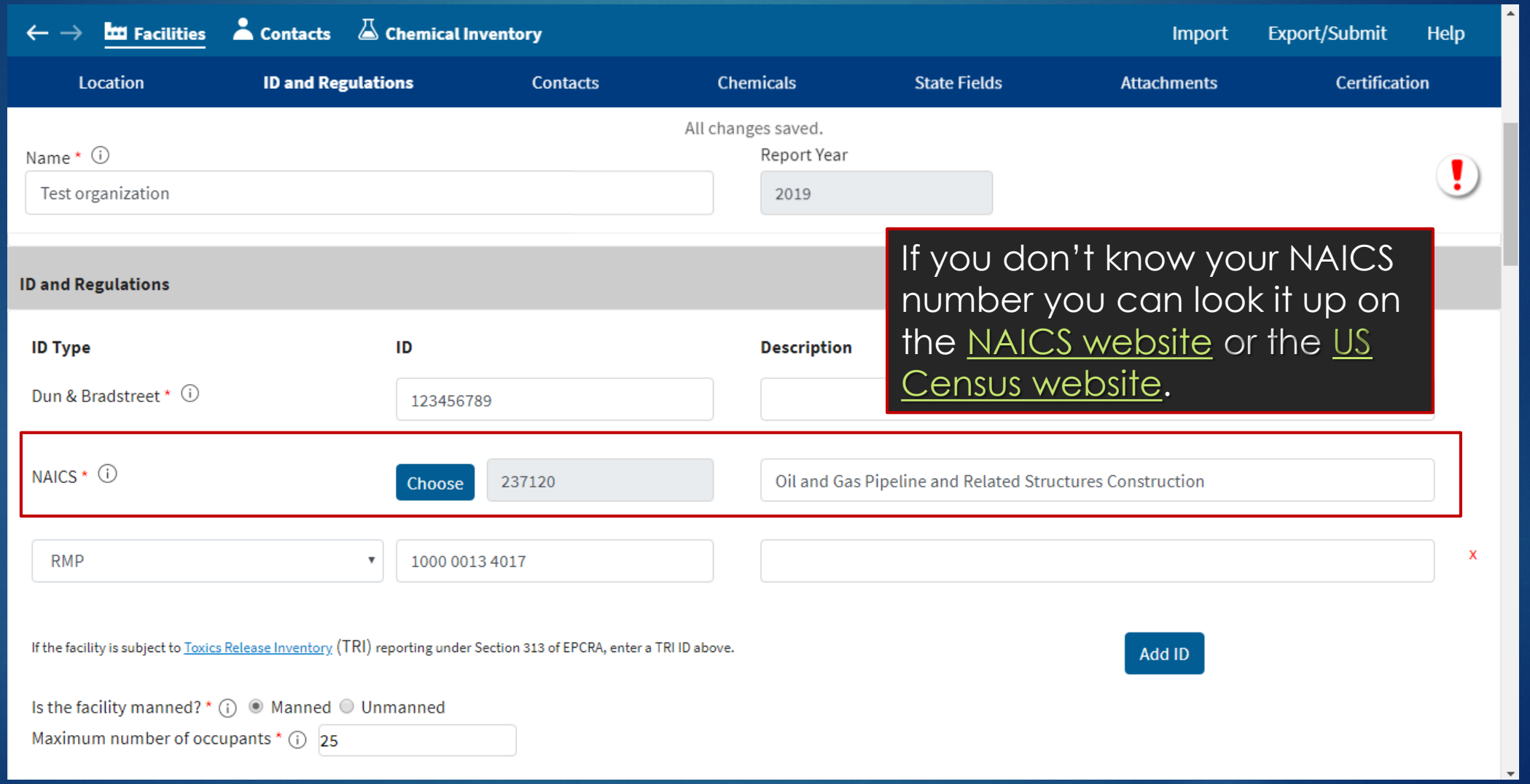


ID and Regulations



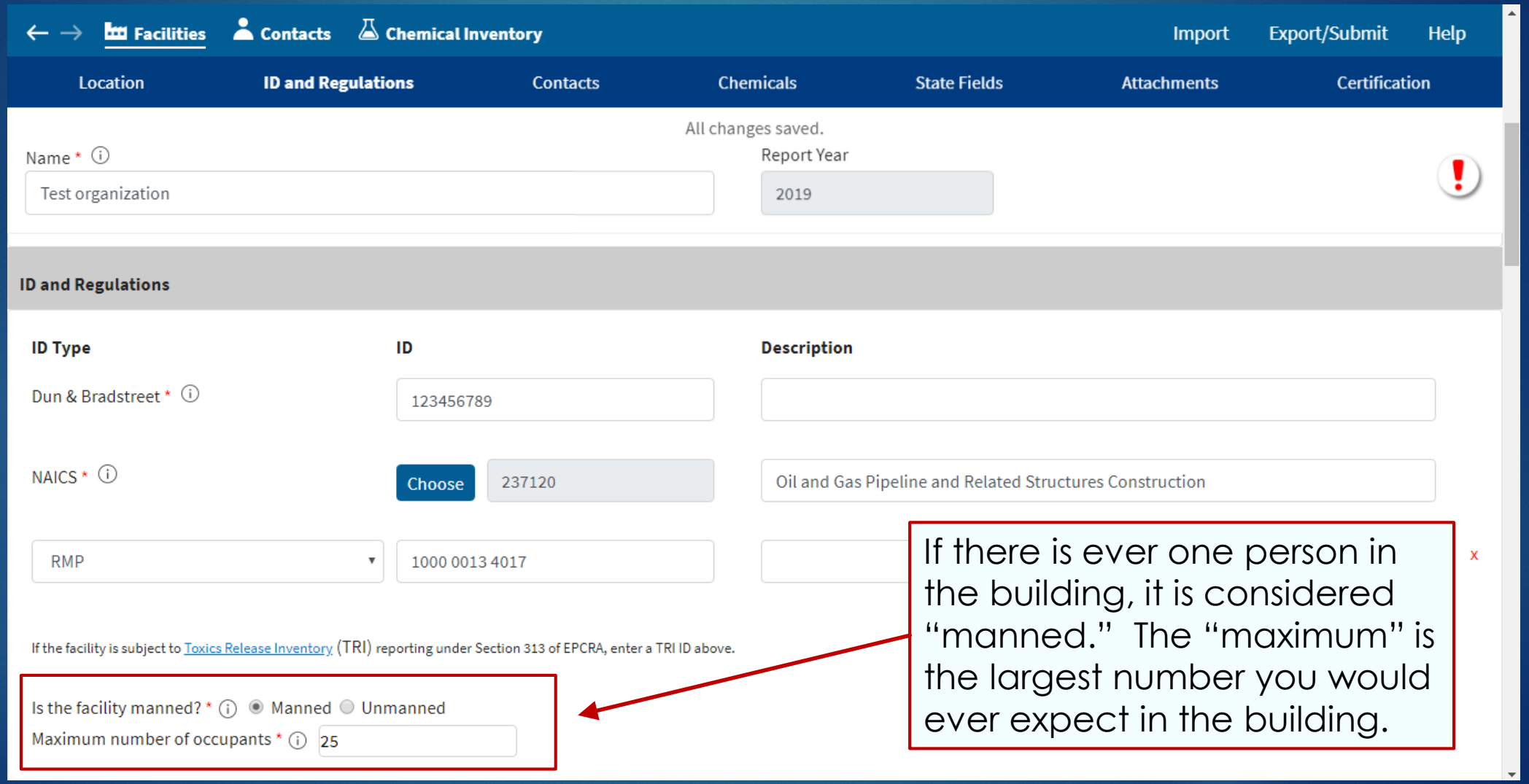
If you don't know your Dun & Bradstreet number, you can look it up or request one from the Dun & Bradstreet website. If your facility is a public utility or other non-business entity, you may enter N/A.

ID and Regulations

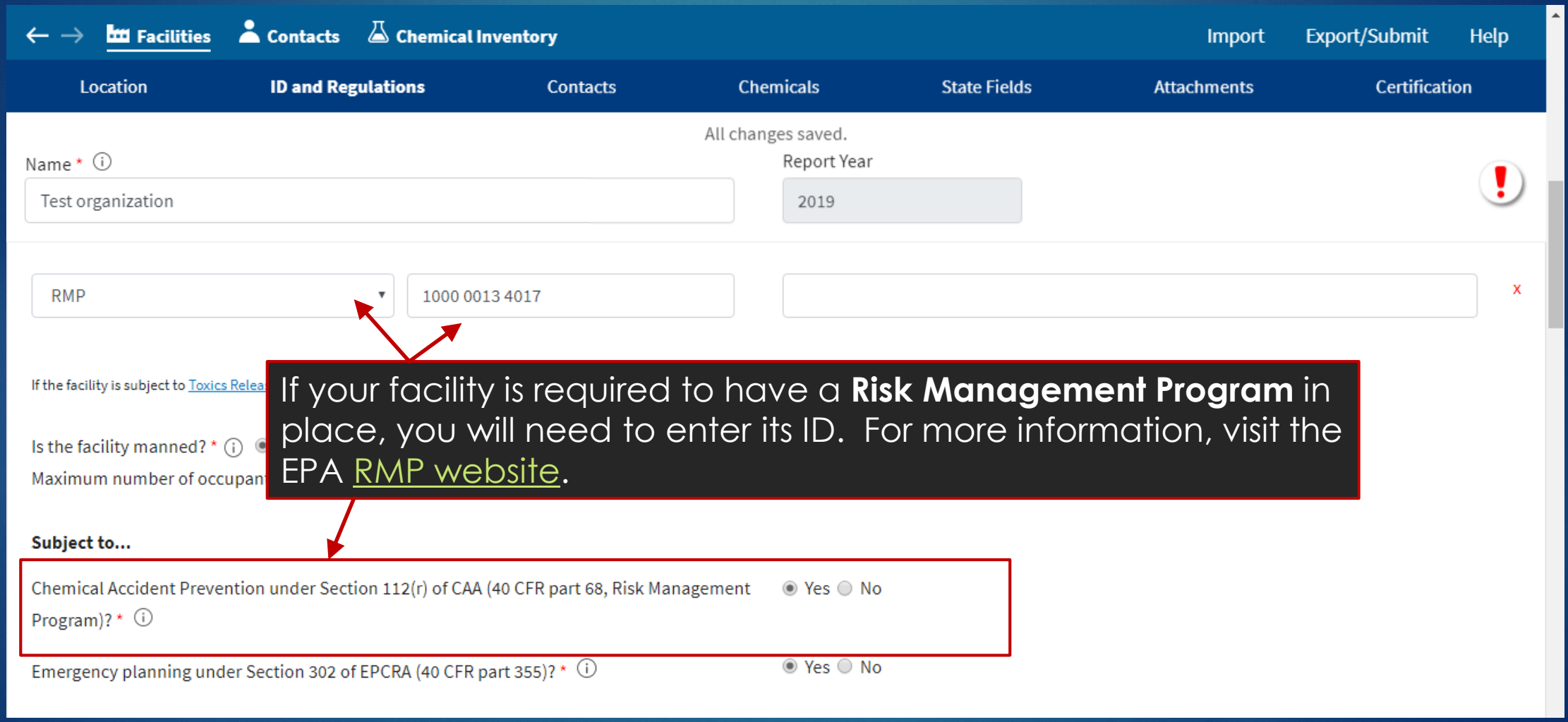


If you don't know your NAICS number you can look it up on the NAICS website or the US Census website.

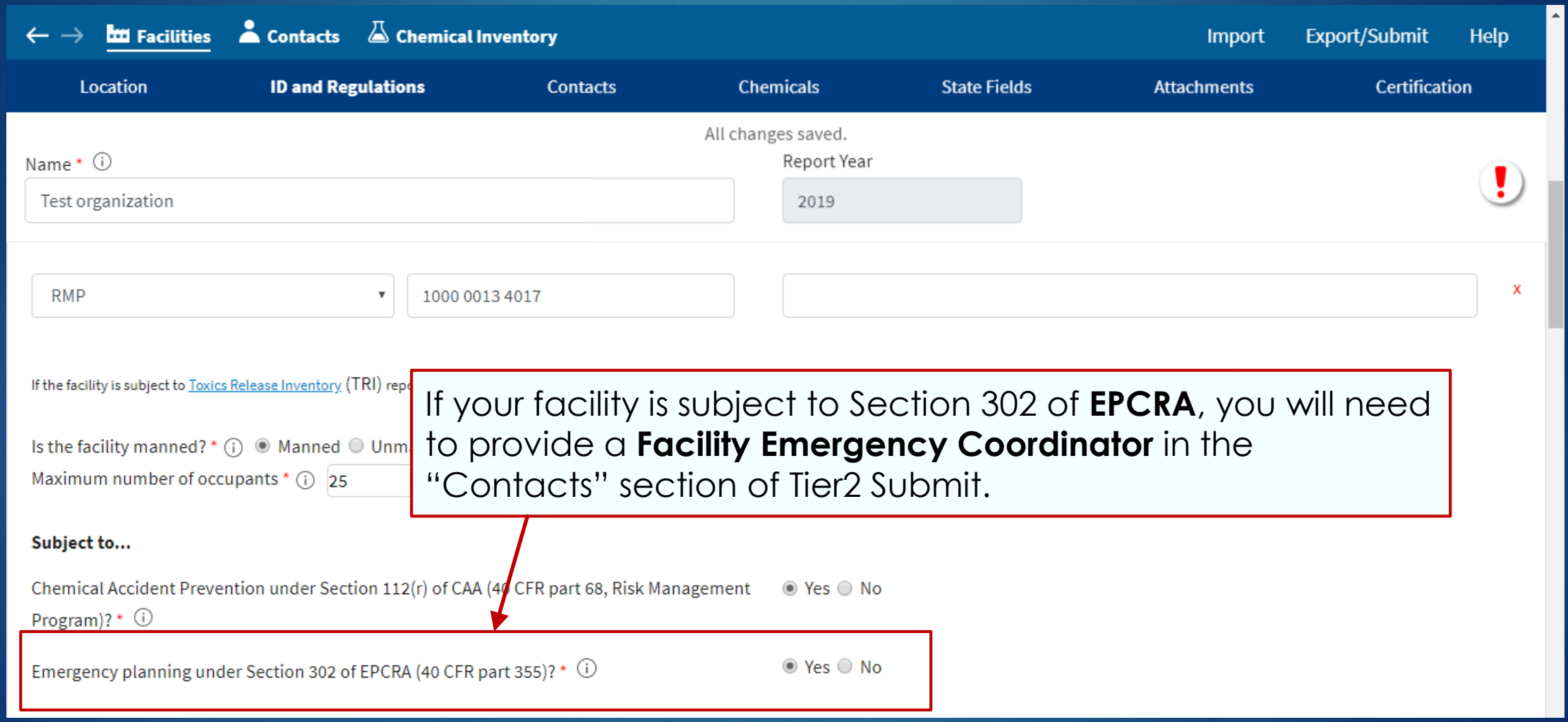
ID and Regulations



ID and Regulations

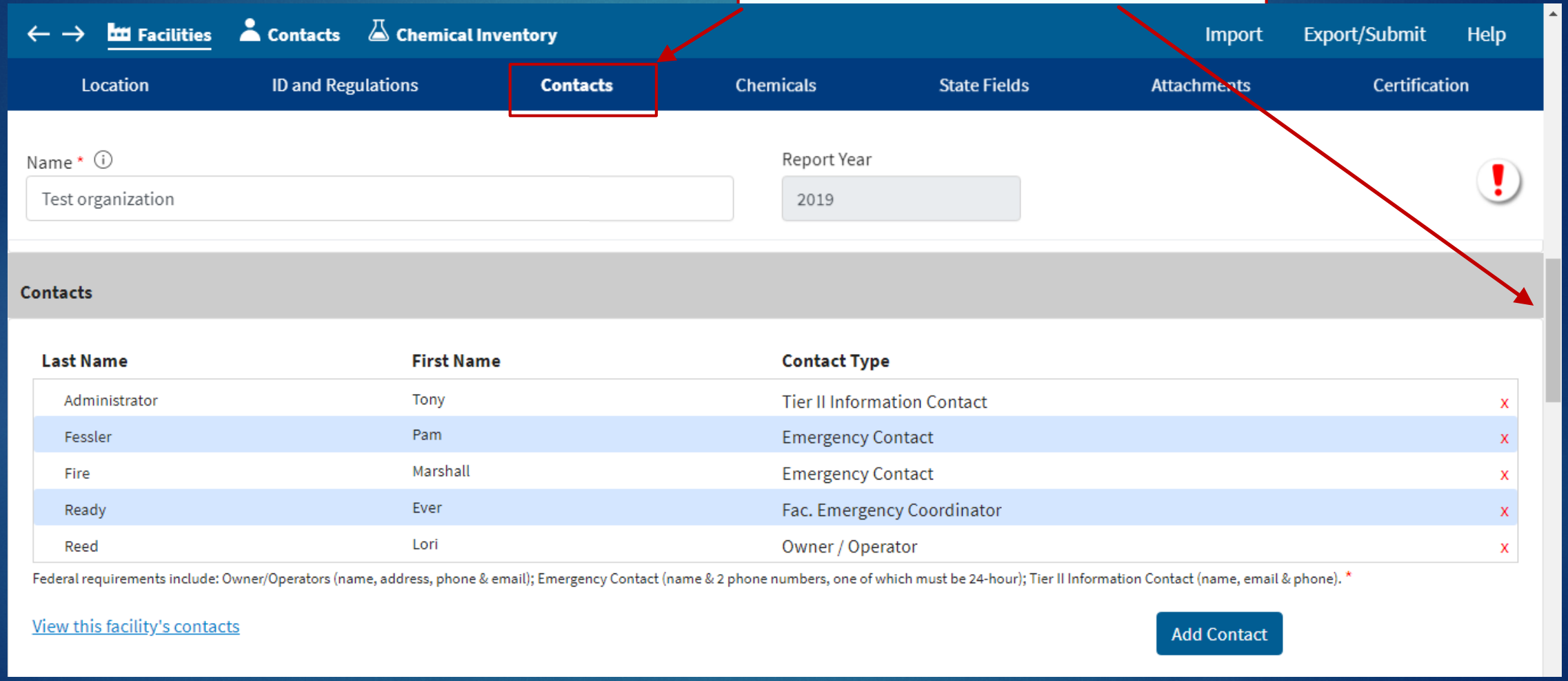


ID and Regulations

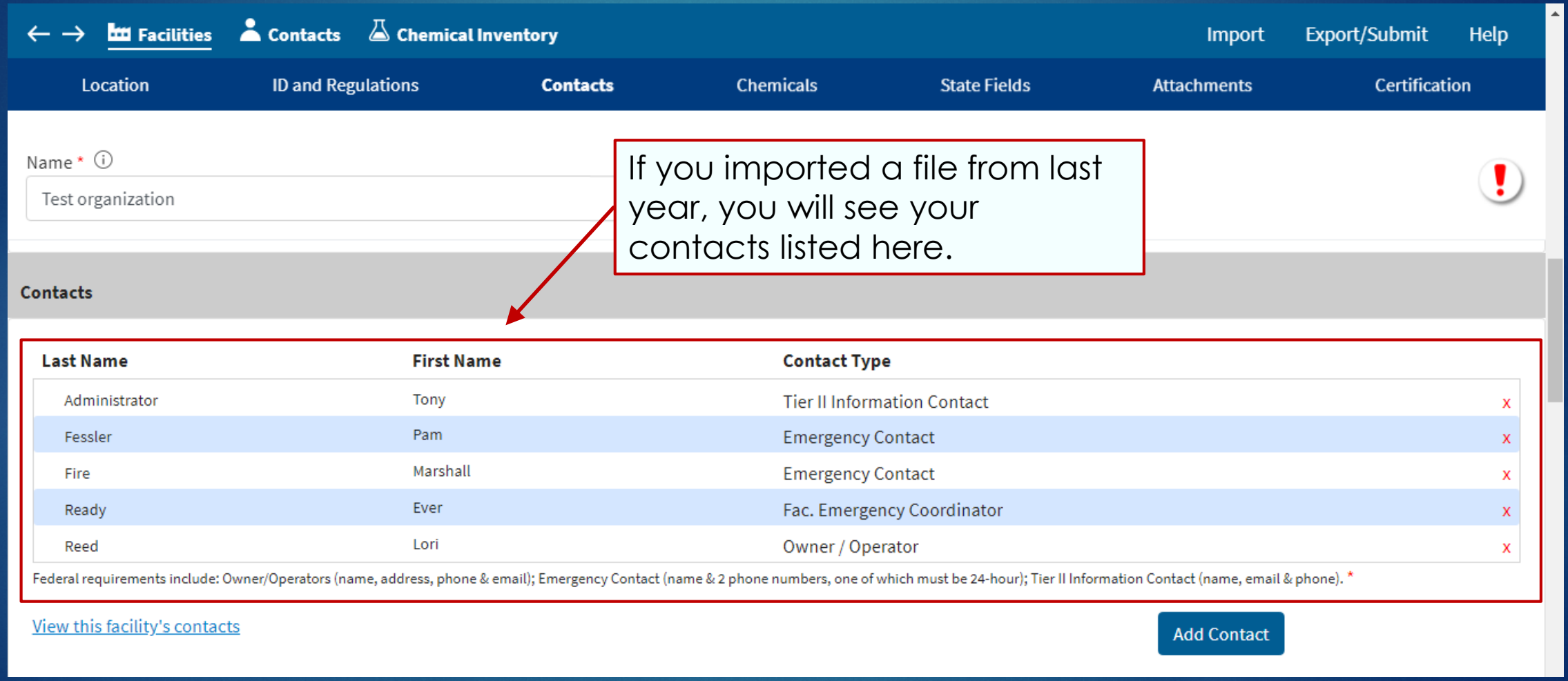


Contacts

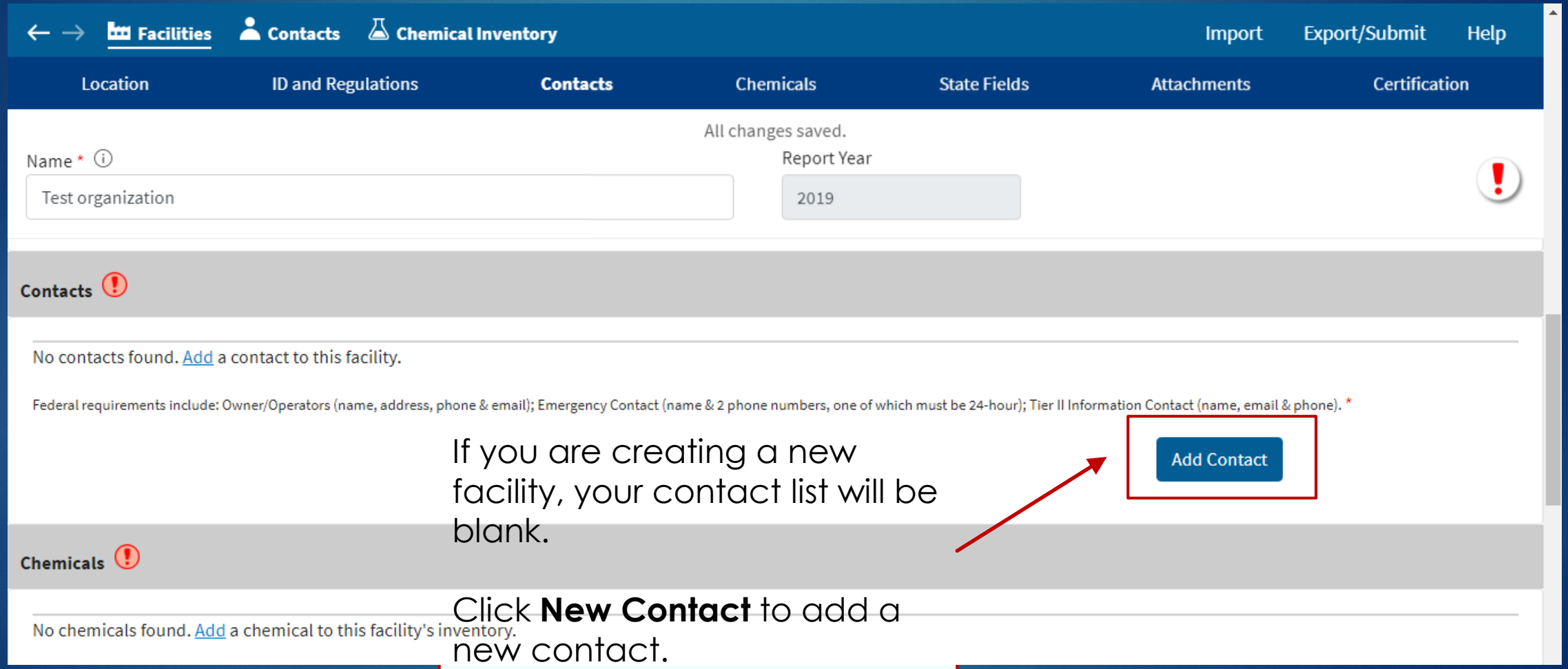
To move on to Contacts, click on **Contacts** or scroll down.



Contacts


Facilities
Contacts
Chemical Inventory
Import
Export/Submit
Help
Location
ID and Regulations
Contacts
Chemicals
State Fields
Attachments
Certification
Name *
Test organization
If you imported a file from last year, you will see your contacts listed here.
Contacts
Last Name
First Name
Contact Type
Administrator
Tony
Tier II Information Contact
Fessler
Pam
Emergency Contact
Fire
Marshall
Emergency Contact
Ready
Ever
Fac. Emergency Coordinator
Reed
Lori
Owner / Operator
Federal requirements include: Owner/Operators (name, address, phone & email); Emergency Contact (name & 2 phone numbers, one of which must be 24-hour); Tier II Information Contact (name, email & phone). *
View this facility's contacts
Add Contact

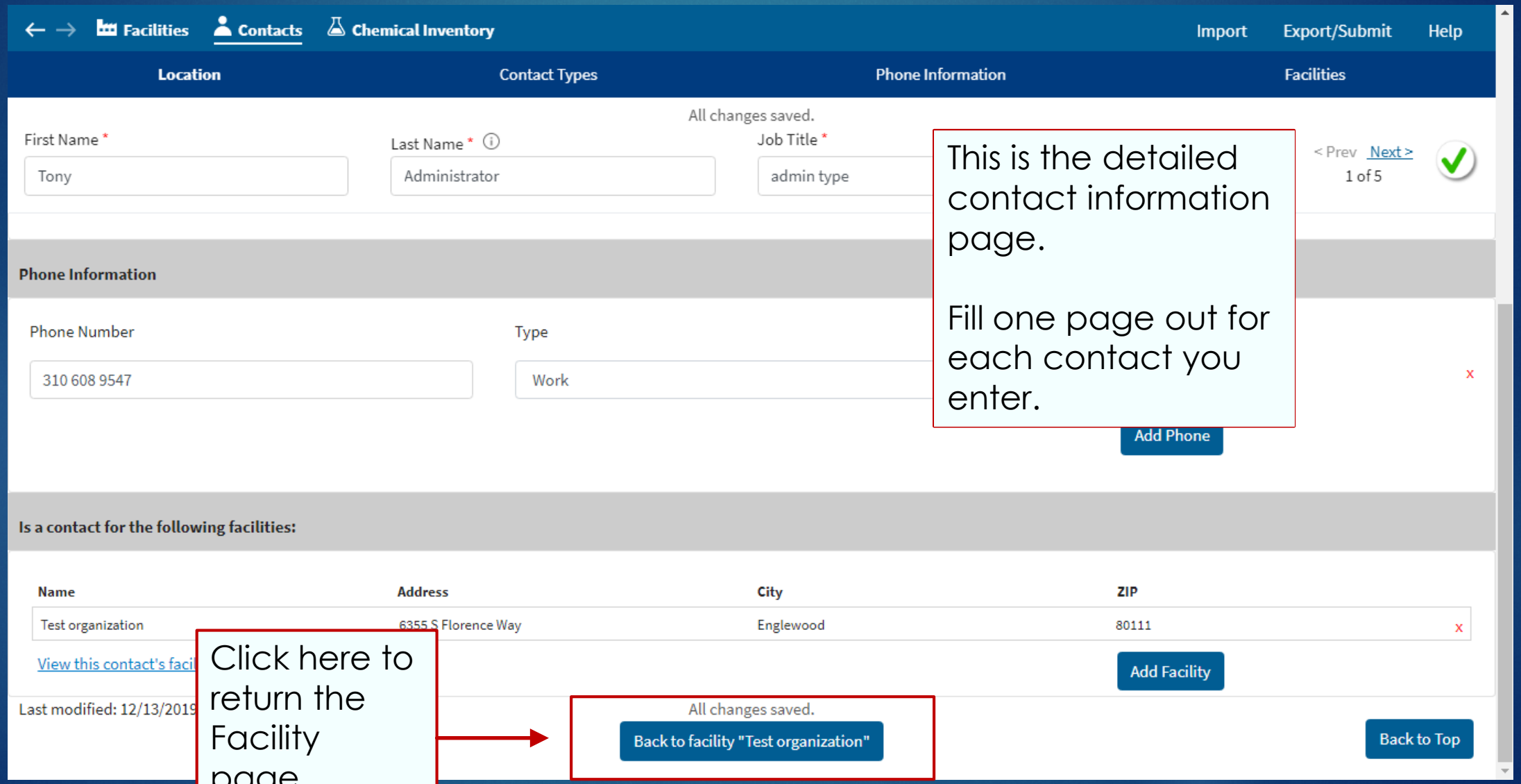
Contacts



If you are creating a new facility, your contact list will be blank.

Click **New Contact** to add a new contact.

Contacts



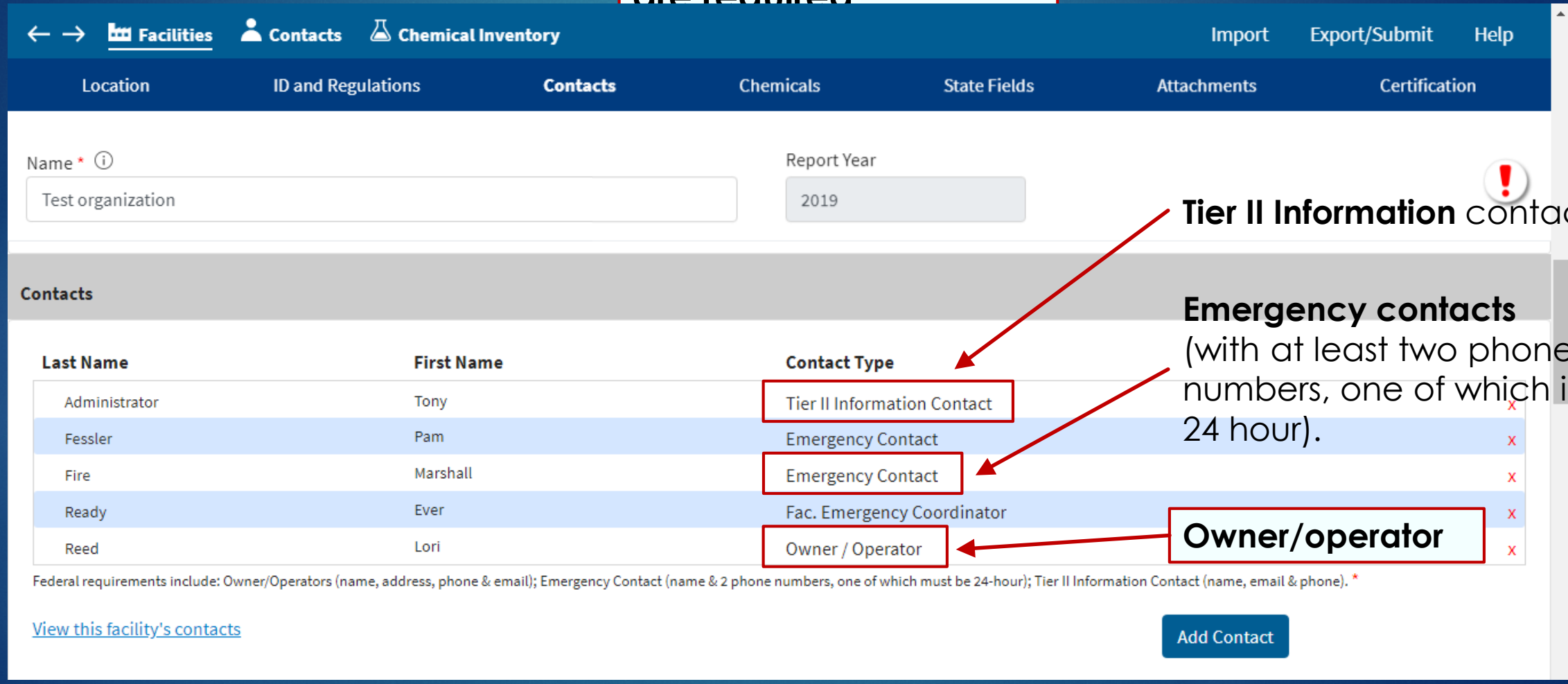
This is the detailed contact information page.

Fill one page out for each contact you enter.

Click here to return the Facility page.

Contacts

Three contacts types **are required**

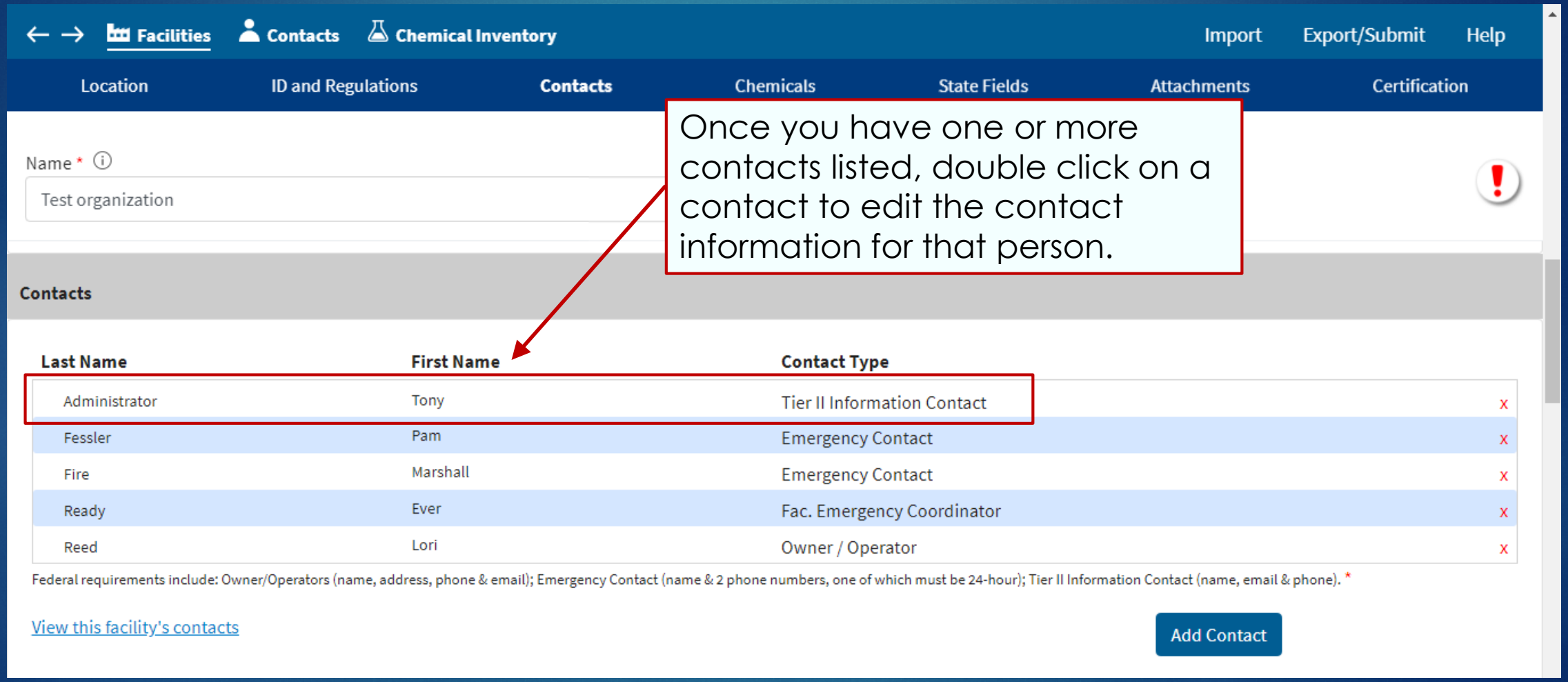


Tier II Information contact

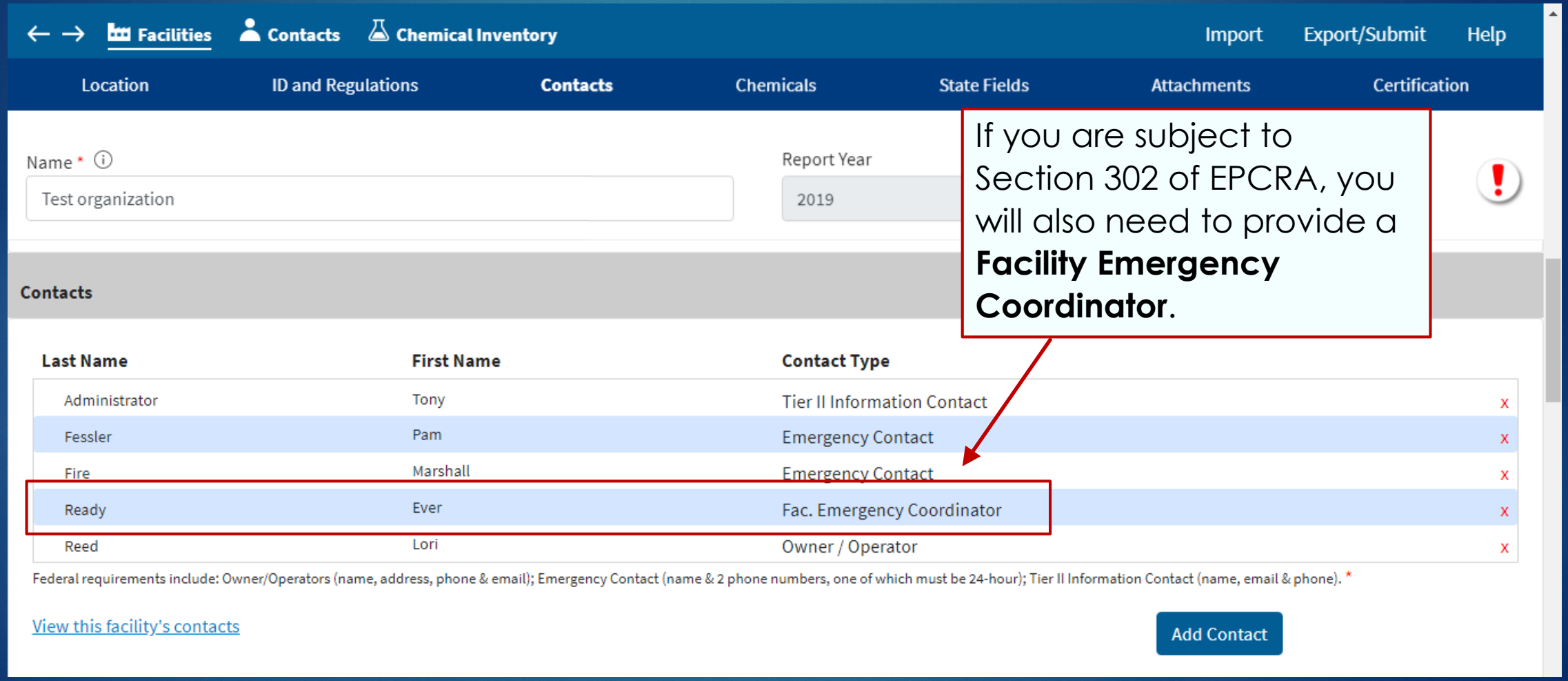
Emergency contacts (with at least two phone numbers, one of which is 24 hour).

Owner/operator

Contacts


Facilities
Contacts
Chemical Inventory
Import
Export/Submit
Help
Location
ID and Regulations
Contacts
Chemicals
State Fields
Attachments
Certification
Name *
Test organization
Once you have one or more contacts listed, double click on a contact to edit the contact information for that person.
Contacts
Last Name
First Name
Contact Type
Administrator
Tony
Tier II Information Contact
Fessler
Pam
Emergency Contact
Fire
Marshall
Emergency Contact
Ready
Ever
Fac. Emergency Coordinator
Reed
Lori
Owner / Operator
Federal requirements include: Owner/Operators (name, address, phone & email); Emergency Contact (name & 2 phone numbers, one of which must be 24-hour); Tier II Information Contact (name, email & phone). *
View this facility's contacts
Add Contact

Contacts


Facilities
Contacts
Chemical Inventory
Import
Export/Submit
Help
Location
ID and Regulations
Contacts
Chemicals
State Fields
Attachments
Certification
Name *
Test organization
Report Year
2019
If you are subject to Section 302 of EPCRA, you will also need to provide a **Facility Emergency Coordinator**.
Contacts
Last Name
First Name
Contact Type
Administrator
Tony
Tier II Information Contact
Fessler
Pam
Emergency Contact
Fire
Marshall
Emergency Contact
Ready
Ever
Fac. Emergency Coordinator
Reed
Lori
Owner / Operator
Federal requirements include: Owner/Operators (name, address, phone & email); Emergency Contact (name & 2 phone numbers, one of which must be 24-hour); Tier II Information Contact (name, email & phone). *
View this facility's contacts
Add Contact

In the next part of Tier2 Submit…

- You add or verify chemicals you are required to report: either **Hazardous Chemicals, Extremely Hazardous Substances,** or a mixture containing these chemicals.
- **Hazardous Chemicals** require OSHA Safety Data Sheets (SDSs).
- **Extremely Hazardous Substances (EHSs)** are identified in the List of Lists and 40 CFR Part 355, Appendix A and Appendix B.
- CAMEO Chemicals can be used to search for EHSs.

Tier II Reporting Quantities

- 10,000 pounds for **Hazardous Chemicals that are non-EHSs**
- 500 pounds or the TPQ for **Extremely Hazardous Substances** (EHSs), whichever is lower
- 75,000 gallons for gasoline or 100,000 gallons for diesel, ***if*** stored underground (UST) at a ***retail*** facility

Qualifying Quantities

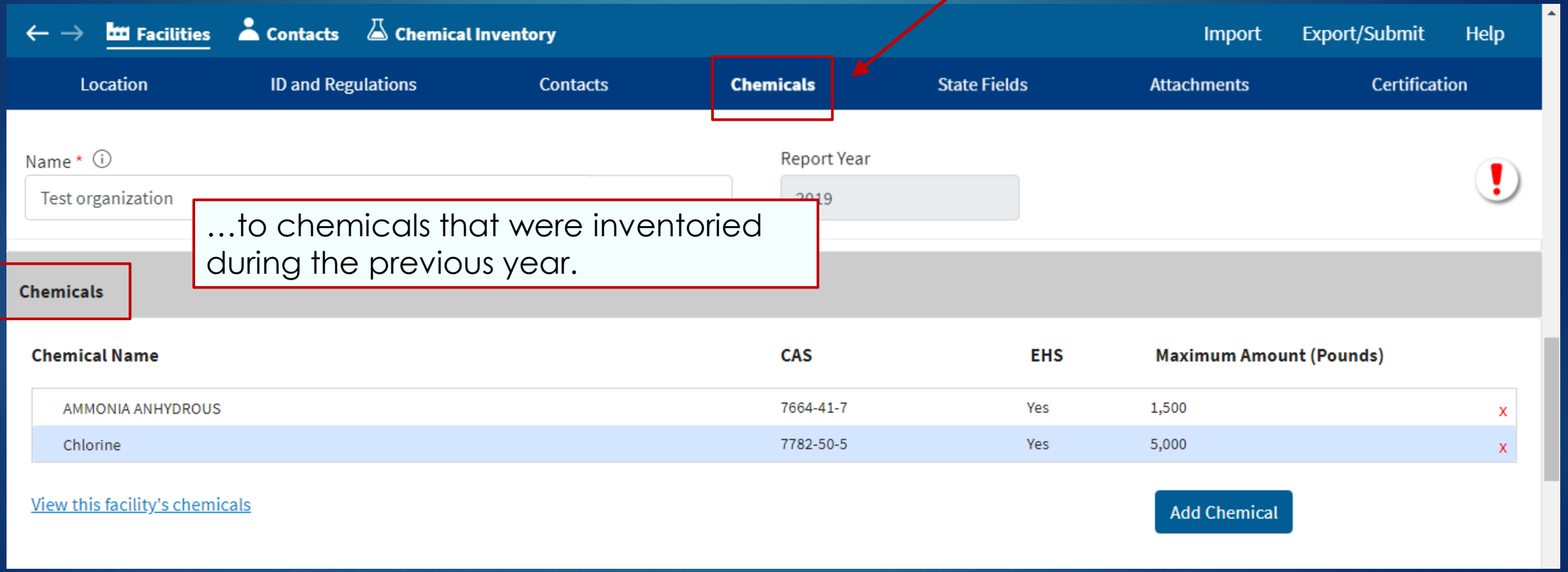
	Section 302	Section 304	Sections 311/312	Section 313
Chemicals Covered	355 Extremely Hazardous Substances	>1,000 substances	Approximately 500,000 hazardous chemicals	> 650 Toxic Chemicals and categories
Thresholds	Threshold Planning Quantity 1-10,000 pounds on site at any one time	Reportable quantity, 1-5,000 pounds, released in a 24-hour period	500 pounds or TPQ whichever is less for EHSs; 75,000 gallons for gasoline; 100,000 gallons for diesel and 10,000 pounds for all other hazardous chemicals	25,000 pounds per year manufactured or processed; 10,000 pounds a year otherwise used; persistent bioaccumulative toxics have lower thresholds

Excerpt from: Emergency Planning and Community Right-to-Know Act
Office of Emergency Management. For more information, click on the Fact Sheet.

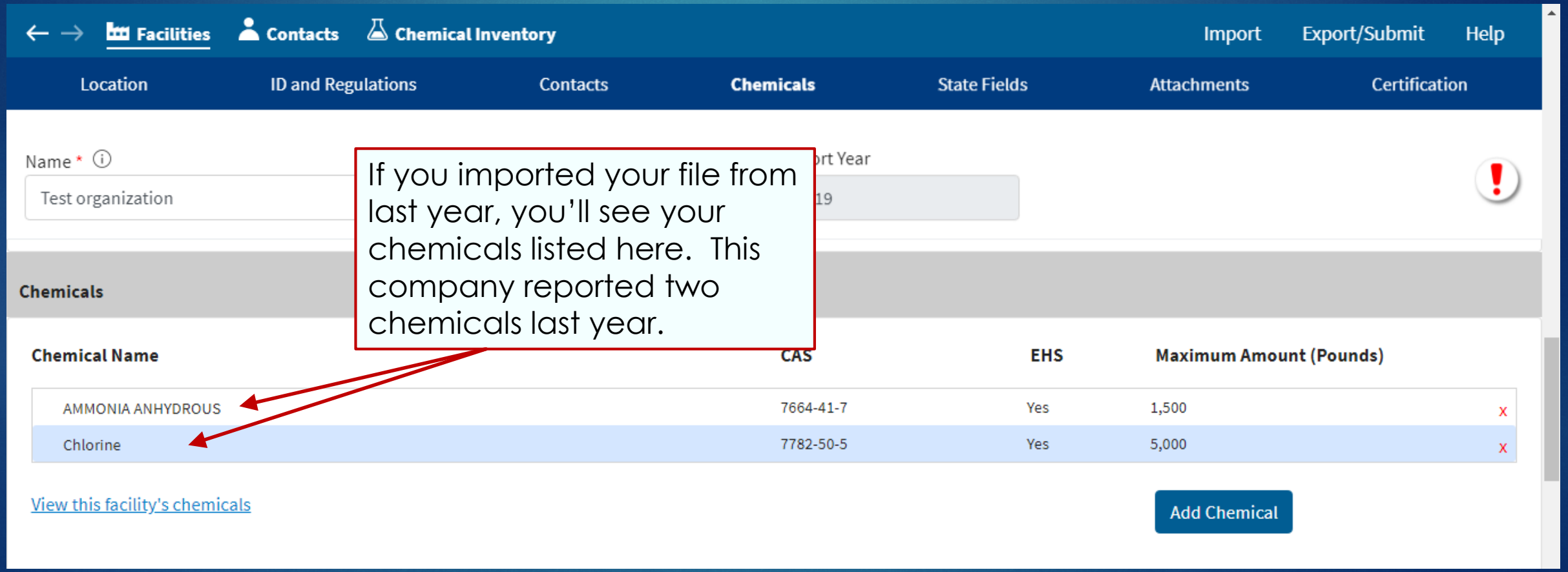
Office of Emergency Management *Fact Sheet*

Chemicals

Moving down the form…

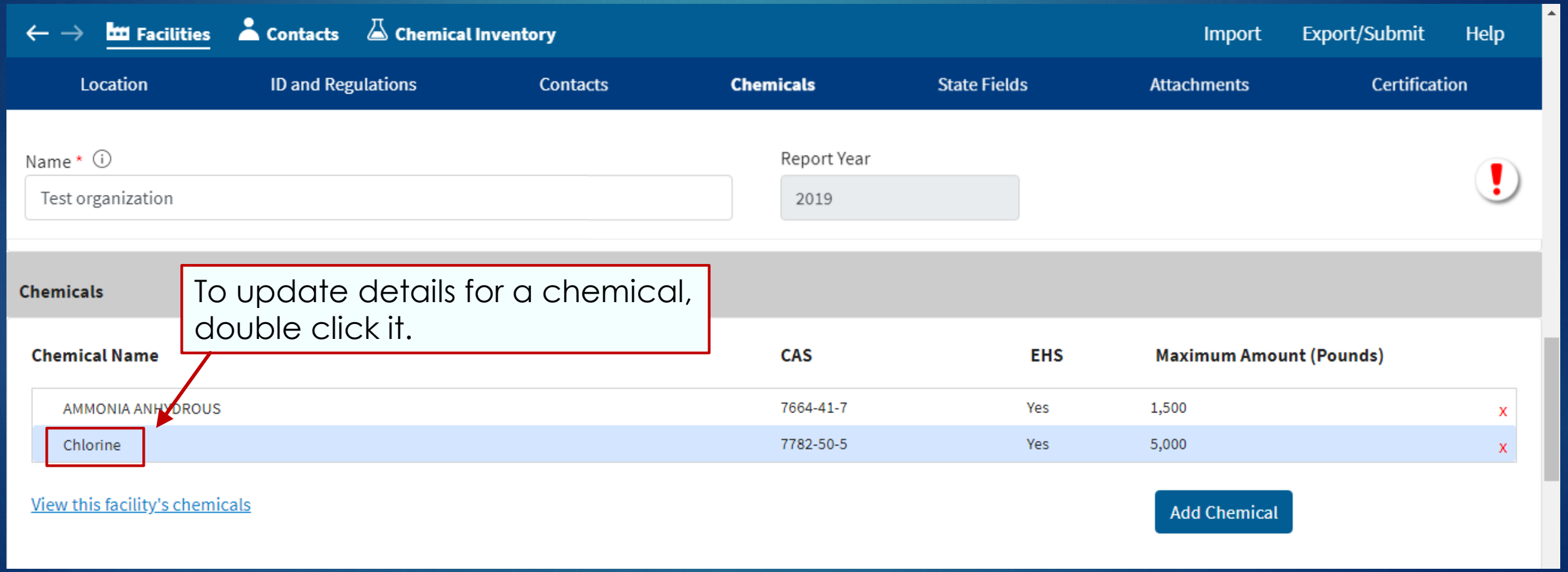


Chemicals

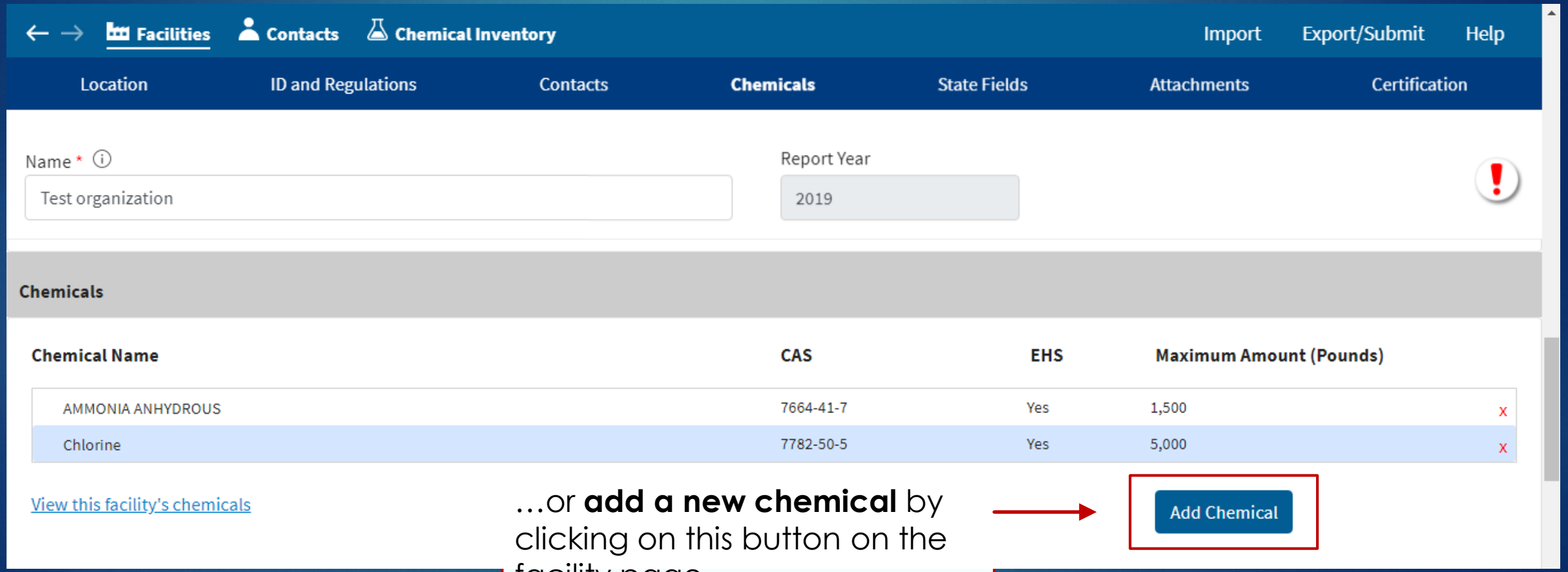


If you imported your file from last year, you'll see your chemicals listed here. This company reported two chemicals last year.

Chemicals

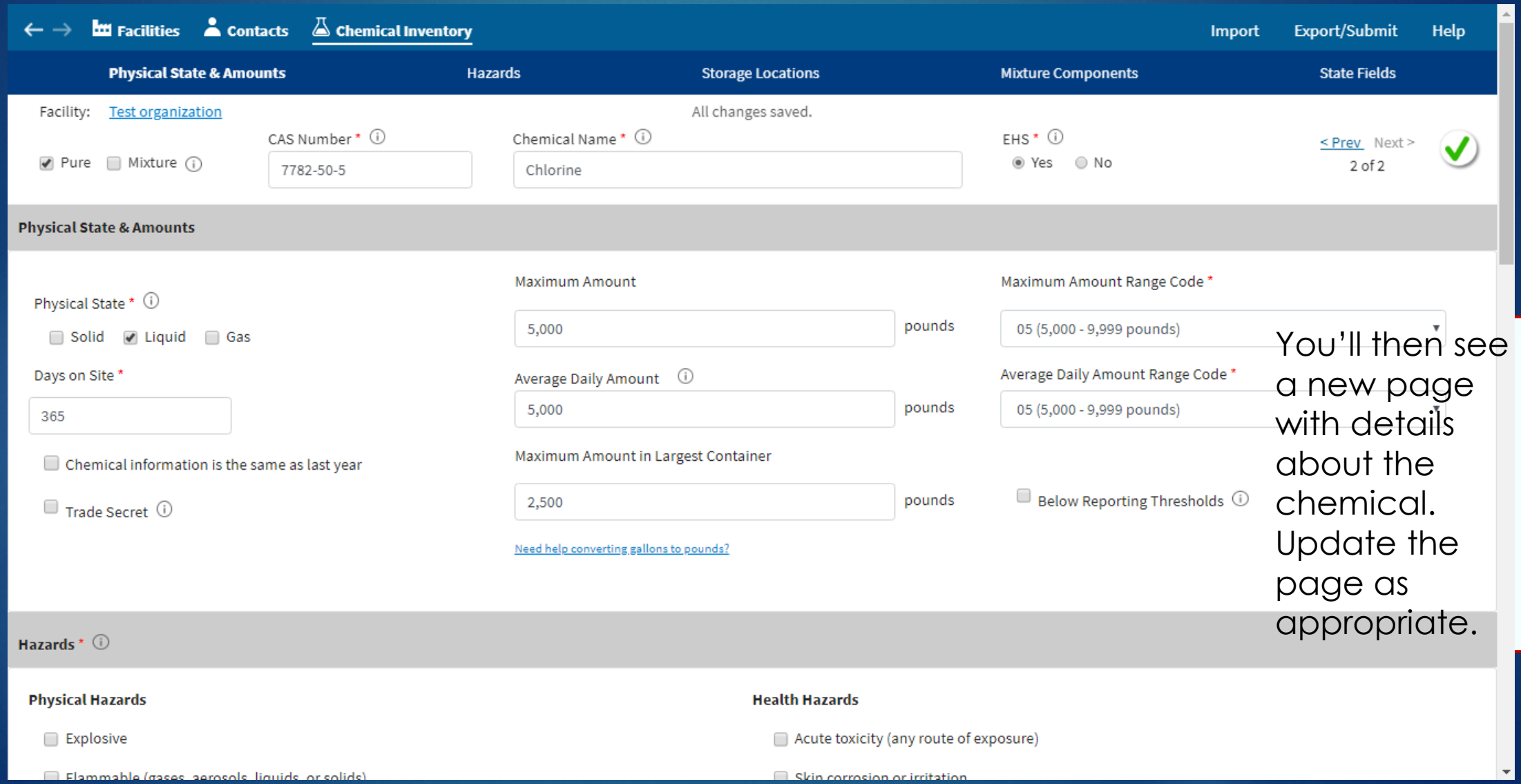

Facilities
Contacts
Chemical Inventory
Import
Export/Submit
Help
Location
ID and Regulations
Contacts
Chemicals
State Fields
Attachments
Certification
Name *
Test organization
Report Year
2019
Chemicals
To update details for a chemical, double click it.
Chemical Name
CAS
EHS
Maximum Amount (Pounds)
AMMONIA ANHYDROUS
7664-41-7
Yes
1,500
Chlorine
7782-50-5
Yes
5,000
View this facility's chemicals
Add Chemical

Chemicals



…or **add a new chemical** by clicking on this button on the facility page.

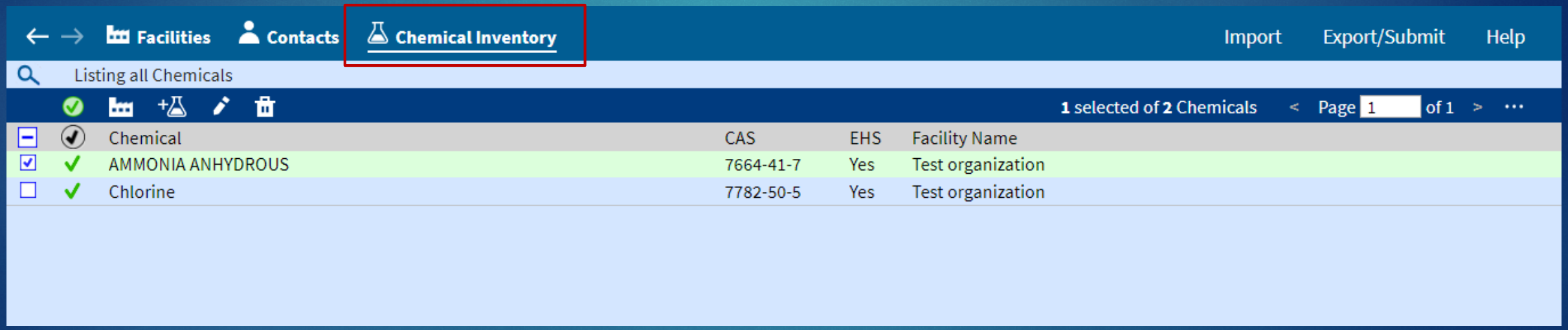
Chemicals



You'll then see a new page with details about the chemical. Update the page as appropriate.

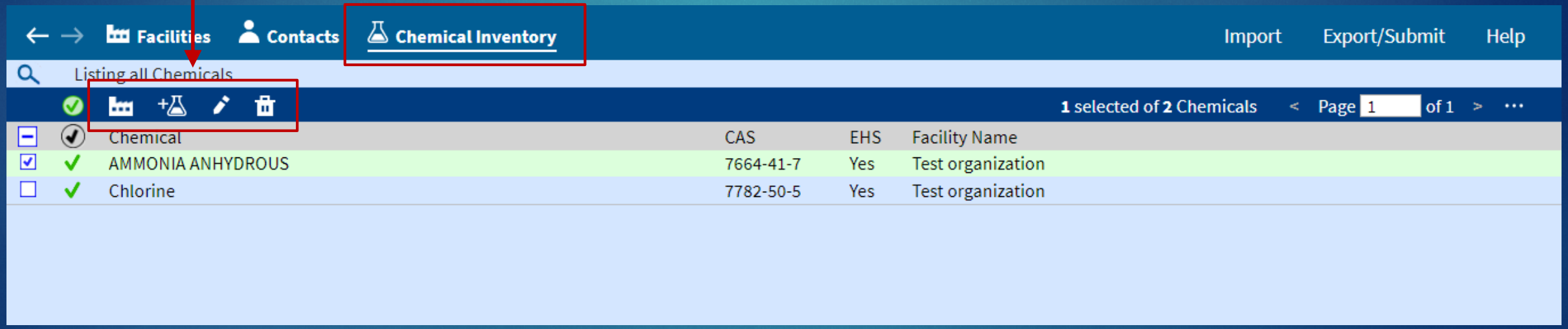
Chemicals

Alternatively, you can get to the chemical detail page by clicking on the **Chemical Inventory** menu.

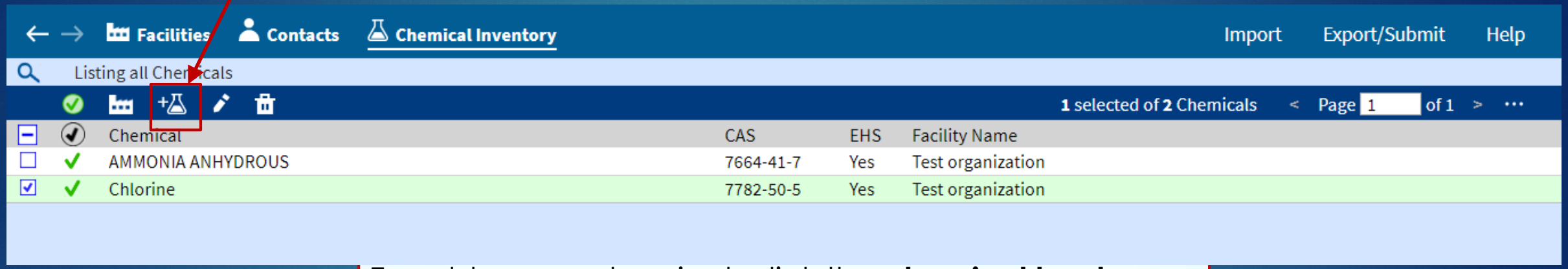


Chemicals

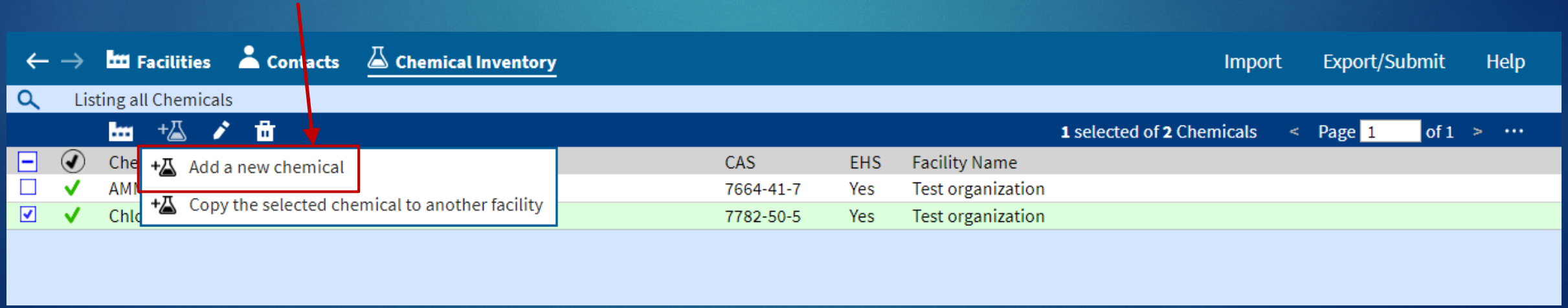
From here, you can view the facility, edit existing chemicals, add new ones, or delete them.



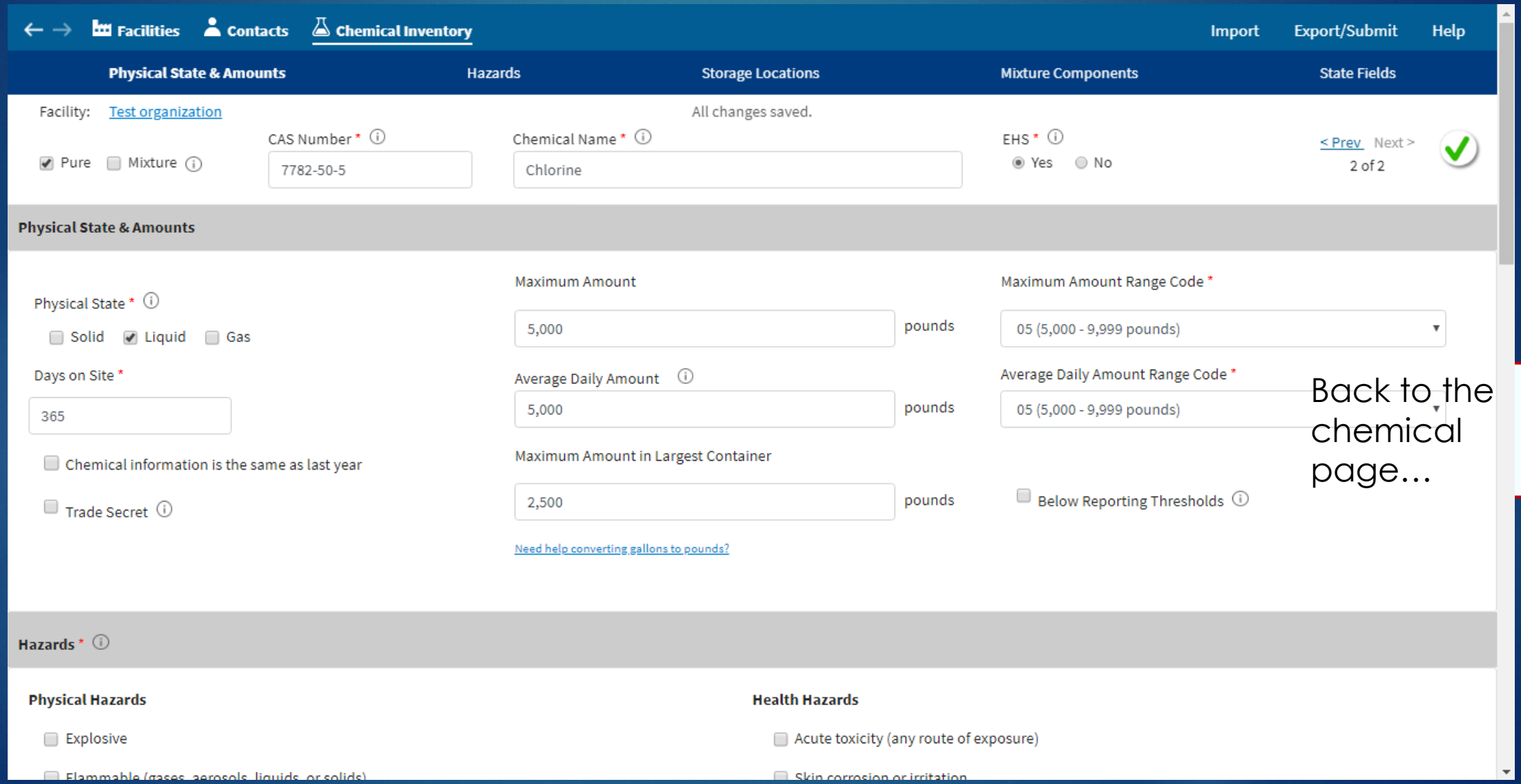
Chemicals



To add a new chemical, click the **chemical beaker icon** and then click **Add a new chemical**.

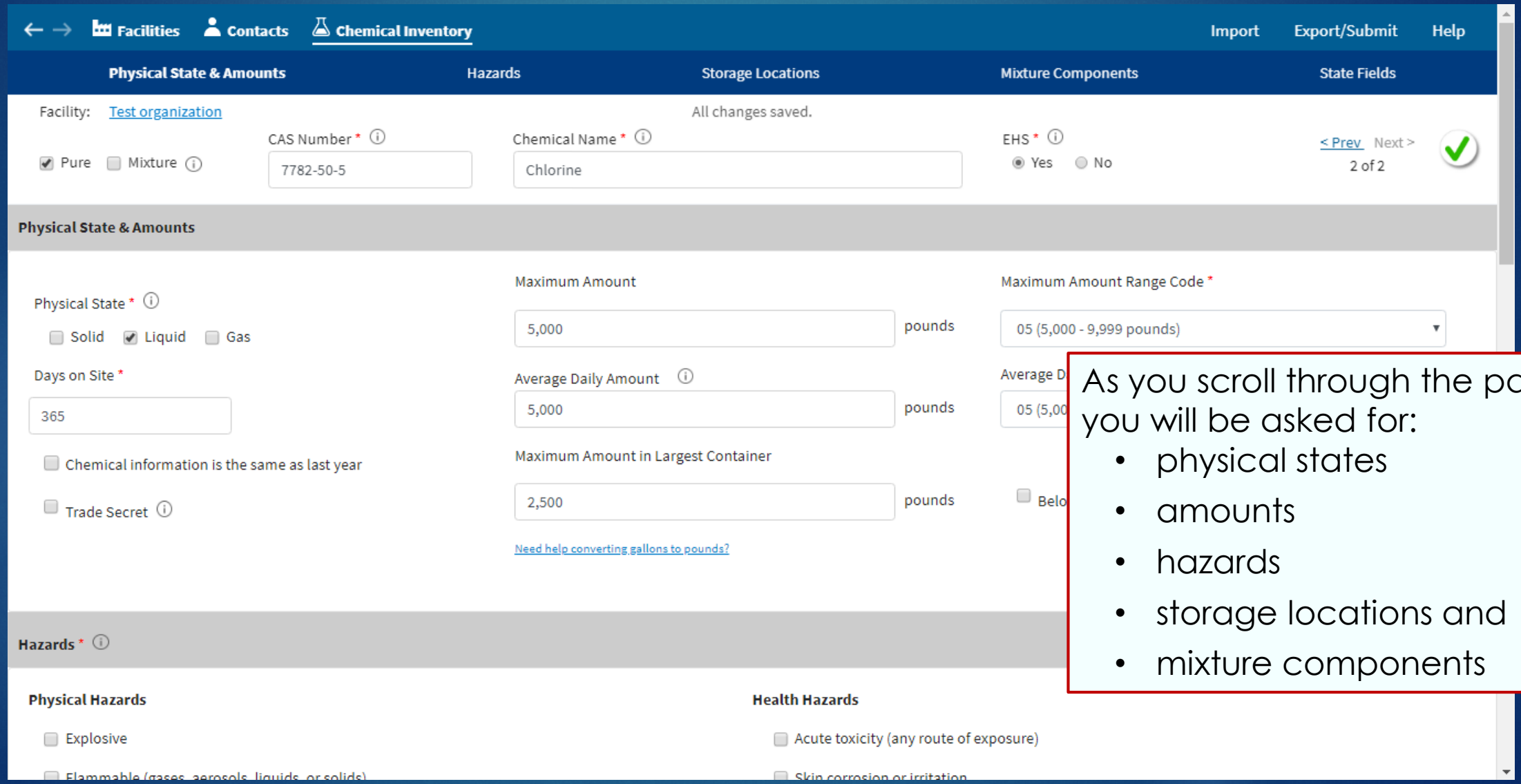


Chemicals



Back to the chemical page…

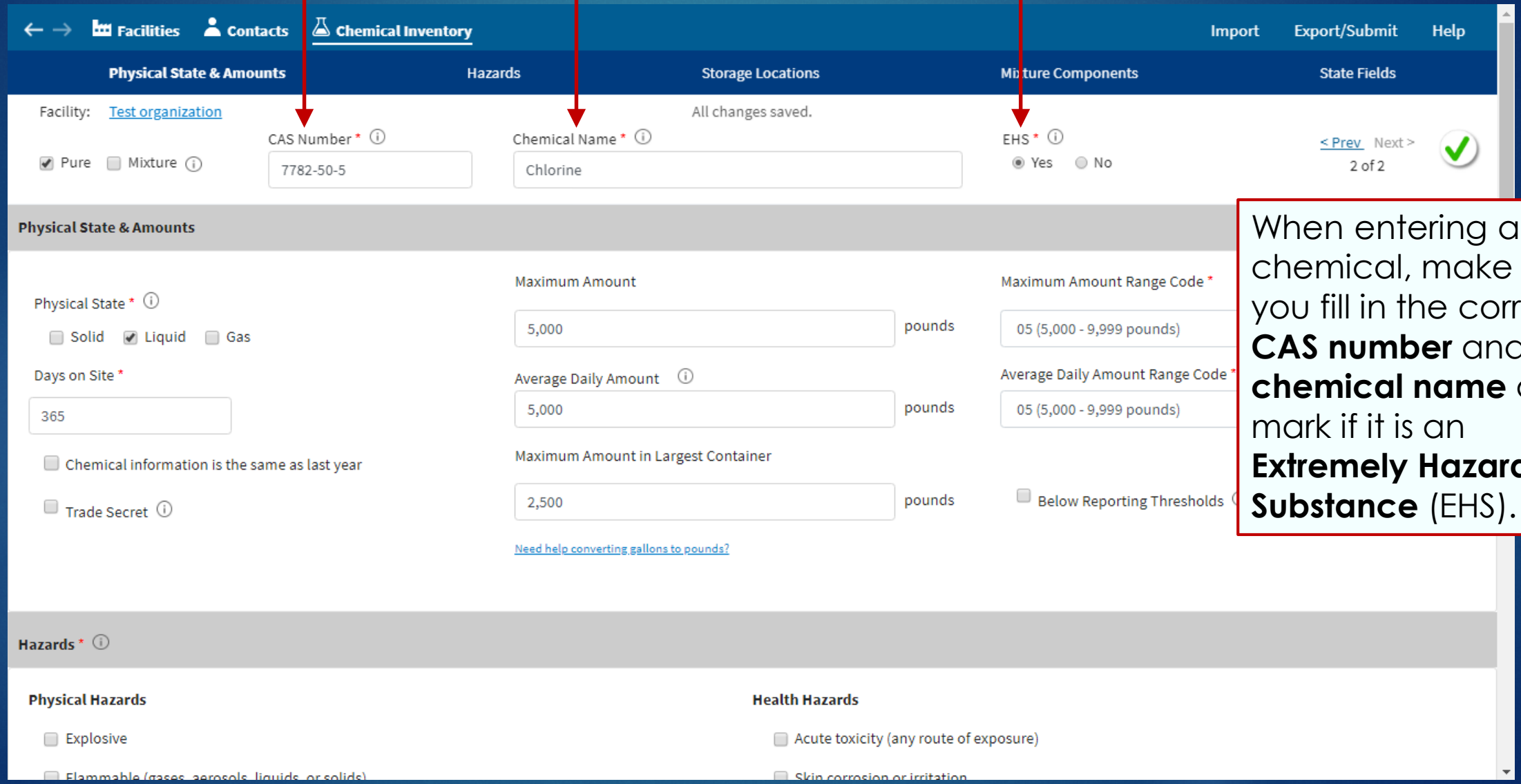
Chemicals



As you scroll through the page, you will be asked for:

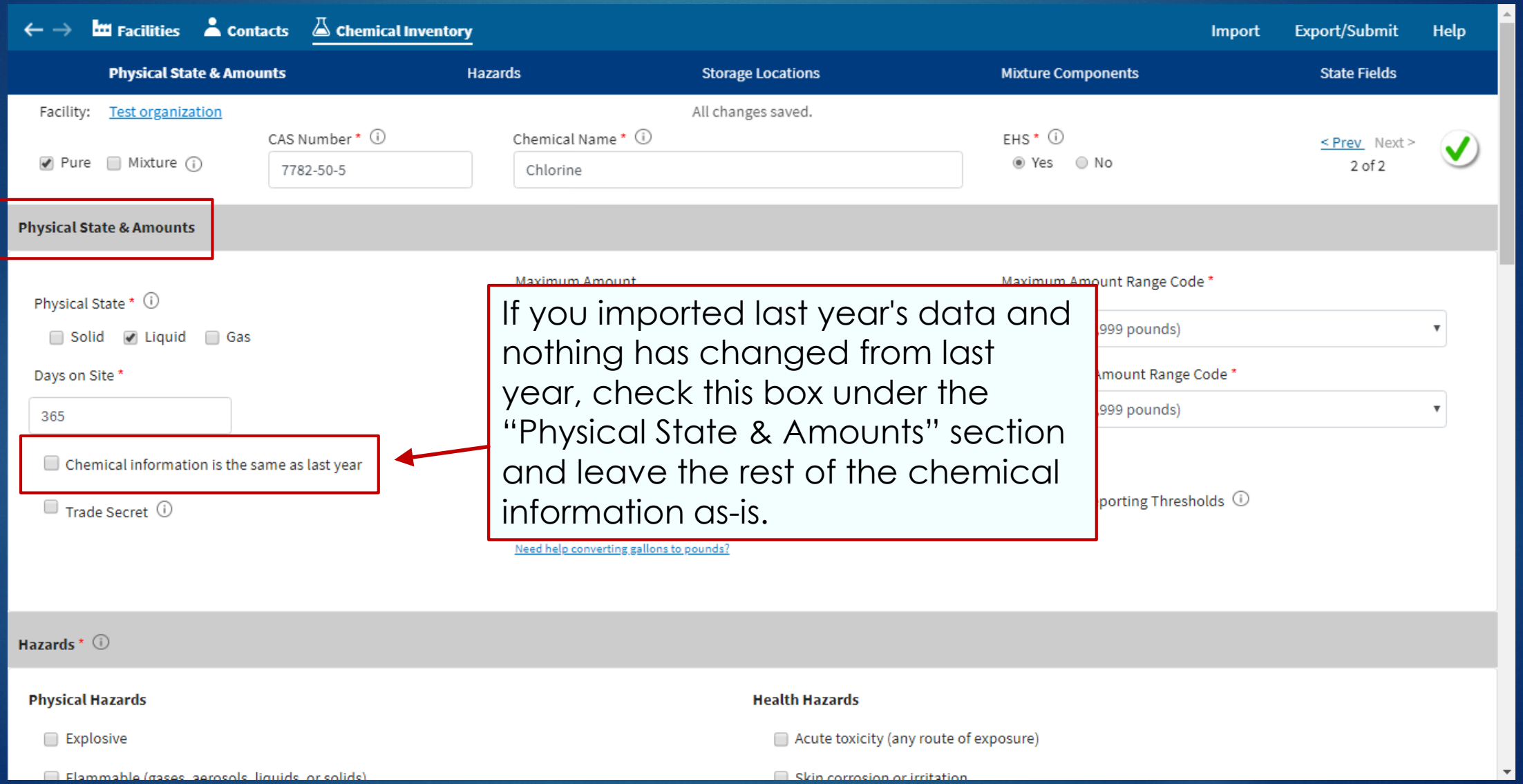
- physical states
- amounts
- hazards
- storage locations and
- mixture components

Chemicals



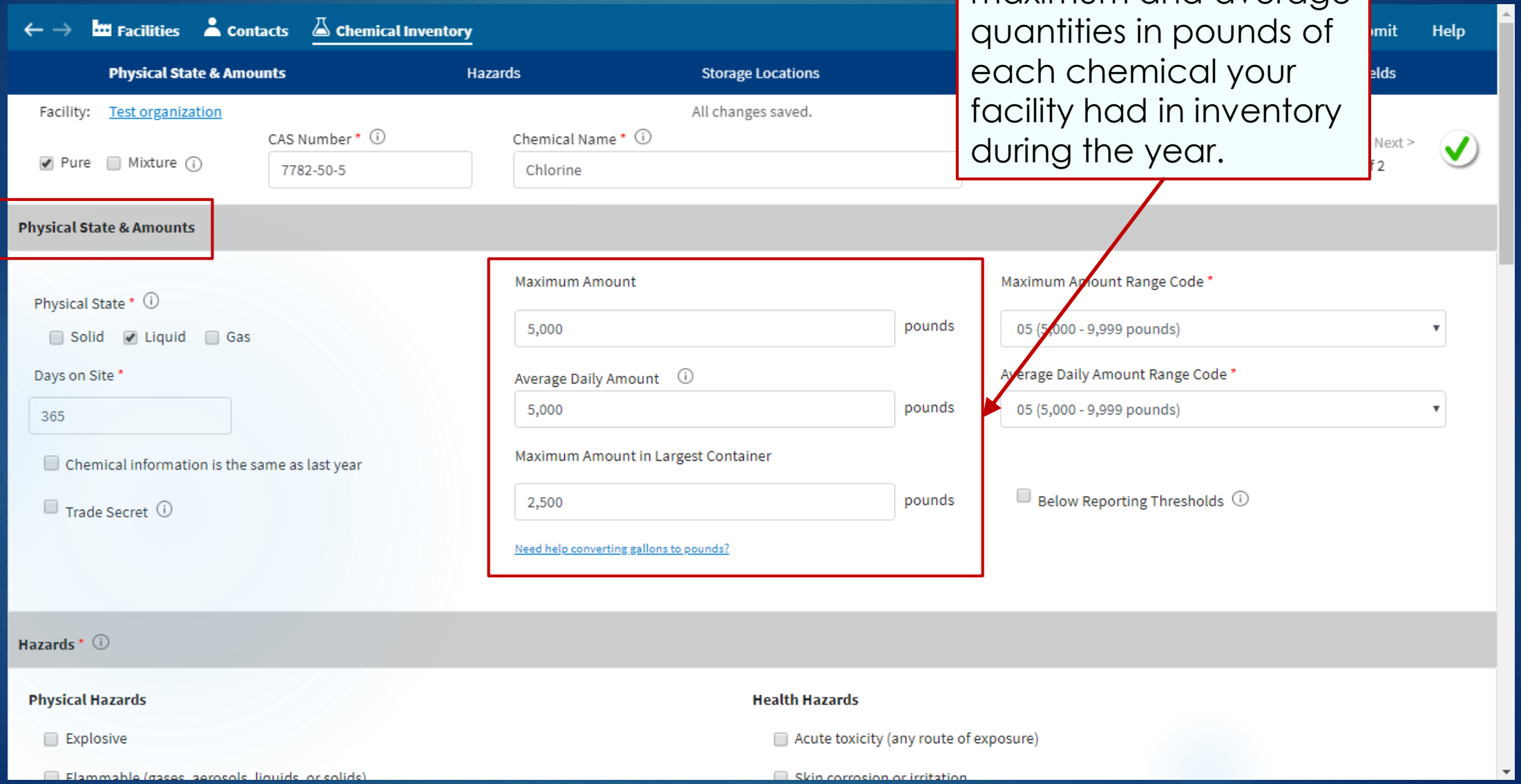
When entering a new chemical, make sure you fill in the correct **CAS number** and **chemical name** and mark if it is an **Extremely Hazardous Substance** (EHS).

Chemicals

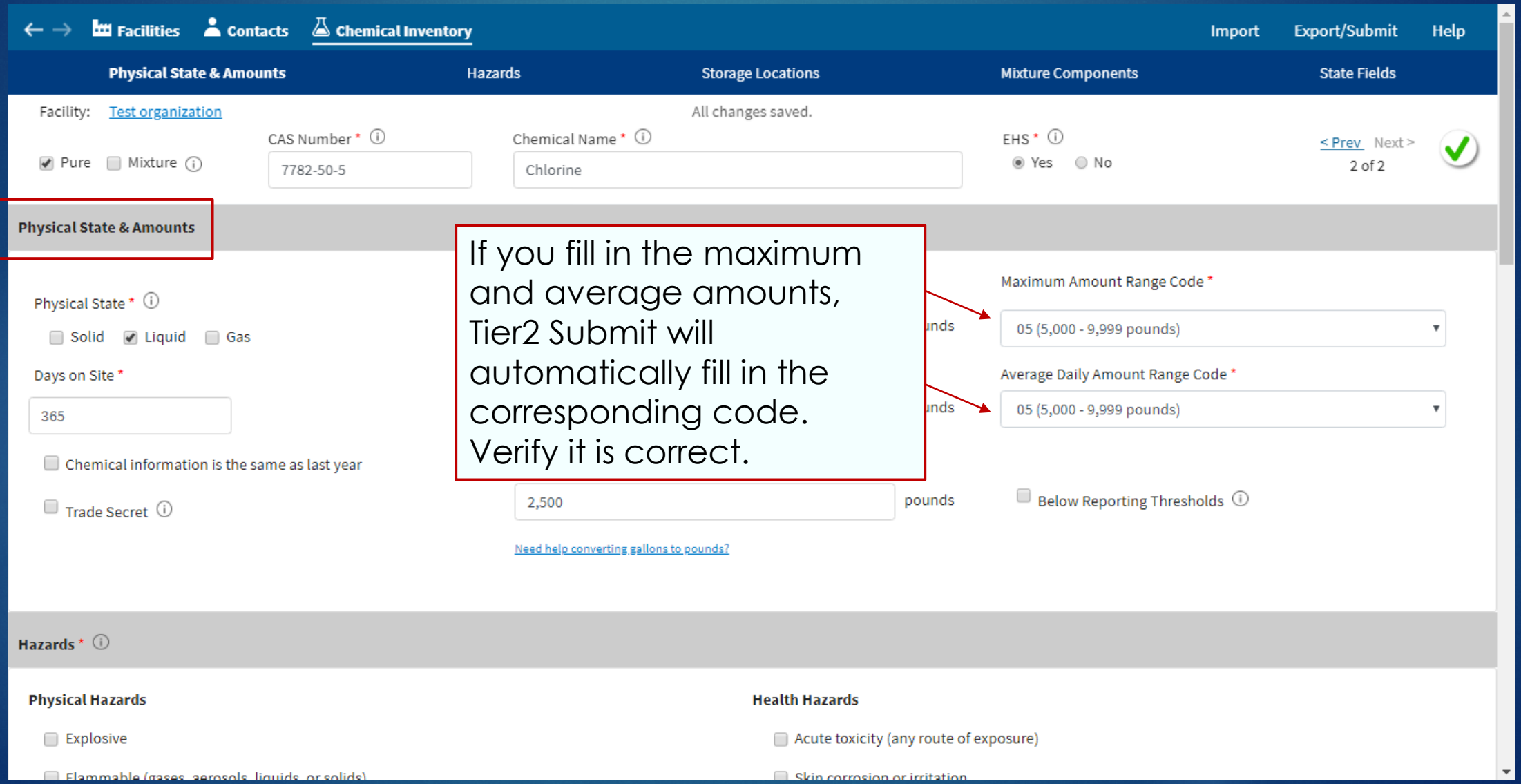


If you imported last year's data and nothing has changed from last year, check this box under the "Physical State & Amounts" section and leave the rest of the chemical information as-is.

Chemicals

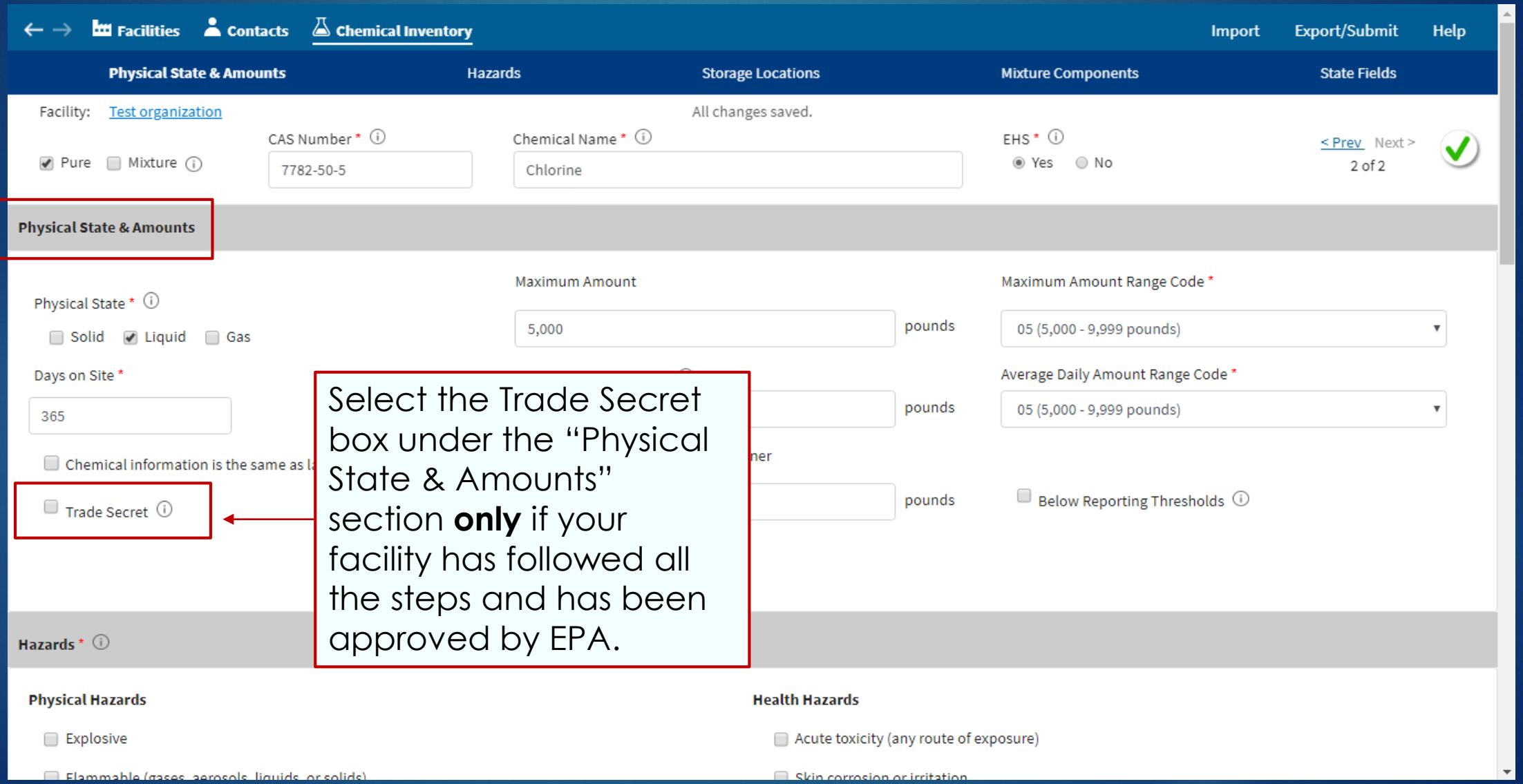

You can enter the maximum and average quantities in pounds of each chemical your facility had in inventory during the year.
Facilities
Contacts
Chemical Inventory
Help
Physical State & Amounts
Hazards
Storage Locations
Facility: Test organization
All changes saved.
CAS Number *
Chemical Name *
Pure
Mixture
7782-50-5
Chlorine
Next >
Physical State & Amounts
Physical State *
Solid
Liquid
Gas
Days on Site *
365
Chemical information is the same as last year
Trade Secret
Maximum Amount
5,000
pounds
Average Daily Amount
5,000
pounds
Maximum Amount in Largest Container
2,500
pounds
Need help converting gallons to pounds?
Maximum Amount Range Code *
05 (5,000 - 9,999 pounds)
Average Daily Amount Range Code *
05 (5,000 - 9,999 pounds)
Below Reporting Thresholds
Hazards *
Physical Hazards
Explosive
Health Hazards
Acute toxicity (any route of exposure)

Chemicals



If you fill in the maximum and average amounts, Tier2 Submit will automatically fill in the corresponding code. Verify it is correct.

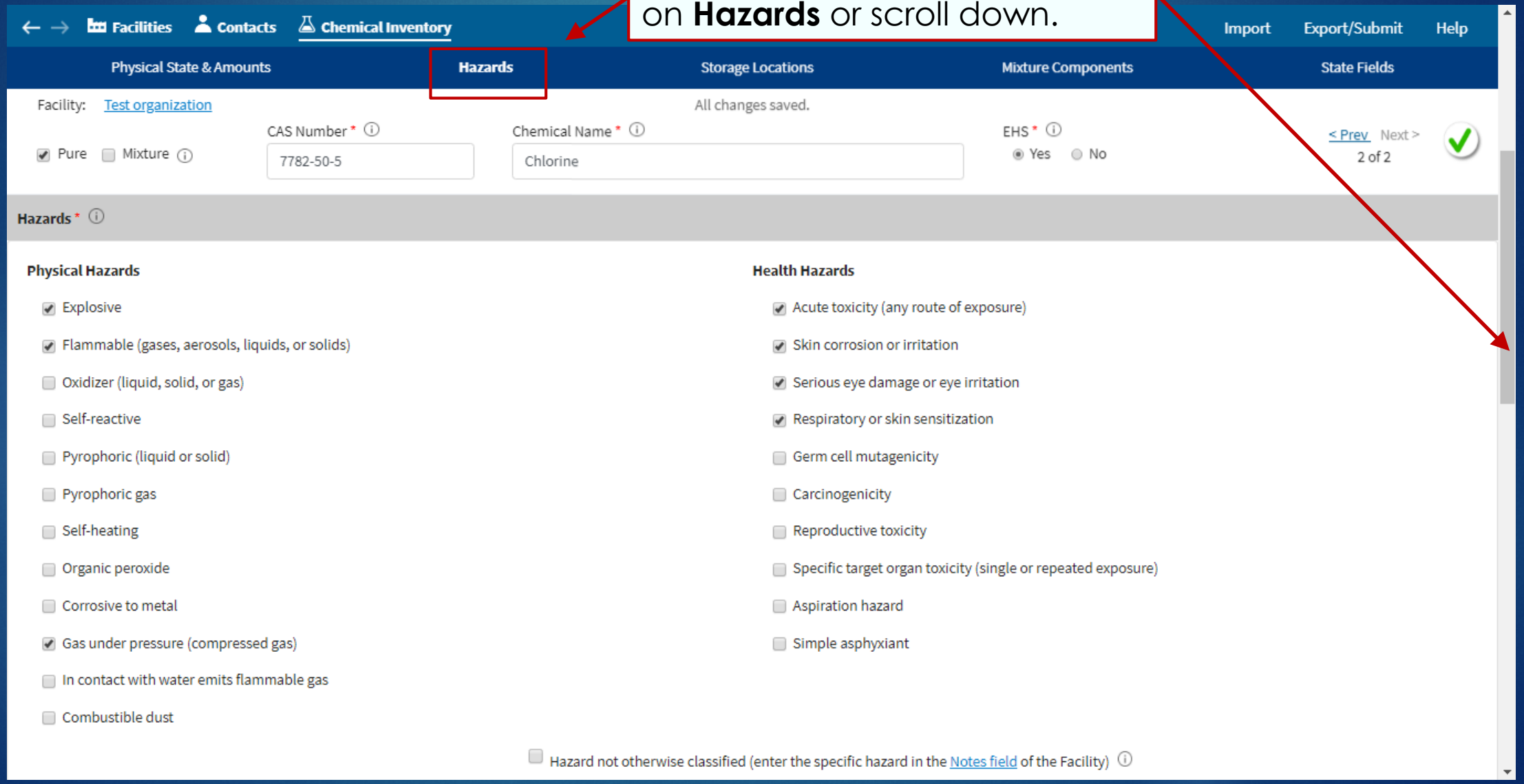
Chemicals



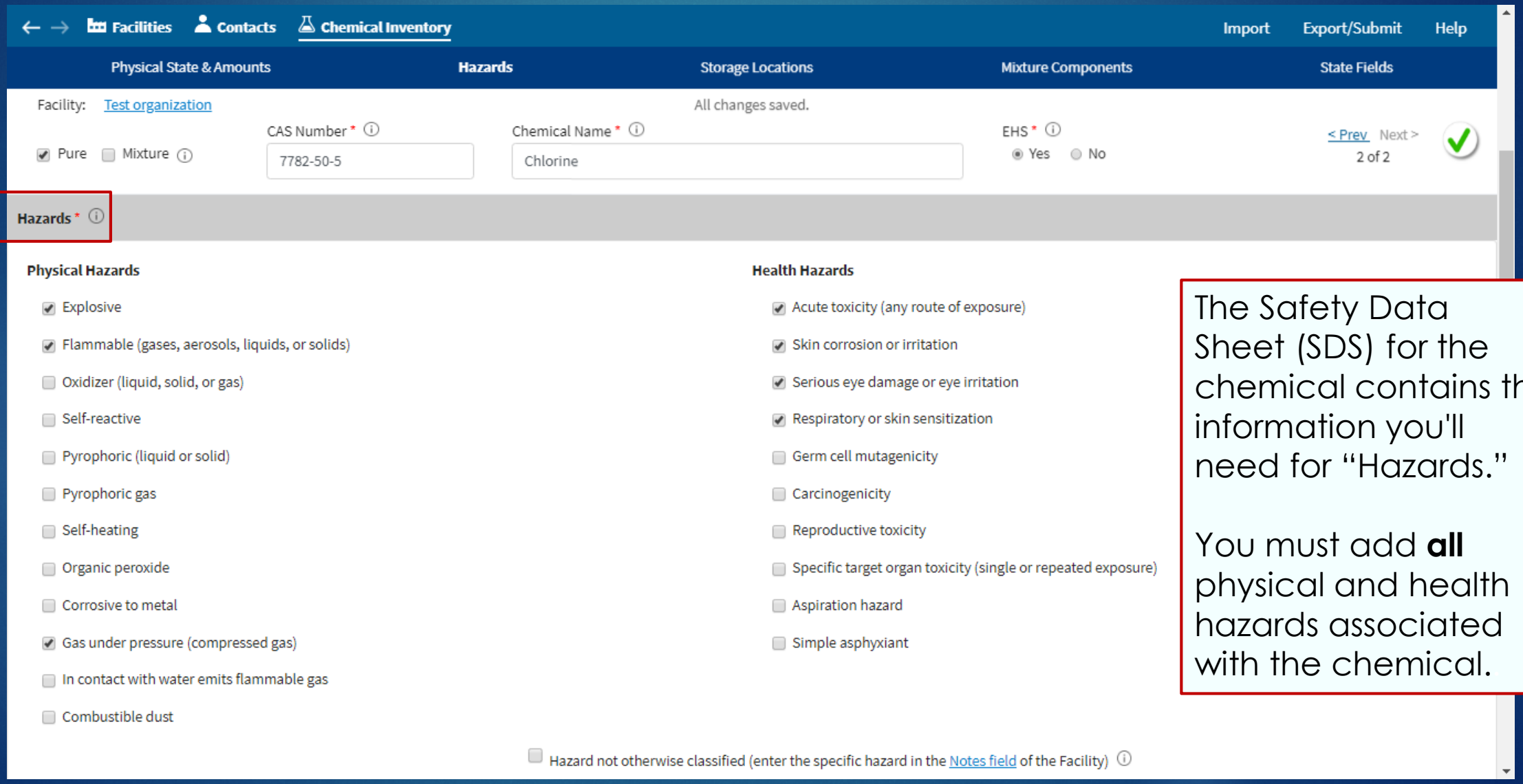
Select the Trade Secret box under the "Physical State & Amounts" section **only** if your facility has followed all the steps and has been approved by EPA.

Chemicals

To move on to Hazards, click on **Hazards** or scroll down.



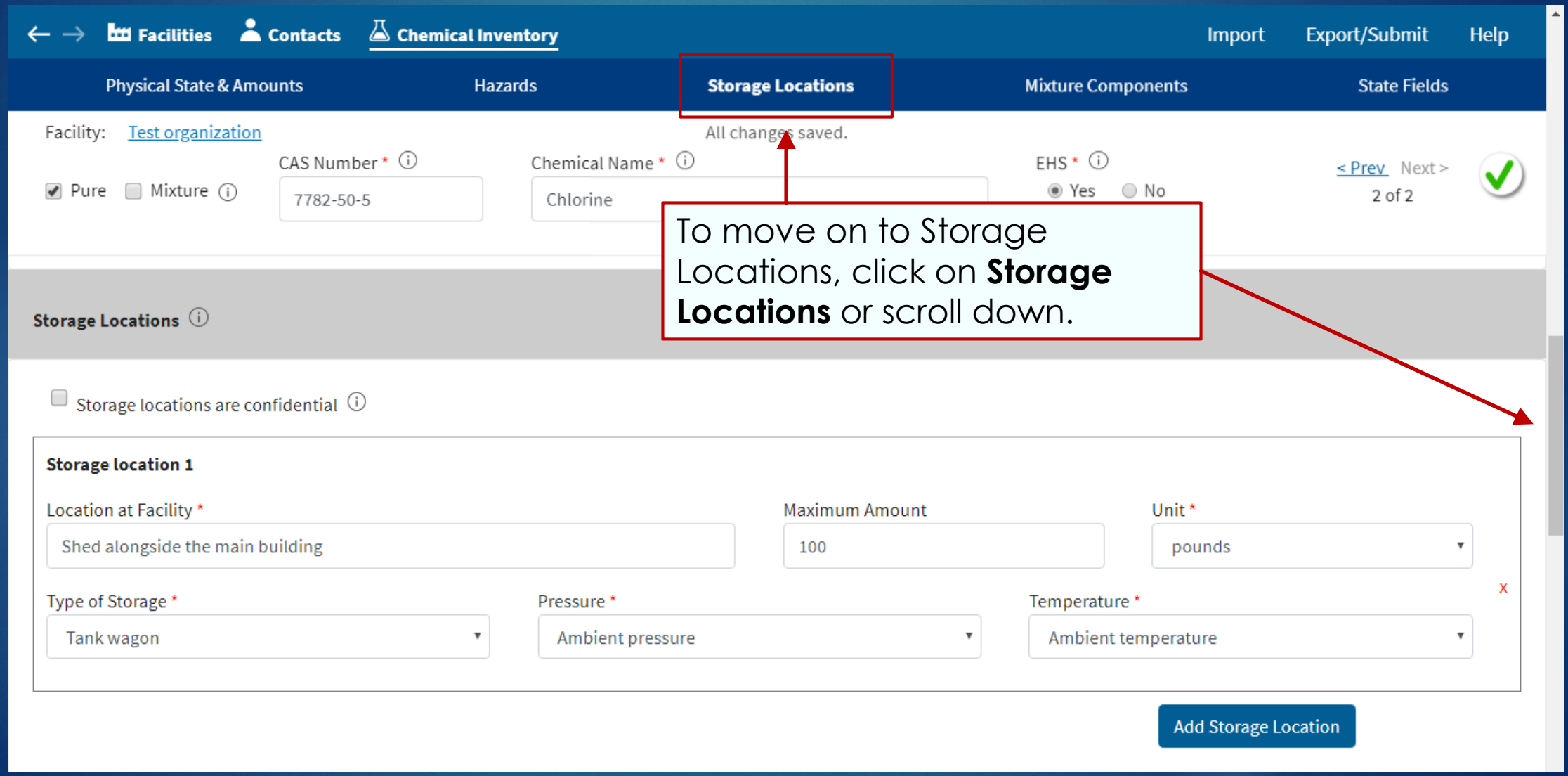
Chemicals



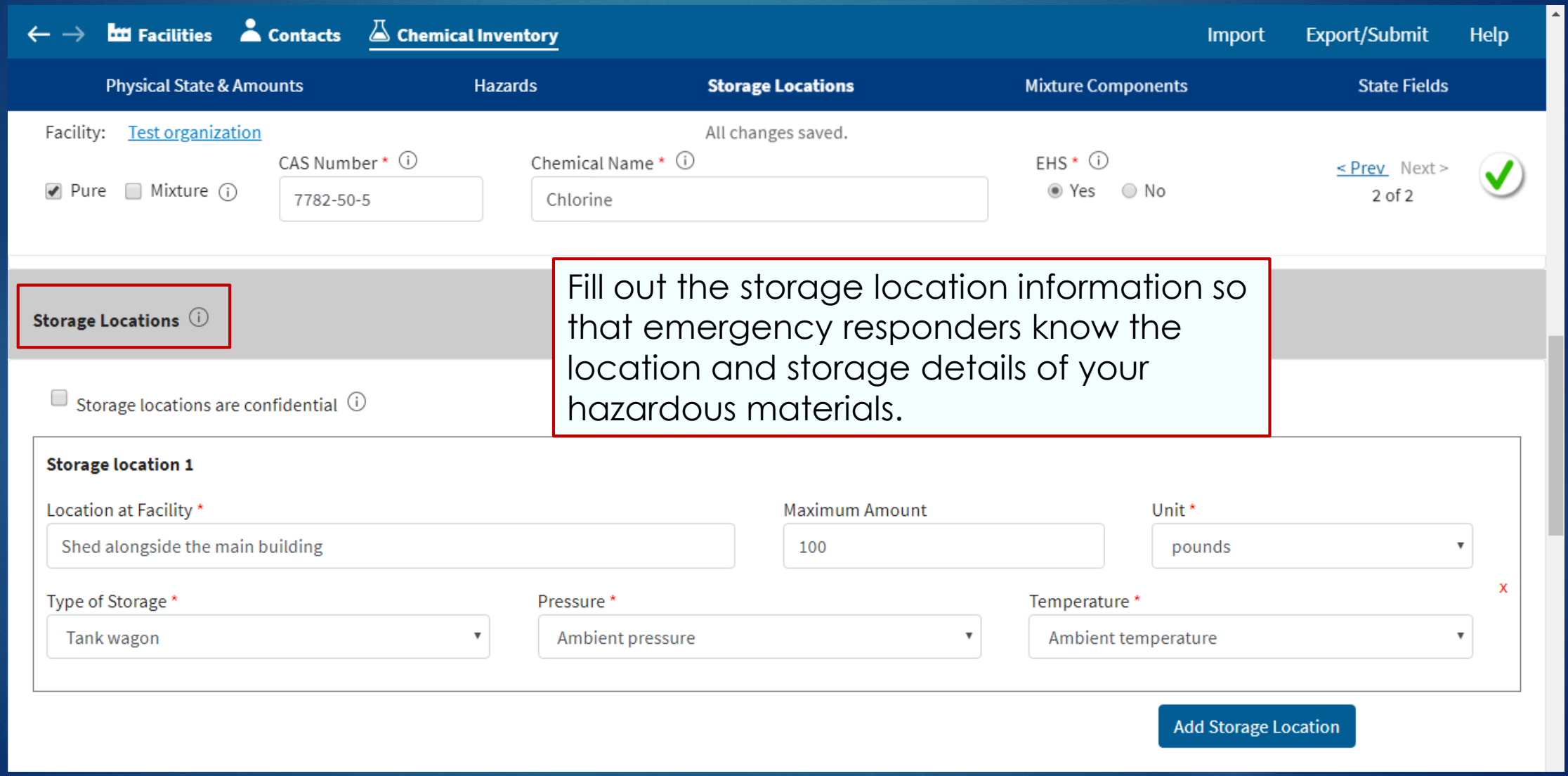
The Safety Data Sheet (SDS) for the chemical contains the information you'll need for "Hazards."

You must add **all** physical and health hazards associated with the chemical.

Chemicals

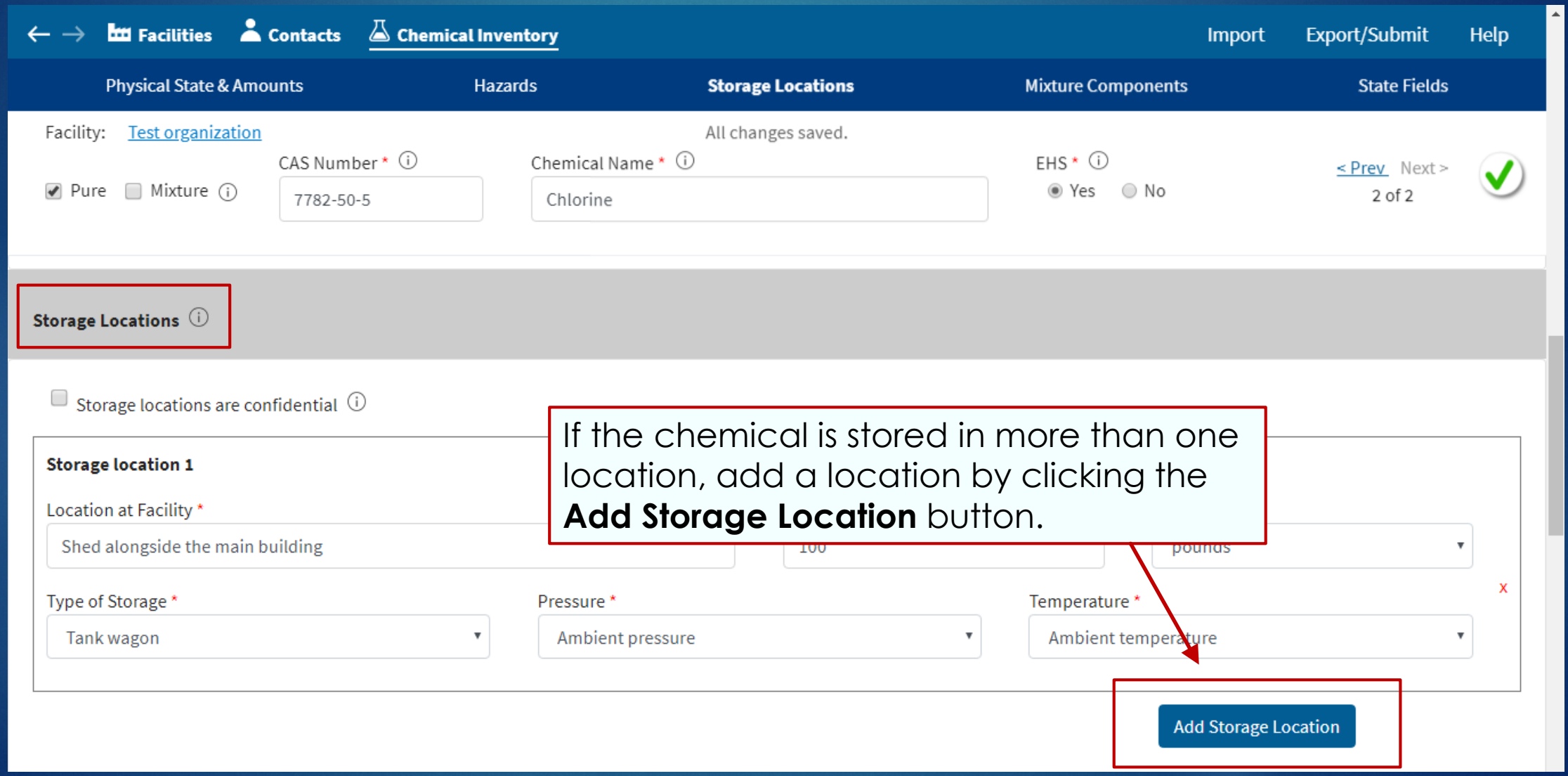

Facilities
Contacts
Chemical Inventory
Import
Export/Submit
Help
Physical State & Amounts
Hazards
Storage Locations
Mixture Components
State Fields
Facility: Test organization
All changes saved.
CAS Number *
Chemical Name *
EHS *
Pure
Mixture
7782-50-5
Chlorine
Yes
No
< Prev
Next >
2 of 2
To move on to Storage Locations, click on **Storage Locations** or scroll down.
Storage Locations
Storage locations are confidential
Storage location 1
Location at Facility *
Shed alongside the main building
Maximum Amount
100
Unit *
pounds
Type of Storage *
Tank wagon
Pressure *
Ambient pressure
Temperature *
Ambient temperature
Add Storage Location

Chemicals



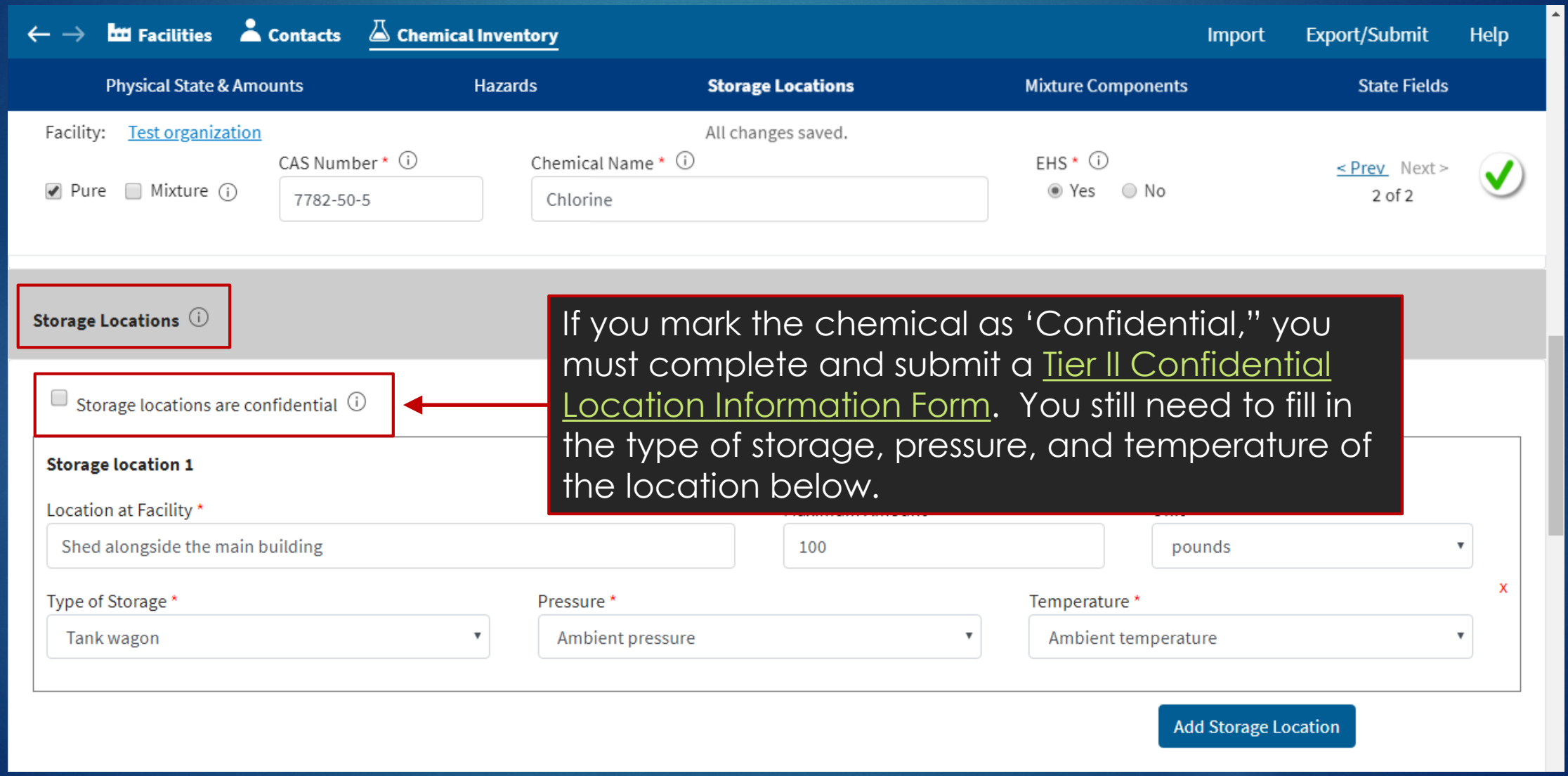
Fill out the storage location information so that emergency responders know the location and storage details of your hazardous materials.

Chemicals



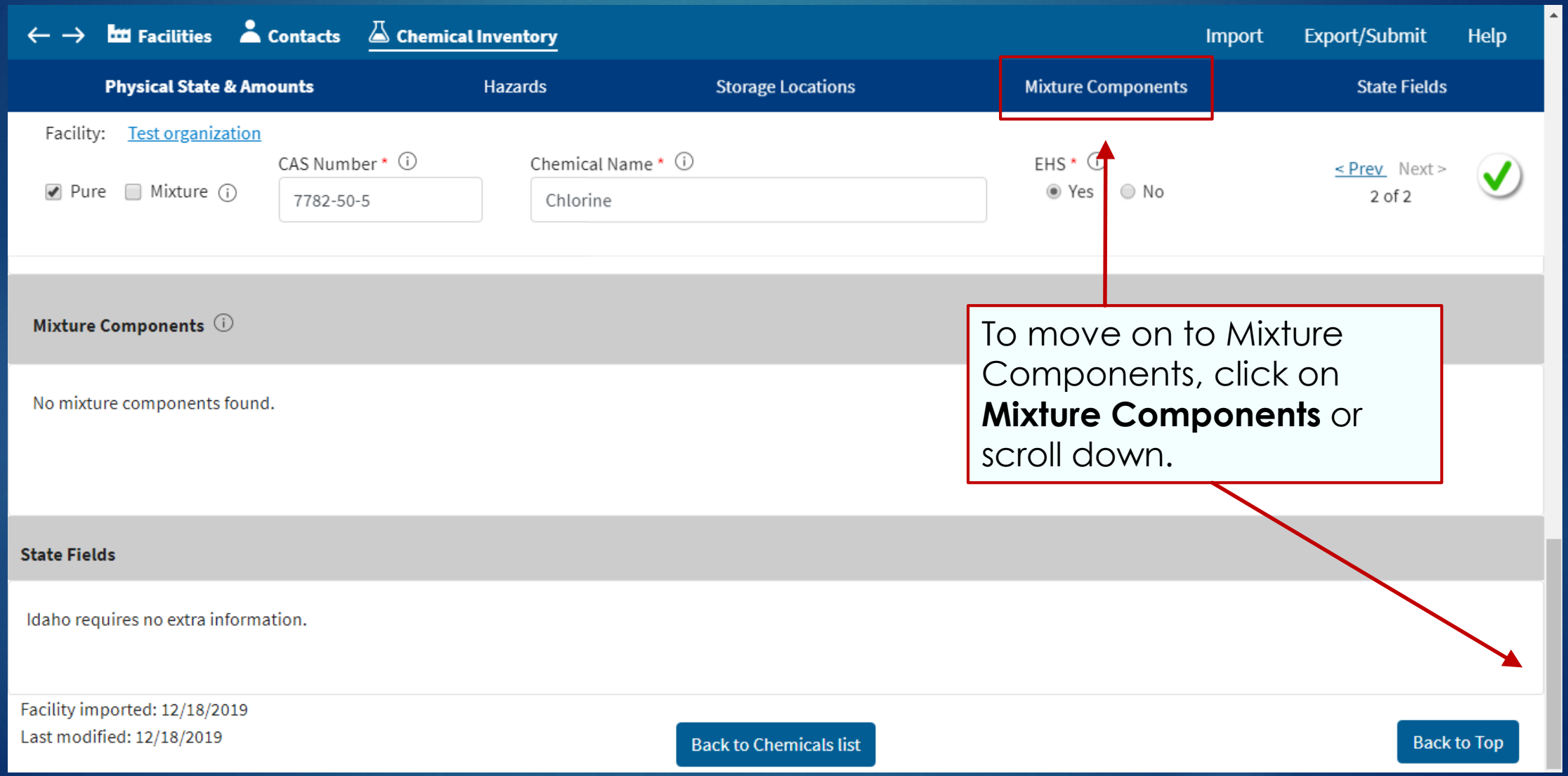
If the chemical is stored in more than one location, add a location by clicking the **Add Storage Location** button.

Chemicals



If you mark the chemical as 'Confidential," you must complete and submit a Tier II Confidential Location Information Form. You still need to fill in the type of storage, pressure, and temperature of the location below.

Chemicals


Facilities
Contacts
Chemical Inventory
Import
Export/Submit
Help
Physical State & Amounts
Hazards
Storage Locations
Mixture Components
State Fields
Facility: Test organization
Pure
Mixture
CAS Number *
7782-50-5
Chemical Name *
Chlorine
EHS *
Yes
No
< Prev
Next >
2 of 2
Mixture Components
No mixture components found.
State Fields
Idaho requires no extra information.
Facility imported: 12/18/2019
Last modified: 12/18/2019
Back to Chemicals list
Back to Top
To move on to Mixture Components, click on **Mixture Components** or scroll down.

Chemicals

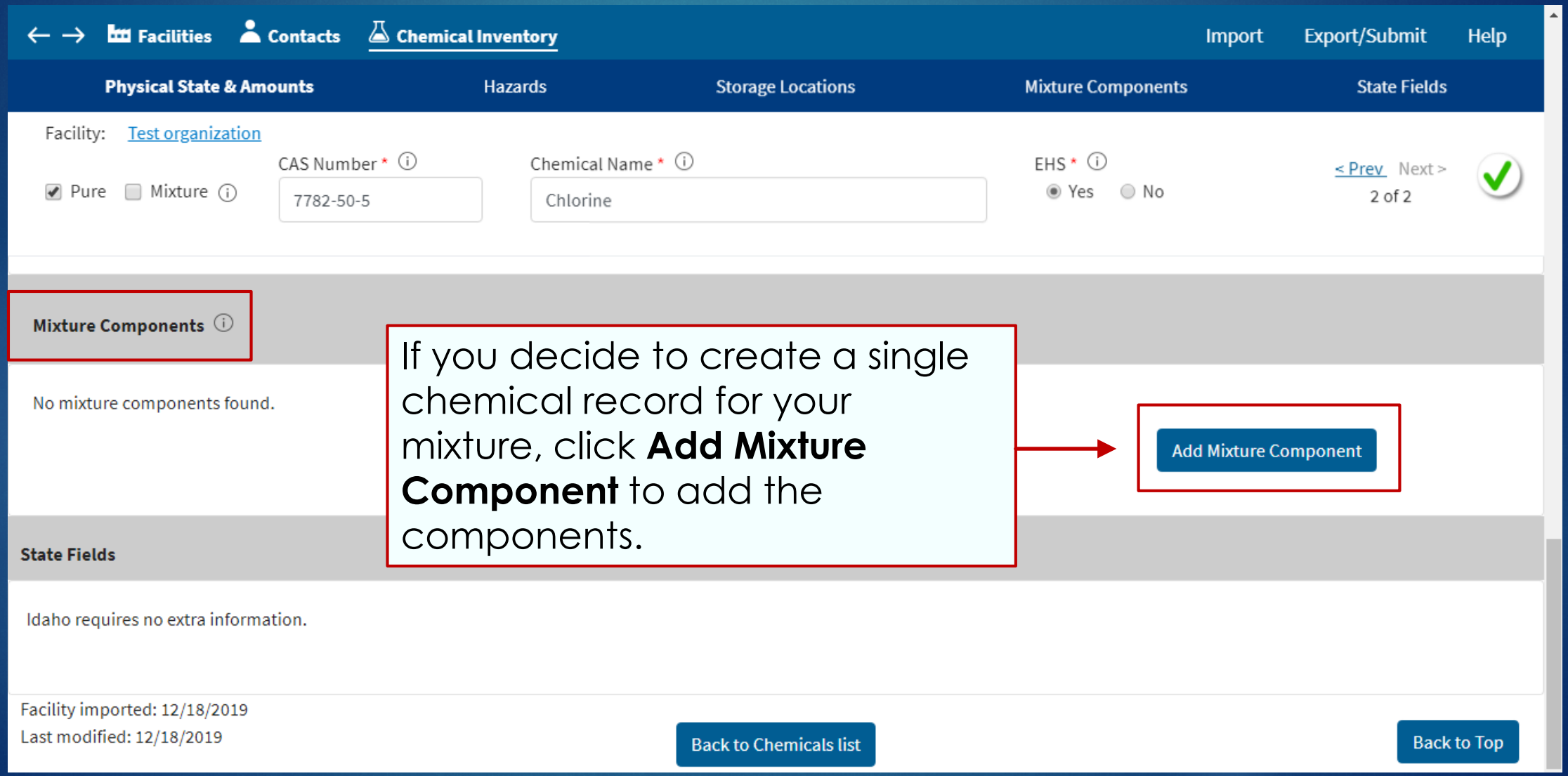
If one or more of your reported chemicals were stored as a mixture, you have the choice of:

a) Creating multiple chemical records in Tier2 Submit, one for each of the hazardous chemicals in the mixture, marking each component chemical as Pure at the top of the page, or

b) Creating a single chemical record, marking the substance as a Mixture at the top of the page, and creating Mixture Component entries for each hazardous component of the mixture.

Your reporting must be consistent between Section 311 reporting and Tier II reporting. For more information, see the Help topics in the upper right corner of the program.

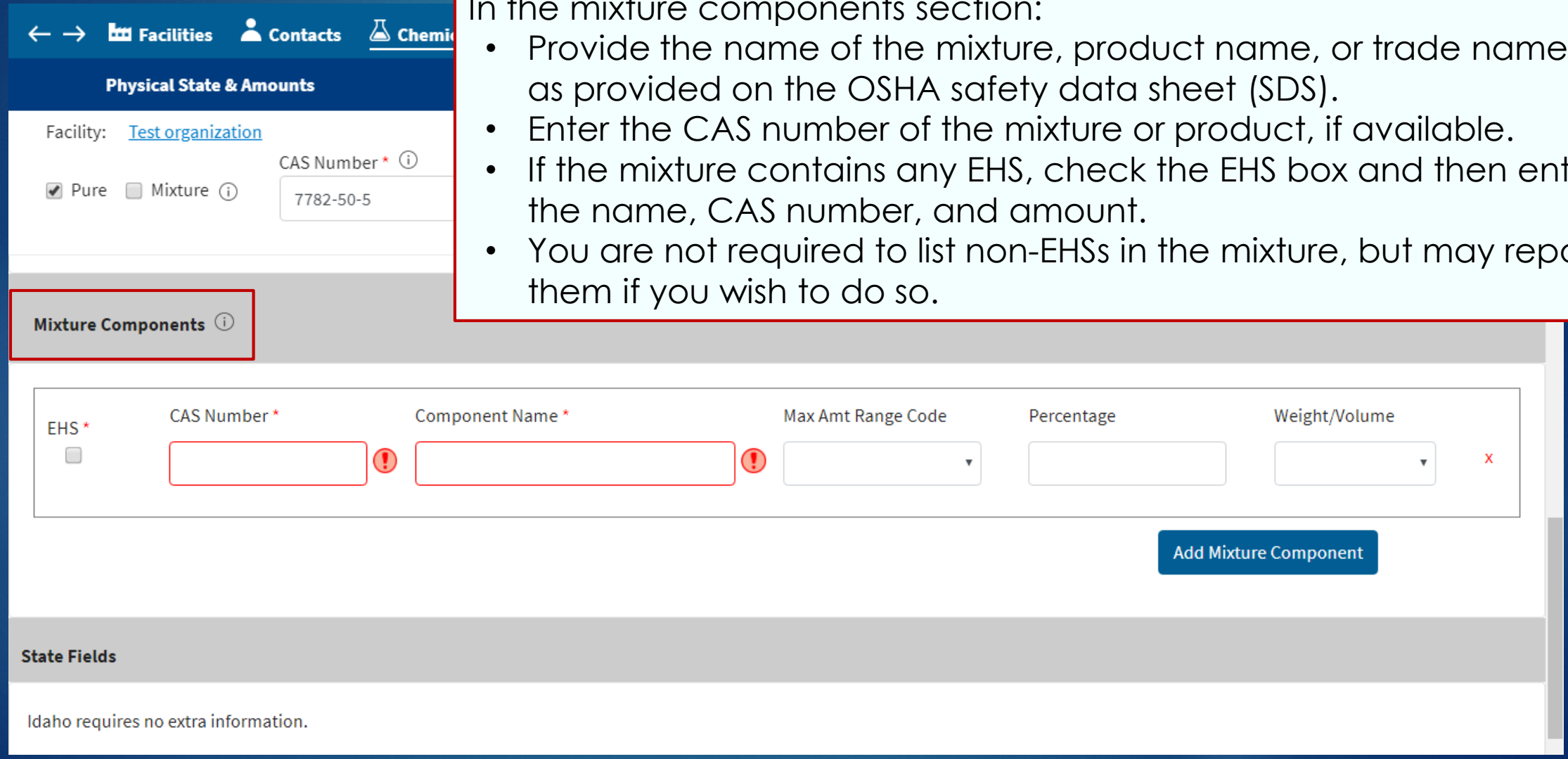
Chemicals


Facilities
Contacts
Chemical Inventory
Import
Export/Submit
Help
Physical State & Amounts
Hazards
Storage Locations
Mixture Components
State Fields
Facility: Test organization
Pure
Mixture
CAS Number *
7782-50-5
Chemical Name *
Chlorine
EHS *
Yes
No
< Prev
Next >
2 of 2
Mixture Components
No mixture components found.
If you decide to create a single chemical record for your mixture, click **Add Mixture Component** to add the components.
Add Mixture Component
State Fields
Idaho requires no extra information.
Facility imported: 12/18/2019
Last modified: 12/18/2019
Back to Chemicals list
Back to Top

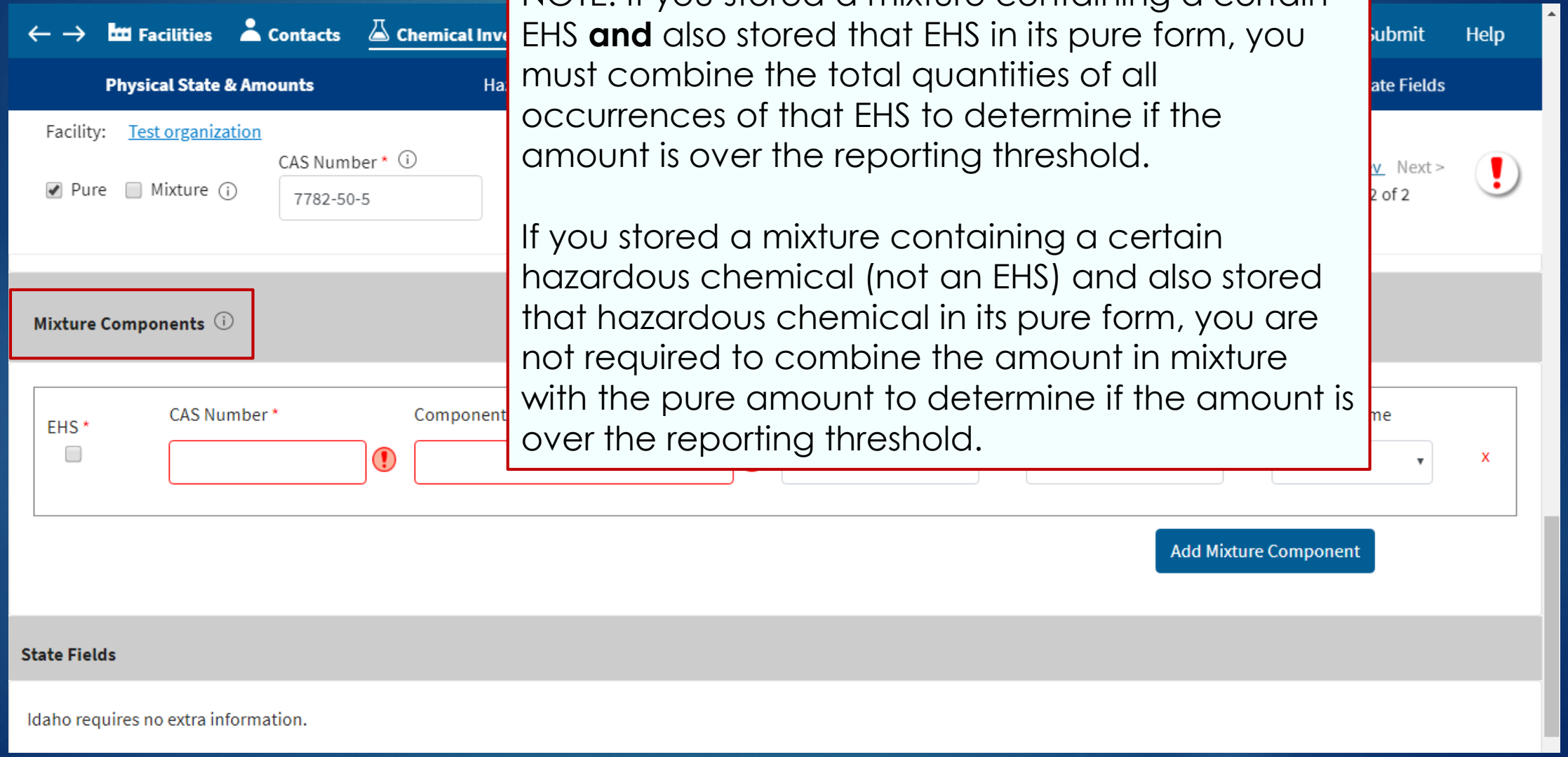
Chemicals

In the mixture components section:

- Provide the name of the mixture, product name, or trade name as provided on the OSHA safety data sheet (SDS).
- Enter the CAS number of the mixture or product, if available.
- If the mixture contains any EHS, check the EHS box and then enter the name, CAS number, and amount.
- You are not required to list non-EHSs in the mixture, but may report them if you wish to do so.



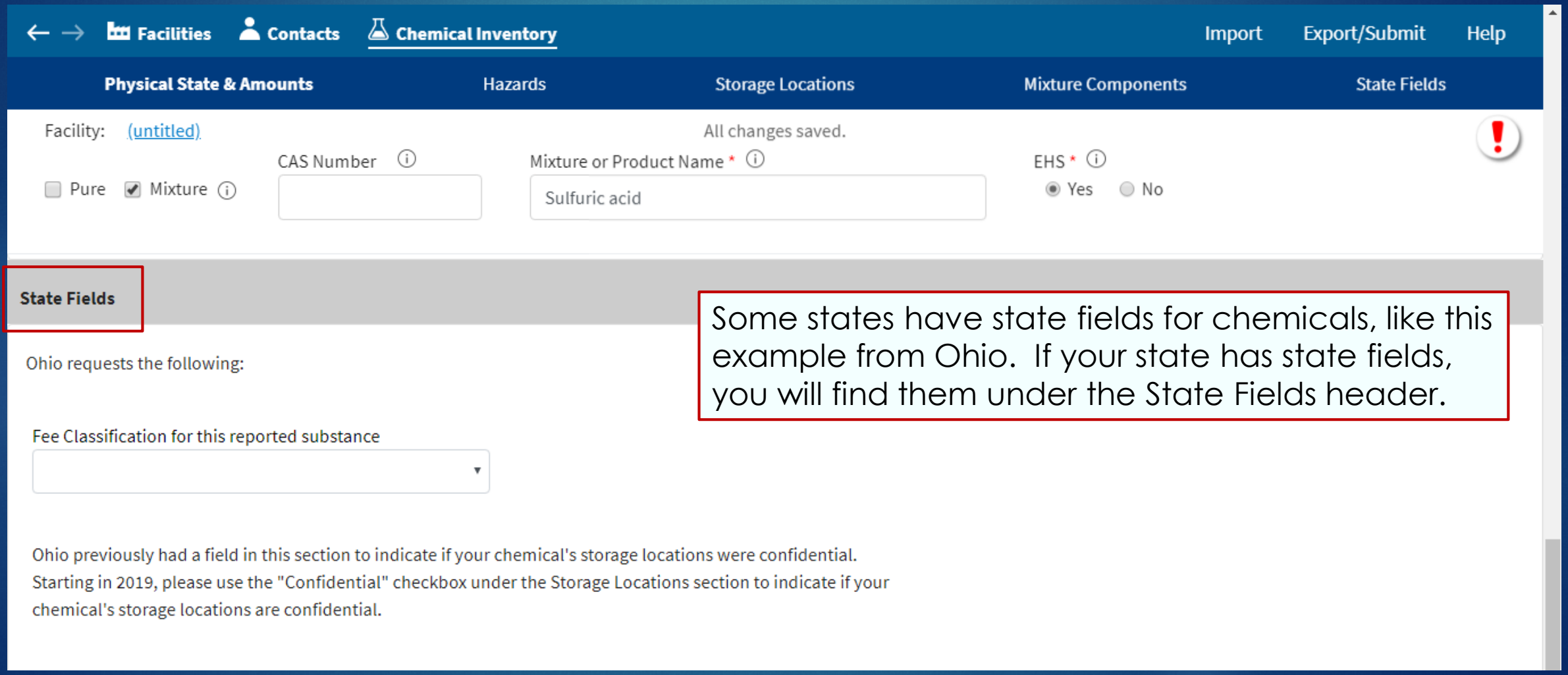
Chemicals



NOTE: If you stored a mixture containing a certain EHS **and** also stored that EHS in its pure form, you must combine the total quantities of all occurrences of that EHS to determine if the amount is over the reporting threshold.

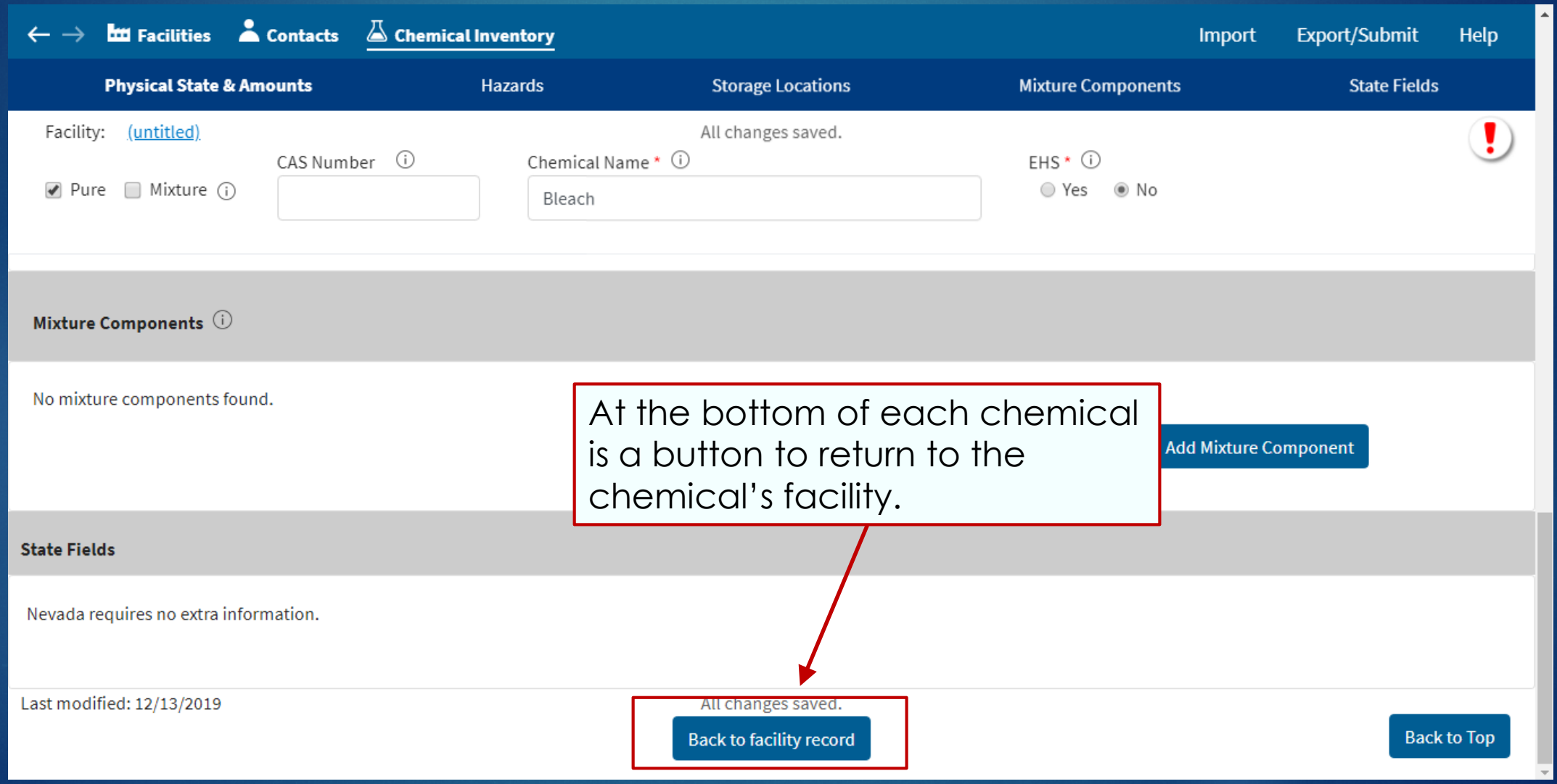
If you stored a mixture containing a certain hazardous chemical (not an EHS) and also stored that hazardous chemical in its pure form, you are not required to combine the amount in mixture with the pure amount to determine if the amount is over the reporting threshold.

Chemicals



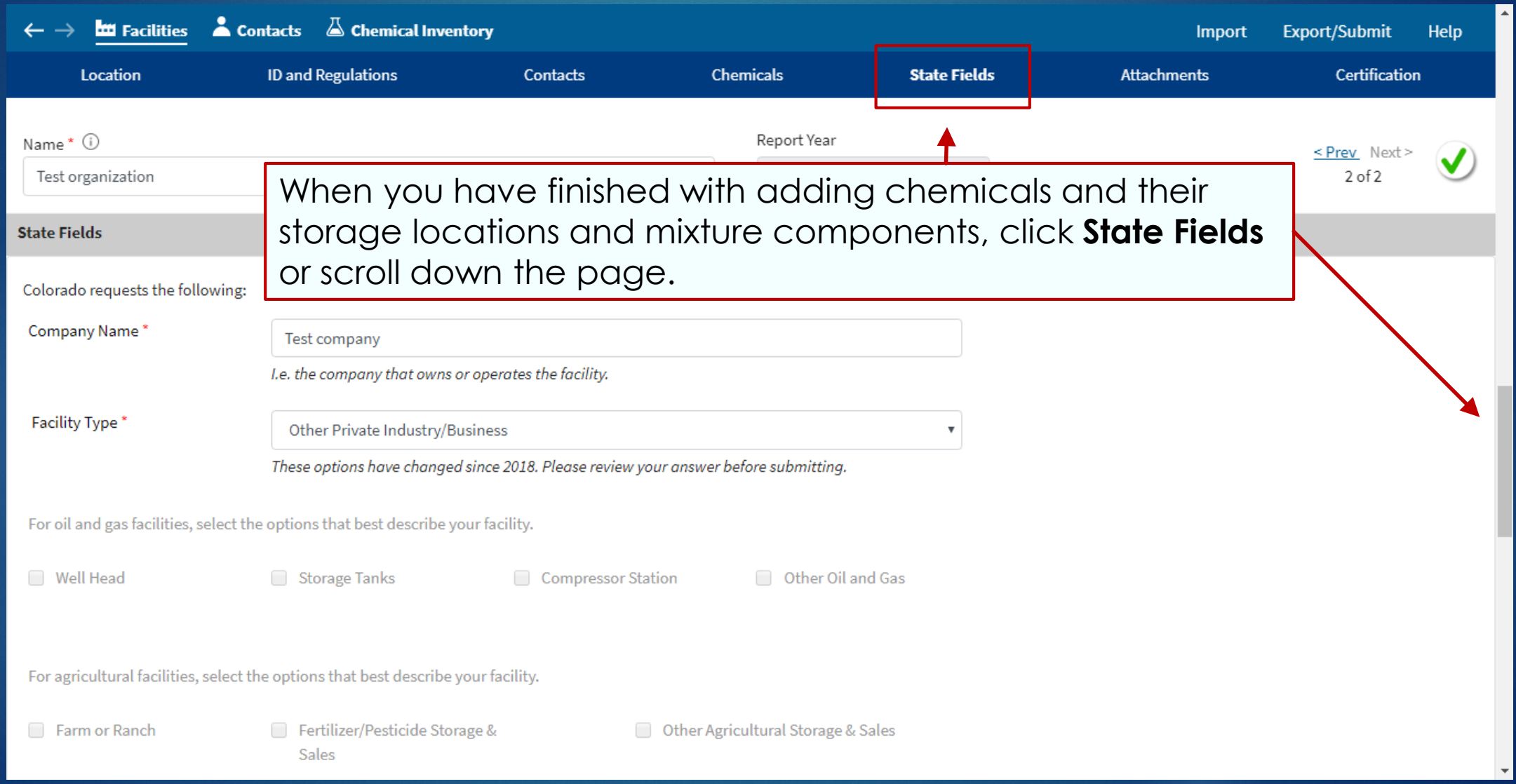
Some states have state fields for chemicals, like this example from Ohio. If your state has state fields, you will find them under the State Fields header.

Chemicals

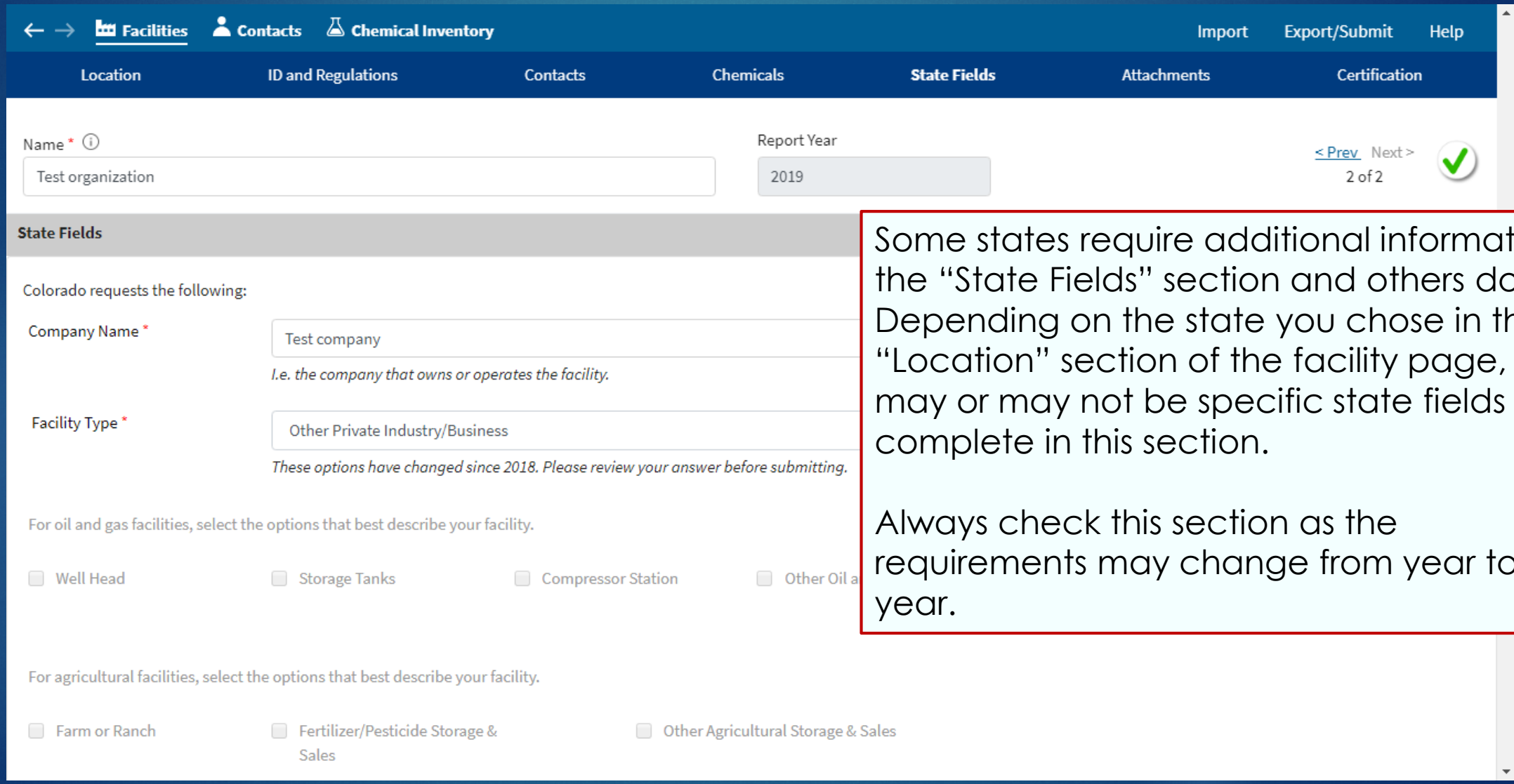


At the bottom of each chemical is a button to return to the chemical's facility.

State Fields



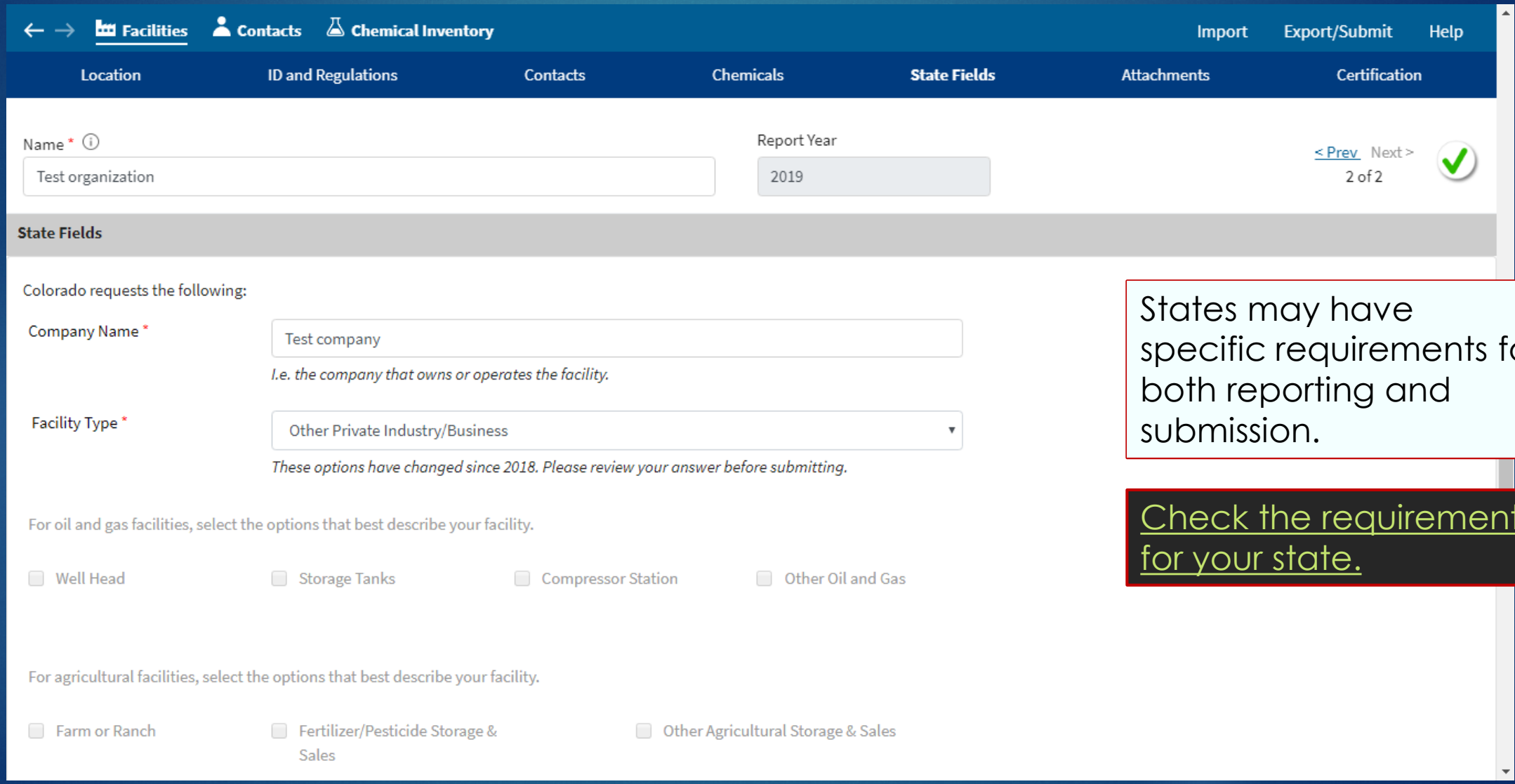
State Fields



Some states require additional information in the "State Fields" section and others do not. Depending on the state you chose in the "Location" section of the facility page, there may or may not be specific state fields to complete in this section.

Always check this section as the requirements may change from year to year.

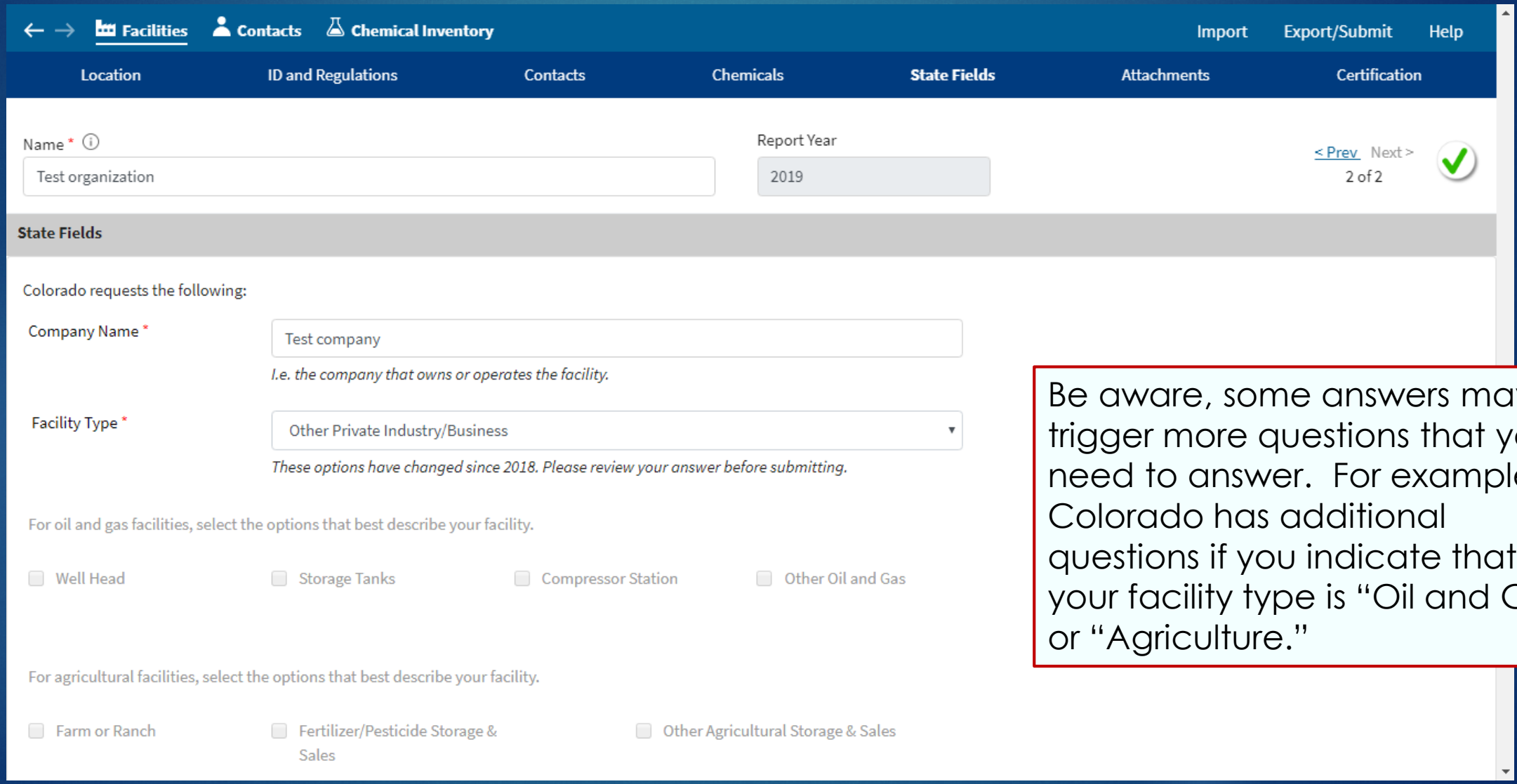
State Fields



States may have specific requirements for both reporting and submission.

Check the requirements for your state.

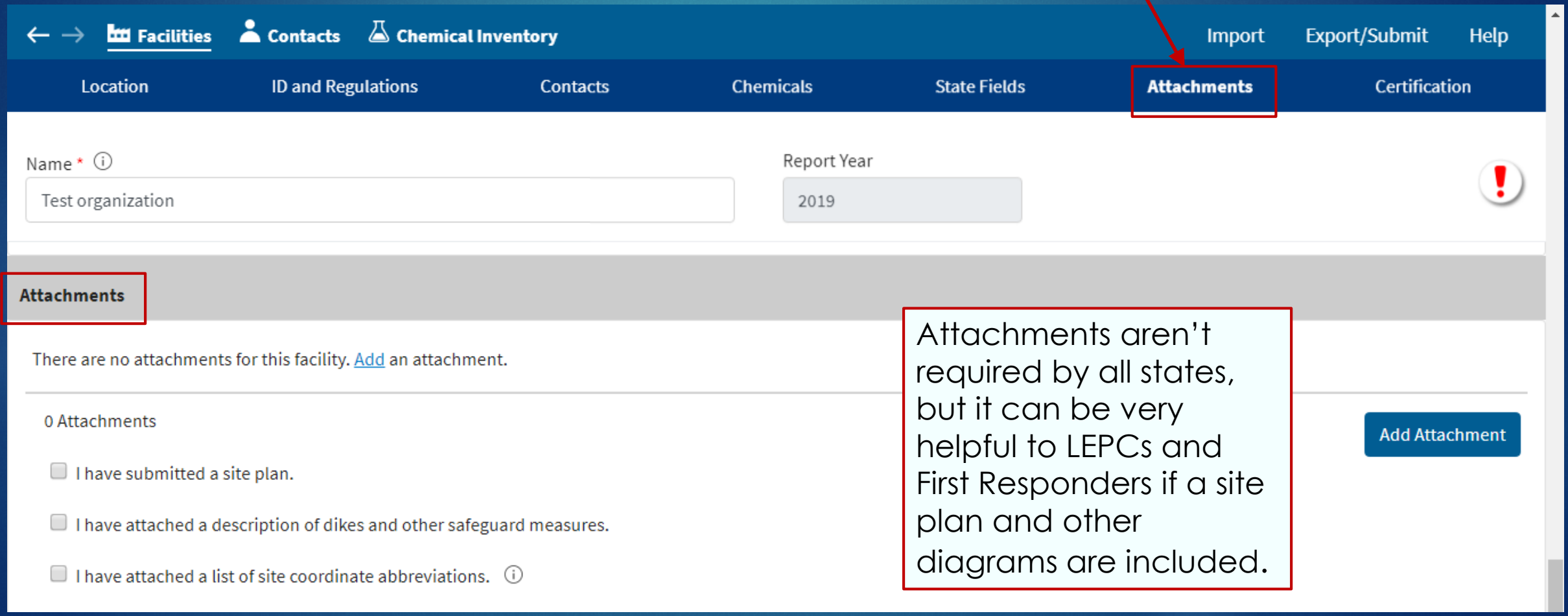
State Fields



Be aware, some answers may trigger more questions that you need to answer. For example, Colorado has additional questions if you indicate that your facility type is "Oil and Gas" or "Agriculture."

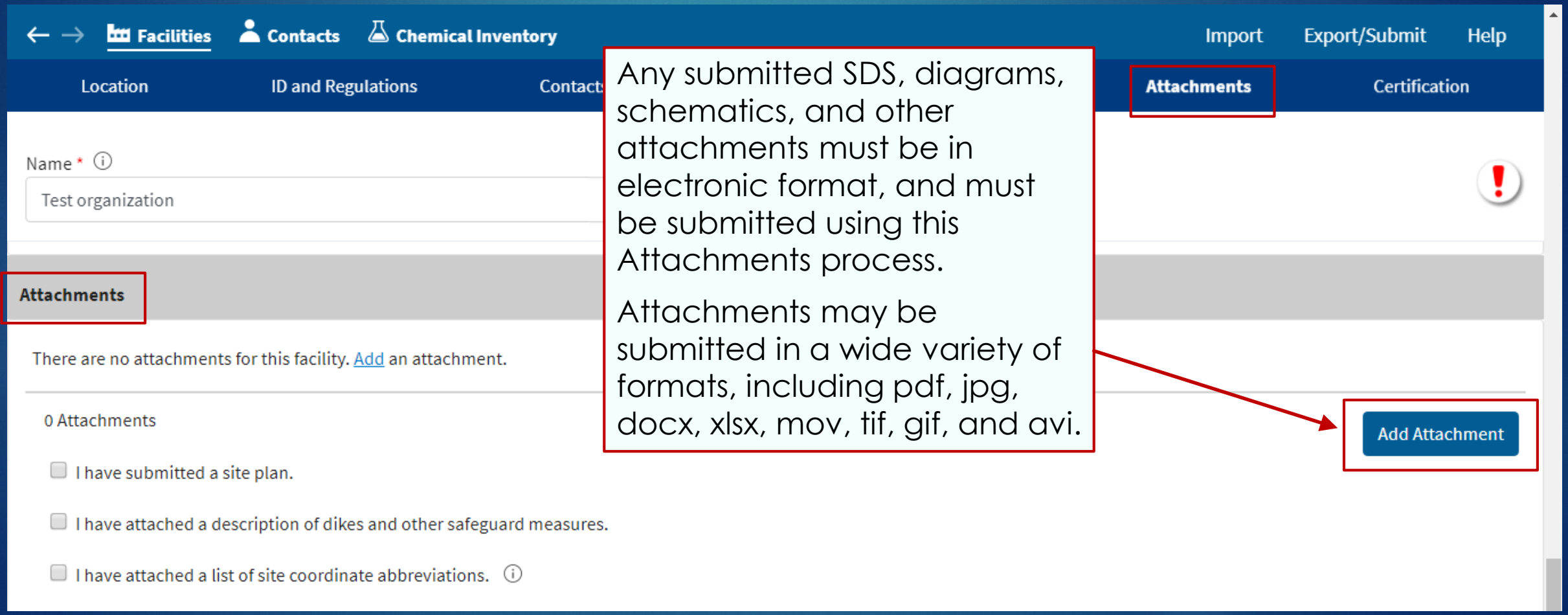
Attachments

Moving on to "Attachments."



Attachments aren't required by all states, but it can be very helpful to LEPCs and First Responders if a site plan and other diagrams are included.

Attachments



Any submitted SDS, diagrams, schematics, and other attachments must be in electronic format, and must be submitted using this Attachments process.

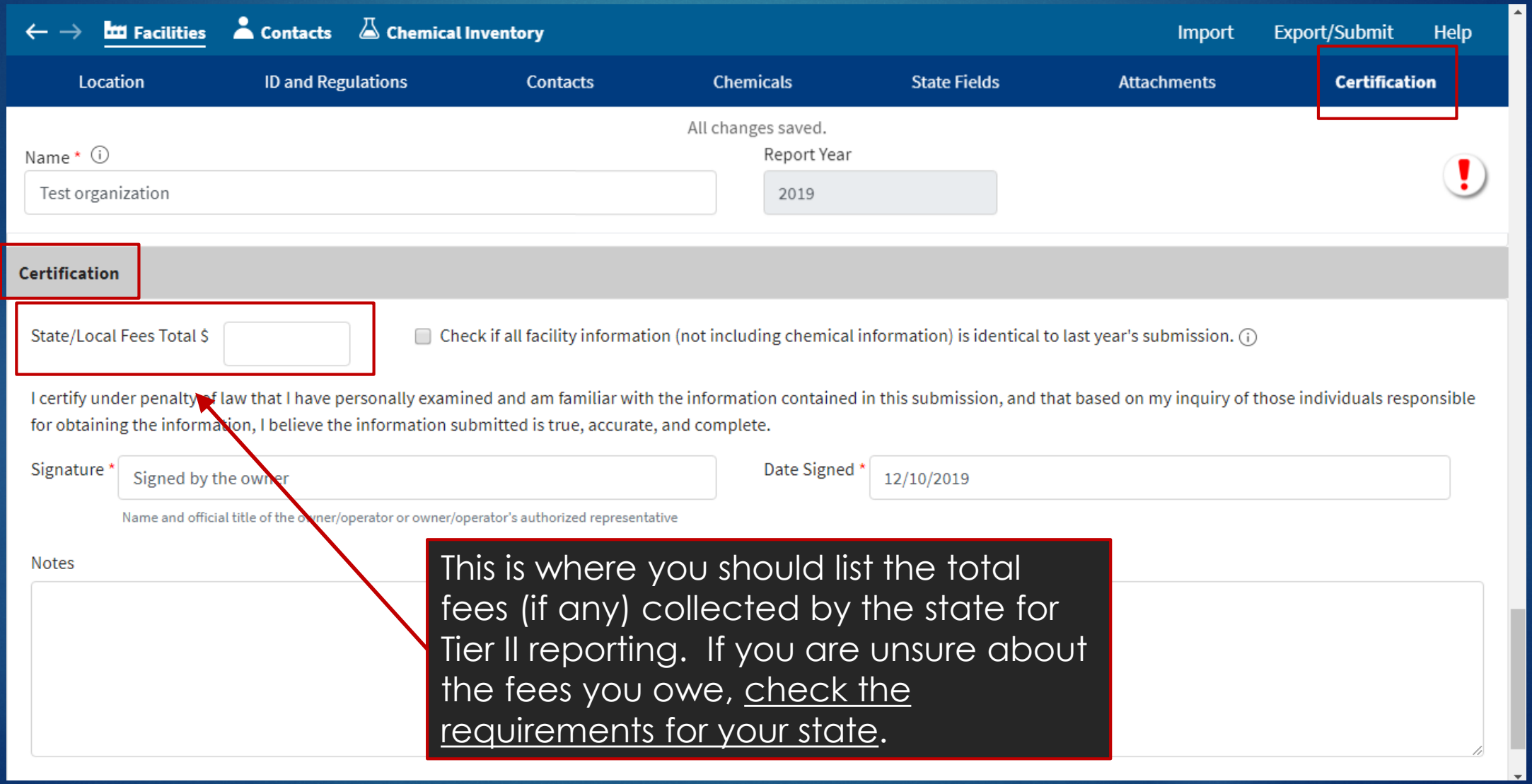
Attachments may be submitted in a wide variety of formats, including pdf, jpg, docx, xlsx, mov, tif, gif, and avi.

Certification

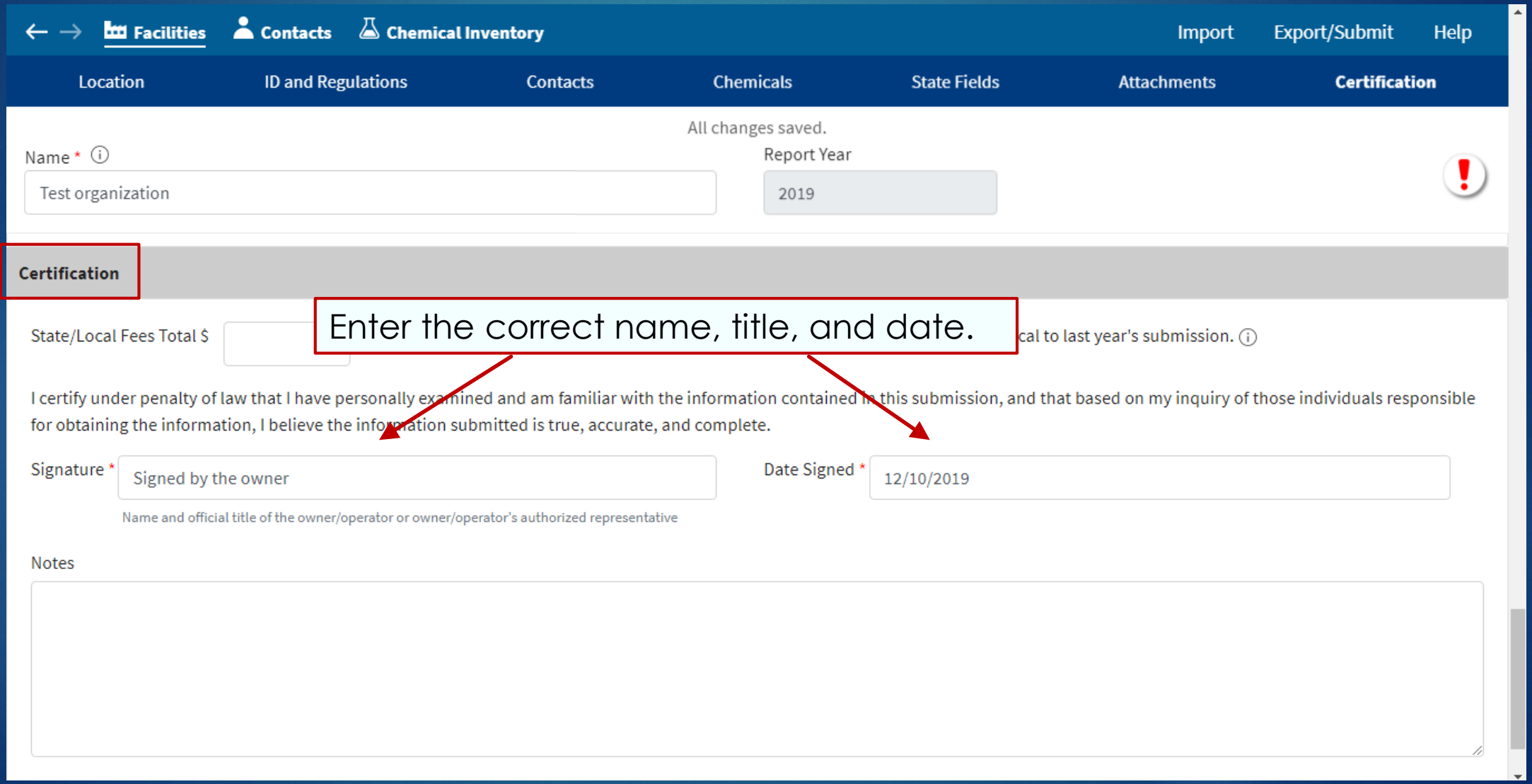
You are now close to finishing your Tier2 Submit form.

The next step is “Certification.”

Certification



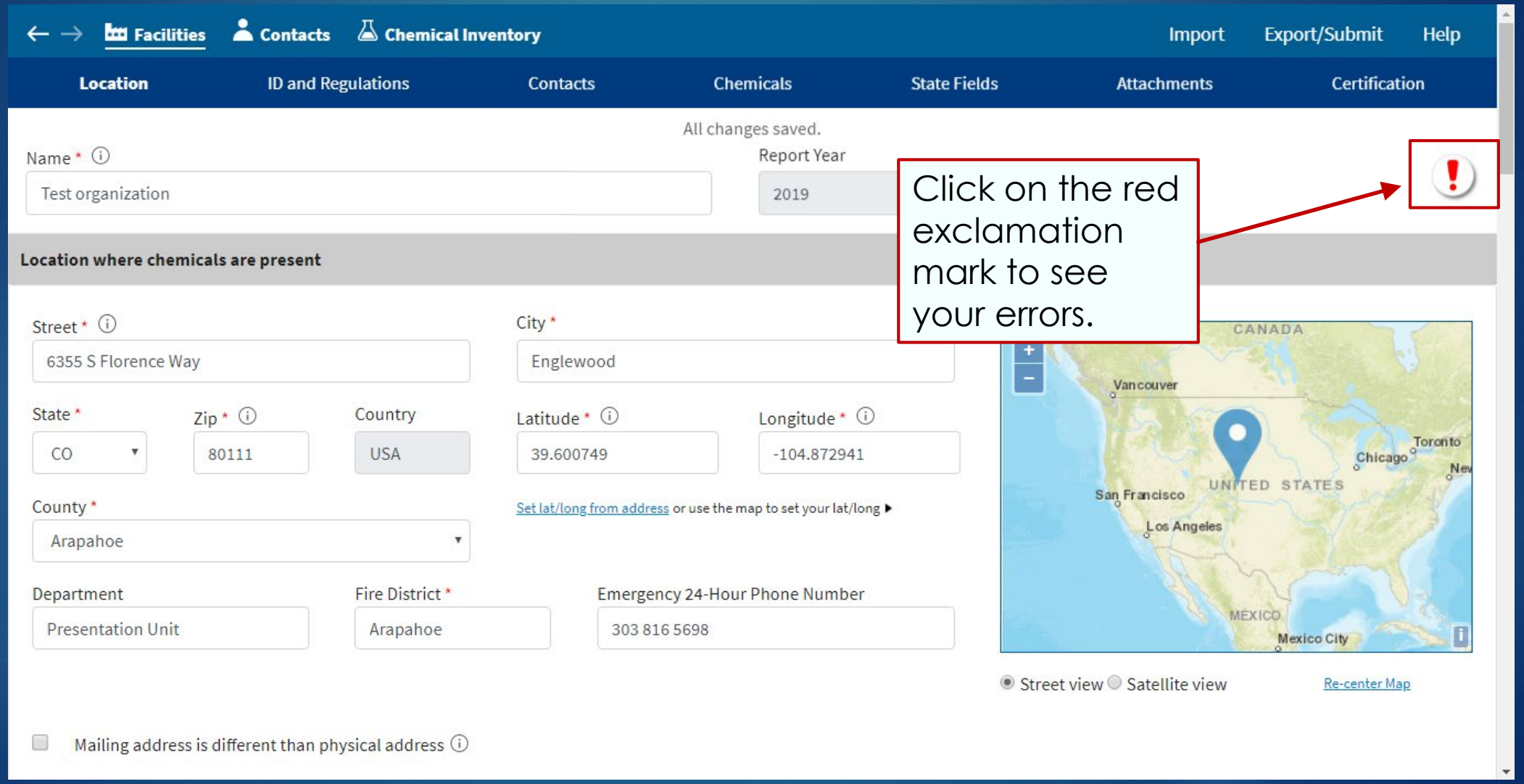
Certification



Checking for Errors

- You have now moved through the Tier2 Submit application.
- Before it can be submitted, it must be checked for errors.
- Fortunately, Tier2 Submit does extensive error checking for you.

Checking for Errors

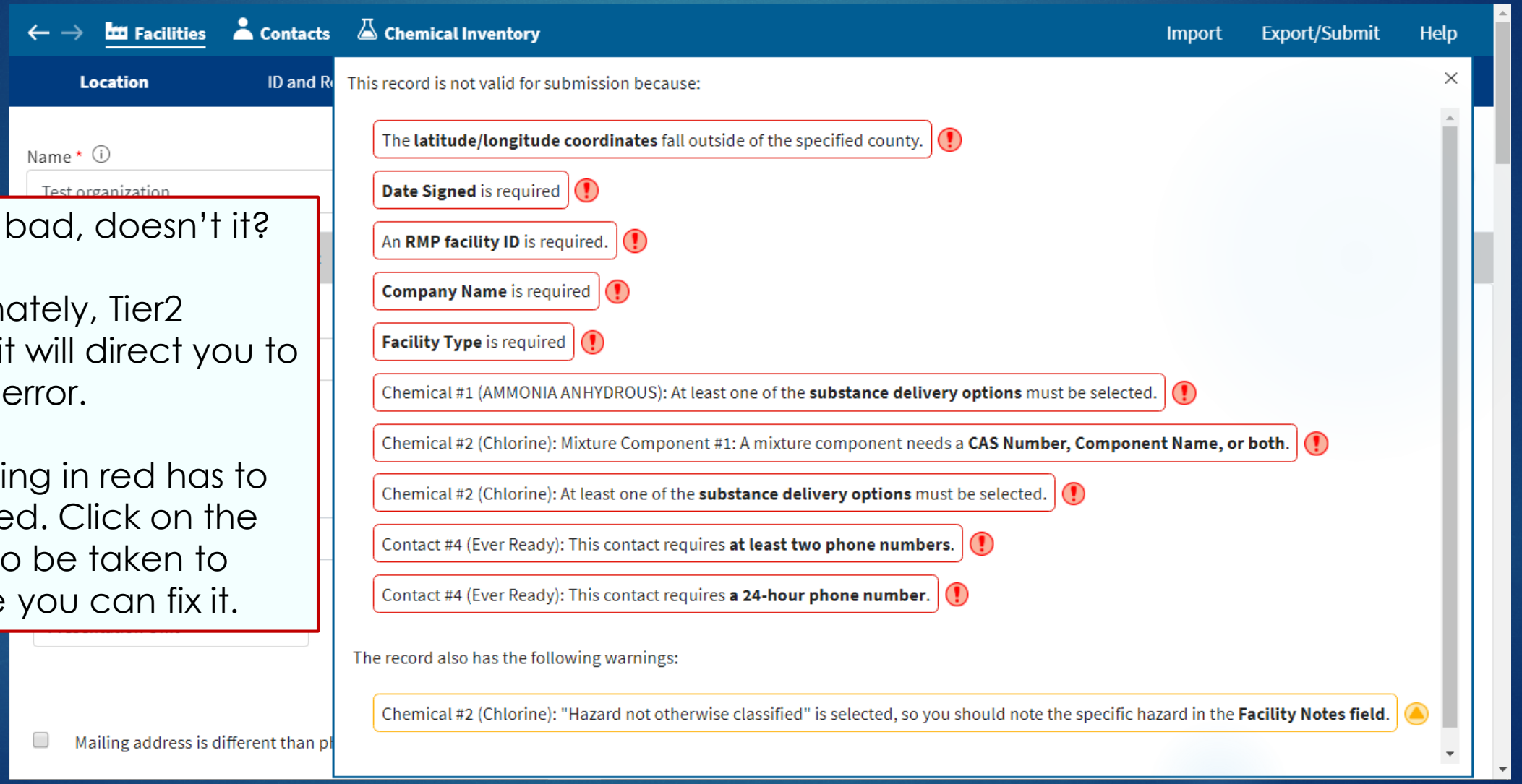


Checking for Errors

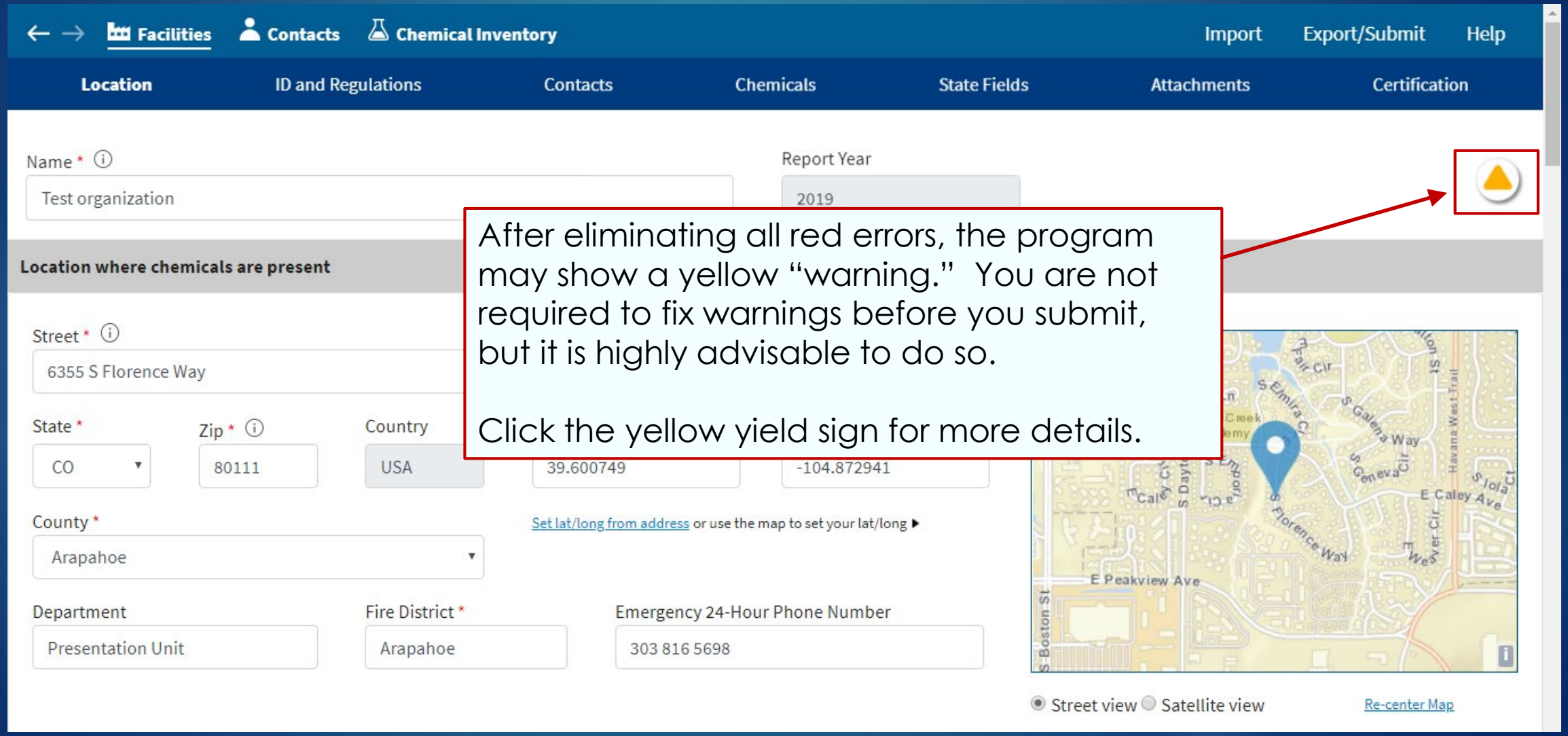
Looks bad, doesn't it?

Fortunately, Tier2 Submit will direct you to each error.

Anything in red has to be fixed. Click on the error to be taken to where you can fix it.



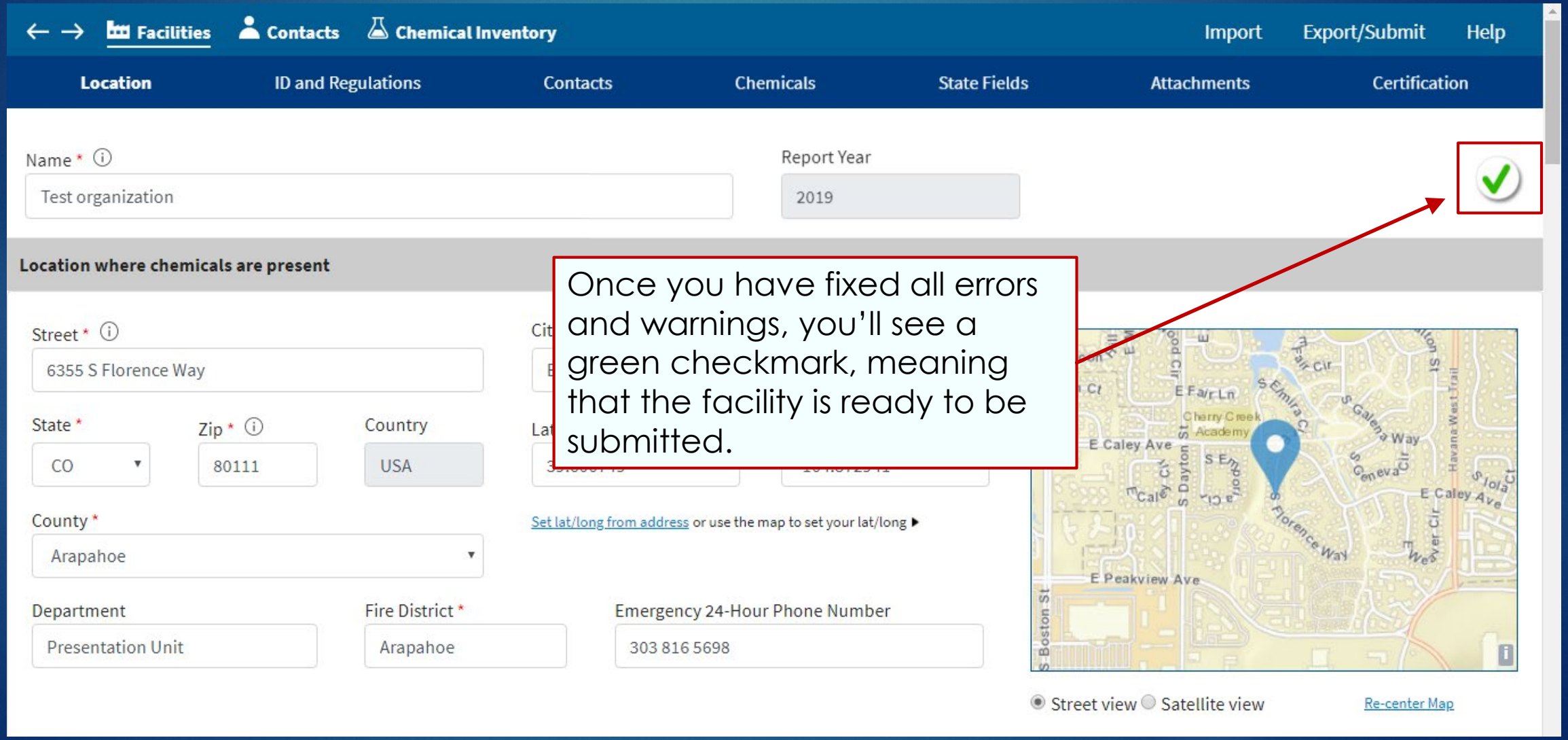
Checking for Errors



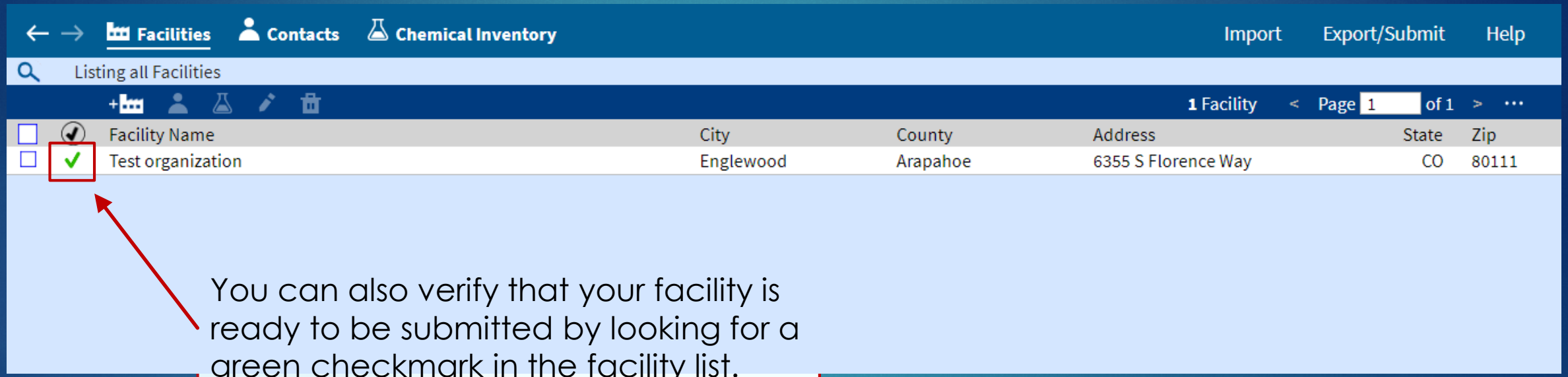
After eliminating all red errors, the program may show a yellow "warning." You are not required to fix warnings before you submit, but it is highly advisable to do so.

Click the yellow yield sign for more details.

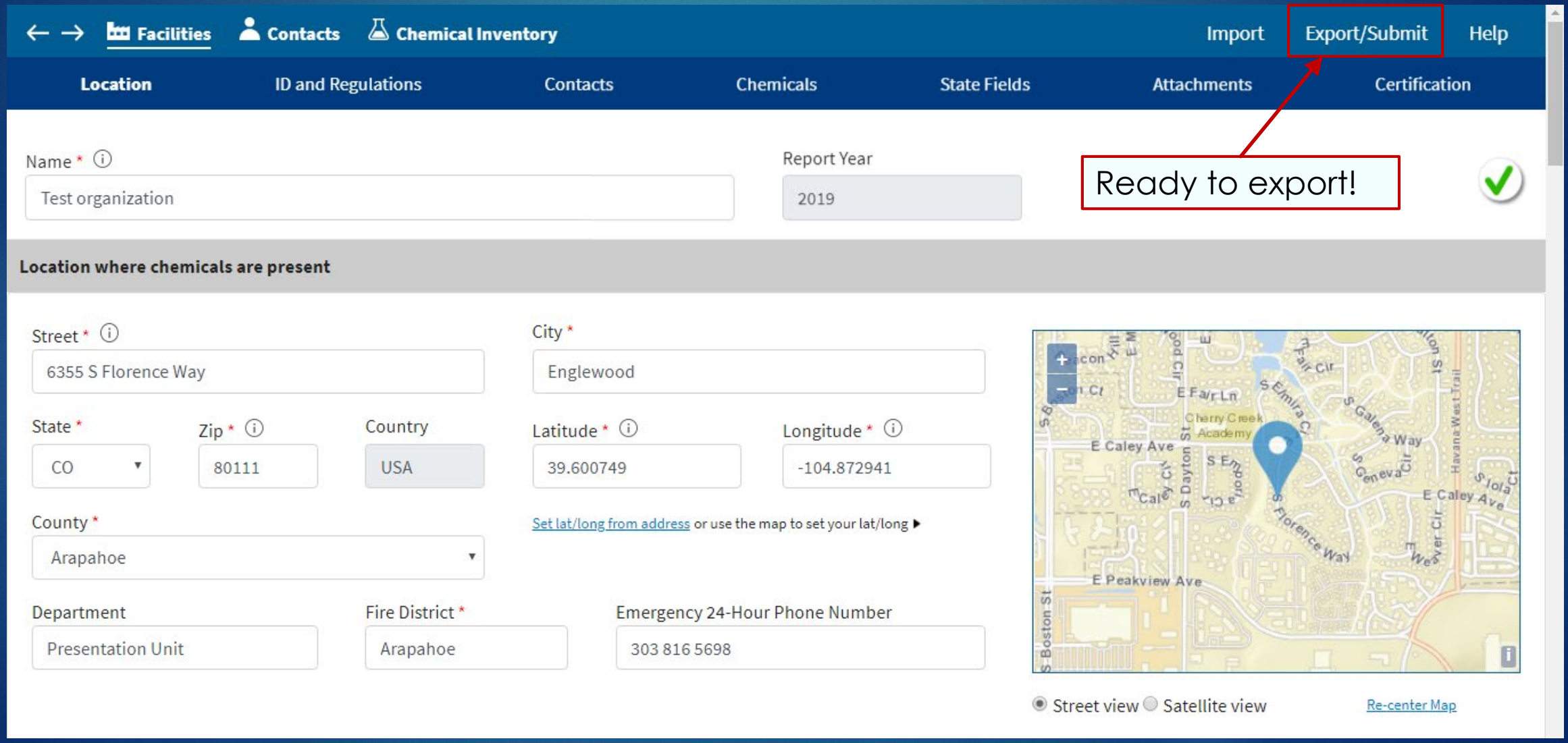
Checking for Errors



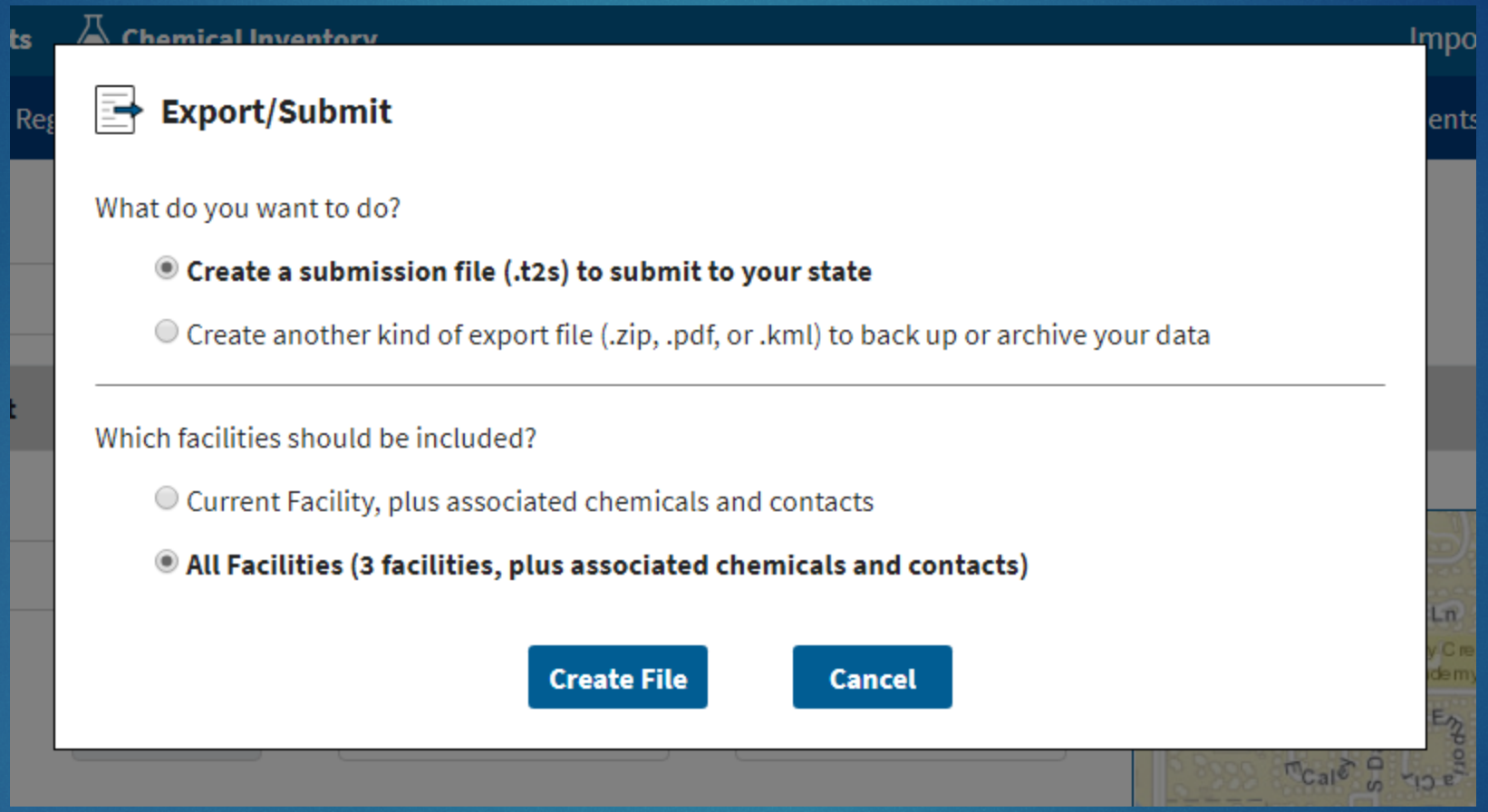
Checking for Errors



Checking for Errors

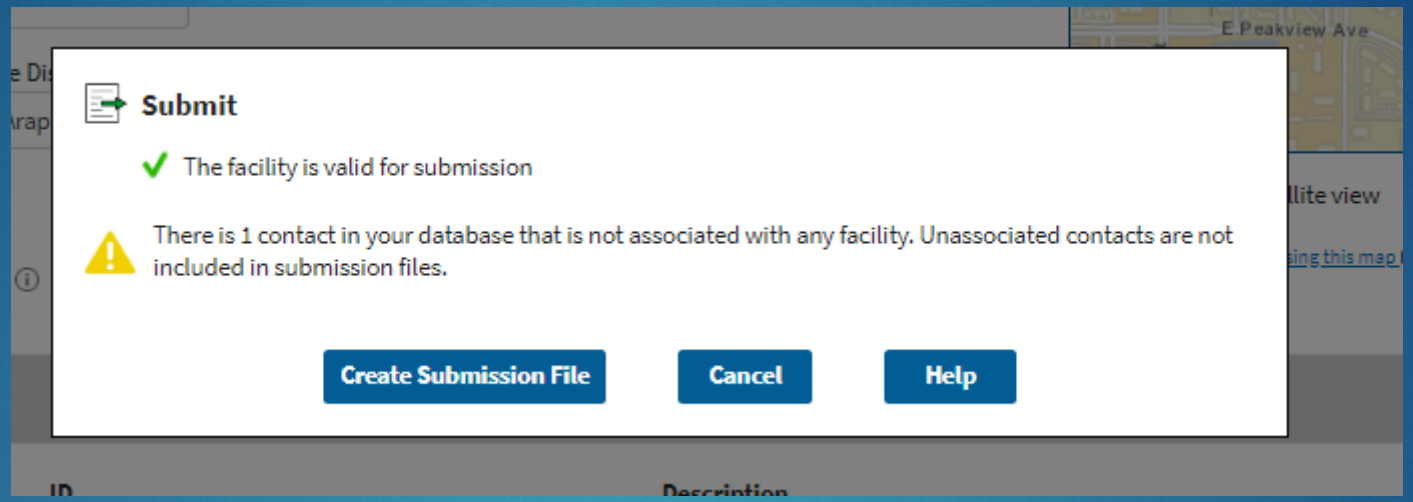


Creating a Submission File



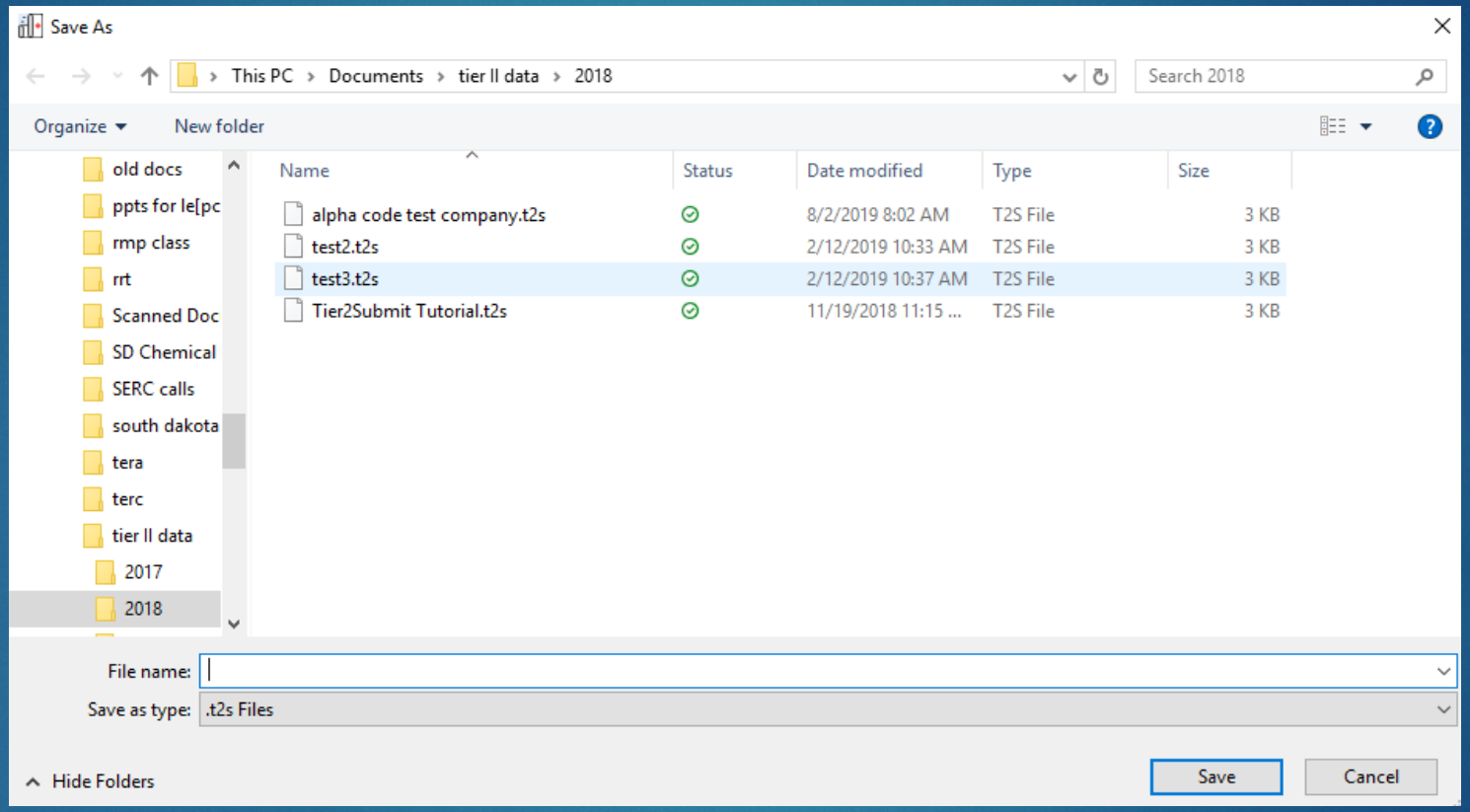
Choose what type of file you want to create. For the purpose of creating a report to send to your state, use the first option to create a .t2s file.

Creating a Submission File



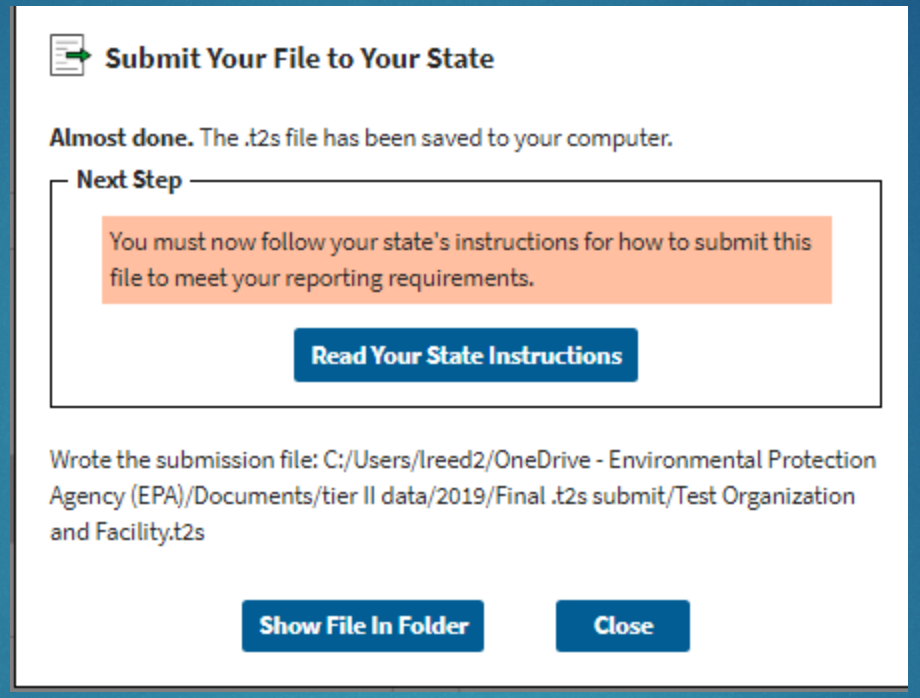
Choose the name of your file (usually based on the name of the facility) and the folder where you want to save it.

Creating a Submission File



Choose the name of your file (usually based on the name of the facility), and the folder where you want to save it.

Creating a Submission File



After the file is saved, the next screen reminds you that even though you saved the file, **you still must send it to your state**.

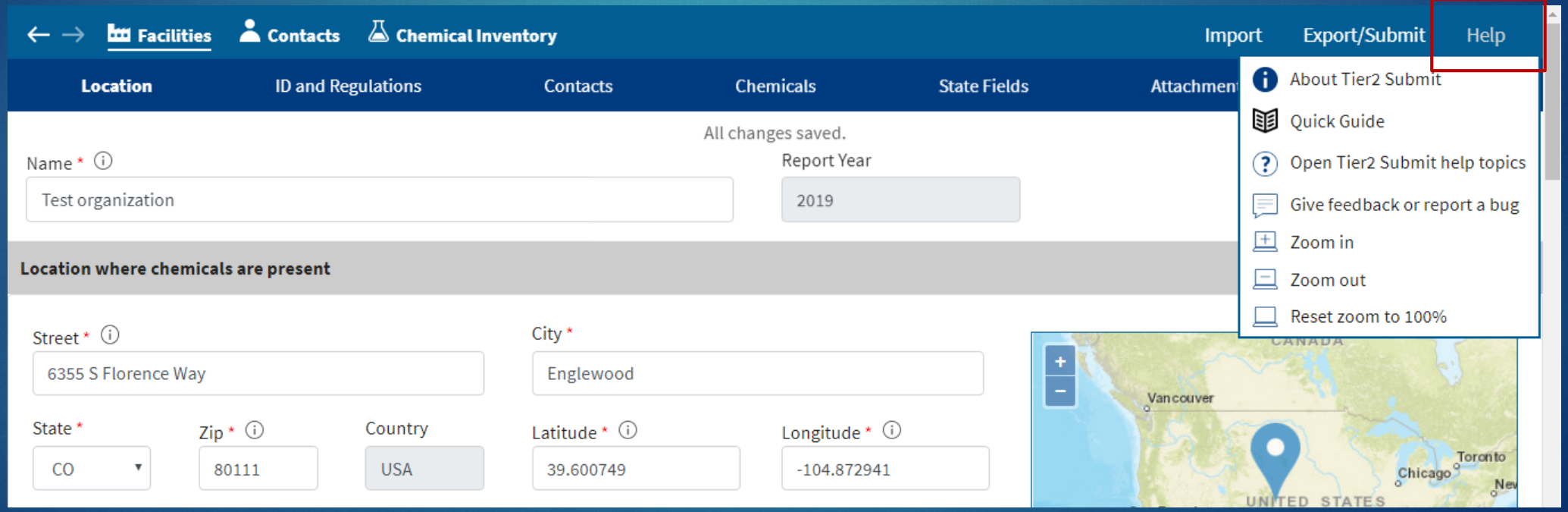
The link "Read Your State Instructions" will take you to the EPA page with state instructions. The button "Show File in Folder" opens the folder on your computer where Tier2 Submit saved the file.

Creating a Submission File

- Reminder: You are not finished after you click "Create Submission File."
- Tier2 Submit does not send your file anywhere. It stores it on your computer for you to send.
- You must submit the Tier2 Submit file directly to your state. Specific instructions for your state are on the EPA State Reporting Requirements page.
  - Each state is unique and may modify their requirements frequently. Check your state for Tier2 Submit 2019 instructions.

Resources

Remember that you can use the **Quick Guide** or the **Help topics** to find instructions and answers to common questions.



Resources

- The EPA EPCRA website has more information and offers an EPCRA Fact sheet
- EPA List of Lists
- Lookup or request a Dun & Bradstreet number on the Dun & Bradstreet website
- Lookup your NAICS code on the NAICS website or the US Census website
- For details on EPCRA implementing regulations, refer to 40 CFR part 370
- For the actual CERCLA Superfund Title III EPCRA Public Law
- State-specific Tier II reporting requirements
- For questions about using Tier2 Submit, contact the RMP Reporting Center via email (RMPRC@epacdx.net) or phone (703-227-7650) on weekdays from 8 AM – 4:30 PM Eastern Time.