

DEPARTMENT OF THE ARMY
 DEVENS RESERVE FORCES TRAINING AREA
 Devens, Massachusetts 01434-4479
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Environmental Protection and Enhancement
**SUPERFUND AMENDMENT AND REAUTHORIZATION ACT (SARA) TITLE III –
 EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT (EPCRA)
 STANDARD OPERATING PROCEDURE**

HISTORY. This is the initial publication of this procedure under the Devens Reserve Forces Training Area (Devens RFTA).

SUMMARY. This procedure covers emergency release notification, Material Safety Data Sheet (MSDS) and inventory reporting, toxic chemical release reporting, and other requirements under EPCRA (SARA Title III).

APPLICABILITY. This procedure applies to all Devens RFTA directorates, staff activities, military organizations, government agencies, civilian organizations, contractors, and individuals training, doing business, conducting research, or otherwise using Devens RFTA facilities. It is both informative and directive in nature.

SUGGESTED IMPROVEMENTS. The proponent of this regulation is the Directorate of Public Works (DPW) Environmental Division. Users are invited to send comments and suggested improvements on Department of the Army (DA) Form 2028 (Recommended Changes to Publications and Blank Forms) to Commander, Devens RFTA, ATTN: IMNE-DEV-PWE, Devens, MA 01434-4479.

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CHAPTER 1. INTRODUCTION

1-1. Purpose. The purpose of this procedure is to provide guidance for fulfilling Army, state, and federal EPCRA (SARA Title III) regulatory requirements. These requirements include emergency release notification, Material Safety Data Sheet (MSDS) and inventory reporting, and toxic chemical release reporting.

1-2. Applicability. Intended users of this guidance are the staff, tenants, and contractors located on the Devens RFTA who are responsible for chemical and hazardous materials inventory and management.

1-3. Scope. The provisions of this plan apply to the personnel and property of Devens RFTA. Implementing regulations for this procedure are found in Title 40 of the Code of Federal Regulations (CFR), Parts 302, 355, and 372; and Chapter 21, Massachusetts Toxics Use Reduction Act.

1-4. Acronyms.

Acronyms	Terms
AEC	Army Environmental Center
CAS	Chemical Abstract System
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CMR	Code of Massachusetts Regulations
DoD	Department of Defense
EHS	Emergency Hazardous Substance
EPA	Emergency Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
LEPC	Local Emergency Planning Committee
MA DEP	Massachusetts Department of Environmental Protection
MEMA	Massachusetts Emergency Management Agency
MSDS	Material Safety Data Sheets
NPDES	National Pollutant Discharge Elimination System
NRC	National Response Center
OSHA	Occupational Safety and Health Administration
SARA	Superfund Amendments and Reauthorization Act
SERC	State Emergency Response Commission
TRI	Toxic Release Inventory
TURA	Toxic Use Reduction Act
USCG	United States Coast Guard

CHAPTER 2. OVERVIEW OF EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT (EPCRA)

2-1. Overview. Emergency Planning and Community Right-to-Know Act (EPCRA) was enacted by Congress as Title III of the Superfund Amendments and Reauthorization Act (SARA) of 1986. EPCRA was passed to improve local community access to information about chemical hazards, and to improve state and local emergency response capabilities, and to report information on chemical releases in the community. The right-to-know acts require reporting of information on chemical inventories and releases to local cities, counties, and the state in which the facility is located. Additionally, the Massachusetts Toxics Use Reduction Act requires the reduction of toxics chemicals use through input substitution, product reformulation, production unit redesign or modernization, improved production unit operation and maintenance, and recycling and reuse. Facilities that are required to file federal Form Rs must also file chemical use reports so that progress toward the stated goal of 50% toxics reduction can be measured. The table in Appendix A is a summary of reporting requirements for EPCRA (SARA Title III).

CHAPTER 3. EPCRA SECTION 301—EMERGENCY RESPONSE NETWORK

3-1. EPCRA Section 301 Requirement Summary. Sections 301 of EPCRA required the creation and implementation of a coordinated network to plan for and respond to releases of hazardous substances that may be present in the community above a certain level known as the threshold planning quantity. While Devens RFTA does not have primary responsibilities for the implementation of this section, it is the prerequisite for emergency planning and response to hazardous substance releases in the local community. This hierarchical network consists of the National Response Center (NRC)/National Response Team which is co-chaired by the Environmental Protection Agency (EPA) and the U. S. Coast Guard (USCG), State Emergency Response Commissions (SERC's), local emergency planning committees (LEPC's), and emergency planning coordinators from facilities subject to the emergency planning requirements of EPCRA.

CHAPTER 4. EPCRA SECTION 302—FACILITY NOTIFICATION OF EMERGENCY PLANNING REQUIREMENTS

4-1. EPCRA Section 302 Requirement Summary. Emergency planning notification requirements are promulgated at 40 CFR Part 355.30. This is a one time notification and the Devens RFTA will comply with these requirements by notifying Massachusetts State Emergency Response Commission/Massachusetts Department of Environmental Protection co-chairs and the Devens Local Emergency Planning Committee (Devens LEPC), Appendix B, in writing within 60 days when the following become present at Devens RFTA:

- a. Any extremely hazardous substance (EHS) in concentrations greater than 1.0%.
- b. In quantities equal to or greater than the threshold planning quantity (see Appendices A and B of 40 CFR Part 355), regardless of the location, number of containers, or method of storage.

CHAPTER 5. EPCRA SECTION 303—EMERGENCY COORDINATOR NOTIFICATION

5-1. EPCRA Section 303 Requirement Summary.

- a. The Devens RFTA will provide the name, address, and phone numbers of the Devens RFTA On-Scene Emergency Coordinator to the Devens LEPC (Appendix B).
- b. This information, as well as any other changes occurring at Devens which may be relevant to emergency planning, must be updated promptly if changes occur.
- c. Devens RFTA environmental staff must provide the Devens LEPC with any other additional information it requests which is necessary for development and implementation of the local emergency plan.

CHAPTER 6. EPCRA SECTION 304—EMERGENCY RELEASE NOTIFICATION

The Devens RFTA will comply with emergency release notification requirements in 40 CFR Part 355.40 and 310 CMR 40 by taking the following specific actions.

6-1. Internal Procedure for Releases.

a. Devens RFTA personnel, tenants, and contractors will take the following actions if a spill of a hazardous, potentially hazardous or unknown substance is discovered:

- (1) To the extent possible, determine if there is immediate danger to human health or the environment;
- (2) Stop the release if it can be done safely;
- (3) Contain the release if it can be done safely; and
- (4) Quantify the release if it can be done safely.

b. Contact the Devens RFTA On-Scene Emergency Coordinator immediately to report the release and any other pertinent information such as personnel injured, location, measures that may have been taken to control the release.

6-2. External Procedure for Releases.

a. The Devens RFTA On-Scene Emergency Coordinator will immediately report by phone, radio, or in person, any releases to the environment of a reportable quantity of any extremely hazardous substances (Appendices A and B of 40 CFR Part 355), any CERCLA hazardous substances (40 CFR Part 302.4), or on the Massachusetts Oil and Hazardous Materials List (310 CMR 40.1600) to the Massachusetts Department of Environmental Protection Emergency

Response Section (1.888.304.1133); the NRC (1.800.424.8802); the SERC and Massachusetts Emergency Management Agency (MEMA), co-chairs; Local Emergency Planning Committees; and the State Emergency Planning Commission and Local Emergency Planning Committees of any other states or areas likely to be affected by the release (Appendix C). See notification exceptions in 310 CMR 40.0317.

b. Notification also includes releases due to transportation and storage breaches. The Devens RFTA Emergency Coordinator will provide the above contacts with the following information:

- (1) The chemical name and identity of the substance(s) involved in the release.
- (2) An indication whether the substance(s) is an extremely hazardous substance.
- (3) An estimate of the quantity of each substance released to the environment.
- (4) The time and duration of the release.
- (5) The medium or media into which the release occurred.
- (6) Any known acute or chronic health risks associated with the emergency and, where appropriate, advice regarding medical attention necessary for exposed individuals.
- (7) Proper precautions to take as a result of the release, including evacuation.
- (8) The names and telephone numbers of the person or persons to be contacted for further information.

c. The Devens RFTA On Scene Emergency Coordinator will provide written follow-up emergency notice (or notices, as more information becomes available). This written notification shall document and update the initial report with the following additional information:

- (1) Actions taken to respond to and contain the release.
- (2) Any known acute or chronic health risks associated with the release.
- (3) Where appropriate, advice regarding medical attention necessary for exposed individuals.

d. This information must be provided to the NRC, MA DEP co-chair of the MEMA, and the Devens LEPC as soon as practicable after the initial phone notification.

6-3. Exemptions. This procedure addresses unplanned, non-routine releases that are catastrophic and constitute an emergency. The following releases are exempt from the emergency release notification requirements of 40 CFR Part 355.40:

- a. Releases which result in exposure to persons solely within the boundaries of a facility.
- b. Any federally permitted release as defined in Section 101 (10) of CERCLA. Example: releases permitted by a National Pollutant Discharge Elimination System (NPDES) permit.
- c. Any release that is continuous and stable in quantity and rate under the definitions of 40 CFR Part 302.8(b). See 40 CFR Part 355.40(a)(2)(iii) for additional information.

CHAPTER 7. SECTION 311—MATERIAL SAFETY DATA SHEET (MSDS) REPORTING

7-1. External Reporting

a. The Devens RFTA will comply with hazardous chemical reporting requirements that are promulgated at 40 CFR Part 370. The following specific actions shall be taken:

(1) Provide MSDS's or equivalent information on hazardous chemicals within three months of becoming present at Devens RFTA in quantities equal to or greater than the minimum threshold level to the SERC/MA DEP co-chairs, Devens LEPC, and fire chiefs of fire departments who respond to emergencies at Devens RFTA. Minimum threshold levels are defined below:

(a) Extremely hazardous substance—500 lb or 227 kg (approximately 55 gal) or the threshold planning quantity as defined in Appendices A and B of 40 CFR Part 355, whichever is lower.

(b) All other hazardous substances—10,000 lb or 4,540 kg.

b. Submit a new MSDS or provide alternative information within three months of discovery of significant new information concerning the hazards associated with a hazardous chemical.

c. Provide other MSDSs requested by the LEPC for chemicals at the facility regardless of quantity within 30 days of the request.

7-2. Internal Reporting. In order to meet the external reporting requirements given in Section 7.1 above, Devens RFTA personnel, tenants, and on-site contractors must inform site environmental compliance immediately when any new quantity of an extremely hazardous substance or new quantity greater than 500 lb of any other chemical/substance becomes present in their work area.

7-3. Exceptions. Research laboratories are exempt from the hazardous chemical reporting requirements of Sections 311 and 312 of EPCRA. Any substance used in a research laboratory under the direction of a technically qualified individual is specifically excluded from the definition of a hazardous chemical (40 CFR Part 370.2) and, therefore, exempt from the reporting requirements.

CHAPTER 8. SECTION 312—INVENTORY REPORTING

8-1. External Reporting. The owner/operator of any facility which is required to prepare or have available a MSDS for a hazardous chemical under the Occupational Safety and Health Act of 1970 (OSHA) and regulations promulgated under the act shall prepared and submit an emergency and hazardous chemical inventory form. The Devens RFTA will comply with

hazardous chemical inventory reporting requirements that are promulgated at 40 CFR Part 370.25 by taking the following specific actions:

a. The Devens RFTA will submit information on hazardous chemicals present at the facility during the preceding calendar year in quantities above the minimum threshold levels.

b. The information will be submitted annually to the SERC, MEMA, LEPC, and fire department(s) with jurisdiction over the facility by March 1 of each year.

c. The information will be submitted electronically using Tier II Forms as requested by the State of Massachusetts. Appendix B contains website information for the electronic submission of 2003 Tier II forms. A paper copy of the Tier II form is given in Appendix D.

8-2. Internal Reporting. Upon request (usually once annually in January), Devens RFTA personnel, tenants, and on-site contractors must provide the following information for the previous calendar year to Devens RFTA environmental staff annual inventory reporting required by EPCRA (Appendix E). The following information must be provided annually by mid-February:

a. Chemical name, Chemical Abstract Service (CAS) number, manufacturer, quantity in pounds, location, and a group contact for any chemical on EPA's extremely hazardous substances list (Appendices A and B of 40 CFR Part 355).

b. Chemical name, CAS number, manufacturer, quantity in pounds, location and group contact for any chemical stored or used in quantities greater than 500 lb.

8-3. MSDS and Inventory Reporting for Hazardous Chemical Mixtures.

a. Hazardous chemical mixtures are mixtures that include chemicals describe in Section 7-1. MSDS and inventory reporting for a hazardous chemical mixture can be met by the following:

(1) Providing the required information on each component in the mixture, which is a hazardous chemical.

(2) Providing the required information on the mixture itself.

b. The same method must be used for both MSDS and inventory reporting, where practical. See 40 CFR Part 370.28 for additional information on MSDS and inventory reporting for hazardous chemical mixtures.

8-4. MSDS and Tier II Information Requests.

a. Any person may obtain an MSDS for a chemical stored at a facility by submitting a written request to the LEPC. The LEPC must provide the requested information. If the LEPC does not have the requested MSDS, it will request the MSDS from Devens RFTA and provide the

information to the requester.

b. Any person may request Tier II information for Devens RFTA by submitting a written request to the LEPC or Devens RFTA. The LEPC or Devens RFTA must provide the requested information. If the LEPC does not have the requested information, it will request information from the facility and provide it to the requester provided certain conditions are met (see 40 CFR Part 370.30(b)(2) and (b)(3)). Upon request of the facility, the LEPC or Devens RFTA may withhold disclosure of the location of any specific chemical listed on the Tier II form.

CHAPTER 9. SECTION 313—TOXIC RELEASE INVENTORY (TRI) REPORTING

Devens RFTA will comply with annual toxic release inventory reporting requirements of Section 313 of EPCRA that are promulgated at 40 CFR Part 372 and Executive Order 12856 Federal Compliance with Right-to-Know laws by taking the following specific actions (Note: This executive order was later replaced by Executive Order 13148 which required federal agencies to continue to report under EPCRA, and Pollution Prevention Requirements which required agency-wide reductions in chemical usages and releases.)

9-1. Facility Eligibility Determination for Reporting TRI

a. Upon request (once annually, by March 1), tenant and employee representatives of all establishments at Devens RFTA with toxic release inventory reporting responsibilities will provide information **for the previous calendar year** on their toxic chemicals activities (Appendix G) to the TRI lead coordinator. Devens RFTA is required to report their releases (permitted and accidental) as well as their waste management activities if the following criteria is met: (1) the facility has 10 or more full time employees equivalents (i.e., a total of 20000 hours or greater); and (2) the facility manufactured, processed, or otherwise used listed toxic chemicals at Devens RFTA in quantities that exceed applicable threshold quantities. Calendar year threshold quantities for toxic chemicals are as follows:

(1) Chemicals manufactured (including imported), or processed—25,000 lb.

(2) Chemicals otherwise used—10,000 lb.

(3) Persistent, bioaccumulative, and toxic (PBT) chemicals are a certain class of chemicals, which have lower reporting thresholds (see 40 CFR Part 372.28).

9-2. Full Time Employee (FTEs) Determination. For TRI reporting purposes, all adjacent and contiguous establishments singularly owned constitute a facility that is subject to TRI reporting requirements. If fewer than 10 employees have worked less than 20,000 hours at a facility/installation, it is exempt from reporting requirements. The EPCRA Munitions Reporting Handbook for the U.S. Army states “as a matter of DoD policy, all ranges at an installation constitute a single EPCRA ‘facility’ for TRI reporting purposes.” (DoD Guidance of March 2000). This approach is not supported by EPA guidance, but DoD policy requires that the

employee criterion be applied separately to the hours worked on ranges from the hours worked at the rest of the facility.

9-3. Exemptions.

a. If reporting criteria is met, all toxic chemical releases, including releases resulting from munitions use at Devens RFTA, must be reported unless exempt. Regulations in 40 CFR Part 372.38 provide exemptions from inclusion of certain materials in determining if the threshold quantity of a toxic chemical has been exceeded and in determining the amount of a toxic chemical released. These exemptions include, but are not limited to the following (see 40 CFR Parts 372.38(g), and (h) for additional exemptions):

(1) *De Minimus* concentrations—non-PBT listed toxic chemicals present in mixtures processed or otherwise used at concentrations below 1% of the mixture or 0.1% of the mixture if the toxic chemical is a carcinogen as defined in 29 CFR Part 1910.1200(d)(4).

(2) Articles—listed toxic chemicals which are constituents in articles such as tanks, containers, etc., which are shaped and designed for a specific purpose and do not release toxic chemicals under normal use or processing. If items are cut, welded, or otherwise processed such that a toxic chemical is released, it does not meet the definition of article and the exemption does not apply.

(3) Otherwise Uses—

(a) Toxic chemicals in structural components of the facility or used to ensure or improve the structural integrity such as copper piping and adhesives and sealants used on structures;

(b) Toxic chemicals in janitorial and grounds maintenance products such as fertilizers, pesticides, herbicides, insecticides, bathroom and kitchen cleaners;

(c) Personal use by/for employees or other persons at the facility of foods, drugs, cosmetics, or other personal items containing toxic chemicals, including supplies for a facility-operated cafeteria, store, or infirmary, such as toxic chemicals in fuels to heat buildings for personal comfort; at commissaries, cafeteria, DoD exchanges, and base medical facilities; and Freon to cool buildings for personal comfort;

(d) Toxic chemicals in products used for the purpose of maintaining motor vehicles used by the facility unless such maintenance is related to the primary business or function of the facility. Examples of facilities that use this exemption are those that use toxic chemicals associated with the maintenance of motor vehicles such as staff cars, base maintenance and support vehicles, and privately owned vehicles; and those that do Organizational Level maintenance on motor vehicles (Intermediate and Depot Level are not exempt); and

(e) Use of toxic chemicals present in process water and non-contact cooling water as drawn from the environment or from municipal sources, or present in air used either as compressed air or as part of combustion, etc.

(4) Use of toxic chemicals manufacture, processed, or used in a covered facility laboratory under the supervision of a technically qualified individual as defined in 40 CFR Part 720.3(ee) with a few exceptions. Devens RFTA does not currently have any covered facility laboratories involving toxic chemicals.

(5) Toxic chemicals used in a facility that is located on leased property provided the owner's only interest in the facility is ownership of the real estate upon which facility is operated. See 40 CFR Part 372.38(e) for additional details. Devens RFTA currently does not have any facilities on leased property.

b. Devens RFTA will use information obtained from various tenants to summarize data according to activity—manufacture, process, or otherwise used. The DoD's TRI Data Delivery System for EPCRA 313 and the MIDAS Munitions Analytical Compliance System (MACS) are automated calculation tools, which can be used to summarize the data.

(1) For mixtures, the following guidelines should be used to summarize the data:

(a) The weight (lb) of a toxic chemical listed at 40 CFR Part 372.65 that is part of a mixture or is an item is determined from MSDSs or from supplier information.

(b) If the toxic chemical identity in the mixture or product is unknown but the maximum concentration is known, then the amount of toxic chemical in the product or mixture shall be calculated using the maximum chemical concentration and item weight.

(c) If the toxic chemical identity in the mixture or product is known, and both the specific and maximum concentration of the mixture or product has not otherwise been developed, then the amount of toxic chemical in the product or mixture does not have to be added to other amounts of toxic chemicals that are manufactured, imported, processed, or otherwise used at the facility.

(d) If the toxic chemical identity in the mixture is unknown and the specific concentration is known, then the amount of toxic chemical in the product or mixture shall be calculated using the concentration and weight of the mixture or product.

(e) If the identity of the toxic chemical in the mixture or product is unknown and the specific concentration is unknown, but the maximum concentration is known, then the amount of toxic chemical in the product or mixture shall be calculated using the maximum concentration and weight of the mixture or product.

(2) If applicable thresholds are met, the Devens RFTA environmental compliance staff submits the data on Form R's to the Army Environmental Center between late April and early May. Form R and detailed instructions for completing it can be found on the World Wide Web

at the EPA site (<http://www.epa.gov>) or by writing the Section 313 Document Distribution Center, P.O. Box 12505, Cincinnati, Ohio 45212. EPA encourages facilities subject to this reporting to submit the required information using magnetic media in lieu of hard copy Form Rs.

(3) The Army Environmental Center submits the comprehensive TRI report to EPA by July 1. Additionally, Devens RFTA will file a chemical use report per the requirement of the State of Massachusetts to meet its goal of 50% statewide toxics-reduction goal.

(4) If activities at Devens RFTA do not cause reporting thresholds for TRI chemicals to be exceeded, the Devens RFTA environmental staff will inform the AEC that the facility will not be required to file Form Rs for the TRI report.

9-4. Compliance and Enforcement. Violation of the requirements of EPCRA Section 313 (40 CFR Part 372) may result in a civil penalty of up to \$25,000 each day for each violation.

CHAPTER 10. RECORDS

All Devens RFTA staff, tenants, and on-site contractor records pertinent to the Devens RFTA Emergency Planning and Community Right-to-Know Act will be kept for a period of five years from when Tier II reports and Form Rs are submitted, and to prove that chemicals have been considered for reporting (DoD Guidance of March 1998).

CHAPTER 11. REFERENCES

11-1. List of References.

- a. 40 CFR Part 302
- b. 40 CFR Part 355
- c. 40 CFR Part 370
- d. 40 CFR Part 372
- e. Chapter 21, Massachusetts Toxics Use Reduction Act
- f. Consolidated List of Chemicals Subject to the Emergency Planning and Community Right-to-Know Act (EPCRA) and Section 112 of the Clean Air Act, EPA
- g. Devens RFTA Management of Hazardous Waste Plan
- h. EPA website, <http://www.epa.gov/epahome/cfr40.htm>
- i. EPA website, <http://www.epa.gov/opptintr/tri/report.htm>

<p>311 HAZARDOUS CHEMICAL INFORMATION</p>	<p>MSDSs or equivalent information on hazardous chemicals present at Devens RFTA at any time in quantities equal to or greater than the minimum threshold level for that chemical. See Chapter 7 of this procedure.</p>	<p>Initial submission on or before October 17, 1990 or within three months after Devens RFTA becomes subject to MSDS reporting. New MSDSs or revised alternative information must be submitted within 3 months after discovery of significant new information or after any new hazardous chemical becomes present at Devens RFTA in quantities equal to or greater than the minimum threshold level for that chemical.</p>	<p>Devens RFTA— DPW, Environmental</p>	<p>MEMA, MA DEP, Devens LEPC, and fire chiefs of local fire departments that respond to hazardous material emergencies at Devens RFTA.</p>
<p>312 HAZARDOUS CHEMICAL INVENTORY REPORTING</p>	<p>Inventory reporting of Tier II information on hazardous chemicals present at the Devens RFTA site during the previous calendar year in quantities equal to or above the minimum threshold levels.</p>	<p>Annually, on or before March 1, of each year.</p>	<p>Devens RFTA— DPW, Environmental</p>	<p>MEMA, MA DEP, Devens LEPC, and fire chiefs of local fire departments that respond to hazardous material emergencies at Devens RFTA.</p>
<p>313 TOXIC CHEMICAL RELEASE REPORTING</p>	<p>Toxic release inventory information on Form R for toxic chemicals/ toxic chemical categories (see 40 CFR Parts 372.65(a), (b), and (c) in quantities exceeding the applicable threshold quantity (see 40 CFR Part 372.22).</p>	<p>Annually, on or before July 1, of each year. For the purposes of Section 313 reporting, the Devens RFTA ranges are considered as a facility; the remainder of the site is considered as a separate facility.</p>	<p>Lead organization selected.</p>	<p>Environmental Protection Agency (EPA), MEMA, and MA DEP</p>

APPENDIX B
FACILITY AND CONTACT NOTIFICATION

Date

[From]

Emergency Planning and Community Right-to-Know Act Section 302 Notification

Dear _____:

Pursuant to Section 302 of the Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986, this letter notifies you that the facility named below is subject to the emergency planning and notification provisions of EPCRA.

[Facility]

[Address]

[County]

In addition, _____ *name* _____ is the EPCRA facility contact. You may contact _____ *name* _____ by phone at [*phone*] or by e-mail at [*e-mail*] during normal business hours or at [*phone/pager*] after hours.

Please address any communications pertaining to this notification to _____ *name* _____ at the above address.

Sincerely,

[Signature]

[Title]

cc: Local Emergency Planning Committee
Files

APPENDIX C

EMERGENCY RESPONSE NETWORK FOR DEVENS RFTA

EMERGENCY RESPONSE NETWORK CONTACTS	ADDRESS AND/OR PHONE NUMBERS
National Response Center (NRC) <i>Note: The NRC is co-chaired by EPA and the U.S. Coast Guard</i>	1-800-424-8802
Elaine Denniston, Massachusetts Emergency Management Agency (MEMA)	400 Worcester Road Framingham, MA 01702-5399 508-820-2000
Massachusetts Department of Environmental Protection (MA DEP) – Emergency Response Section	One Winter Street Boston, MA 02108 1-888-304-1133
Devens RFTA On-Scene Emergency Coordinator	978-796-3778 978-796-3333 (After Hours)
DoD Police at Devens RFTA	978-796-3333/3221
Devens Commerce Center Fire Department Fire Chief	104 MacArthur Avenue Devens, MA 01434 978-772-4500 For emergency, dial 9-911
Devens RFTA DPW Environmental Division (ENV)	796-2747 or ext. 3078, 3665
Devens RFTA Safety Office	796-2159 or 2441

APPENDIX D- TIER II FORM

<p>Tier Two EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY</p> <p><i>Specific Information by Chemical</i></p>	<p>Facility Identification</p> <p>Name _____ Street _____ City _____ State _____ Zip _____</p> <p>County _____ Dun & Brad Number _____</p> <p>SIC Code _____</p> <p style="text-align: center;">FOR OFFICIAL USE ONLY</p> <p>ID # _____ Date Received _____</p>	<p>Owner/Operator Name</p> <p>Name _____ Phone () _____</p> <p>Mail Address _____</p> <p>Emergency Contact</p> <p>Name _____ Title _____</p> <p>Phone () _____ 24 Hr. Phone () _____</p> <p>Name _____ Title _____</p> <p>Phone () _____ 24 Hr. Phone () _____</p>	<p>Reporting Period From January 1 to December 31, 20 _____</p> <p>[] Check if information below is identical to the information submitted last year _____</p>	
<p>Chemical Description</p> <p>CAS Chem. Name _____ Trade Secret _____</p> <p>Check all that apply Pure Mix Solid Liquid Gas EHS</p> <p>EHS Name _____</p>	<p>Physical and Health Hazards (check all that apply)</p> <p><input type="checkbox"/> Fire Sudden Release of Pressure</p> <p><input type="checkbox"/> Reactivity Immediate (acute) Delayed (chronic)</p>	<p>Inventory</p> <p>Max. Daily Amount (code) _____</p> <p>Avg. Daily Amount (code) _____</p> <p>No. of Days On-site (days) _____</p>	<p>Storage Codes and Locations (Non-Confidential)</p> <p>Storage Locations</p>	
<p>CAS Chem. Name _____ Trade Secret _____</p> <p>Check all that apply Pure Mix Solid Liquid Gas EHS</p> <p>EHS Name _____</p>	<p><input type="checkbox"/> Fire Sudden Release of Pressure</p> <p><input type="checkbox"/> Reactivity Immediate (acute) Delayed (chronic)</p>	<p>Max. Daily Amount (code) _____</p> <p>Avg. Daily Amount (code) _____</p> <p>No. of Days On-site (days) _____</p>	<p>Optional</p>	
<p>CAS Chem. Name _____ Trade Secret _____</p> <p>Check all that apply Pure Mix Solid Liquid Gas EHS</p> <p>EHS Name _____</p>	<p><input type="checkbox"/> Fire Sudden Release of Pressure</p> <p><input type="checkbox"/> Reactivity Immediate (acute) Delayed (chronic)</p>	<p>Max. Daily Amount (code) _____</p> <p>Avg. Daily Amount (code) _____</p> <p>No. of Days On-site (days) _____</p>	<p>Optional</p>	
<p>Certification (Read and sign after completing all sections)</p> <p>I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages one through _____, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.</p> <p>Name and official title of owner/operator OR owner/operator's authorized representative _____ Signature _____ Date signed _____</p>				<p>Optional Attachments</p> <p><input type="checkbox"/> I have attached a site plan</p> <p><input type="checkbox"/> I have attached a list of site coordinate abbreviations</p> <p><input type="checkbox"/> I have attached a description of dikes and other safeguards measures</p>

APPENDIX E - Request for Annual Chemical Inventory

Annual Hazardous Chemical Inventory Request Letter

IMNE-DEV-ZA

[Date]

MEMORANDUM FOR GARRISON DIRECTORATES, SPECIAL STAFF SECTIONS, AND TENANTS ACTIVITIES

SUBJECT: Request for HAZMAT Inventory for Superfund Amendments and Reauthorization Act (SARA) Tier II Reporting

1. The Environmental Protection Agency (EPA) and Occupational Safety and Health Administration (OSHA) require a thorough accounting of hazardous chemicals in the workplace in response to requirements of 40 CFR Part 370. As a SARA Tier II Requirement, the Devens Reserve Forces Training Area (Devens RFTA) is required to submit annually its hazardous chemical inventory and MSDS information to local, state, and federal agencies. All hazardous chemicals produced or purchased and brought onsite must be inventoried including those used in maintenance activities such as petroleum products. To prepare these reports, Devens RFTA employees and tenants must provide the following hazardous material information for calendar year [year]:

- Organization name, point of contact name, telephone number and email address;
- Hazardous material product or trade name;
- Manufacturer;
- Quantity of hazardous materials purchased and brought onsite (by volume or weight);
- Dates that the hazardous materials were brought onsite; and
- Location where chemicals are used and/or stored (Bldg#)

2. An example inventory form is enclosed for reference in providing requested information. Also, enclosed is a common hazardous materials listing of products used on the Devens RFTA.

3. This information must be returned NLT [date]. Please provide this information hard copy or electronically to [contact name], DPW Environmental Section, at [address] or [email address]. Direct any questions you may have to [contact name] at extension [phone number].

Encls

[Commander Signature]
[Commander Printed Name]
[Title]
Commanding

**APPENDIX F
ELECTRONIC TIER II SUBMISSION**

Massachusetts

Tier II Administration: Massachusetts Emergency Management Agency

Address: 400 Worcester Road, Framingham, MA 01702-5399

Phone: (508) 820-2000

E-Mail: Elaine.Denniston@state.ma.us

Website: <http://www.mass.gov/mema> [EXIT disclaimer >](#)

Special Instructions:

Massachusetts is requiring that all facilities submitting Tier2 Submit 2005 email their zip file to Tier2@state.ma.us. Facilities will receive an email acknowledgement of their submission.

[download...Tier2 Submit 2005 for Windows](#)

[download...Tier2 Submit 2005 for Macintosh](#)

[download...Facility Submission Guide](#)

Please contact your LEPC and local fire department to determine whether to submit via email, diskette or CD-Rom, or paper.

Submissions are required for these entities:

- 1.) The Massachusetts SERC, 400 Worcester Rd., Framingham, MA 01702-5399
- 2.) Your Local Emergency Planning Committee (LEPC)
- 3.) Your local fire department

The list of all certified LEPCs is available on the MEMA Website listed above.

Please contact the Massachusetts SERC at 508 820-2000 for additional information or assistance. If you encounter difficulties related to downloading the application you may also call the Tier2 Help Desk at (301) 429-5018 or email: userrmp.usersupport@csc.com.

APPENDIX G – REQUEST FOR TOXIC CHEMICAL ACTIVITIES

Annual Toxic Chemical Release Request Letter

IMNE-DEV-ZA

[DATE]

MEMORANDUM FOR GARRISON DIRECTORATES, SPECIAL STAFF SECTIONS, AND TENANTS ACTIVITIES

SUBJECT: [*Reporting Year*] Annual Toxic Chemical Release Inventory (TRI) Reporting—SARA 313

1. As a result of Executive Order 12856, “Federal Compliance with Community Right-to-Know Laws and Pollution Prevention Requirements,” the Devens RFTA must comply with the annual toxic release inventory (TRI) reporting requirements of the Emergency Planning and Community Right-to-Know Act (EPCRA) Section 313. EPCRA Section 313 requires reporting of toxic chemicals releases and waste management activities if a facility met the reporting criteria including manufacturing, processing, or otherwise using listed toxic chemicals in quantities above certain thresholds. Chemicals coincidentally produced (e.g., as a by-product or impurity) must also be considered for reporting. Laboratories and test munitions range are exempted, but other facilities are required to report.

2. In order to prepare this report, the following is needed:

- Completion of the attached questionnaire; and
- Group name, group representative name, and her/his contact information of whom additional information can be obtained.

3. Please send the above requested information by date to name , via email [*email address*], fax [*fax number*], or mail/delivery [*street address & room number*]. If you have questions, you may contact name at phone .

[*Commander Signature*]
[*Commander Printed Name*]
[*Title*]
Commanding

Encl: TRI Reporting Questionnaire

APPENDIX G (contd.)

Devens RFTA TRI Reporting Questionnaire for CY ____

Please send responses by ____date____ via email [*email address*], fax [*fax number*], or mail/delivery [street address & room number]. If you have any questions, please call [*telephone number*].

Page 1 of 3

1. Do your group's operations and activities include manufacturing, processing, or use of any chemicals in CY ____? *Examples of TRI activities are cutting of ammo or metals, ammo usage, fuel usage, refrigeration, use of photo lab chemicals, pesticide usage, toxic chemical usage, etc.*

Yes (Continue. Complete questionnaire and submit to the above contact.)

No (Stop. Submit this questionnaire to the above contact)

Note: *Management/Environmental POCs at South Post and Installation Maintenance must provide the additional information requested at the end of questionnaire.*

2. Please give a brief description of your group's operations and activities that involve chemical usage only.

3. List the amount of each type of fuel (e.g., fuel oil No.2, gasoline, wood, etc.) combusted in CY _____, and what the fuel was used for (e.g., to power equipment, to heat buildings, to power vehicles operated on-site, etc.)

- Used to power on-site process equipment (enter fuel type and amount):
- Used to power on-site vehicles (enter fuel type and amount):
- Sent off-site in repaired equipment (enter fuel type and amount):
- Used on-site to refuel off-site vehicles (enter fuel type and amount):
- Used to heat buildings on-site (enter fuel type and amount):
- Amount of Wood Burnt:
- Other Combustion:

4. If you (or your contractor) used the pesticide heptachlor, enter the amount used. It is used for fire ant control in buried transformers, and cable TV and telephone boxes.

5. Enter the amount used in CY ____:

Methoxychlor – CAS# 72-43-5 (pesticide):

Pendamethalin – CAS# 40487-42-1 (pesticide):

Trifluralin – CAS# 1582-09-8 (pesticide):

Tetrabromobisphenol A (TBBPA) – CAS# 79-94-7 (flame retardant for plastics, resins, circuit boards):

Devens RFTA TRI Reporting Questionnaire for CY ____

6. Was freon used during CY ____? If so, what type and how much?
7. If you paved any areas of your site, estimate the amount of pavement used, and state the use of the paved area. If you do not know the amount of pavement used, estimate the surface area covered and the thickness of the pavement.
8. If you used any materials containing mercury (even at trace concentrations), please state the purpose, use and the quantity of mercury.
9. Describe any activities involving PCBs, including storage of PCB-containing electrical equipment.
10. Attach a separate sheet listing the type and amount of any materials containing <i>any</i> toxic TRI chemical (e.g., chromium copper, lead, nickel, manganese, PBTs such as mercury, lead, PCBs, etc.) that you sent off-site for recycling. Includes copper wire, steel parts, equipment, scrap metal, used oil, paints, and other spent liquids, etc. Include the concentration of the toxic chemical.
11. What amount (in pounds) and type of welding rods or wire feed did you use in CY ____?
12. List name, date, and amount of any chemicals spilled onto land or into water in CY ____.
13. Describe any air releases (including accidental) that occurred in CY ____, such as halon fire extinguishers or friable asbestos.
14. Do you have any water monitoring data for water discharges of TRI chemicals (for any year)? This includes stormwater data.
15. Did you perform any on-site metals recovery or recycling? If so, what type of metal and how much in CY ____?
16. Describe any significant operations such as welding, cutting, disassembly, chemical use, or waste management that occurred in CY ____.

South Post Only

South Post Range Control: Please attach a list of the quantities and types of all munitions fired/exploded/destroyed from range activities.

Management/Environmental POCs at South Post and Installation Maintenance: Provide the amount of hours including overtime by each employee spent in CY ____ in support of the (1) South Post Ranges; (2) South Post ASP.

South Post Ranges: Answer the following questions:

Were there any demilitarization operations, which can include disassembly, dismantling, recycling, recovery, reclamation, and reuse in CY____? If so, please list.

Were there any OB/OD, incineration, or chemical neutralization in CY____?