EPA Tier2 Submit Software Demonstration for Connecticut Facilities

Presented by:
Len Wallace
EPA Region 1

Diane Duva
Lisa Lawson
Peter Zach
Connecticut

January 26
11:00 AM – 12:00 PM EST
Webinar Logistics

✓ Audio connection via computer only
✓ All attendees will be muted throughout the broadcast
✓ There may be some delays due to internet connections – please bear with us!
✓ Please send us your feedback by filling out the short Google Form linked from the Q&A section
HOW TO SUBMIT QUESTIONS/ COMMENTS

- During the event, select My Questions on the right-hand side of the screen.
- Scroll down and enter your question into the text box.
- Select the send button to submit.
DISCLAIMER

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Links to non-EPA websites are provided solely as a pointer to information that might be useful to the public and do not imply any official EPA endorsement of or a responsibility for the opinions, ideas, data or products presented at those locations or guarantee the validity of the information provided.
AGENDA

➢ Introduction
➢ State-Specific Tier II Reporting Information
➢ EPA Tier2 Submit Software Demonstration
➢ EPCRA Tier II Reporting Resources
➢ Q & A Session
## EPCRA Overview

<table>
<thead>
<tr>
<th>SECTION</th>
<th>COVERAGE/TOPIC</th>
<th>REQUIREMENT</th>
<th>RELEVANT CHEMICAL LIST</th>
<th>THRESHOLDS</th>
<th>SUBMIT TO:</th>
</tr>
</thead>
<tbody>
<tr>
<td>304</td>
<td>Emergency Notification</td>
<td>Accidental Release Reporting</td>
<td>EHS and CERCLA 102(a) Substance</td>
<td>Specified Reportable Quantities</td>
<td>SERC/TERC LEPC/TEPC</td>
</tr>
<tr>
<td>311</td>
<td>Hazardous Chemical Inventory</td>
<td>SDS (MSDS) or List of Chemicals</td>
<td>OSHA Hazardous Chemicals (No Specific List)</td>
<td>10,000 #, or, if EHS, 500 #, or TPQ - whichever is lower</td>
<td>SERC/TERC LEPC/TEPC</td>
</tr>
<tr>
<td>311</td>
<td>Hazardous Chemical Inventory</td>
<td>Inventories, Hazards, and Locations (Tier I and II)</td>
<td>OSHA Hazardous Chemicals (No Specific List)</td>
<td>10,000 #, or, if EHS, 500 #, or TPQ - whichever is lower</td>
<td>SERC/TERC LEPC/TEPC</td>
</tr>
<tr>
<td>312</td>
<td>Hazardous Chemical Inventory</td>
<td>Inventories, Hazards, and Locations (Tier I and II)</td>
<td>OSHA Hazardous Chemicals (No Specific List)</td>
<td>10,000 #, or, if EHS, 500 #, or TPQ - whichever is lower</td>
<td>SERC/TERC LEPC/TEPC</td>
</tr>
<tr>
<td>313</td>
<td>Toxic Chemical Release Reporting</td>
<td>Total Annual Release, Waste Management, &amp; Source Reduction Data - PPA (Form R)</td>
<td>Over 600 Toxic Chemicals and Chemical Categories</td>
<td>25,000 # manufactured or processed; 10,000 # otherwise used</td>
<td>EPA State</td>
</tr>
</tbody>
</table>
EPA Region 1 Video Series on EPCRA and CAA RMP/GDC

1. Introduction to Facility Hazards and Chemical Safety

2. EPCRA Sections 301-303: Emergency Planning with your SERC/TERC/LEPC

3. EPCRA Section 304: Reporting Accidents and Continuous Releases

4. EPCRA Sections 311-312: Tier II Reporting and Tier2 Submit Software

Watch on YouTube: https://www.youtube.com/playlist?list=PLvC8kUCteU1_N54sCAD6b-dsE2ocYybws
EPCRA Tier II Acronyms

- **EHS** - Extremely Hazardous Substance
- **TPQ** - Threshold Planning Quantity
- **SDS** - Safety Data Sheet
- **MSDS** - Material Safety Data Sheet (now SDS)
Connecticut State-Specific Information

About EPCRA Tier II Reporting
Tier2 Submit

EPA Software Demonstration
Do you need to submit a Tier II report?

- **Hazardous Chemical**
  - Required to have an SDS under OSHA HCS
  - Over 10,000 pounds at any one time

- **Extremely Hazardous Substance**
  - On the List of Lists or 40 CFR part 355 Appendix A or B
  - Over the TPQ or 500 pounds ...whichever is less

- **Retail gas station exemption for underground storage tank**
  - Under 100,000 gallons of diesel
  - Under 75,000 gallons of gasoline

*Tier II Report required*
In Tier2 Submit,

you add or verify chemicals you are required to report: **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 EPA List of Lists
- CAMEO Chemicals can be used to search for EHSs: [https://cameochemicals.noaa.gov/](https://cameochemicals.noaa.gov/)
<table>
<thead>
<tr>
<th>NAME</th>
<th>CAS/313 Category Codes</th>
<th>Section 302 (EHS) TPQ</th>
<th>Section 304 (EHS) RQ</th>
<th>CERCLA RQ</th>
<th>Section 313 RQ</th>
<th>RCRA CODE</th>
<th>CAA 112(r) TQ</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cadmium ‡‡</td>
<td>7440-43-9</td>
<td>10</td>
<td>313</td>
<td></td>
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<tr>
<td>Chromium ‡‡</td>
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<tr>
<td>Cobalt</td>
<td>7440-48-4</td>
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<td>313</td>
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<td></td>
</tr>
<tr>
<td>Copper ‡‡</td>
<td>7440-50-8</td>
<td>5,000</td>
<td>313</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Vanadium (except when contained in an alloy)</td>
<td>7440-82-2</td>
<td></td>
<td>313</td>
<td></td>
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<td></td>
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</tr>
<tr>
<td>Zinc (fume or dust)</td>
<td>7440-86-8</td>
<td>1,000</td>
<td>313</td>
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<td></td>
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<tr>
<td>Zinc ‡‡</td>
<td>7440-86-8</td>
<td>1,000</td>
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<td></td>
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<tr>
<td>Selenium dioxide</td>
<td>7446-08-4</td>
<td></td>
<td>313</td>
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<td></td>
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<tr>
<td>Sulfur dioxide</td>
<td>7446-09-5</td>
<td>500</td>
<td>313</td>
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<tr>
<td>Sulfur dioxide (anhydrous)</td>
<td>7446-09-5</td>
<td>500</td>
<td>313</td>
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<tr>
<td>Sulfur trioxide</td>
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<tr>
<td>Lead sulfate</td>
<td>7446-14-2</td>
<td></td>
<td>313</td>
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<td></td>
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<tr>
<td>Thallium(I) sulfate</td>
<td>7446-18-6</td>
<td>100/10,000</td>
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<td></td>
<td></td>
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<tr>
<td>Thallous sulfate</td>
<td>7446-18-6</td>
<td>100/10,000</td>
<td>313</td>
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<tr>
<td>Lead phosphate</td>
<td>7446-27-7</td>
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<tr>
<td>Cupric chloride</td>
<td>7447-39-4</td>
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<td>313</td>
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<td>Mercuric chloride</td>
<td>7487-94-7</td>
<td>500</td>
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<tr>
<td>Selenium sulfide</td>
<td>7488-56-4</td>
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<td>6-Nitrochrysene</td>
<td>7496-02-8</td>
<td></td>
<td>313</td>
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<tr>
<td>Titanium chloride (TiCl4) (T-4)-</td>
<td>7550-45-0</td>
<td>100</td>
<td>313</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Titanium tetrachloride</td>
<td>7550-45-0</td>
<td>100</td>
<td>313</td>
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<tr>
<td>Sodium phosphate, dibasic</td>
<td>7558-79-4</td>
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<td>313</td>
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<tr>
<td>Lithium hydride</td>
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<td>313</td>
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<tr>
<td>Sodium phosphate, tribasic</td>
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<td></td>
<td>313</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sodium arsenate</td>
<td>7631-89-2</td>
<td>1,000/10,000</td>
<td>313</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Sodium bisulfite</td>
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<td>313</td>
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<tr>
<td>Sodium nitrite</td>
<td>7632-00-0</td>
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<td>313</td>
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<tr>
<td>Borane, trifluoro-</td>
<td>7637-07-2</td>
<td>500</td>
<td>313</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Boron trifluoride</td>
<td>7637-07-2</td>
<td>500</td>
<td>313</td>
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</tr>
<tr>
<td>Lead arsenate</td>
<td>7645-25-2</td>
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<td>313</td>
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<tr>
<td>Zinc chloride</td>
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<td>313</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Hydrochloric acid</td>
<td>7647-01-0</td>
<td></td>
<td>313</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hydrochloric acid (conc 37% or greater)</td>
<td>7647-01-0</td>
<td></td>
<td>313</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hydrochloric acid (aerosol forms only)</td>
<td>7647-01-0</td>
<td></td>
<td>313</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hydrogen chloride (anhydrous)</td>
<td>7647-01-0</td>
<td>500</td>
<td>313</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hydrogen chloride (gas only)</td>
<td>7647-01-0</td>
<td>500</td>
<td>313</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Antimony pentachloride</td>
<td>7647-18-9</td>
<td></td>
<td>313</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Phosphoric acid</td>
<td>7664-03-2</td>
<td></td>
<td>313</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hydrofluoric acid</td>
<td>7664-39-3</td>
<td>100</td>
<td>313</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hydrofluoric acid (conc. 50% or greater)</td>
<td>7664-39-3</td>
<td>100</td>
<td>313</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hydrogen fluoride</td>
<td>7664-39-3</td>
<td>100</td>
<td>313</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hydrogen fluoride (anhydrous)</td>
<td>7664-39-3</td>
<td>100</td>
<td>313</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ammonia</td>
<td>7664-41-7</td>
<td>500</td>
<td>313</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ammonia (anhydrous)</td>
<td>7664-41-7</td>
<td>500</td>
<td>313</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ammonia (conc 20% or greater)</td>
<td>7664-41-7</td>
<td>500</td>
<td>313</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

LIST OF LISTS

Consolidated List of Chemicals Subject to the Emergency Planning and Community Right-To-Know Act (EPCRA), Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and Section 112(r) of the Clean Air Act

- EPCRA Section 302 Extremely Hazardous Substances
- CERCLA Hazardous Substances
- EPCRA Section 313 Toxic Chemicals
- CAA 112(r) Regulated Chemicals for Accidental Release Prevention
Computer-Aided Management of Emergency Operations (CAMEO)

**CAMEO®**
- What is CAMEO?
- Download CAMEOfm
- Download CAMEO Chemicals

**ALOHA®**
- Download ALOHA

**MARPLOT®**
- Download MARPLOT
- Geospatial Data Sources

**Training and Resources**
- CAMEO Training and Events
- Online Resources

https://www.epa.gov/cameo
### Regulatory Information

**What is this information?**

**EPA Consolidated List of Lists**

<table>
<thead>
<tr>
<th>Regulatory Name</th>
<th>CAS Number/213 Category Code</th>
<th>EPCRA 302 EHS TPQ</th>
<th>EPCRA 304 EHS RQ</th>
<th>CERCLA RQ</th>
<th>EPCRA 213 TRI</th>
<th>RCRA Code</th>
<th>CAA 112 (r) RMP TQ</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ammonia</td>
<td>7664-41-7</td>
<td>500 pounds</td>
<td>100 pounds</td>
<td>100 pounds</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ammonia (anhydrous)</td>
<td>7664-41-7</td>
<td>500 pounds</td>
<td>100 pounds</td>
<td>100 pounds</td>
<td>X</td>
<td></td>
<td>10000 pounds</td>
</tr>
<tr>
<td>Ammonia (conc 20% or greater)</td>
<td>7664-41-7</td>
<td>see ammonium hydroxide</td>
<td>X</td>
<td>20000 pounds</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ammonia (includes anhydrous ammonia and aqueous ammonia from water dissociable ammonium salts and other sources; 10 percent of total aqueous ammonia is reportable under this listing)</td>
<td>7664-41-7</td>
<td></td>
<td></td>
<td>313</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

"X" indicates that this is a second name for an EPCRA section 313 chemical already included on this consolidated list. May also indicate that the same chemical with the same CAS number appears on another list with a different chemical name.

(EPA List of Lists, 2015)

**DHS Chemical Facility Anti-Terrorism Standards (CFATS)**

<table>
<thead>
<tr>
<th>Chemical of Interest</th>
<th>CAS Number</th>
<th>Min Conc</th>
<th>STQ</th>
<th>Security Issue</th>
<th>Min Conc</th>
<th>STQ</th>
<th>Security Issue</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ammonia (anhydrous)</td>
<td>7664-41-7</td>
<td>1.00 %</td>
<td>10000 pounds</td>
<td>toxic</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ammonia (conc. 20% or greater)</td>
<td>7664-41-7</td>
<td>20.00 %</td>
<td>20000 pounds</td>
<td>toxic</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(DHS, 2007)

**OSHA Process Safety Management (PSM) Standard List**

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>CAS Number</th>
<th>Threshold Quantity (TQ)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ammonia solutions (&gt;44% ammonia by weight)</td>
<td>7664-41-7</td>
<td>15000 pounds</td>
</tr>
<tr>
<td>Ammonia, Anhydrous</td>
<td>7664-41-7</td>
<td>10000 pounds</td>
</tr>
</tbody>
</table>

(OSHA, 2011)
Where do I find this year’s Tier2 Submit Software?

Tier2 Submit Software

The newest version of Tier2 Submit™ is for Reporting Year 2020.

Completed Tier II forms are due by March 1, 2021. Refer to the reporting requirements for your state for submission details. EPA developed Tier2 Submit to help facilities prepare an electronic chemical inventory report. Many states accept Tier2 Submit, and the Tier II chemical inventory data can also be exported into the CAMEO Data Manager emergency planning software.

Downloading Tier2 Submit 2020

Read the terms and conditions for information on using Tier2 Submit.

Download Tier2 Submit 2020 for Windows (62 MB, Dec 2020)
Download Tier2 Submit 2020 for Macintosh (91 MB, Dec 2020)

The Windows version can be run on Windows 7, Windows 8.1, and Windows 10 operating systems. The Macintosh version can be run on High Sierra (10.13), Mojave (10.14), Catalina (10.15), and Big Sur (11) operating systems. Operating systems not listed here have not been tested and are not supported.

If you have questions about reporting, please see: Tier II Chemical Inventory Reporting.

https://www.epa.gov/epcra/tier2-submit-software
What has changed?

• Added the ability to export files divided by field values
• Added the ability to export PDF files sorted by field
• Added an advanced import feature, through which the user can opt to see all import warnings at the end of the import session
• Changed attachment upload process to allow users to attach more than one file at a time
• Enhanced the Find on Page feature
• Added red boxes around invalid fields
• Added a link to view the data folder location
•Smoothed the visual re- ordering of sub-records
• Updated state-specific fields
• Fixed several bugs
• Revised the help topics
**Quick Guide**

**Step 1: Import last year’s data or create a new facility**

To get started, click "Import" to import last year’s data, or click the "Add a New Facility" icon to add a new facility record.

Enter the required data for the facility, its contacts, and its chemicals. Data is automatically saved as you enter it.

**Step 2: Correct validation errors and warnings**

The red ! and yellow ▲ icons in the Facilities, Contacts, and Chemical Inventory list indicate errors and warnings. Click these icons to see the problems.

You must fix all errors before creating a submission file.

**Step 3: Create a submission file**

Click "Export/Submit" and choose "Create a submission file (.2s) to submit to your state." Select the facilities to be included in the submission file, most commonly all of your facilities.

The program does a final check of your data before writing it to the file you specify.

**Step 4: Send your submission file to your state**

Follow your state's instructions for how to submit the .2s file you created to meet your reporting requirements.

Also save the .2s file to a safe backup location. You will use this file as the starting data for next year's Tier2 Submit report.

**Step 5: Make a .pdf file for your records**

Click "Export/Submit" and choose "Create another kind of export file" and "Create a .pdf file." Select the facilities to be included in the .pdf file, most commonly all of your facilities.

The program writes the data to the .pdf file you specify. You can print this file and archive it as a printed record of what you submitted.
Create the electronic submission file.

You are not finished yet!

You must submit the Tier2 Submit file directly to your state. Tier2 Submit does not send it anywhere. It stores it on your computer for you to send.

Each state is unique - specific instructions for your state are [here](#). Check your state each year for Tier2 Submit instructions, as they may change.
Submit Tier II Report

<table>
<thead>
<tr>
<th>Submit</th>
<th>Submit Tier II report(s) annually on or before March 1 for previous calendar year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Submit</td>
<td>Submit original list within 90 days of exceeding reporting thresholds</td>
</tr>
<tr>
<td>Update</td>
<td>Update submission within 90 days of obtaining significant new information including new chemicals</td>
</tr>
</tbody>
</table>
Submit Tier II Report to:

<table>
<thead>
<tr>
<th>Submit</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>SERC and/or TERC</td>
</tr>
<tr>
<td></td>
<td>LEPC and/or TEPC</td>
</tr>
<tr>
<td></td>
<td>Local Fire Department</td>
</tr>
</tbody>
</table>
Download Tier2 Submit software: https://www.epa.gov/epcra/tier2-submit-software

Tier2 Submit Tutorial: https://www.epa.gov/epcra/tier2-submit-tutorial

EPA New England EPCRA Tier2 Submit Trainings and Q&A sessions: https://www.epa.gov/epcra/emergency-planning-and-community-right-know-act-epcra-workshops-new-england
1. Introduction to Facility Hazards and Chemical Safety

2. EPCRA Sections 301-303: Emergency Planning with your SERC/TERC/LEPC

3. EPCRA Section 304: Reporting Accidents and Continuous Releases

4. EPCRA Sections 311-312: Tier II Reporting and Tier2 Submit Software

Watch on YouTube: https://www.youtube.com/playlist?list=PLvC8kUCteU1_N54sCAD6b-dsE2ocYybws
State Tier 2 reporting procedures and requirements:

EPCRA Quick Reference Fact Sheet, Fall 2020

Guide to EPCRA, Fall 2020

Ice Rinks Emergency Planning and Community Right-To-Know Act fact sheet, November 2019
Remember: the deadline to submit completed Tier II forms is March 1st of every year.

- The EPCRA, RMP and Oil Information Center
  - 1-800-424-9346
- The RMP Reporting Center for Tier2 Submit Assistance
  - 703-227-7650 RMPRC@epacdx.net
If there is an accidental release over the reporting threshold

Notify these three:

1. **Local (LEPC/TEPC):** 911
2. **State (SERC/TERC):**
   - Connecticut 860-424-3338
   - Maine 800-452-4664
   - Massachusetts 888-304-1133
   - New Hampshire 800-852-3411
   - Rhode Island 401-222-3070 (24 hrs)
   - Vermont 800-641-5005
3. **National Response Center:** 800-424-8802
The CSB's reporting rule requires prompt reports to the CSB from owners or operators of facilities that experience an accidental release of a regulated substance or extremely hazardous substance that results in a death, serious injury or substantial property damage.
You are required to report an accidental release within eight hours of a qualifying event (40 C.F.R. §1604) in one of three ways:

1. Contact the CSB by telephone at 202-261-7600 and answer a series of questions
2. Fill out and submit a form with appropriate response to the CSB by email to report@csb.gov
3. If you have submitted a report to the National Response Center for the same incident under CERCLA, email the CSB with the NRC report identification number, no CSB form required

The Form:
https://www.csb.gov/assets/1/6/revision_5_fillable_ombapprovedreportformandinstructions_08052020.pdf
Web based “eDisclosure” portal launched December 2015

 Allows entities to promptly disclose violations and submit compliance certification under EPA’s Audit policy

 eDisclosure: https://www.epa.gov/compliance/epas-edisclosure

 EPA Audit Policy: https://www.epa.gov/compliance/epas-audit-policy
Questions?

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