



Tim O'Brien
Chair
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Secretary

August 1, 2017

RE: Significant Changes to USEPA Tier II Hazardous Chemical Inventory Reporting effective in 2018

Dear Facility Owner/Operator:

By March 1 of each calendar, facilities that use, process, manufacture or store hazardous materials or extremely hazardous substances must report the presence of such materials to the following:

- The Local Fire Department with jurisdiction where the facility is located,
- The Local Emergency Planning Committee (LEPC), and
- The State Emergency Response Commission (SERC).

On March 26th, 2012, the Occupational Safety and Health Administration (OSHA) revised the Hazard Communication Standard (HCS) by adopting the United Nations Globally Harmonized System of Classification and Labeling of Chemicals (GHS). The USEPA has incorporated these changes to the classification of hazardous chemicals in the reporting requirements under Sections 311 and 312 of EPCRA effective on January 1, 2018 and cover inventory reports from Calendar Year 2017.

These revisions will affect the way Tier II Chemical Inventory Reports must be completed. The Fact Sheet accompanying this letter describes the hazard classification information your facility will need to identify for Reporting Year 2017. The Lucas County LEPC has sent this letter to advise reporting facilities of the coming changes as significant pre work may be required. The information required for the revised report can be obtained from Section 2 of the chemical's Safety Data Sheet (SDS). If you are not able to gain the information from your existing Material Safety Data Sheet (MSDS), it is recommended that you contact the manufacturer or supplier of the chemical and request an updated SDS.

Because substantial changes are being made to the report requirements, use of previous years' versions of the Tier II Chemical Inventory Report forms will not be acceptable for the March 1, 2018 filing and you may be at risk of filing an incomplete report. You will be required to download the new forms or use the electronic software for reports submitted in 2018. Lucas County LEPC recommends that facilities consider using the electronic software for Tier II Reports and submit the electronic "t2s" file to the LEPC.

Additional information on the OSHA rule can be obtained by visiting the United States Department of Labor's Hazard Communication page at www.osha.gov/dsg/hazcom/. If you need assistance or further information, please contact the Lucas County Emergency Planning Committee at (419) 213-6527.

OSHA / EPA TIER II HAZARD CLASSIFICATION FACT SHEET

The OSHA hazard classifications will affect how facilities report the physical and health hazards associated with their chemicals. The previous standard required reporting facilities to identify 5 hazard classifications associated with a hazardous substance. The OSHA classification system divides the hazard classes into two categories with several sub-categories associated with each. The EPA Tier II reporting will require identification of each hazardous chemical according to its sub-category

| Pre-2018 Tier II Reporting Hazard Classifications | |
|--|------------------------------|
| <u>Physical Hazards</u> | <u>Health Hazards</u> |
| Flammable | Acute |
| Pressure | Chronic |
| Reactive | |

| New Tier II Reporting Hazard Classifications (effective January 1, 2018) | |
|---|--|
| <u>Physical Hazards</u> | <u>Health Hazards</u> |
| Explosive | Acute toxicity (any route of exposure) |
| Flammable (gases, aerosols, liquids, or solids) | Skin corrosion or irritation |
| Oxidizer (liquid, solid, or gas) | Serious eye damage or eye irritation |
| Self-reactive | Respiratory or skin sensitization |
| Pyrophoric (liquid or solid) | Germ cell mutagenicity |
| Pyrophoric gas | Carcinogenicity |
| Self-heating | Reproductive toxicity |
| Organic Peroxide | Specific target organ toxicity (single or repeated exposure) |
| Corrosive to metal | Aspiration hazard |
| Gas under pressure (compressed gas) | Simple asphyxiant |
| In contact with water emits flammable gas | Hazard not otherwise classified |
| Combustible dust | |
| Hazard not otherwise classified | |