

Safety Meetings are important!

They: get your employees actively involved
encourage safety awareness
help identify problems before they become accidents
motivate employees to follow proper safety procedures

We are happy to provide you with a monthly topic for your agenda.

ROUTE TO:

- General Manager
- Safety Coordinator
- Supervisor Dept. _____
- Other _____
- Date of Meeting _____

February 2022

EPA SARA Tier II Leaking Cylinder Guidelines



EPA SARA Tier II

Since 1986, any facility, public or private, that has hazardous materials present at or above established EPA threshold amounts (TPQ) may potentially be subject to the Emergency Planning and Community Right-to-Know Act (EPCRA) and must report inventory levels on a SARA Tier II report. Generally the TPQ for the hazardous materials we inventory is 10,000 lbs, unless the material is considered an Extremely Hazardous Substance, then the TPQ is significantly lower (see [EPA List of Lists](#)).

The purpose of a SARA Tier II report is to provide State and local officials and the public with specific information on hazardous chemicals present at your facility (quantities, location and storage conditions) during the past year. This information is



used by local Fire Departments for personnel training, hazmat pre-planning and local/regional response to spills and releases. Tier II data is also used in mapping hazmat facilities and their distance to sensitive populations, such as schools and nursing homes.

In addition to the products at your facility, you must also notify your customers (by February 15) of their reporting obligations for any hazardous material stored at their locations above the threshold planning quantity (TPQ), as listed in the EPA List of Lists.

For example:

- Bulk storage tanks/trailers at customer locations and owned by your company that contain hazardous material at or above the TPQ.
- You are NOT obligated to notify the customer if they own the bulk tank...but it is good customer service.
- You are NOT obligated to file IF there is language in the contract that states the customer is responsible to comply with all EPCRA obligations.

NOTE: hospitals are exempt from the reporting and your notification requirement. (EPCRA 311 and 40 CFR 370.2 and 355.2 allow the exclusion of any “hazardous chemical” that is used for research, medical facility or hospital if they have a technically qualified direct supervisor).

Tier II forms, instructions and state reporting requirements can be found at [EPA.gov/epcra](https://www.epa.gov/epcra).

Dates to note:

February 15 - written notification due for customers with bulk tanks at/above TPQ

March 1 - SARA Tier II filing due





Leaking Cylinder Guidelines

Leaking cylinders are not unknown in our industry - how we respond to a leaking cylinder is where we demonstrate our expertise...or do we have the expertise? Have your employees been trained on how to respond to a leaking cylinder? Responding to leaking cylinders is similar to responding to a fire - never plan alone and never respond alone.

The GAWDA Safety Committee has developed “ Guidelines for Handling Leaking Cylinders at Customer Locations.” This document is a practical approach to leaking cylinders and an easy to use document for training your employees. The document includes the definitions of Minor and Major leaks, easy to follow flowcharts and a form to record customer complaints concerning leaking cylinders.

“Guidelines for Handling Leaking Cylinders at Customer Locations” can be found on the GAWDA website/ Members only documents/ Sample Safety Practices.

If you have any questions about Leaking cylinders, SARA Tier II or other EPA, DHS, OSHA questions, please contact:

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GAWDA Professional Compliance Webinar
Hold the dates – March 22 – 26, 2021
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