

**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

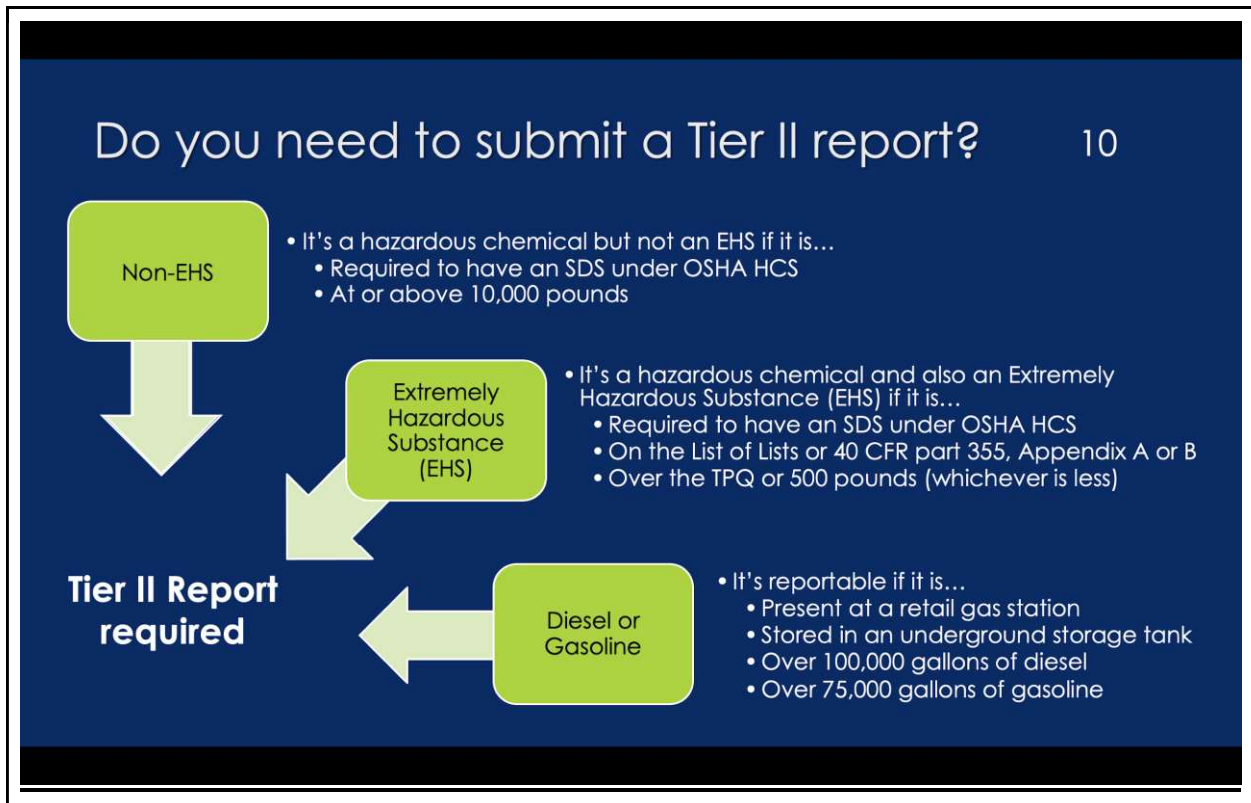
**We are happy to provide you with a monthly topic for your agenda.**

**ROUTE TO:**

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

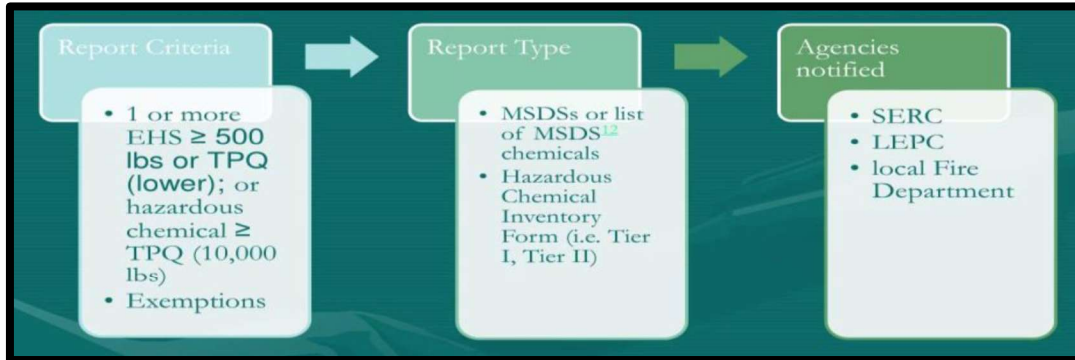
January 2023

**EPA SARA Tier II**



Every **March 1**, an EPA Tier II form is required to be filed by any company that has a hazardous material at or above the threshold quantity as listed on the [EPA Consolidated list of lists](#) or at a quantity greater than 10,000 lbs. The intent of the Tier II form is to provide information about the potential hazards at your worksite to emergency responders: State Emergency Response Commission, Local Emergency Planning Commission and your local Fire department.





The inventory form must be reported as listed on the State information page of the [State Reporting Requirements](#).

In addition to the products at your facility, you must also consider bulk products stored at your customer locations. For example:

Bulk storage tanks/trailers at customer locations owned by your company:

You have an obligation, under EPCRA 312, to notify the customer of their obligation to report under SARA Tier II for any hazardous material that is at or above the reporting threshold. Notification must be sent by February 15, in a letter stating the chemical(s) that require SARA Tier II reporting and where to find the appropriate forms.

- 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.

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

### **SARA Tier II Reporting DUE MARCH 1**

**REMEMBER 10,000 lbs is the threshold for Any product NOT listed on the list of lists!**

The most recent version of Tier2 Submit, links to state Tier II reporting requirements and contact information, and Tier I and II forms and instructions may be found at URL:<https://www.epa.gov/epcra>

For questions regarding SARA Tier II you can ask on the [EPA FAQ page](#) or contact me.



## Dry Ice Safety

OSHA recently published “[Laboratory Safety: Cryogenics and Dry Ice](#)” an appropriate topic for many of our customers now handling dry ice for the COVID-19 Vaccine. The bulletin covers the temperature of liquid nitrogen and dry ice. The Quick Fact also covers General Precautions when working with Dry Ice or Liquid nitrogen and First Aid measures.

CGA also has a FREE poster on [Safe Handling, Use & Transport of Dry Ice](#) as well as other publications for GAWDA members who participate in the CGA Safety program.

I encourage you to post and distribute these handouts to all customers handling Liquid Nitrogen and Dry Ice.

## Training Reminder

One of the greatest hazards employees in our industry face are injuries from cylinder handling. Injuries range from: fractures, contusions of the hand/ foot / leg, back and shoulder strains. Soft tissue injuries are the most frequent and can require long recovery periods which will decrease your productivity and can affect workforce morale. The GAWDA Safety Committee developed a best practice for [Safe Cylinder Handling](#). This best practice can be modified to fit your company and can be used as a safety training.

You’ll find the document on the [GAWDA website/ Members Only Documents / Sample Safety Practices \(alphabetically listed\)](#).

If you have any questions about either of these topics or any other OSHA, EPA or DHS questions please contact me.

**Marilyn Dempsey**  
**GAWDA DHS, EPA, OSHA Consultant**

Safety Dragons Workplace Consultants, LLC  
[marilyn@safetydragons.com](mailto:marilyn@safetydragons.com)  
940-999-8466

