



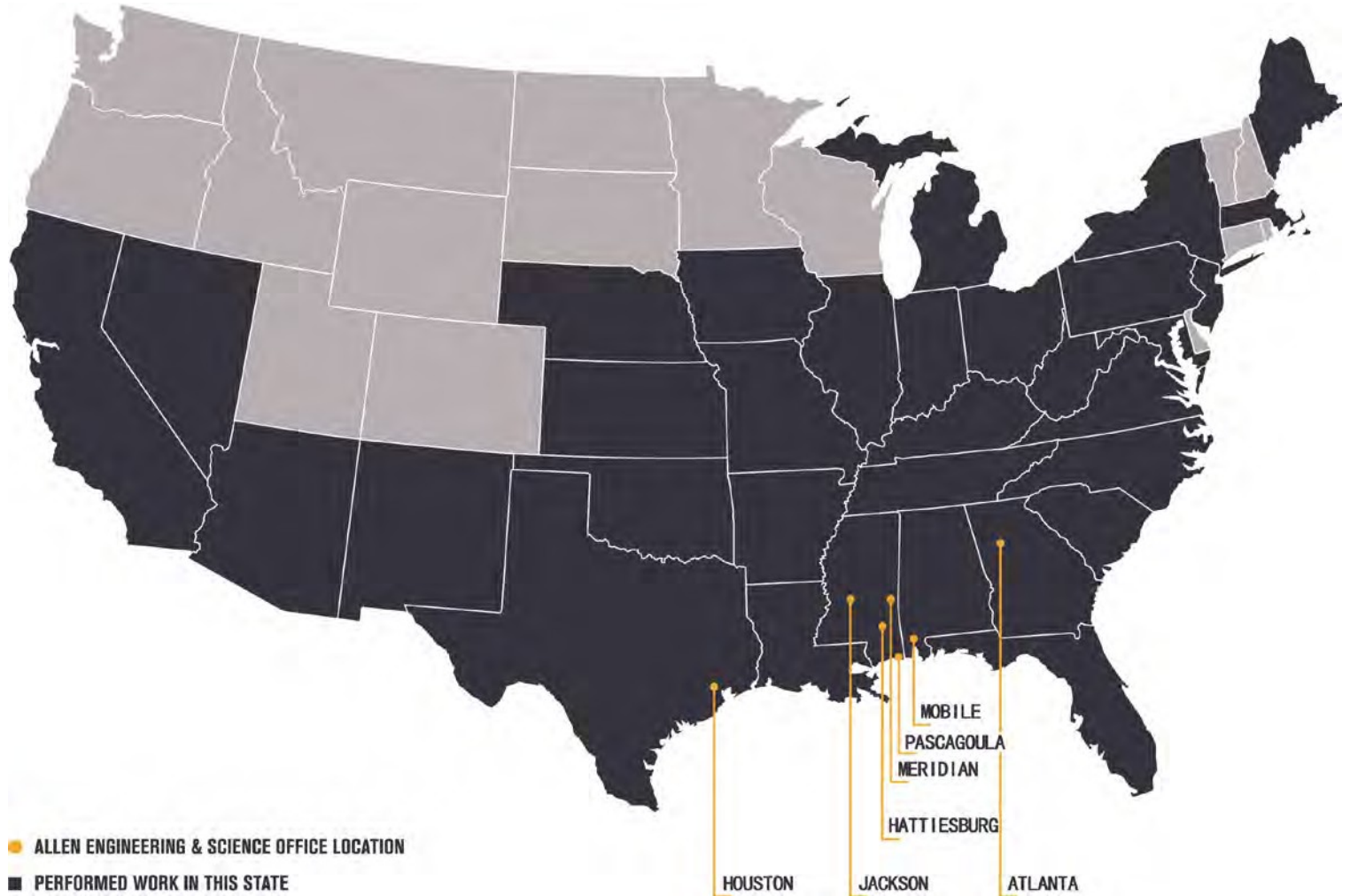
SARA Title III Inspections

AWMA Southern Section
Conference
September 22, 2016

Andrew S. Covington, P.E.



Office Locations for Allen Engineering and Science



- ALLEN ENGINEERING & SCIENCE OFFICE LOCATION
- PERFORMED WORK IN THIS STATE

HOUSTON JACKSON ATLANTA
MOBILE
PASCAGOULA
MERIDIAN
HATTIESBURG



History

- Established in 1993 in Jackson, MS
- Seven Offices in the Southeast
- Committed to Project Success
- One-stop Shop for Industry
- Full-Service Professional Firm
- Engineering, Science and Planning
- Formerly called Eco-Systems, Inc.

What is SARA Title III?

- 1986 Changes and Additions to Superfund as direct response to Bhopa, India disaster of 1984 where 3800 people were killed due to isocyanate gas leak
- One of biggest changes was the Superfund Amendments and Reauthorization Act (SARA) of 1986
- It is a separate law unto itself, commonly called SARA Title III



SARA Title III has four provisions

1. Emergency Planning (Sections 301-303)
2. Emergency Release Notification (Section 304)
3. Hazardous Chemical Storage Reporting Requirements (Sections 311-312) **Tier II**
4. Toxic Chemical Release Inventory (Section 313) **TRI**



By what names is it known?

- Section 313 of Emergency Planning and Community Right-to-Know Act (EPCRA)
- Toxic Chemical Release Inventory (TRI) Reporting
- Form R (There is also a Form A) submitted through EPA's CDX system to access TRI-MEweb forms



Chemicals to be Reported

- 595 Individual Chemicals listed
- 31 Chemical Compounds which also includes 68 individually listed compounds
- 690 Total



Activity Determination Definitions and Examples

- Manufactured – Produce, prepare, compound, or import an EPCRA Section 313 chemical. This also includes coincidental production as byproduct or impurity.
- Processed – Preparation of a listed EPCRA Section 313 chemical after its manufacture for distribution. Usually incorporating a chemical into a product.
- Otherwise Used – Any use that is not covered by the terms manufacture or process.



Thresholds

25,000 pounds – Manufactured or Processed

10,000 pounds – Otherwise Used

Persistent Bioaccumulative Toxic (PBT) Chemicals – Lead is 100 pounds, for example



Threshold Issues to Consider

Formulation component and article component are considered “processed” and the 25,000 threshold applies.

Formulation component – additives, dyes, solvents, surfactants, lubricants, etc.

Article component – pigment in paint, metal parts of finished product

De Minimis Exemption – 1% or 0.1% (PBT do not have a de minimis level)



Recent Title III Inspections

Contract or Cooperative Agreements with another agency (National Older Workers Career Center – NOWCC)

SARA Title III in Mississippi is not a delegated program. MDEQ was not contacted.

State agency agreement



Recent SARA Title III Inspections

Requested TRI Report Submission for last 5 years

Requested all calculations to determine thresholds

Requested Tier II reports for last 5 years

Requested plant tour