



Syracuse University Environmental Health and Safety Services

Guidance Document for Tier II Reporting under the Emergency Planning and Community Right to Know Act

This guidance document provides a general summary of the chemical inventory reporting requirement of USEPA's Emergency Planning and Community Right to Know Act (EPCRA).

Tier II Reporting Requirements

Section 312 of EPCRA requires facilities to submit chemical inventory reports (known as Tier II Reports) by March 1st of each year for all hazardous chemicals that were present at the facility during the previous year in quantities that exceed the reporting thresholds listed in the regulation.

A **hazardous chemical** is broadly defined by EPCRA as any substance for which a Safety Data Sheet (SDS) is required to be made available at the facility under the OSHA Hazardous Communication Standard. However, certain substances such as food or drugs regulated by the FDA, substances packaged for use by the general public, and substances used in research laboratories are exempt from EPCRA's reporting requirements and therefore do not need to be included on Tier II Reports.

For Tier II Reports, the University is required to report the quantities of hazardous chemicals that exceeded the following thresholds at any one time during the previous calendar year:

- a) If the aggregate quantity of the hazardous chemical is greater than 10,000 pounds, or
- b) If the substance is listed in the regulation as an "extremely hazardous substances", then the reporting quantity is either 500 pounds or the threshold planning quantity (TPQ) that is listed in the regulation, whichever is lower.
(see attached list of "extremely hazardous substances" and their TPQs)

Hazardous chemicals that commonly exceed the reporting thresholds at University facilities include:

- Petroleum products such as fuel oil, diesel fuel, gasoline, mineral oil and silicone (in transformer reservoirs), and hydraulic oil (in elevator reservoirs)
- Lead acid batteries (in forklifts, man lifts, and battery backup systems)
- Heat transfer fluids such as propylene glycol
- Rock salt (for melting snow and ice on roads and walkways)

Tier II Reporting Process

Environmental Health and Safety Services (EHSS) is responsible for compiling the required information and submitting Tier II Reports for each applicable University facility. In order to do so, EHSS requests that specific University departments review the chemical inventory information that was submitted in the previous year's report and indicate whether any additions or changes need to be made with regard to the chemicals listed and/or the quantities stored at each facility for the current reporting period.

After the annual update information is received, EHSS prepares the Tier II Reports for each facility and submits the reports (as required by regulation) to the State Emergency Response Commission, the Local Emergency Planning Committee, and the local fire department for each facility.

There is no recordkeeping requirement under EPCRA for maintaining copies of Tier II Reports, however as a best management practice, EHSS retains copies of previously submitted Tier II Reports for a minimum of three years.

EXTREMELY HAZARDOUS SUBSTANCES AND THEIR THRESHOLD PLANNING QUANTITIES

(FROM 40 CFR PART 355 APPENDIX A)

CAS No.	Chemical name	Notes	Threshold planning quantity (pounds)
75-86-5	Acetone Cyanohydrin		1,000
1752-30-3	Acetone Thiosemicarbazide		1,000/10,000
107-02-8	Acrolein		500
79-06-1	Acrylamide	f	1,000/10,000
107-13-1	Acrylonitrile	f	10,000
814-68-6	Acrylyl Chloride	d	100
111-69-3	Adiponitrile	f	1,000
116-06-3	Aldicarb	b	100/10,000
309-00-2	Aldrin		500/10,000
107-18-6	Allyl Alcohol		1,000
107-11-9	Allylamine		500
20859-73-8	Aluminum Phosphide	a	500
54-62-6	Aminopterin		500/10,000
78-53-5	Amiton		500
3734-97-2	Amiton Oxalate		100/10,000
7664-41-7	Ammonia	f	500
300-62-9	Amphetamine		1,000
62-53-3	Aniline	f	1,000
88-05-1	Aniline, 2,4,6-Trimethyl-		500
7783-70-2	Antimony Pentafluoride		500
1397-94-0	Antimycin A	b	1,000/10,000
86-88-4	ANTU		500/10,000
1303-28-2	Arsenic Pentoxide		100/10,000
1327-53-3	Arsenous Oxide	d	100/10,000
7784-34-1	Arsenous Trichloride		500
7784-42-1	Arsine		100
2642-71-9	Azinphos-Ethyl		100/10,000
86-50-0	Azinphos-Methyl		10/10,000

CAS No.	Chemical name	Notes	Threshold planning quantity (pounds)
98-87-3	Benzal Chloride		500
98-16-8	Benzenamine, 3-(Trifluoromethyl)-		500
100-14-1	Benzene, 1-(Chloromethyl)-4-Nitro-		500/10,000
98-05-5	Benzeneearsonic Acid		10/10,000
3615-21-2	Benzimidazole, 4,5-Dichloro-2-(Trifluoromethyl)-	c	500/10,000
98-07-7	Benzotrichloride		100
100-44-7	Benzyl Chloride		500
140-29-4	Benzyl Cyanide	d	500
15271-41-7	Bicyclo[2.2.1]Heptane-2-Carbonitrile, 5-Chloro-6-(((Methylamino)Carbonyl)Oxy)Imino)-, (1s-(1-alpha,2-beta,4-alpha,5-alpha,6E))-		500/10,000
534-07-6	Bis(Chloromethyl) Ketone		10/10,000
4044-65-9	Bitoscanate		500/10,000
10294-34-5	Boron Trichloride		500
7637-07-2	Boron Trifluoride		500
353-42-4	Boron Trifluoride Compound With Methyl Ether (1:1)		1,000
28772-56-7	Bromadiolone		100/10,000
7726-95-6	Bromine	f	500
1306-19-0	Cadmium Oxide		100/10,000
2223-93-0	Cadmium Stearate	b	1,000/10,000
7778-44-1	Calcium Arsenate		500/10,000
8001-35-2	Campechlor		500/10,000
56-25-7	Cantharidin		100/10,000
51-83-2	Carbachol Chloride		500/10,000
26419-73-8	Carbamic Acid, Methyl-, O-(((2,4-Dimethyl-1,3-Dithiolan-2-yl)Methylene)Amino)-		100/10,000
1563-66-2	Carbofuran		10/10,000
75-15-0	Carbon Disulfide	f	10,000
786-19-6	Carbophenothion		500
57-74-9	Chlordane		1,000
470-90-6	Chlorfenvinfos		500
7782-50-5	Chlorine		100

CAS No.	Chemical name	Notes	Threshold planning quantity (pounds)
24934-91-6	Chlormephos		500
999-81-5	Chlormequat Chloride	d	100/10,000
79-11-8	Chloroacetic Acid		100/10,000
107-07-3	Chloroethanol		500
627-11-2	Chloroethyl Chloroformate		1,000
67-66-3	Chloroform	f	10,000
542-88-1	Chloromethyl Ether	d	100
107-30-2	Chloromethyl Methyl Ether	b	100
3691-35-8	Chlorophacinone		100/10,000
1982-47-4	Chloroxuron		500/10,000
21923-23-9	Chlorthiophos	d	500
10025-73-7	Chromic Chloride		1/10,000
62207-76-5	Cobalt, ((2,2'-(1,2-Ethanediylobis (Nitrilomethylidyne)) Bis(6-Fluorophenolato))(2-)-N,N',O,O')-		100/10,000
10210-68-1	Cobalt Carbonyl	d	10/10,000
64-86-8	Colchicine	d	10/10,000
56-72-4	Coumaphos		100/10,000
5836-29-3	Coumatetralyl		500/10,000
95-48-7	Cresol, o-		1,000/10,000
535-89-7	Crimidine		100/10,000
4170-30-3	Crotonaldehyde		1,000
123-73-9	Crotonaldehyde, (E)-		1,000
506-68-3	Cyanogen Bromide		500/10,000
506-78-5	Cyanogen Iodide		1,000/10,000
2636-26-2	Cyanophos		1,000
675-14-9	Cyanuric Fluoride		100
66-81-9	Cycloheximide		100/10,000
108-91-8	Cyclohexylamine	f	10,000
17702-41-9	Decaborane(14)		500/10,000
8065-48-3	Demeton		500
919-86-8	Demeton-S-Methyl		500

CAS No.	Chemical name	Notes	Threshold planning quantity (pounds)
10311-84-9	Dialifor		100/10,000
19287-45-7	Diborane		100
111-44-4	Dichloroethyl ether		10,000
149-74-6	Dichloromethylphenylsilane		1,000
62-73-7	Dichlorvos		1,000
141-66-2	Dicrotophos		100
1464-53-5	Diepoxybutane		500
814-49-3	Diethyl Chlorophosphate	d	500
71-63-6	Digitoxin	b	100/10,000
2238-07-5	Diglycidyl Ether		1,000
20830-75-5	Digoxin	d	10/10,000
115-26-4	Dimefox		500
60-51-5	Dimethoate		500/10,000
2524-03-0	Dimethyl Phosphorochloridothioate		500
77-78-1	Dimethyl sulfate		500
75-78-5	Dimethyldichlorosilane	d	500
57-14-7	Dimethylhydrazine		1,000
99-98-9	Dimethyl-p-Phenylenediamine		10/10,000
644-64-4	Dimetilan		500/10,000
534-52-1	Dinitrocresol		10/10,000
88-85-7	Dinoseb		100/10,000
1420-07-1	Dinoterb		500/10,000
78-34-2	Dioxathion		500
82-66-6	Diphacinone		10/10,000
152-16-9	Diphosphoramidate, Octamethyl-		100
298-04-4	Disulfoton		500
514-73-8	Dithiazanine Iodide		500/10,000
541-53-7	Dithiobiuret		100/10,000
316-42-7	Emetine, Dihydrochloride	d	1/10,000
115-29-7	Endosulfan		10/10,000
2778-04-3	Endothion		500/10,000

CAS No.	Chemical name	Notes	Threshold planning quantity (pounds)
72-20-8	Endrin		500/10,000
106-89-8	Epichlorohydrin	f	1,000
2104-64-5	EPN		100/10,000
50-14-6	Ergocalciferol	b	1,000/10,000
379-79-3	Ergotamine Tartrate		500/10,000
1622-32-8	Ethanesulfonyl Chloride, 2-Chloro-		500
10140-87-1	Ethanol, 1,2-Dichloro-, Acetate		1,000
563-12-2	Ethion		1,000
13194-48-4	Ethoprophos		1,000
538-07-8	Ethylbis(2-Chloroethyl)Amine	d	500
371-62-0	Ethylene Fluorohydrin	b, d	10
75-21-8	Ethylene Oxide	f	1,000
107-15-3	Ethylenediamine		10,000
151-56-4	Ethyleneimine		500
542-90-5	Ethylthiocyanate		10,000
22224-92-6	Fenamiphos		10/10,000
115-90-2	Fensulfothion	d	500
4301-50-2	Fluometil		100/10,000
7782-41-4	Fluorine	e	500
640-19-7	Fluoroacetamide		100/10,000
144-49-0	Fluoroacetic Acid		10/10,000
359-06-8	Fluoroacetyl Chloride	b	10
51-21-8	Fluorouracil		500/10,000
944-22-9	Fonofos		500
50-00-0	Formaldehyde	f	500
107-16-4	Formaldehyde Cyanohydrin	d	1,000
23422-53-9	Formetanate Hydrochloride	d	500/10,000
2540-82-1	Formothion		100
17702-57-7	Formparanate		100/10,000
21548-32-3	Fosthietan		500
3878-19-1	Fuberidazole		100/10,000

CAS No.	Chemical name	Notes	Threshold planning quantity (pounds)
110-00-9	Furan		500
13450-90-3	Gallium Trichloride		500/10,000
77-47-4	Hexachlorocyclopentadiene	d	100
4835-11-4	Hexamethylenediamine, N,N'-Dibutyl-		500
302-01-2	Hydrazine		1,000
74-90-8	Hydrocyanic Acid		100
7647-01-0	Hydrogen Chloride (gas only)	f	500
7664-39-3	Hydrogen Fluoride		100
7722-84-1	Hydrogen Peroxide (Conc >52%)	f	1,000
7783-07-5	Hydrogen Selenide		10
7783-06-4	Hydrogen Sulfide	f	500
123-31-9	Hydroquinone	f	500/10,000
13463-40-6	Iron, Pentacarbonyl-		100
297-78-9	Isobenzan		100/10,000
78-82-0	Isobutyronitrile	d	1,000
102-36-3	Isocyanic Acid, 3,4-Dichlorophenyl Ester		500/10,000
465-73-6	Isodrin		100/10,000
55-91-4	Isofluorphate	b	100
4098-71-9	Isophorone Diisocyanate	g	500
108-23-6	Isopropyl Chloroformate		1,000
119-38-0	Isopropylmethyl-pyrazolyl Dimethylcarbamate		500
78-97-7	Lactonitrile		1,000
21609-90-5	Leptophos		500/10,000
541-25-3	Lewisite	b, d	10
58-89-9	Lindane		1,000/10,000
7580-67-8	Lithium Hydride	a	100
109-77-3	Malononitrile		500/10,000
12108-13-3	Manganese, Tricarbonyl Methylcyclopentadienyl	d	100
51-75-2	Mechlorethamine	b	10
950-10-7	Mephosfolan		500
1600-27-7	Mercuric Acetate		500/10,000

CAS No.	Chemical name	Notes	Threshold planning quantity (pounds)
7487-94-7	Mercuric Chloride		500/10,000
21908-53-2	Mercuric Oxide		500/10,000
10476-95-6	Methacrolein Diacetate		1,000
760-93-0	Methacrylic Anhydride		500
126-98-7	Methacrylonitrile	d	500
920-46-7	Methacryloyl Chloride		100
30674-80-7	Methacryloyloxyethyl Isocyanate	d	100
10265-92-6	Methamidophos		100/10,000
558-25-8	Methanesulfonyl Fluoride		1,000
950-37-8	Methidathion		500/10,000
2032-65-7	Methiocarb		500/10,000
16752-77-5	Methomyl	d	500/10,000
151-38-2	Methoxyethylmercuric Acetate		500/10,000
80-63-7	Methyl 2-Chloroacrylate		500
74-83-9	Methyl Bromide	f	1,000
79-22-1	Methyl Chloroformate	d	500
60-34-4	Methyl Hydrazine		500
624-83-9	Methyl Isocyanate		500
556-61-6	Methyl Isothiocyanate	a	500
74-93-1	Methyl Mercaptan	f	500
3735-23-7	Methyl Phenkapton		500
676-97-1	Methyl Phosphonic Dichloride	a	100
556-64-9	Methyl Thiocyanate		10,000
78-94-4	Methyl Vinyl Ketone		10
502-39-6	Methylmercuric Dicyanamide		500/10,000
75-79-6	Methyltrichlorosilane	d	500
1129-41-5	Metolcarb		100/10,000
7786-34-7	Mevinphos		500
315-18-4	Mexacarbate	d	500/10,000
50-07-7	Mitomycin C		500/10,000
6923-22-4	Monocrotophos		10/10,000

CAS No.	Chemical name	Notes	Threshold planning quantity (pounds)
2763-96-4	Muscimol		500/10,000
505-60-2	Mustard Gas	d	500
13463-39-3	Nickel Carbonyl		1
54-11-5	Nicotine	b	100
65-30-5	Nicotine Sulfate		100/10,000
7697-37-2	Nitric Acid		1,000
10102-43-9	Nitric Oxide	b	100
98-95-3	Nitrobenzene	f	10,000
1122-60-7	Nitrocyclohexane		500
10102-44-0	Nitrogen Dioxide		100
62-75-9	Nitrosodimethylamine	d	1,000
991-42-4	Norbormide		100/10,000
	Organorhodium Complex (PMN-82-147)		10/10,000
630-60-4	Ouabain	b	100/10,000
23135-22-0	Oxamyl		100/10,000
78-71-7	Oxetane, 3,3-Bis(Chloromethyl)-		500
2497-07-6	Oxydisulfoton	d	500
10028-15-6	Ozone		100
1910-42-5	Paraquat Dichloride		10/10,000
2074-50-2	Paraquat Methosulfate		10/10,000
56-38-2	Parathion	b	100
298-00-0	Parathion-Methyl	b	100/10,000
12002-03-8	Paris Green		500/10,000
19624-22-7	Pentaborane		500
2570-26-5	Pentadecylamine		100/10,000
79-21-0	Peracetic Acid		500
594-42-3	Perchloromethylmercaptan		500
108-95-2	Phenol		500/10,000
4418-66-0	Phenol, 2,2'-Thiobis(4-Chloro-6-Methyl)-		100/10,000
64-00-6	Phenol, 3-(1-Methylethyl)-, Methylcarbamate		500/10,000
58-36-6	Phenoxarsine, 10,10'-Oxydi-		500/10,000

CAS No.	Chemical name	Notes	Threshold planning quantity (pounds)
696-28-6	Phenyl Dichloroarsine	d	500
59-88-1	Phenylhydrazine Hydrochloride		1,000/10,000
62-38-4	Phenylmercury Acetate		500/10,000
2097-19-0	Phenylsilatrane	d	100/10,000
103-85-5	Phenylthiourea		100/10,000
298-02-2	Phorate		10
4104-14-7	Phosacetim		100/10,000
947-02-4	Phosfolan		100/10,000
75-44-5	Phosgene	f	10
13171-21-6	Phosphamidon		100
7803-51-2	Phosphine		500
2703-13-1	Phosphonothioic Acid, Methyl-, O-Ethyl O-(4-(Methylthio) Phenyl) Ester		500
50782-69-9	Phosphonothioic Acid, Methyl-, S-(2-(Bis(1Methylethyl)Amino)Ethyl) O-Ethyl Ester		100
2665-30-7	Phosphonothioic Acid, Methyl-, O-(4-Nitrophenyl) O-Phenyl Ester		500
3254-63-5	Phosphoric Acid, Dimethyl 4-(Methylthio)Phenyl Ester		500
2587-90-8	Phosphorothioic Acid, O,O-Dimethyl-S-(2-Methylthio) Ethyl Ester	b, c	500
7723-14-0	Phosphorus	a, d	100
10025-87-3	Phosphorus Oxychloride		500
10026-13-8	Phosphorus Pentachloride	a	500
7719-12-2	Phosphorus Trichloride		1,000
57-47-6	Physostigmine		100/10,000
57-64-7	Physostigmine, Salicylate (1:1)		100/10,000
124-87-8	Picrotoxin		500/10,000
110-89-4	Piperidine		1,000
23505-41-1	Pirimifos-Ethyl		1,000
10124-50-2	Potassium Arsenite		500/10,000
151-50-8	Potassium Cyanide	a	100
506-61-6	Potassium Silver Cyanide	a	500

CAS No.	Chemical name	Notes	Threshold planning quantity (pounds)
2631-37-0	Promecarb	d	500/10,000
106-96-7	Propargyl Bromide		10
57-57-8	Propiolactone, Beta-		500
107-12-0	Propionitrile		500
542-76-7	Propionitrile, 3-Chloro-		1,000
70-69-9	Propiophenone, 4-Amino-	c	100/10,000
109-61-5	Propyl Chloroformate		500
75-56-9	Propylene Oxide	f	10,000
75-55-8	Propyleneimine		10,000
2275-18-5	Prothoate		100/10,000
129-00-0	Pyrene	b	1,000/10,000
140-76-1	Pyridine, 2-Methyl-5-Vinyl-		500
504-24-5	Pyridine, 4-Amino-	d	500/10,000
1124-33-0	Pyridine, 4-Nitro-,l-Oxide		500/10,000
53558-25-1	Pyriminil	d	100/10,000
14167-18-1	Salcomine		500/10,000
107-44-8	Sarin	d	10
7783-00-8	Selenious Acid		1,000/10,000
7791-23-3	Selenium Oxychloride		500
563-41-7	Semicarbazide Hydrochloride		1,000/10,000
3037-72-7	Silane, (4-Aminobutyl)Diethoxymethyl-		1,000
7631-89-2	Sodium Arsenate		1,000/10,000
7784-46-5	Sodium Arsenite		500/10,000
26628-22-8	Sodium Azide (Na(N ₃))	a	500
124-65-2	Sodium Cacodylate		100/10,000
143-33-9	Sodium Cyanide (Na(CN))	a	100
62-74-8	Sodium Fluoroacetate		10/10,000
13410-01-0	Sodium Selenate		100/10,000
10102-18-8	Sodium Selenite	d	100/10,000
10102-20-2	Sodium Tellurite		500/10,000
900-95-8	Stannane, Acetoxytriphenyl-	c	500/10,000

CAS No.	Chemical name	Notes	Threshold planning quantity (pounds)
57-24-9	Strychnine	b	100/10,000
60-41-3	Strychnine Sulfate		100/10,000
3689-24-5	Sulfotep		500
3569-57-1	Sulfoxide, 3-Chloropropyl Octyl		500
7446-09-5	Sulfur Dioxide	f	500
7783-60-0	Sulfur Tetrafluoride		100
7446-11-9	Sulfur Trioxide	a	100
7664-93-9	Sulfuric Acid		1,000
77-81-6	Tabun	b, d	10
7783-80-4	Tellurium Hexafluoride	e	100
107-49-3	TEPP		100
13071-79-9	Terbufos	d	100
78-00-2	Tetraethyllead	b	100
597-64-8	Tetraethyltin	b	100
75-74-1	Tetramethyllead	b, f	100
509-14-8	Tetranitromethane		500
10031-59-1	Thallium Sulfate	d	100/10,000
6533-73-9	Thallos Carbonate	b, d	100/10,000
7791-12-0	Thallos Chloride	b, d	100/10,000
2757-18-8	Thallos Malonate	b, d	100/10,000
7446-18-6	Thallos Sulfate		100/10,000
2231-57-4	Thiocarbazide		1,000/10,000
39196-18-4	Thiofanox		100/10,000
297-97-2	Thionazin		500
108-98-5	Thiophenol		500
79-19-6	Thiosemicarbazide		100/10,000
5344-82-1	Thiourea, (2-Chlorophenyl)-		100/10,000
614-78-8	Thiourea, (2-Methylphenyl)-		500/10,000
7550-45-0	Titanium Tetrachloride		100
584-84-9	Toluene 2,4-Diisocyanate		500
91-08-7	Toluene 2,6-Diisocyanate		100

CAS No.	Chemical name	Notes	Threshold planning quantity (pounds)
110-57-6	Trans-1,4-Dichlorobutene		500
1031-47-6	Triamiphos		500/10,000
24017-47-8	Triazofos		500
76-02-8	Trichloroacetyl Chloride		500
115-21-9	Trichloroethylsilane	d	500
327-98-0	Trichloronate	e	500
98-13-5	Trichlorophenylsilane	d	500
1558-25-4	Trichloro(Chloromethyl)Silane		100
27137-85-5	Trichloro(Dichlorophenyl) Silane		500
998-30-1	Triethoxysilane		500
75-77-4	Trimethylchlorosilane		1,000
824-11-3	Trimethylolpropane Phosphite	d	100/10,000
1066-45-1	Trimethyltin Chloride		500/10,000
639-58-7	Triphenyltin Chloride		500/10,000
555-77-1	Tris(2-Chloroethyl)Amine	d	100
2001-95-8	Valinomycin	b	1,000/10,000
1314-62-1	Vanadium Pentoxide		100/10,000
108-05-4	Vinyl Acetate Monomer	f	1,000
81-81-2	Warfarin		500/10,000
129-06-6	Warfarin Sodium	d	100/10,000
28347-13-9	Xylylene Dichloride		100/10,000
58270-08-9	Zinc, Dichloro(4,4-Dimethyl-5(((Methylamino)Carbonyl)Oxy)Imino)Pentanenitrile)-, (T-4)-		100/10,000
1314-84-7	Zinc Phosphide	a	500

Notes:

- a. This material is a reactive solid. The TPQ does not default to 10,000 pounds for non-powder, non-molten, non-solution form.
- b. The calculated TPQ changed after technical review as described in a technical support document for the final rule, April 22, 1987.
- c. Chemicals added by final rule, April 22, 1987.
- d. Revised TPQ based on new or re-evaluated toxicity data, April 22, 1987.
- e. The TPQ was revised due to calculation error, April 22, 1987.
- f. Chemicals on the original list that do not meet toxicity criteria but because of their acute lethality, high production volume and known risk are considered chemicals of concern ("Other chemicals"), November 17, 1986 and February 15, 1990.
- g. The TPQ was recalculated (September 8, 2003) since it was mistakenly calculated in the April 22, 1987 final rule under the wrong assumption that this chemical is a reactive solid, when in fact it is a liquid. RQ for this chemical was adjusted on September 11, 2006.