

# .: Industry Highlights- EPCRA Updates .:

VOL 1, Issue 1 / December 2017

## Alabama Emergency Response Commission Updates



On 11/1/2017 the AERC (formerly known as SERC) met for their bi-annual meeting and voted in favor of requiring all facilities to submit EPCRA documents to the AERC in a digital format. A .t2s file from [Tier2Submit](#) or [E-plan](#) will be the only two options for electronic filing for Tier II in Alabama starting in 2019. When filing your 2018 Tier II Report, if your facility cannot file digitally, please contact us for additional instructions.

[Tier2Submit](#) is a free program produced by the EPA that can be downloaded from their [website](#). Tier2Submit is a form creator program that contains Federal and State required fields. The program generates a proper Tier II form in the required t2s format. Facilities will then [e-mail](#) .t2s files to the AERC. Proof of receipt is e-mailed after the files are processed. A valid e-mail address for your proof of receipt is a new state required field for 2017. Tier2Submit is updated annually; the previous year's .t2s file can be imported into the new version and updated as needed. You are still required to submit a copy to your LEPC and local Fire Department.

[E-plan](#) is an online web service maintained by UT Dallas. There is a small fee to file with E-plan. Data is maintained from year to year and can be easily updated for the new filing year. If you plan on using E-plan, there is no need to create a new Access ID if you filed Tier II forms in 2016. Contact [E-plan](#) or [Beth Woodfin](#) to get it. Once you have your Access ID, you can login and access that data, make updates, and submit through the webpage. Proof of receipt for E-plan is the payment confirmation. Any fees associated with E-plan go to the University to maintain E-plan. You must contact your LEPC and local Fire Department to see if they accept E-plan as a filing option. **E-plan is the only approved on-line web platform. Be wary of ads and spam websites. If the web address does not contain, "erplan.net" you are not in the right place!**

## Regulatory Changes



-OSHA updated their Hazard Communication System and expanded the physical and health hazards sections. Facilities are now required to report the revised physical hazard classes on Tier II Forms for 2017. This is a necessary, but somewhat painful process. On Tier2Submit and E-plan there will be a series of checkboxes with categories that must be selected appropriately, otherwise your form will not pass validation.

-Please note if you submit a Tier II Form that is lacking any required categories/fields, it will not be considered valid.

-Air releases from animal waste under CERCLA/EPCRA were granted an exemption from the EPA which has recently been repealed by the court system. The court case is evolving; the DC Circuit Court of Appeals granted EPA's motion to further stay the mandate until January 22, 2018. We suggest that farmers visit [EPA's website](#) for more information.

## Reminders



-Tier II forms are due by March 1st. TRI forms are due July 1st.

-Tier2Submit users: remember to back up Tier2Submit data before downloading the 2017 version; program data gets deleted with each new install.

-Ensure that all location information is up-to-date. Master ID # and a valid e-mail for proof of receipt are State required fields. Forms will be rejected if they are lacking any required fields.

-ADEM's [SARA Title III Webpage](#), is updated periodically throughout the year and contains FAQs and useful information on EPCRA reporting requirements.

-The AERC is conducting a short survey that will be distributed via e-mail to gauge facility interest in additional training opportunities and participation in the AERC. Once distributed, please take a few minutes to complete. Your input is invaluable.

## Training Opportunities



-Free Regional E-plan Training is being offered for the first time in January 2018. Join us for hands on experience! Learn how to use E-plan to file your Tier II Report with ease. Register on our [Eventbrite page](#).

-E-plan also offers free [webinars](#) in January and February. Be sure to take advantage of this great resource.

-Free on-line training is available for TRI submission help through [EPA's TRI website](#).

A yearly newsletter brought to you by the Alabama Emergency Response Commission (AERC).

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