

Time to Get Ready for EPCRA Reporting

Reporting Deadlines Fast Approaching

THE EMERGENCY PLANNING and Community Right-to-Know Act (EPCRA) reporting deadlines are fast approaching. Emergency and Hazardous Chemical Inventory, Section 312, reporting is due in a few weeks and the Toxic Chemical Release (TRI), Section 313, Form R reporting deadline is right around the corner. If you haven't already, it is time to make sure you have the most current guidance from your state, the

lead of EPA and developing electronic reporting systems. Many states will accept the electronic files generated by EPA's Tier2 Submit software, have developed their own software based on Tier2 Submit, or have developed web portals into which their facilities enter data. See EPA's Tier II Chemical Inventory Reports/Tier2 Submit web site for further information at www.epa.gov/oswer0e1/content/epcra/tier2.htm.

state reporting requirements for your facility. In that case, a separate submittal to the state is needed and required. TRI-MEweb will assist your facility in preparing materials containing your TRI data and in the required format specified by your state (i.e., diskette, paper, etc.). Be certain you have your username and password for TRI-MEweb, keep EPA e-mail correspondence (e.g., the e-mail with the facility Access Key or

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Section 312 Tier II reporting is due 1 March 2011. Many states will send updated reporting packages to facilities that have reported in the past. These packages are available via e-mail and contain a link to the reporting web site. Alternatively, states often post the packages directly on their web sites. For submissions, states are following the

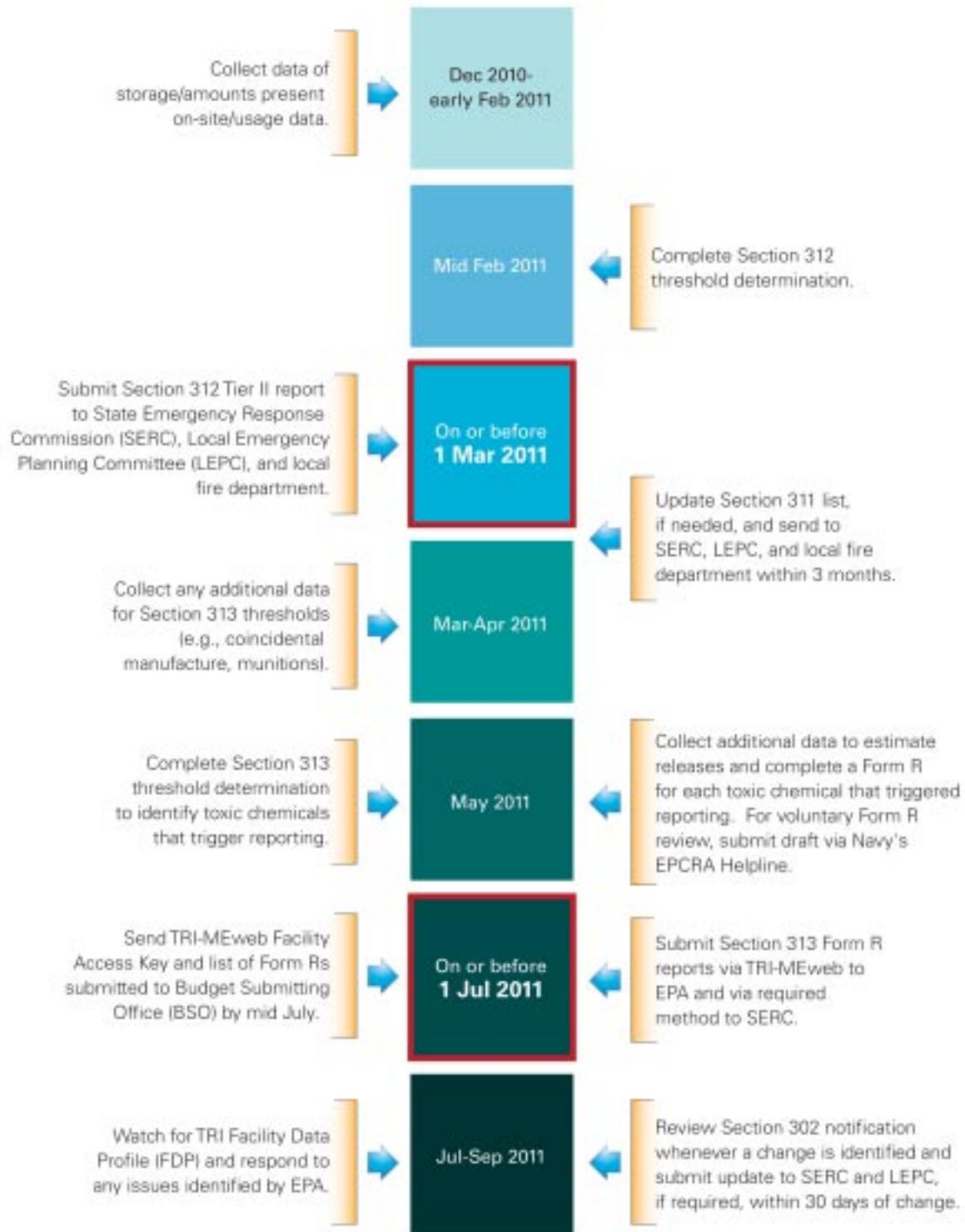
Reporting Year 2010 Section 313 Form Rs are due to EPA on 1 July 2011. Most states will be utilizing Toxics Release Inventory—Made Easy Web (TRI-MEweb). Navy installations in TRI-MEweb participating states will only have to submit the form(s) once via TRI-MEweb. TRI-MEweb will automatically forward the Form R(s) to the state (i.e., a separate submittal to the state is not needed or required). If your state does not participate in the TRI State Data Exchange, submitting via the Internet does not satisfy your

other TRI-MEweb access information), and check to make sure your Certifying Official has not changed (and has their username and password for TRI-MEweb).

EPA Will Not Accept Uncertified Submissions via TRI-MEweb

When submitting your Form R(s) via TRI-MEweb, the facility's registered Certifying Official must electronically sign the submission before it can be entered into the TRI database. The

RY 2010 EPCRA REPORTING TIMELINE



** Compile and complete all EPCRA documentation for the reporting year as soon as practicable following submittals.*

Form R must be certified on or before 1 July for the submittal to be considered on time and in compliance. EPA will not accept any uncertified submissions via TRI-MEweb. Be certain that your Certifying Official is approved within TRI-MEweb in time for the reporting deadline.

In the Facility Data Profile (FDP) that is sent to the technical contact given on the Form R, EPA will include a Notice of Significant Error (NOSE). A facility must respond to a NOSE within 21 days of receipt. Failure to respond within the initial 21-day requirement could result in the issuance of a Notice of Noncompliance (NON).

A NON requires a facility to take corrective action within 30 days and respond to the Agency that correction action has been taken. Because a Navy installation is a Federal facility complying with an Executive Order, if a NON is received it should be forwarded up the chain of command for resolution between the Navy/Department of Defense and EPA. If a facility fails to respond to the NON within a required time period, the Agency may take further action. A NON is not included in a FDP but is mailed separately.

A facility must respond to a NOSE within 21 days of receipt.

TRI-DDS Updated

The Toxics Release Inventory Data Delivery System (TRI-DDS) web-based system for the calculation of Section 313 thresholds and releases from munitions and range activities has been updated and improved. There is a new user interface to allow for easier identification and execution of the



All About the Navy EPCRA Helpline

1. The Navy's EPCRA Helpline (NavyEPCRA@urscorp.com) is available to answer your EPCRA questions.
2. The Helpline is staffed by Naval Civil Engineer Corps Officers School (CECOS) Navy EPCRA training instructors from URS Corporation that have extensive knowledge of DoD and Navy EPCRA policy and much experience supporting Navy installations with EPCRA compliance.
3. EPCRA questions may be emailed to the Helpline at any time and a response will be sent the next business day.
4. The voluntary Form R technical review service is available through the Helpline. If interested, send an e-mail to the Helpline with the name, phone number, and e-mail address of the Form R contact at the installation and a list of expected Form Rs. Once a Form R is ready for review, send a notification e-mail to the Helpline. The reviewer will then contact you to discuss accessing the Form Rs in TRI-MEweb.

How to Consider Range & Munitions Activities Under EPCRA Section 313

THE CHIEF OF Naval Operations Energy and Environment Readiness Division is further expanding its “Getting Started with the Emergency Planning and Community Right-to-Know Act (EPCRA): A Primer for Navy Facilities” (May 2009) guidance with a new section on range and munitions activities specific to Section 313. This new section is expected to be released in early 2011.

The new section, titled “How to Consider Range and Munitions Activities under EPCRA Section 313,” will provide detailed guidance on:

- Defining your facility when there are adjacent, contiguous, encompassed, or geographically separate ranges.
- Distinguishing between a range activity (that is reported on a separate Form R) and a munitions activity (that is reported on the installation Form R).
- Establishing areas in TRI-DDS to support separate range and munitions reporting.
- Collecting the necessary data for threshold determinations.
- Using TRI-DDS and the TRI Information Summary Report for threshold determinations.
- Collecting additional data needed for the Form R.
- Using TRI-DDS and the TRI Information Summary Report for release estimates on the Form R.
- Preparing and submitting EPCRA Section 313 reports for range and munitions activities.

Once available, an email will be sent using the Navy EPCRA e-mail list and the document and any spreadsheet files will be posted to:

- The TRI-DDS web site at <https://dod-tridds.org/tri-web/> (login required)
- The Naval Facilities Engineering Command’s Enterprise Document Library web site at https://portal.navfac.navy.mil/portal/page/portal/NAVFAC/NAVFAC_DOCS_PP
- The CECOS web site at <http://www.cecosweb.com/handouts/EPCRA/FuelsUnderSection313.pdf>


The TRI-DDS web-based system for the calculation of Section 313 thresholds and releases from munitions and range activities has been updated and improved.

needed functions. For example, functions for generating a report or importing/uploading data into TRI-DDS have been streamlined. In addition, close to 1,000 munitions items have been added to the system so be certain to confirm any munitions items where you needed to assign a substitute.

Upcoming EPCRA Training Opportunities and Resources

The CECOS EPCRA no-cost, no-travel web conferences are in progress. To help with the upcoming reporting

deadlines of 1 March and 1 July, CECOS is again offering Sections 311/312 and Section 313 refresher courses. These refresher courses briefly review the regulations with a focus on DoD and Navy-specific scenarios. Course participants may submit facility-specific questions in advance of the training for discussion. Refresher courses for the EPCRA Sections 311/312 requirements are offered prior to the Section 312 reporting deadline of 1 March—one was conducted on 6 January 2011 and another will be held on 9 February 2011. Refresher courses

for the EPCRA Section 313 reporting deadline of 1 July are scheduled for 8–9 and 29–30 March 2011. All upcoming EPCRA course offerings are listed on the CECOS web site at <https://www.netc.navy.mil/centers/csfe/cecos/> under the courses tab. 

CONTACT

Bob Neumann
Chief of Naval Operations Energy and
Environmental Readiness Division
703-602-5334
DSN: 322-5334
robert.p.neumann@navy.mil