

HOW TO SAVE MONEY BY BECOMING AN *E-PLAN* STATE



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Overview of Topics

- ▣ Regulations involved with reporting requirements.
- ▣ EPA's guidance on reporting options.
- ▣ Benefits of moving towards paperless reporting.
- ▣ States that have gone to electronic submittals.

Regulations

- ▣ 40 CFR Part 370: Hazardous chemical reporting: community right-to-know
 - Facility must submit an MSDS or list, as provided in §370.30(a), to the LEPC, the SERC, and the fire department with jurisdiction over your facility.
 - Facility must submit the required inventory information on or before March 1.

Regulations

- ▣ § 370.40 (b) Tier I information is the minimum information that you must report to be in compliance with the inventory reporting requirements of this part.
 - Note to paragraph (b): Some States require Tier II information annually under State law.
 - (c) You should contact the SERC to determine that State's requirements for inventory reporting formats, procedures, and to obtain inventory forms.

Guidance from EPA

- ▣ **Federal Register / Vol. 75, No. 133 / Tuesday, July 13, 2010 / Rules and Regulations 39855**
 - “The Agency suggested the single point submission to reduce the burden on the regulated community, as well as reduce information management burden on some implementing agencies.”
 - “Although States have the flexibility to choose any method for submittal and joint access to information, that method must meet the March 1 reporting deadline specified in the statute.”

Guidance from EPA

- “A formal agreement is necessary between the SERC, LEPC and fire department. States should then notify the facilities about this agreement and the new submission process. That is, States should inform the facilities that they can submit their section 312 report to the SERC and it will provide access to the LEPC and the fire department.”

Benefits of paperless reporting

- ▣ Access to data on or before March 1st
- ▣ Internet based for on the go access
 - Downloadable to CAMEOfm
- ▣ Accurate information
- ▣ Less staff hours to handle paper reports

States using paperless reporting

- ▣ Utilizing E-Plan for Submitting:
 - North Carolina
 - South Carolina
 - Georgia
 - New York
 - Tennessee
- ▣ Using “Other” online programs:

FL	AR	DE	IL	IN
IA	KY	LA	MD	MN
MO	NV	NJ	ND	PA

**States not listed may use electronic submittals but not online (tier2submit)

Where to start?

- ▣ Create hierarchy of approving authorities
 - Who should have access?
 - How much access should they have?
- ▣ Train all personnel in the use of E-Plan
- ▣ SERC agrees to accept electronic submittals
- ▣ LEPC and fire departments agree to accept electronic submittals
- ▣ SERC notifies facilities on reporting requirements

Why

E

Plan

?

It's

FREE

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