

Common Errors:

What to Prioritize for your Tier II season



Meet Your Guide



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Account Manager

Encamp

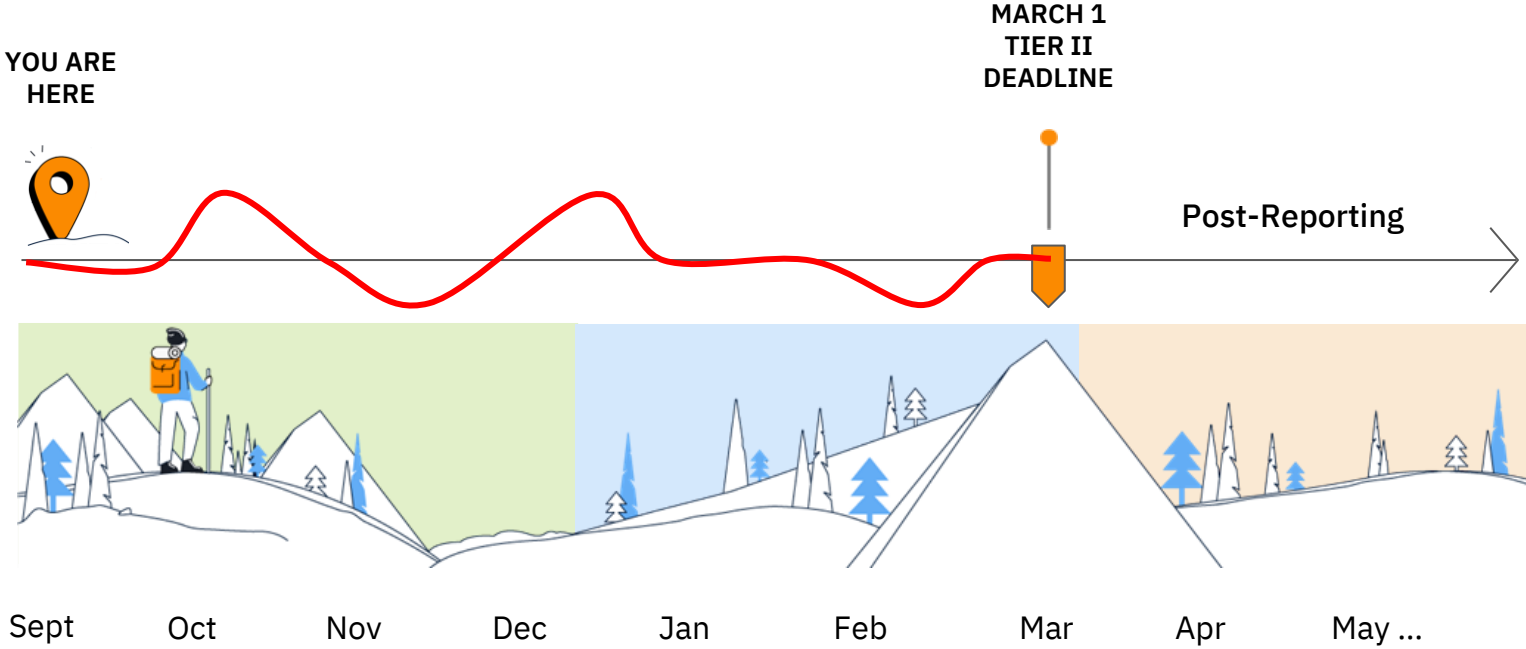
Avoid Common Errors to Improve Compliance for the 2023 Reporting Season

Takeaways from today:

- Recognize the essentials for the reporting process, reducing the potential for errors.
- Gain actionable insights to minimize common errors and increase the accuracy of your compliance reporting
- Learn intricacies of state-specific regulations and thresholds



Tier II Journey



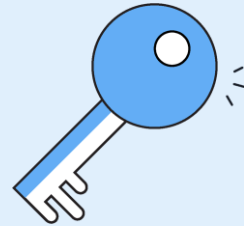
Tier II Season Essentials



Step 1:

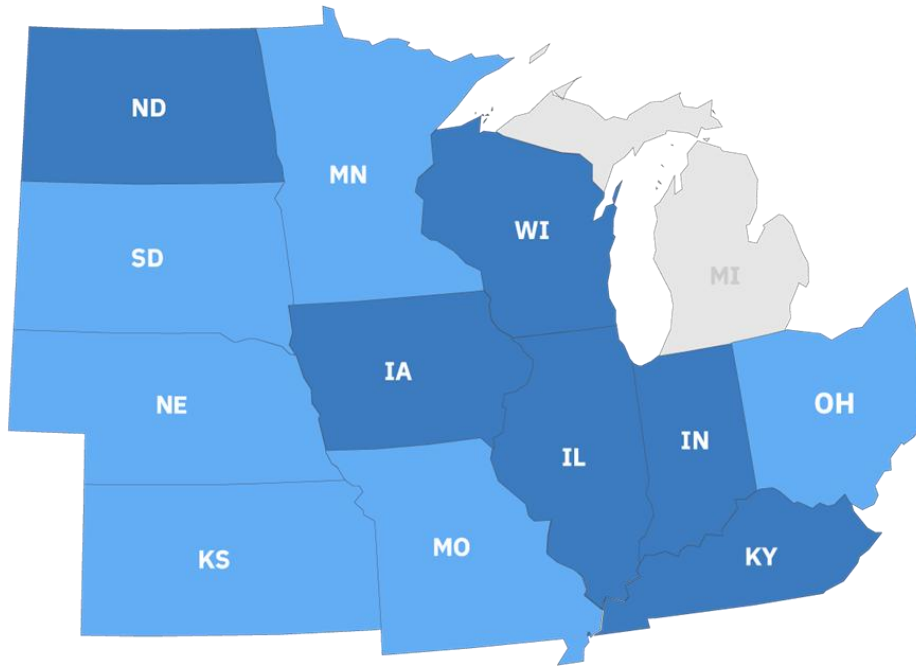
Evaluate portal credentials & sites

- Check current portal credentials and any newly acquired or put into production sites.
- Spend time validating credentials (and resetting if necessary) and getting new facilities setup.
- Evaluate sites that have closed, when did they close, do you need a RY23 report?
 - *If they closed before 12/31/21, ensure they are closed in state portals to eliminate inquiry from regulators.*



Midwestern States

Closed Site Requirements



Portal Action:

Illinois
Indiana
Iowa (Optional)
Kentucky
North Dakota
Wisconsin

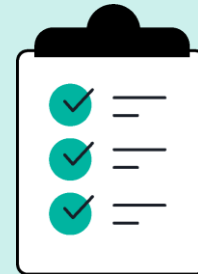
Email:

Kansas
Minnesota
Missouri
Nebraska
Ohio
South Dakota

Step 2:

Establish ownership & training

- Determine who is conducting the reporting.
- Check if you are reporting in a new jurisdiction.
Freshen up on the requirements in the event there are any nuances that do not apply to other states (perhaps an additional submittal for a county or city).
- If there are new site individuals responsible for reporting, setup appropriate training prior to the deadline so they are well equipped for the season.





PRO TIP:

States can have very different requirements / preferences even from county to county, so if you have multiple facilities in one state things can even look different depending on location.

For example: the Ford County LEPC in Kansas wants a “wet” signature on either the cover letter or the report.

The Warren County LEPC in Kansas and the Chicago, IL LEPC in Illinois utilizes a separate submittal portal than the state portal.

Step 3:

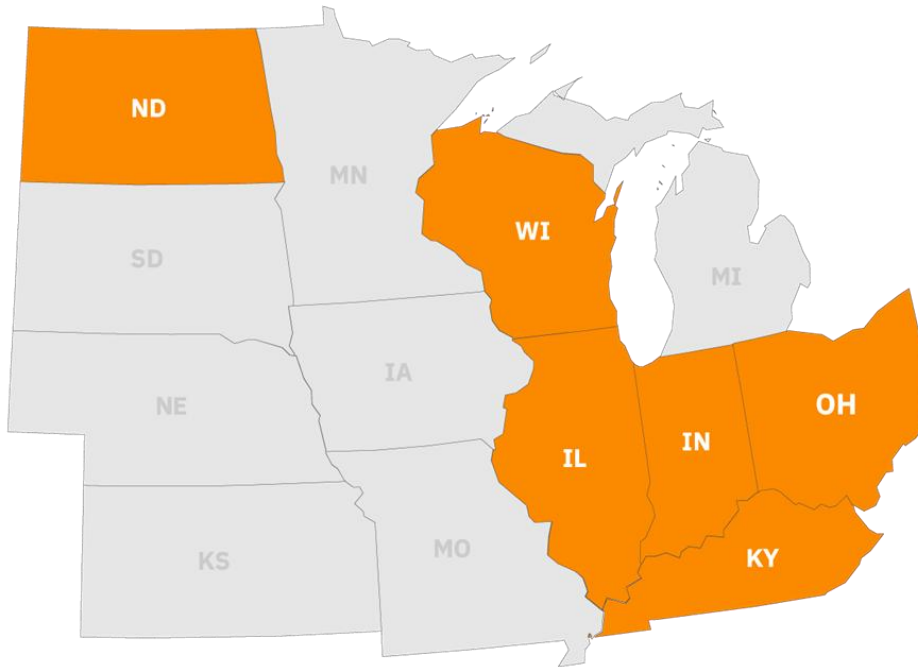
Initiate threshold assessments

- Under reporting - Start evaluation EARLY
 - Federal thresholds for hazardous and extremely hazardous substances (EHSs) should be utilized unless the State has other requirements.
 - Knowing max and average amount will allow for the most accurate report. Keep top of mind throughout the year.
- Not aggregating EHS's
 - EHSs should be combined into one total amount for your facility.
 - I.e. the facility has 6 barrels and 3 canisters of sulfuric acid. It should all be combined to create your total amount and your storage locations should indicate the different containers.
- Converting from gallons to pounds
 - Most States require chemicals to be reported in pounds so utilizing the correct chemical conversion is crucial.
- Audit your SDS library and update accordingly.
If you are in a state that requires SDSs make sure the most recent is attached.



Midwestern States

SDSs Required



Illinois
Indiana
North Dakota
Ohio
Wisconsin
Kentucky



PRO TIP:

Top 3 most commonly missed chemicals for you to look out for:

- **Lead acid batteries**
- **Mineral Oil**
- **Rock Salt**

Any chemical with a safety data sheet (SDS) is most likely going to need to be reported at the hazardous material or extremely hazardous material TPQ

DON'T FORGET your operational equipment could utilize chemicals that are required to be reported.

Step 4:

Identify current contacts

- Evaluate your contacts. If you have high turnover, identifying your reporting contacts can take time.
 - Make sure all contact information is accurate.
- Ensure individuals listed
 - Know the facility well
 - Are available 24/7
 - Touch base with local emergency responders
- Utilize ALL Emergency Contacts
 - Most States request multiple emergency contacts, utilizing each of these contacts for different individuals can help ensure the facility is covered.





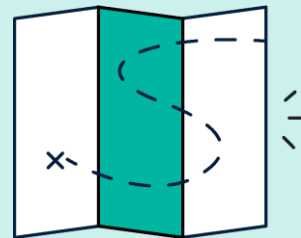
PRO TIP:

SERCs have been known to **call emergency contacts at all times of the day to see if the contact is up-to-date**. If they are unable to get reach the individual at their 24/7 number, it could possibly cause your facility to receive a fine or violation.

Step 5:

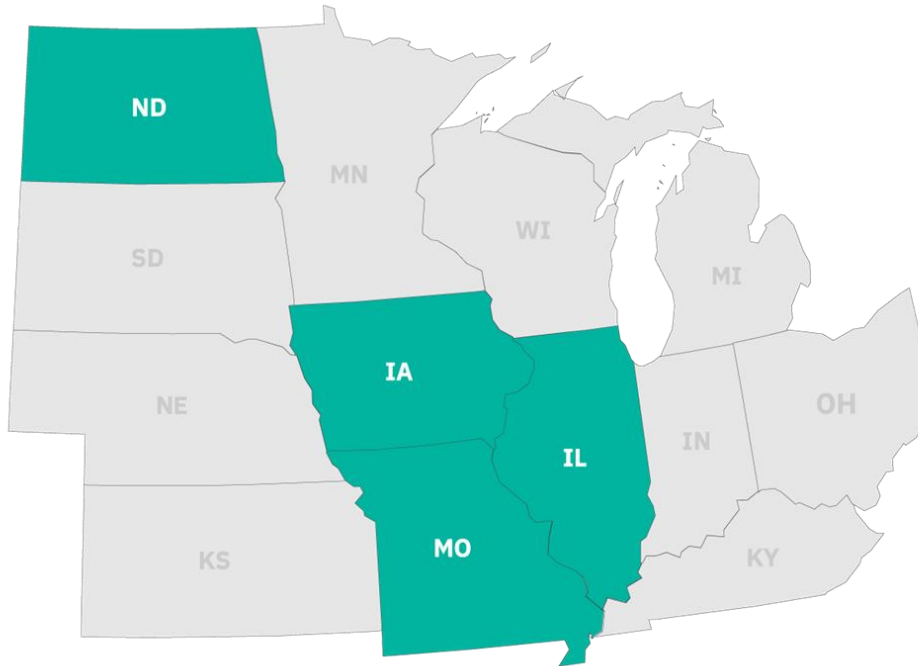
Review storage location descriptions, site maps, & response plans

- Storage locations - Vague or unclear descriptions
 - Utilize common landmarks and directional descriptions
 - I.e. chemical is located in the NW corner of the gravel lot.
- Not properly identified on site maps
 - Site maps should have chemical storage clearly identified.
- Ensure state specific information is correct
 - Some states have specific requirements for site maps & response plans.



Midwestern States

Site Maps Required



Illinois
Indiana
Missouri
North Dakota (Optional)



PRO TIP:

Site maps are important information for first responders to have in the case of incident. Reviewing these anytime something changes is a crucial step and can be required by States.

As an example, the Ohio SERC requires that your site map is updated every 3 years or any time a major change occurs.

Evergreen Tasks for Tier II



Verify any changes in local, state, or federal reporting requirements.



Review and verify the listed emergency contact information. If the facility emergency coordinator has changed, it's required to file an EPCRA 311/302 notification.



Contact your State Emergency Response Commission (SERC), LEPC, or FD for any questions prior to the reporting period.



= Evergreen tasks

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Q&A



27K+

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SINCE 2019

60K+

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SAVED

200+

CUSTOMERS

18K+

FACILITIES
IMPLEMENTED