

STATE OF DELAWARE
ANNUAL HAZARDOUS CHEMICAL INVENTORY REPORTING INSTRUCTIONS
(For Submission on Paper Forms)

NOTE: This package deals only with the *annual hazardous chemical inventory reporting requirements*. There are also requirements for periodic chemical inventory updates if changes occur at your facility that could effect emergency planning and response, as well as other related requirements. Information on these additional requirements is available by contacting the Delaware EPCRA Reporting Program at (302) 739-9405, or by visiting Delaware's Emergency Planning and Community Right-to-Know website at <http://www.dnrec.delaware.gov/SERC/Services/Pages/ComplianceAssistance.aspx>.

BACKGROUND

In 1986, the Federal Superfund Amendments and Reauthorization Act (SARA) was passed. Title III of SARA was a freestanding statute titled "The Emergency Planning and Community Right-To-Know Act" (EPCRA). Section 312 of this federal statute requires covered facilities to submit hazardous chemical inventory forms annually. The standard federal forms for supplying this information are known as Tier I and Tier II forms. However, states are given the option to develop their own state specific forms containing the federal information as a minimum.

In 1991, the State of Delaware Emergency Planning and Community Right-To-Know Act (EPCRA) was established. This Act formalized the hazardous chemical inventory reporting program in the State of Delaware and established reporting fees. Because Delaware's hazardous chemical inventory reporting requirements are more comprehensive than the federal requirements, state specific reporting forms were developed.

By following these directions and submitting the proper Delaware hazardous chemical inventory forms, you will be complying with **both** the federal SARA Title III, Section 312 and the State of Delaware Annual Hazardous Chemical Inventory reporting requirements.

PURPOSE

The collection of this information serves several major purposes. The 911 Fire Dispatch centers can access and provide chemical information to local fire fighters and other emergency personnel responding to an emergency at a facility. Local Emergency Planning Committees (LEPCs) use the information to develop emergency response plans for their districts. Certain hazardous chemical inventory information collected under EPCRA is also available publicly to foster cooperative efforts between citizens, government and industry to prepare for emergencies and manage chemical risks.

The reporting fees are mandated for use in supporting activities of the Local Emergency Planning Committees (LEPCs) and in gathering the data in a usable format to support emergency personnel in planning for and responding to emergencies at or near your facility. The funds may also be used for certain related activities, such as the maintenance of portable decontamination trailers in each county.

COVERED FACILITIES

The owner or operator of a facility may be covered under this program if, under the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard or the Delaware Hazardous Chemical Information Act, the owner or operator is required to prepare or have available Material Safety Data Sheets (MSDS) for hazardous chemicals or extremely hazardous substances present at the facility. The term "facility" means all buildings, equipment, structures, and other stationary items that are located on a single site or on contiguous or adjacent sites and which are owned or operated by the same person (or by any person which controls, is controlled by, or under common control with, such person). "Facility" shall include manmade structures as well as all natural structures in which chemicals are purposefully placed or removed through human means such that it functions as a containment structure for human use. For reporting to be required, the chemicals must also be present above specific threshold quantities.

COVERED CHEMICALS AND THRESHOLD AMOUNTS

In Delaware, the owner or operator of a facility must report hazardous chemicals and extremely hazardous substances present at the facility at any one time **during the previous calendar year** in amounts that equal or exceed the following thresholds:

HAZARDOUS CHEMICALS - For chemicals identified as hazardous chemicals, the threshold quantity is 55 gallons or 500 pounds, whichever is lower. **There is no specific list of these chemicals.** "Hazardous chemical" means *any* chemical that is considered a physical or health hazard under OSHA's Hazard Communication Standard (Title 29 of the Code of Federal Regulations (CFR), Section 1910.1200(c)).

EXTREMELY HAZARDOUS SUBSTANCES - For chemicals identified as extremely hazardous substances (EHSs), the threshold quantity is 55 gallons, 500 pounds, or the Threshold Planning Quantity (TPQ), whichever is lower. A listing of the Federally designated EHSs and their TPQs can be found in 40 CFR Part 355, Appendices A and B, and is also attached for reference. Because EHSs are extremely important to planning, the amount of an EHS at a facility (both the pure EHS and the EHS in mixtures) must be aggregated for purposes of threshold determination.

SUBSTANCES USED SOLELY FOR BUILDING HEATING PURPOSES - Although classifiable as hazardous chemicals, substances used solely for the purpose of heating buildings, such as fuel oil or propane, are subject to a 10,000 pound threshold. However, heating substances at a facility which are used for purposes other than building heating are treated as hazardous chemicals subject to the 55 gallon/500 pound threshold.

EXEMPTIONS

The owner or operator of a facility must report each hazardous chemical or extremely hazardous substance present at the facility above the threshold quantities and for which an MSDS is required. However, both OSHA and EPA regulations provide for some exemptions:

OSHA regulations provide for the following exemptions (as stated in 29 CFR Section 1910.1200):

- (i) Any hazardous waste as such term is defined by the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 U.S.C. 6901 et seq.), when subject to regulations issued under that Act by the Environmental Protection Agency;
- (ii) Any Hazardous substance as such term is defined by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (42 U.S.C. 9601 et seq.) when the hazardous substance is the focus of remedial or removal action being conducted under CERCLA in accordance with Environmental Protection Agency regulations;
- (iii) Tobacco or tobacco products;
- (iv) Wood or wood products, including lumber which will not be processed, where the chemical manufacturer or importer can establish that the only hazard they pose to employees is the potential for flammability or combustibility (wood or wood products which have been treated with a hazardous chemical covered by this standard, and wood which may be subsequently sawed or cut, generating dust, are not exempted);
- (v) "Articles" ["Article" means a manufactured item other than a fluid or particle: (i) which is formed to a specific shape or design during manufacture; (ii) which has end use function(s) dependent in whole or in part upon its shape or design during end use; and (iii) which under normal conditions of use does not release more than very small quantities, e.g. minute or trace amounts of a hazardous chemical, and does not pose a physical hazard or health risk to employees];
- (vi) Food or alcoholic beverages which are sold, used or prepared in a retail establishment (such as a grocery store, restaurant, or drinking place), and foods intended for personal consumption by employees while in the workplace;
- (vii) Any drug, as that term is defined in the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 301 et seq.), when it is in solid, final form for direct administration to the patient (e.g. tablets or pills); drugs which are packaged by the chemical manufacturer for sale to consumers in a retail establishment (e.g., over-the-counter drugs); and drugs intended for personal consumption by employees while in the workplace (e.g. first aid supplies);
- (viii) Cosmetics which are packaged for sale to consumers in a retail establishment, and cosmetics intended for personal consumption by employees while in the workplace;
- (ix) Any consumer product or hazardous substance, as those terms are defined in the Consumer Product Safety Act (15 U.S.C. 2051 et seq.) and Federal Hazardous Substances Act (15 U.S.C. 1261 et seq.) respectively, where the employer can show that it is used in the workplace for the purpose intended by the chemical manufacturer or importer of the product, and the use results in a duration and frequency of exposure which is not greater than the range of exposures that could reasonably be experienced by consumers when used for the purpose intended;
- (x) Nuisance particulates where the chemical manufacturer or importer can establish that they do not pose any physical or health hazard covered under this section;
- (xi) Ionizing and nonionizing radiation; and,
- (xii) Biological hazards

Federal and State EPCRA reporting regulations provide exemptions for the following substances:

- (i) Any food, food additive, color additive, drug, or cosmetic regulated by the Food and Drug Administration;
- (ii) Any substance present as a solid in any manufactured item to the extent exposure to the substance does not occur under normal conditions of use;
- (iii) Any substance to the extent it is used for personal, family, or household purposes, or is present in the same form and concentration as a product packaged for distribution and use by the general public.
- (iv) Any substance to the extent it is used in a research laboratory or a hospital or other medical facility under the direct supervision of a technically qualified individual;

- (v) Any substance to the extent it is used in routine agricultural operations or is a fertilizer held for sale by a retailer to the ultimate customer.

Additionally, chemicals or substances in transportation or being stored incident to such transportation, including the transportation and distribution of natural gas, are not subject to the inventory reporting requirements.

Since many of these exemptions can be easily misinterpreted, please call the Delaware EPCRA Reporting Program at (302) 739-9405 if you have any questions concerning applicability of these exemptions to chemicals at your facility.

WHAT MUST BE SUBMITTED

If your facility **did not have reportable chemicals** during the past calendar year, you must submit a letter on company letterhead. A contact name and phone number should be included, as well as the company address if different from the address on the letterhead. Also include the SIC code or a description of the type of business, and give the reason your facility is not required to report. If this applies to more than one facility, please attach a list indicating the address of each facility.

If your facility **did have reportable chemicals**, you must submit the following:

1. A completed ANNUAL FACILITY FORM. Instructions for this form begin on page 4.
2. One completed ANNUAL CHEMICAL FORM - NON-CONFIDENTIAL for each chemical being reported. Instructions for this form begin on page 6. One blank ANNUAL CHEMICAL FORM - NON-CONFIDENTIAL is attached (make copies as needed).
3. A site plot plan of your facility per the guidelines on page 9.
4. A check for the appropriate annual fee, if applicable to your facility. **Make checks payable to "State of Delaware - EPCRA Program."** (NOTE: Reporting fees must be calculated by facilities and submitted with the reports by March 1).

ELECTRONIC REPORTING

The new internet-based Tier II Manager™ reporting system is available to prepare and submit annual hazardous chemical inventory reports. All information submitted by facilities last year, including data from facilities that reported on paper forms, is already loaded into this system. Tier II Manager™ can provide invoices, automatically calculate reporting fees, and there are electronic payment options in addition to paying by check. For more information or to access the system, go to: <http://www.dnrec.delaware.gov/serc/services/pages/download.aspx>. We strongly urge all facilities reporting on paper forms to consider switching to on-line reporting with Tier II Manager™.

Please note when reporting electronically you do not need to submit the paper report.

DEADLINE AND ADDRESS FOR SUBMITTALS

Annual Hazardous Chemical Inventory reports must be submitted on or before **March 1** each year reflecting chemicals on-site during the previous calendar year. All submittals under this program should be sent to the following address:

**EPCRA Reporting Program, DNREC
Blue Hen Corporate Center
655 S. Bay Road, Suite 5N
Dover, DE 19901**

CONTACTS FOR ASSISTANCE

If you have any questions relating to the reporting requirements or the completion of these forms, contact the EPCRA Reporting Program at (302) 739-9405.

COMMENTS OR SUGGESTIONS

If you have any comments or suggestions for improving these forms or instructions, please feel free to include them with your submittal, or send them separately at a later date. Any suggestions would be greatly appreciated.

GENERAL INSTRUCTIONS FOR ALL FORMS

- Please read all instructions carefully.
- Type or print all responses clearly. *Illegible forms will be returned for clarification.*
- You must provide all information requested on these forms to fulfill the reporting requirements. Incomplete forms will be returned. If an item does not apply to your facility, enter "N/A" in the applicable space. **Do not leave items blank.**
- Much of the chemical related information you will need is contained on the chemical's Material Safety Data Sheet (MSDS), which facilities are required to have available by law. If you do not have the MSDS(s) for a chemical or substance, contact the supplier or manufacturer of that substance and request a copy.
- Make additional copies of the attached form(s) as necessary.
- All pages of the submittal, including the site plot plan and other attachments, must be labeled on the upper right corner with specific page numbers, as well as the total number of pages. This will enable quick and effective referencing during possible follow-up correspondence, and ensure that all pages are received.
- An original signature is required on the ANNUAL FACILITY FORM, and on at least the first ANNUAL CHEMICAL FORM - NON-CONFIDENTIAL. Subsequent pages must contain either an original signature, a photocopy of the original signature, or a signature stamp.

ANNUAL FACILITY FORM

An ANNUAL FACILITY FORM must be completed and submitted as follows by each facility that had reportable substances on site that exceeded the threshold during 2005:

SECTION 1. FACILITY IDENTIFICATION

1.1, 1.2 - Enter the corporate name and specific facility/site name applicable to your facility.

1.3 - Enter the address for the facility. This is **not the mailing address, but must be the 911 street address.** **DO NOT** use a P.O. Box or other mailing address for this item. To find out the 911 address, call (302) 744-2420 in Kent County, (302) 395-8213 in New Castle County or (302) 855-1176 in Sussex County.

1.4 - Enter the name of the development or industrial park in which your facility is located, or "N/A" if not applicable.

1.5 through 1.8 - Enter the city, state, zip code, and county for your facility.

1.9 - Enter the Employer Identification Number (EIN) for your facility. This number can be obtained from your business license and/or your business tax forms. If several EIN numbers are applicable to your facility, enter them in the space provided or write "See Attached Page" and attach a separate page containing the additional EIN numbers.

1.10 - Enter the Dun & Bradstreet number for your facility, or "N/A" if not applicable. If you do not have this information, the State or regional Dun and Bradstreet office can provide you with a number for your facility.

1.11 - Enter the Standard Industrial Classification (SIC) code(s) applicable to your facility. If you are not familiar with the SIC codes that apply to your facility, contact your trade association, Chamber of Commerce, or legal counsel. If you still can not obtain your SIC code(s), simply enter a short statement identifying the primary activity at your facility, such as "metal furniture manufacturing", "wood furniture re-finishing", or "auto body repair and painting."

SECTION 2. OWNER/OPERATOR

2.1 through 2.6 - Enter the full name or business name of the owner/operator, a current mailing address, and telephone number.

SECTION 3. COMPLIANCE CONTACT

3.1 through 3.7 - Enter the name, title, mailing address, and telephone number of the individual preparing this form or who can answer questions regarding the information submitted. This is also the address to which all correspondence, including future reporting packages, will be sent.

SECTION 4. EMERGENCY CONTACTS

4.1, 4.2 - Enter the telephone number and fax number which could be used for direct contact with and transfer of data to the facility during an emergency, or "N/A" if not applicable.

4.3 - Enter the names for a **minimum** of three (3) emergency contacts for the facility. Please provide five contacts if possible. These persons will serve as critical sources of information if emergency personnel are called to respond to an incident at your facility. Enter "N/A" for the optional contacts #4 and #5 if it is not possible for you to provide them.

4.4 through 4.7 - Enter the title, work telephone number, 24-hour emergency (or after hours) telephone number, and pager number (enter "N/A" if not applicable) for each of the emergency contacts identified under 4.3.

SECTION 5. REPORTING STATUS

5.1 - Identify the appropriate calendar year, beginning January 1 and ending December 31, for which the information is being reported. This does not mean the year in which you are submitting the report(s). Due on or before **March 1**, this report is to cover activities at the facility during the previous calendar year.

5.2 - Check the option that summarizes the reporting status of your facility for the calendar year covered by this submittal (check only one option):

Option A - Check this option if your facility did not *at any time* during the previous calendar year store hazardous substances.

Option B - Check this option if there were hazardous substances present at your facility, but the substances are exempt from reporting either because the maximum quantities on site were below the reporting thresholds or because one or more of the exemptions described previously are applicable to the substances.

Option C - Check this option if you are reporting hazardous chemicals or substances that were present at your facility during the previous calendar year.

5.3 - If you checked Option A or B under 5.2, check the box marked N/A for this item and proceed to Section 6. If you checked Option C under 5.2, check whether or not you are including either of the two optional attachments listed.

SECTION 6. REPORTING FEE SUMMARY

6.1, 6.2 - If you checked Option A or B in 5.2, check the box marked N/A for Section 6 and proceed to Section 7. If you checked Option C in 5.2, check whether or not your facility is a federal, state, county, or local government facility, or a non-profit organization. If you checked "Yes" for either of these questions, your facility is exempt from the reporting fees.

6.3 through 6.7 - These items can only be completed after all annual chemical forms are finished. From information in Section 6 on each attached ANNUAL CHEMICAL FORM - NON-CONFIDENTIAL, count the total number of substances being reported for each of the listed classifications. Enter the total number for each classification in the appropriate box. Multiply the number of substances in each classification by the dollar amount shown and enter the subtotal in the space provided.

*** EXAMPLE ***

6. REPORTING FEE SUMMARY		N/A <input type="checkbox"/>	
6.1 Exempt government facility?		YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
6.2 Exempt non-profit?		YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
6.3 # of Hazardous Chemicals	5	x \$40 =	200
6.4 # of Extr. Haz. Substances	2	x \$80 =	160
6.5 # Mixtures <10% EHS	0	x \$40 =	0
6.6 # Mixtures >10% EHS	1	x \$80 =	80
6.7 # of M.V.F. for Retail Sale	0	Exempt	----
6.8 Total Reporting Fee Due		\$	440.00

6.8 - Add the fee subtotals from each of the items 6.3 through 6.7 and enter this amount in the space provided. Since the annual fee *per facility* under the Act shall not exceed \$5000, enter \$5000 on this line if your total reporting fee exceeded \$5000. This is the total reporting fee due for your facility for the reporting year. A check for this amount, made payable to "State of Delaware - EPCRA Program", must be mailed with the submittal.

SECTION 7. CERTIFICATION

The owner or operator, or the officially designated representative of the owner or operator, must certify that all information included in the annual hazardous chemical inventory submission is true, accurate, and complete. Print the full name and title of this individual, then have him/her sign their name and enter the current date. Subsequent pages must contain either an original signature, a photocopy of the original signature, or a signature stamp. Each page must contain the date on which the original signature was affixed to the first form, and the page numbering section on the upper right corner of the form must be completed. *An original signature is required on the ANNUAL FACILITY FORM.*

ANNUAL CHEMICAL FORM -- NON-CONFIDENTIAL

One ANNUAL CHEMICAL FORM - NON-CONFIDENTIAL must be submitted for each reportable chemical or substance. If multiple chemicals or substances are being reported, information in Sections 1, 2, and 3 may be completed and the form photocopied for use with subsequent chemicals to save work.

SECTION 1. FACILITY IDENTIFICATION

1.1 through 1.7 - Complete each item exactly as completed in items 1.1 through 1.7 on the ANNUAL FACILITY FORM.

SECTION 2. OWNER/OPERATOR

2.1 through 2.6 - Complete each item exactly as completed in items 2.1 through 2.6 on the ANNUAL FACILITY FORM.

SECTION 3. REPORTING PERIOD

3.1 - Enter the appropriate calendar year, beginning January 1 and ending December 31 for which the information is being reported, exactly as entered in item 5.1 on the ANNUAL FACILITY FORM.

SECTION 4. CHEMICAL DESCRIPTION

4.1 - If you are withholding the identity of the chemical as trade secret in accordance with criteria specified in Title III, Section 322, check "Yes". If you are not claiming the identity of the chemical as trade secret, check "No". Trade secret information must be submitted to the U.S. EPA and must include substantiation. Please refer to EPA's regulation (40 CFR Part 350) for detailed information on how to submit trade secrecy claims. Do not submit trade secrecy claims to the Delaware EPCRA Reporting Program.

4.2 - Refer to the MSDS and enter the Chemical Abstract Services (CAS) number for the chemical or substance being reported. If a single CAS number is provided for the substance, enter that number. If a list of component CAS numbers is provided on the MSDS without a single number being identified for the overall substance, then enter "N/A". DO NOT report the CAS numbers for components of a substance. If you are claiming the chemical identity as trade secret under 4.1, enter "N/A".

4.3 - Enter the chemical or common name for the chemical or substance being reported. If you are claiming the chemical identity as trade secret under 4.1, enter the generic class or category that is structurally descriptive of the chemical (for example, list *Toluene Diisocyanate* as "Organic Isocyanate") under Chemical Name.

Reporting of Mixtures - The term "mixture" means a heterogeneous association of substances where the various individual substances retain their identities and can usually be separated by mechanical means. This includes solutions and compounds. Provided a substance meets the definition of a mixture, you have the option of reporting on either the entire mixture or on the hazardous components of the mixture. However, the reporting option used should be consistent with the manner in which the MSDSs at your facility are maintained. If you have an MSDS for the entire mixture, you should report on the mixture. If you have MSDSs for the components, you could consider reporting on the components.

Because EHSs are extremely important to planning, the amount of an EHS at a facility (both pure EHSs and EHSs in mixtures) must be aggregated for purposes of threshold determination. It is suggested that the aggregation calculation be done as a first step in making the threshold determination. Once you determine whether a threshold for an EHS has been reached, you should report either the EHS and/or the mixtures containing the EHS.

4.4 - Check "Yes" or "No" for each of the listed descriptors. It is possible to check "Yes" for one, several, or all of the descriptors. For Example, if you had pure chlorine gas, and two mixtures that contain liquid chlorine, you would check "Yes" for pure, mix, liquid and gas, and check "No" for solid. Be sure to check either "Yes" or "No" for each.

4.5 - Check whether or not the reported substance **is or contains** an Extremely Hazardous Substance (EHS).

4.6 - If the substance is or contains an EHS, list the CAS # and Name of the EHS(s); if not, check "N/A".

SECTION 5 - PHYSICAL AND HEALTH HAZARDS

Refer to the MSDS and check "Yes" or "No" for each of the listed physical and health hazards as they apply to the reported chemical. These hazard categories are defined in 40 CFR 370.2. The two health hazard categories and three physical hazard categories are a consolidation of the 23 hazard categories defined in the OSHA Hazard Communication Standard.

HAZARD CATEGORY COMPARISON FOR HAZARDOUS CHEMICAL INVENTORY REPORTING

FIRE	SUDDEN RELEASE OF PRESSURE	REACTIVITY	IMMEDIATE (ACUTE) HEALTH HAZARDS	DELAYED (CHRONIC) HEALTH HAZARDS
Flammable Combustible Liquid Pyrophoric Oxidizer	Explosive Compressed Gas	Unstable Reactive Organic Peroxide Water Reactive	Highly Toxic Toxic Irritant Sensitizer Corrosive Other hazardous chemicals that may have an adverse effect after short term exposure	Carcinogen Other hazardous chemicals that may have an adverse effect after long term exposure.

The Material Safety Data Sheets (MSDSs) required to be maintained on site and/or manufacturers or suppliers of the chemical should be consulted for questions on physical and health hazards of specific chemicals.

SECTION 6. FEE CLASSIFICATION

For the chemical being reported, check **one and only one** of the listed fee classifications as follows:

Hazardous Chemical - Check this classification if the substance is identifiable simply as a hazardous chemical (see definition on page 1).

Extr. Hazardous Substance (EHS) - Check this classification if the reported substance is on the list of Extremely Hazardous Substances (see attached list).

Mix containing <10% EHS - Check this classification if the reported substance is a mixture containing listed extremely hazardous substances in a concentration of LESS THAN 10% by weight. This also includes mixtures containing no EHSs.

Mix containing ≥10% EHS - Check this classification if the reported substance is a mixture containing listed extremely hazardous substances in a concentration of GREATER THAN OR EQUAL TO 10% by weight.

M.V.F for retail sale - Check this classification if the chemical or mixture is a motor vehicle fuel offered for retail sale at your facility. If the chemical or mixture is a motor vehicle fuel but is not offered for retail sale at your facility, check one of the other four classifications as appropriate.

The chemical(s) reported in each category will be tallied on the ANNUAL FACILITY FORM to arrive at the total reporting fee for your facility.

SECTION 7. INVENTORY

7.1 - For the reported chemical, estimate the greatest amount present at your entire facility on any single day during the reporting period and enter this figure **in pounds**. To convert gas or liquid volume to weight in pounds, multiply by an appropriate density factor. For example, you have 2500 gallons of benzene. You find from your MSDS that the density of benzene is 7.29 pounds per gallon, so you multiply 2500 gallons by 7.29 to get a weight of 18,225 pounds. Instead of actual density for the substance, many MSDSs provide the specific gravity (also referred to as relative density) for the substance. This number relates the density of the substance to the density of water, which is 8.34 pounds per gallon or 62.3 pounds per cubic foot. You must multiply the specific gravity of the substance by the density of water to arrive at the actual density for the substance.

7.2 - For the reported chemical, estimate the average daily amount present at your entire facility during the reporting year. To do this, total all daily weights and divide by the number of days the chemical was present on site. For example, a substance is on site for five days: on day one, there was 1000 pounds; day two, 800 pounds; day three, 600 pounds; day four, 400 pounds; and day five, 200 pounds. To calculate the average daily amount, sum the maximum on site each day (1000 + 800 + 600 + 400 + 200 which equals 3000 pounds) and divide the result by the number of days on site (in this case, 5 days) and enter the result (600 pounds) in the space provided. You cannot simply divide the maximum daily amount facility wide (entered in 7.1) by the number of days on site (7.3) since this will result in an inaccurate quantity for planning. While the quantity listed in 7.1 can be considered a "worst case", the quantity listed in 7.2 should be reflective of the average quantity on site on any given day.

7.3 - Enter the number of days that the reported chemical was found on-site during the reporting year.

SECTION 8. STORAGE CODES AND LOCATIONS (NON-CONFIDENTIAL)

For the reported chemical, all non-confidential chemical storage locations along with container types and conditions associated with each location are to be entered in this section. Please note that a particular chemical may be located in several places at the facility. Each row of boxes followed by two lines for a location description represents a unique location for the specific chemical being reported. If you have more than six locations for any chemical or substance, complete another ANNUAL CHEMICAL FORM - NON-CONFIDENTIAL for that substance. Add the word "Continued" at the end of the chemical or substance

name, and continue the location information on the additional page.

In addition to providing location information on substances in "storage", you should also provide information about substances in process. For example, if a substance is stored in a warehouse for a period of time prior to being moved to the production area, you should list both locations in Section 8. If you are concerned about including this type of information, you may claim storage locations as confidential (see page 9).

Storage Types and Conditions: From the table below, find the appropriate Type of Storage and enter the corresponding code into the first box. Then find the appropriate Pressure Condition, and enter its code into the second box. Finally, find the appropriate Temperature Condition, and enter the corresponding code into the third box.

STORAGE CODES AND CONDITIONS

CODE	TYPE OF STORAGE	CODE	PRESSURE CONDITION	CODE	TEMPERATURE CONDITION
A	Above ground tank	1	Ambient pressure	4	Ambient temperature
B	Below ground tank	2	Greater than ambient pressure	5	Greater than ambient
C	Tank inside building	3	Less than ambient pressure	6	Less than ambient, but not cryogenic
D	Steel drum			7	Cryogenic condition
E	Plastic/non-metallic drum				
F	Can				
G	Carboy				
H	Silo				
I	Fiber drum				
J	Bag				
K	Box				
L	Cylinder				
M	Glass bottle or jug				
N	Plastic bottle or jug				
O	Tote bin				
P	Tank wagon				
Q	Rail car				
R	Other *				

* If you choose the code "R" for other, please identify the specific type of storage in the storage location description section.

Storage Amounts: Estimate the greatest amount present for each location on any single day during the reporting period and enter this figure **in pounds** in the fourth larger box. To convert gas or liquid volume to weight in pounds, multiply by an appropriate density factor as explained previously. Please keep in mind that the sum of the maximum daily amounts for the individual storage locations cannot be less than the maximum daily amount facility wide (given in Section 7.1).

Storage Location Descriptions: On the lines provided, enter a brief description of the precise location of the chemical for each location so that emergency responders can locate the area easily. Location descriptions should coordinate easily with the site plot plan required to be submitted when reporting chemicals, but should also be detailed enough to be used without the site plot plan. For each chemical, indicate at a minimum the building or lot. Additionally, where practical, the room or area may be indicated. General statements such as "on site" or "see plot plan" are not acceptable location descriptions. Adequate detail must be given to identify the location of the substance within the facility. If the chemical is present in more than one building, lot or area location, continue your responses down the page as needed. If the chemical exists everywhere at the plant simultaneously, you may report that the chemical is "present throughout the site".

EXAMPLE

Benzene is kept in a tank in the production area of the main building at ambient pressure and less than ambient temperature. The maximum daily amount is calculated to be 10,000 pounds.

From the table, the code for a tank inside the building is "C", the code for ambient pressure is "1" and the code for less than ambient temperature is "6". In the appropriate spaces enter:

Container Type	Pressure	Temperature	Maximum Daily Amount (Lbs.)	Storage Location Description
C	1	6	10,000	<u>In Production Area of Main Building</u>

CONFIDENTIAL Location Information: Under the law, you may elect to withhold location information on a specific chemical from public disclosure. Use of this option requires an additional form specifically designed for reporting confidential storage location information. If you choose to use this option, please contact the EPCRA Reporting Program at (302) 739-4791 for specific instructions and to obtain the additional confidential reporting form.

SECTION 9. CERTIFICATION

The owner or operator or officially designated representative of the owner or operator must certify that all information included in the Annual Chemical Form(s) submitted is true, accurate, and complete. On the first ANNUAL CHEMICAL FORM, as on the ANNUAL FACILITY FORM, print the full name and title of this individual, then have him/her sign their name and enter the current date. Subsequent pages must contain either an original signature, a photocopy of the original signature, or a signature stamp. Each page must contain the date on which the original signature was affixed to the first form, and the page numbering section on the upper right corner of the form must be completed.

SITE PLOT PLAN

If you are reporting chemicals at your facility, you must submit a site plot plan that accurately portrays the layout of your facility. The plot plan must also be coordinated with the chemical location descriptions provided on your Annual Chemical Forms. Submittal of a road map pin-pointing the location of your facility is not acceptable.

General Instructions for the Site Plot Plan:

- All site plot plans must be submitted on a plain sheet of 8.5-inch x 11-inch size paper. The site plot plans are scanned into a computer system for use by responders and planners. Since lines on lined paper and graph paper interfere with the clarity of the image, only plain white paper should be used.
- Label the plot plan with the facility name and address.
- Include a directional arrow showing North.
- On the plot plan, sketch all buildings, building-like structures, outside storage tanks, storage areas, etc. Also include drive through gates, access roads and other obstacles which may inhibit access or mobility throughout the site. Keep in mind that emergency response personnel may be relying on this plot plan if called to respond to an incident at your facility.
- Although the plot plan does not have to be of drafting quality, it must be neat and legible. Illegible plot plans will be returned for correction and re-submission.
- The plot plan should be drawn to scale with the scale shown on the plan. If you are unable to designate a scale, then identify building dimensions and provide distance between structures or other distances that can be used as reference.
- Label each building, storage tank, storage area, etc. with the name or number used on site. Remember that the chemical storage location descriptions provided on the Annual Chemical Form(s) must be clearly distinguishable on and related to the site plot plan.
- If you use symbols or codes on your site plot plan, a list identifying the meaning of each symbol or code must be attached.
- If applicable, identify fire hydrants, fire connections, sprinkler systems, and/or fire panels on the plot plan as well.
- If the facility is too large or complex to portray clearly on a single page, subdivide the facility into several sections or complexes and submit a plot plan for each.
- Any pertinent information concerning the site that can be depicted on the plot plan without compromising the clarity and thus the usefulness of the plan would be appreciated.

<p>IF YOU HAVE ANY QUESTIONS WHILE COMPLETING THESE FORMS, PLEASE CONTACT THE EPCRA REPORTING PROGRAM AT (302) 739-9405.</p>
