



Preparing for Annual Reporting Obligations Q&A

EPCRA Section 312 Tier II and RCRA Hazardous Waste Reports

Verisk 3E's John Koning, Regulatory Business Solutions Specialist, recently offered guidance on EPCRA and RCRA reporting requirements. Find out potential impacts to your business in this Q&A with questions from your peers answered by our experts. Delve deeper into the topic with our on-demand webinar: [Preparing for Annual EPCRA \(Tier II\) & RCRA \(Hazardous Waste\) Reporting Obligations](#).

Question: The EPCRA federal threshold states that there is a 10,000-pound daily maximum before falling into Tier II. Is that maximum per hazardous chemical or for the total amount of chemicals?

A: The federal threshold for Tier II allows a maximum of 10,000 pounds per hazardous chemical.

Question: With lead acid batteries classified as Extremely Hazardous Substances (EHS) due to sulfuric acid, is the calculation for the weight of the lead acid battery or the sulfuric acid?

A: You are required to calculate the total amount of sulfuric acid. Some states may require the sulfuric acid calculation in addition to the lead total. The reporting obligation is a federal requirement however the reporting itself is done at the state and local level. Reviewing the specific requirements for your state is advised.

Question: For the Tier II reporting of a product mixture, how does one report the classification for individual substances where the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) hazard is represented for the whole mixture?

A: We would typically use the substance with the highest classification. For example, in lead acid battery electrolyte we use sulfuric acid since that substance is the highest classification.

Question: If we have lead acid batteries that exceed the 10,000-pound threshold for lead, are we required to report lead or lead acid batteries?

A: Typically, you will be reporting the sulfuric acid and lead, but some states may require just the lead acid battery. We advise reviewing your state and local requirements.

Question: What is the process for submitting Tier II reports?

A: The United States Environmental Protection Agency (EPA) developed [Tier2 Submit software](#) to help facilities prepare an electronic chemical inventory report. Within Tier2 Submit you can input all your data elements and generate a report file or submit in the appropriate format that your state requires. States that follow federal requirements will accept reports generated from this application. States may have specific reporting submission methods. We advise to review your state and local requirements.

Question: Does a facility registered as a Small Quantity Generator (SQG) need to complete the RCRA biennial hazardous waste report?

A: No, under the federal regulation, the biennial report is required only for facilities classified as a Large Quantity Generator (LQG). Facilities registered as SQG or Conditional Exempt Small Quantity Generator (CESQG) / Very Small Quantity Generator (VSQG) are exempt from this reporting requirement. There are some cases, when the state regulation will require SQG facilities to submit as well. We advise reviewing your state and local requirements.

Choose Verisk 3E

At Verisk 3E, our proven team of hazardous waste specialists is qualified, prepared and ready to provide the answers and support you need to report on the use, generation and storage of hazardous chemicals in your facilities. We leverage more than 30 years of experience helping companies ensure safety while streamlining EHS compliance. We offer a range of solutions including the completion and submission of reports through Regulatory Reporting Services or 24-7-365 access to regulatory documents through 3E Protect™. [Contact us today.](#)