

# 2015 SARA Title III/EPCRA Reporting

Sanjay Thirunagari/Prina Chudasama

Virginia Department of Environmental Quality

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# SARA Title III or the Emergency Planning and Community Right-to-Know Act (EPCRA)

- Signed in to law on October 17, 1986 as Title III of the Superfund Amendments and Reauthorization Act (SARA) of 1986
- Also known as Emergency Planning and Community Right-to-Know Act (EPCRA)
- Why was SARA Title III enacted?
  - 1984 Bhopal (India) Incident – Methyl Isocyanate Gas Release – 2,500 deaths; tens of thousands injured.
- Purpose:
  - To create a cooperative relationship among the government, businesses, and the public and involving all of them in the effort to prevent, plan, and prepare for, and manage chemical emergencies.

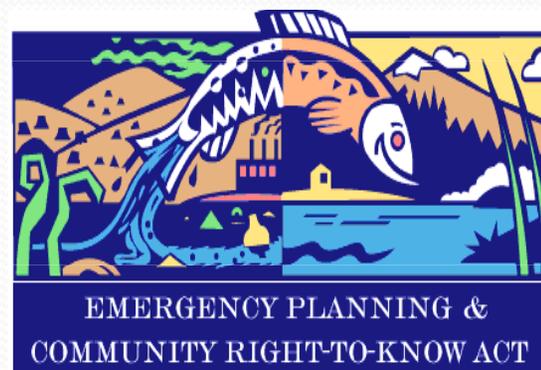


## **SARA Title III – Enforcement & Compliance**

- In Virginia, the enforcement authority resides with the United States Environmental Protection Agency (EPA)
- Local Emergency Planning Committees (LEPCs) or local fire department authority may request additional information for LEPC planning purposes or on behalf of its citizens.

# SARA Title III – EPCRA Reporting Programs

- Section 302 – Emergency Planning Notification
- Section 304 – Emergency Release Notification
- Section 311 – Safety Data Sheet (SDS) Submission
- Section 312 – Emergency and Hazardous Chemical Inventory (Tier II Reports)
- Section 313 – Toxic Chemical Release Inventory  
(Not covered in this webinar)



## Section 302 – Emergency Planning Notification

- A facility is required to send a one-time, written notification to the VERC and its jurisdictional LEPC, if:
  - An extremely hazardous substance (EHS) is present at any one time, **and**
  - The amount is equal to or greater than the applicable threshold planning quantity (TPQ)
- Federal Regulation: [\[40 CFR, Part 355, Section 30\]](#)
- TPQs for EHSs can be one of 1, 10, 100, 500, or 1000 lbs.
  - [EPA List of Lists](#)
  - Currently 356 EHSs listed based on toxicity, reactivity, volatility, dispersability, combustibility, or flammability
  - EHSs can be added or delisted by either research or by petition to the EPA



## Section 304 – Emergency Release Notification

- A facility is required to provide notification of any release to the VERC, if:
  - The material released is an EHS or a CERCLA hazardous substance, **and**
  - The amount is equal to or greater than the applicable reportable quantity (RQ)
- Federal Regulation: [\[40 CFR, Part 355, Section 40\]](#)
- Currently, about 800 specifically-designated and listed Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) hazardous substances.

# Section 304 – Notification Exemptions

## Notification Exemptions:

1. Releases which result in exposure solely on-site
2. Federally permitted releases
3. Continuous releases
4. Releases of certain pesticide products under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)
5. CERCLA exempt releases – Section 101(22)
6. Radionuclides – naturally-occurring or related to coal handling at utility and industrial facilities
7. Solid metals
8. Facilities that handle no hazardous chemicals



## Section 304 – Notification Mechanism

Provide immediate notification to:

1. For EHSs only:
  - Local Fire Department
  - LEPC
  - Virginia Department of Emergency Management (VDEM) (1-800-468-8892)
  
2. For CERCLA hazardous substances:
  - Local Fire Department
  - LEPC
  - VDEM (1-800-468-8892)
  - National Response Center (NRC) – operated by the National Guard (1-800-424-8802)





## Section 304 – Initial Notification Mechanism

Content of Verbal or Written Initial Notification:

1. Chemical identification/name and if it is an EHS
2. Estimated quantity of release
3. Time and duration of release
4. Medium/media into which release occurred
5. Known/anticipated acute or chronic health risks and advice on medical attention necessary for exposed individuals
6. Proper precaution/evacuation to take
7. Name and contact information of person(s) to be contacted for more information



## Section 304 – Follow-Up Notification Mechanism

Written Follow-up Notification to the LEPC and State (VERC):

1. Name of the organization and person contacted during initial notification – including time of notification
2. Update of initial information
3. Actions taken to respond to and contain the release
4. Any known/anticipated acute or chronic health risks associated with the release
5. Advice regarding medical attention necessary for exposed individuals



## Section 311 – SDS Submission

- A facility that stores, uses, or produces chemicals, requiring Safety Data Sheets (SDSs) under the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard, that equal or exceed the threshold quantity must report
- Submit a copy of SDS for each hazardous chemical or submit a list of hazardous chemicals for which an SDS is present
- Reporting includes an initial submission and periodic updates:
  - Initial submission and updates should be submitted within 3 months of the receipt of a new hazardous chemical, or the chemical exceeding the threshold.



## Section 312 – Tier II Reports

- Who should report?
  - A facility is required to submit a Tier II report if a SDS hazardous chemical is present at any one time during the reporting year in amounts equal to or greater than the minimum threshold limits.
- Reporting Deadline:
  - Reports are due **March 1** for the previous calendar year.
- Purpose:
  - To provide State and local officials and the public with specific information on hazardous chemicals present at a facility during the preceding year.
- Who to report to:
  - Virginia Emergency Response Council (VERC) – c/o of Virginia DEQ
  - Local Emergency Planning Committee (LEPC)
    - [LEPC list on DEQ website](#)
  - Local Fire Department



# EPCRA Exempt Chemicals

## EPCRA-Specific Exemptions:

1. The FDA Exemption
2. Solids in manufactured items
3. Consumer products
4. Laboratory chemicals
5. Agricultural chemicals
6. Retail gas station in compliance with Underground Storage Tank (UST) regulations storing gasoline and diesel fuel entirely underground



# OSHA Exempt Chemicals

The OSHA Exemptions:

1. Hazardous wastes regulated by RCRA
2. Tobacco or tobacco products
3. Wood or wood products
4. Manufactured items
5. Food, drugs, cosmetics, or alcoholic beverages in a retail establishment which are packaged for sale to public
6. Food, drugs, or cosmetics intended for personal consumption by employees while in the workplace.
7. Consumer products when used in the workplace
8. Any drugs in solid, final form for direct administration to a patient



## Section 311 & 312 – Reporting Thresholds

- **Extremely Hazardous Substances:**  
Greater than or equal to 500 lbs (or the individual chemical's threshold planning quantity (TPQ), whichever is less, at any one time
- **Hazardous Substances:**  
Greater than or equal to 10,000 lbs at any one time
- **De minimis concentration:**  
Equal to or less than 1% of weight for hazardous chemicals or 0.1% for EHS carcinogens

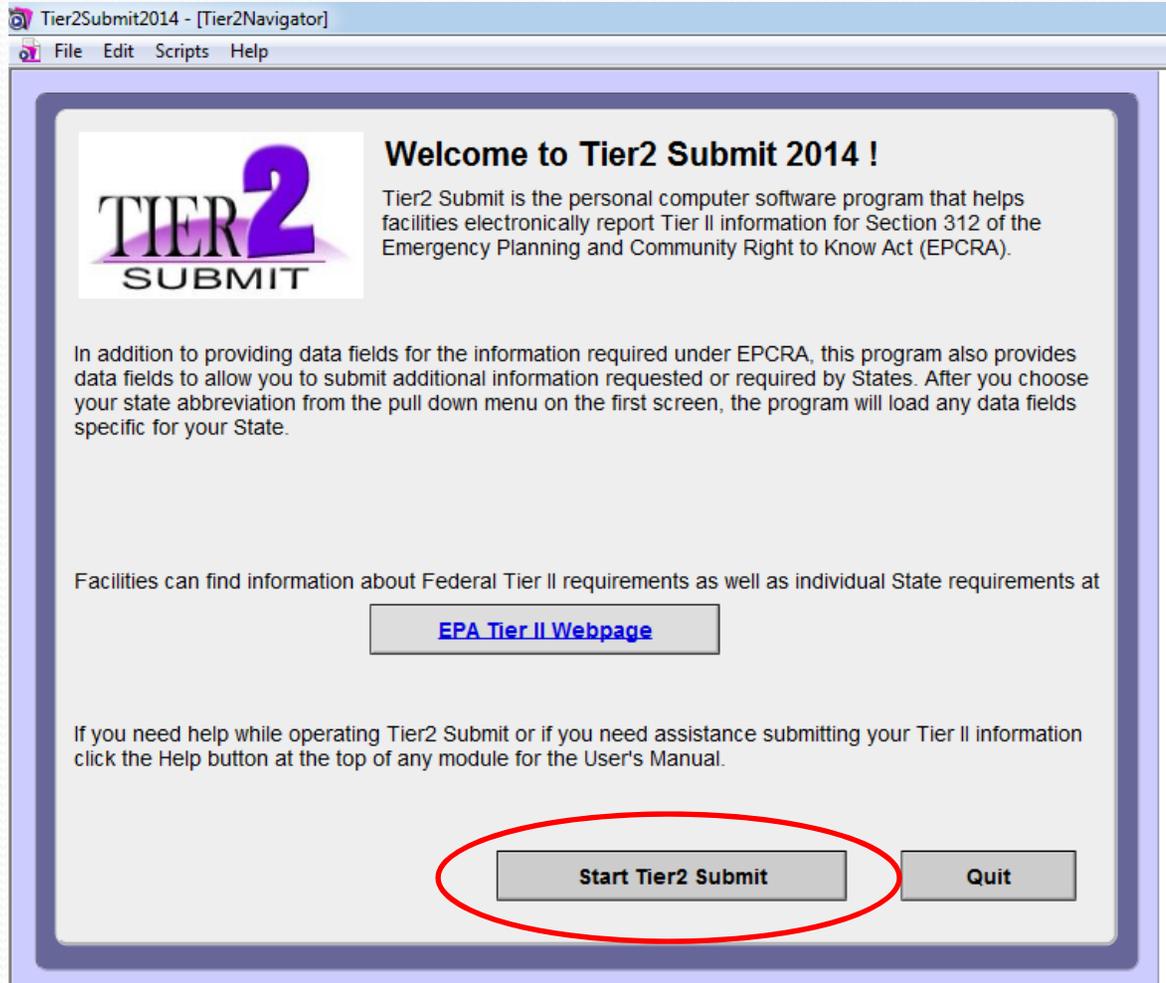


# Tier II Reporting Goals

- **Reporting Tools:**
  - How to correctly prepare a 2015 Tier II report
  - [Tier2 Submit software](#) and [EPA Form No. 8700-30](#)
- **DEQ's Reporting Options:**
  - 3 options:
    - Generate an electronic .t2s file and email it to DEQ along with a certification letter (preferred)
    - Generate a PDF, sign and email it to DEQ
    - Print a hard copy, sign and mail it to DEQ
- **Reporting Deadline:**
  - March 1<sup>st</sup>
  - Reports need to be submitted on or before March 1<sup>st</sup> even if the reporting deadline falls on a weekend. In order to be considered submitted, Tier II forms must be postmarked by March 1<sup>st</sup>.

# Tier2 Submit Software

- Start the Tier2 Submit software



# Facility Location Section

- Enter information on the facility and its physical location
- Use [Bing maps](#) to find and enter the latitude and longitude
  - The longitude can be a negative number
- If the mailing address is different, enter it in the “Mailing Address” section

Tier2Submit2014 - [Tier2Facilities]

File Edit Record Search Scripts Help

View List Chem Inventory List Contact List New Facility Quick Report Help 1 of 1 total

**Facilities** Last Modified 2/4/2015

Facility Name \* Test Facility  
If different, include both company name and facility name in the facility name field.

Department Report Year \* 2014

**Location** ID and Regs Contacts State Fields Attachments Certification

Location Where Hazardous Chemicals are Present Mailing Address (if different)

Street \* Test Address

City \* Test City State \* VA Zip \* 23219

County Test County Fire District Test Fire District Country USA

Emergency 24-Hour Phone Number Test 24-hr Number

Enter lat/long values in decimal degrees (use a negative number for Western hemisphere longitude).  
[Need help finding your lat/long values?](#)

Latitude \* 38.392143 Longitude \* -78.9643004

A red \* indicates a federal or state requirement.

# ID and Regs Section

- Enter the facility's Dun & Bradstreet ID and the NAICS ID
  - If the facility doesn't have a Dun & Bradstreet ID, enter "N/A"
- If the facility is manned, enter the max number of occupants
- If unmanned, enter 0
- If your facility is subject to Section 112(r) of the Clean Air Act (CAA), enter the RMP Facility ID.
- Facilities that have an EHS present in quantities greater than the threshold, are subject to Section 302.

Tier2Submit2014 - [Tier2Facilities]

File Edit Record Search Scripts Help

View List Chem Inventory List Contact List New Facility Quick Report Help 1 of 1 total

**Facilities** Last Modified 2/4/2015

Facility Name \* Test Facility  
If different, include both company name and facility name in the facility name field.

Department Report Year \* 2014

Location **ID and Regs** Contacts State Fields Attachments Certification

ID Type	ID	Description
Dun & Bradstreet	Test ID	
NAICS	Test ID	

Is the facility manned? \*  Manned  Unmanned Maximum No. of Occupants \* 100

Subject to Chemical Accident Prevention under Section 112(r) of CAA (40 CFR part 68, Risk Management Program)? \*  Yes  No

Subject to Emergency Planning under Section 302 of EPCRA (40 CFR part 355)? \*  Yes  No

A red \* indicates a federal or state requirement.

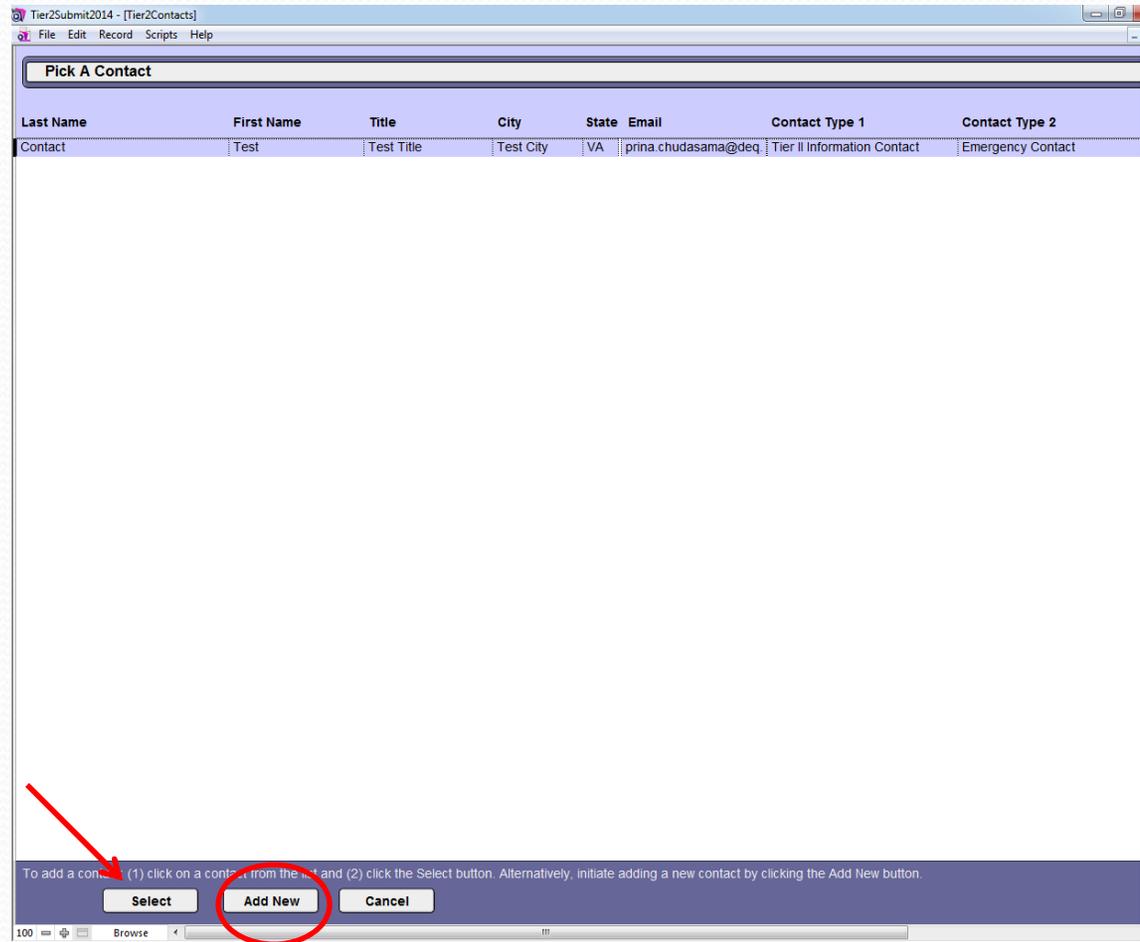
# Contacts Section

- Click on “Add Contact” to add a new contact
- 4 types of contacts need to be listed:
  - Owner/Operator
  - Facility Emergency Coordinator (if applicable – Section 302)
  - Tier II Information Contact
  - 2 Emergency Contacts

The screenshot shows the 'Tier2Submit2014 - [Tier2Facilities]' web application. The interface includes a menu bar with 'File', 'Edit', 'Record', 'Search', 'Scripts', and 'Help'. Below the menu bar are tabs for 'View List', 'Chem Inventory List', 'Contact List', 'New Facility', 'Quick Report', and 'Help'. The 'Contact List' tab is active, and the 'Contacts' sub-tab is highlighted with a red circle. The main content area shows a form for adding a contact. The 'Facilities' section is titled 'Last Modified 2/4/2015'. The form includes fields for 'Facility Name \*' (containing 'Test Facility'), 'Department', and 'Report Year \*' (containing '2014'). Below the form are tabs for 'Location', 'ID and Regs', 'Contacts', 'State Fields', 'Attachments', and 'Certification'. The 'Contacts' tab is active, and the 'Add Contact' button is highlighted with a red arrow. The 'Add Contact' button is located at the bottom right of the form, along with 'Remove Contact' and 'View Contact' buttons. A red arrow points to the 'Add Contact' button. The text 'Federal requirements include: Owner / Operator (name, address, phone & email); Emergency Contact (name & 2 phone numbers, one of which must be 24-hour); Tier II Information Contact (name, email & phone). \*

# Adding a New Contact

- This screen will pop up after you click on “Add Contact”
- Click on “Add New” to add a new contact
- Click on “Select” if you already have an existing contact on the list.



# Adding a New Contact

- Enter the contact information for your specific contact type
  - If the contact falls under more than one contact type, select all applicable fields
- For emergency contacts, a 24-hour phone number is required
- Enter a valid email for the contact
  - Ensure that the email is accurate and has no typos
- Click “Done” and repeat for the next contact

The screenshot shows a web application window titled "Tier2Submit2014 - [Tier2Contacts]". The main content area is titled "Contacts" and has a "Last Modified" date of "2/4/2015". The form is divided into several sections:

- Personal Information:** Fields for First Name (Test), Last (Contact), Title (Test Title), Address (Test Address), City (Test City), State (VA), Zip (23219), and Country (USA). The Email field contains "prina.chudasama@deq.virginia.gov".
- Phone Information:** A table with columns "Phone Type" and "Phone #". It contains two rows: "Work" with phone number "804-698-4159" and "24-hour" with phone number "804-698-4159". Each row has a "Delete" button.
- Contact Type:** A dropdown menu with options: "Tier II Information Contact", "Emergency Contact", "Owner / Operator", and "Fac. Emergency Coordinator".
- Footer:** A note states "A red \* indicates a federal or state requirement." and two buttons: "Done" and "Cancel".

Red arrows in the image point to the Email field, the 24-hour phone number field, and the Done button.

# Attachments Section

- Attach any site plans, descriptions of dikes and other safeguard measures, and/or lists of site coordinate abbreviations.
- Check the box for the document that you want to upload
- Click “Add” and select the document from the source to add it to your submission
- Documents can also be attached to electronic submittals or hardcopy submittals

The screenshot displays the 'Facilities' section of the Tier2Submit2014 web application. The interface includes a navigation menu with options like 'View List', 'Chem Inventory List', 'Contact List', 'New Facility', 'Quick Report', and 'Help'. The main form area is titled 'Facilities' and shows 'Last Modified 2/4/2015'. Fields for 'Facility Name \*' (containing 'Test Facility'), 'Department', and 'Report Year \*' (containing '2014') are visible. Below these are tabs for 'Location', 'ID and Regs', 'Contacts', 'State Fields', 'Attachments', and 'Certification'. The 'Attachments' tab is selected and circled in red. Underneath, the 'Optional Attachments' section contains three checkboxes, each also circled in red: 'I have submitted a site plan.', 'I have attached a description of dikes and other safeguard measures.', and 'I have attached a list of site coordinate abbreviations.'. Below the checkboxes is a multi-line text input area. To the right of this area are three buttons: 'Add', 'Remove', and 'Show'. A red arrow points to the 'Add' button. At the bottom of the form, there is a 'Number of attachments:' field with a yellow input box. A footer note states 'A red \* indicates a federal or state requirement.'

# Adding A New Chemical

- To add a new chemical, click on “Chem Inventory List”
- Select “New Chemical In Inventory” to enter information about the chemical

Tier2Submit2014 - [Tier2Facilities]

File Edit Record Search Scripts Help

View List **Chem Inventory List** Contact List New Facility

**Facilities**

Facility Name \* Test Facility  
If different, include both company name and facility name in the facility

Department

Location ID and Regs Contacts

**Optional Attachments**

I have submitted a site plan.

I have attached a description of dikes and other safeguard

I have attached a list of site coordinate abbreviations.

Tier2Submit2014 - [Tier2ChemicalsInInventory]

File Edit Record Search Scripts Help

View Record Facility Record Contact List **New Chemical In Inventory** View All Chemical Inventories Help Back

**Chemicals in Inventory for :**

Facility Name Test Facility

Street Test Address

City Test City County Test County State VA Zip 23219

Chemical	CAS	Facility Name
Test Chemical Name	Test CAS #	Test Facility

# Chemical Inventory, Physical Quantity Section

- Enter the chemical name, corresponding CAS #, physical state, associated hazards, and health effects
- Enter the number of days the chemical is stored on site
- Enter the maximum and average daily amounts and/or range codes

The screenshot displays the 'Chemicals in Inventory' web application interface. The 'Physical State & Quantity' section is highlighted with a red circle. The form includes the following fields and options:

- Facility Name:** Test Facility
- Report Year:** 2014
- City:** Test City
- State:** VA
- CAS #:** Test CAS #
- Chem Name\*:** Test Chemical Name
- Physical State\*:**
  - Pure
  - Mixture
  - Solid
  - Liquid
  - Gas
- Hazards\*:**
  - Fire
  - Sudden Release of Pressure
  - Reactive
- Health Effects\*:**
  - Acute
  - Chronic
- Days On Site\*:** 365
- Max Daily Amount:** 10000 pounds
- Average Daily Amount:** 10000 pounds
- Max Code\*:** 06 (10,000 - 24,999 pounds)
- Ave Code\*:** 06 (10,000 - 24,999 pounds)
- Max amount in largest container:** 0 pounds

A red \* indicates a federal or state requirement.

# Chemical Inventory, Storage Locations Section

- Describe the exact location of the chemical stored at the facility
- Enter the maximum amount stored at that specific location
- Enter the type of storage container
- Enter the pressure and temperature at which the chemicals are stored

The screenshot shows a web application window titled 'Tier2Submit2014 - [Tier2ChemicalsInventory]'. The main content area is titled 'Chemicals in Inventory' and includes a 'Last Modified' date of 2/4/2015. The form is divided into several sections:

- Facility Information:** Facility Name (Test Facility), Report Year (2014), City (Test City), State (VA).
- Chemical Information:** CAS # (Test CAS #), Chem Name\* (Test Chemical Name), EHS\* (checked), Trade Secret (unchecked), and a 'Lookup Chemical Name' button.
- Navigation Tabs:** Physical State & Quantity, **Storage Locations** (circled in red), Mixture Components, and State Fields.
- Storage Locations Table:** A table with columns for Location at Facility\*, Type\*, Pressure\*, Temperature\*, Max Amount, and a 'Delete' button. The first row is populated with: Test location, Above ground tank, Ambient pressure, Ambient temperature, and pounds.
- Footer:** A note stating 'Each row represents one storage location' and 'A red \* indicates a federal or state requirement'.

# Chemical Inventory, Mixture Components Section

- If the chemical is a mixture, its components should be listed here
- Enter the max code (depending on the amount of chemical stored)
- Enter the % weight or % volume of the component in the mixture

Tier2Submit2014 - [Tier2ChemicalsInventory]

File Edit Record Search Scripts Help

View List Facility Record Contact List New Chemical In Inventory Help Back / Close 1 of 1 total

### Chemicals in Inventory

Last Modified 2/4/2015

Facility Name Test Facility  
Report Year 2014 City Test City State VA

CAS # Test CAS #  EHS\*  Trade Secret  
Chem Name\* Test Chemical Name [Lookup Chemical Name](#)

Physical State & Quantity Storage Locations **Mixture Components** State Fields

EHS*	CAS	Component	Max Code	%	WT / Vol	
<input checked="" type="checkbox"/>	Test CAS #	Test Component	06	50	Wt	Delete
<input type="checkbox"/>	Test CAS #	Test Component	06	50	Wt	Delete
<input type="checkbox"/>						Delete
<input type="checkbox"/>						Delete
<input type="checkbox"/>						Delete
<input type="checkbox"/>						Delete
<input type="checkbox"/>						Delete
<input type="checkbox"/>						Delete
<input type="checkbox"/>						Delete
<input type="checkbox"/>						Delete

[Lookup Component Name](#)

A red \* indicates a federal or state requirement.

# Report Certification

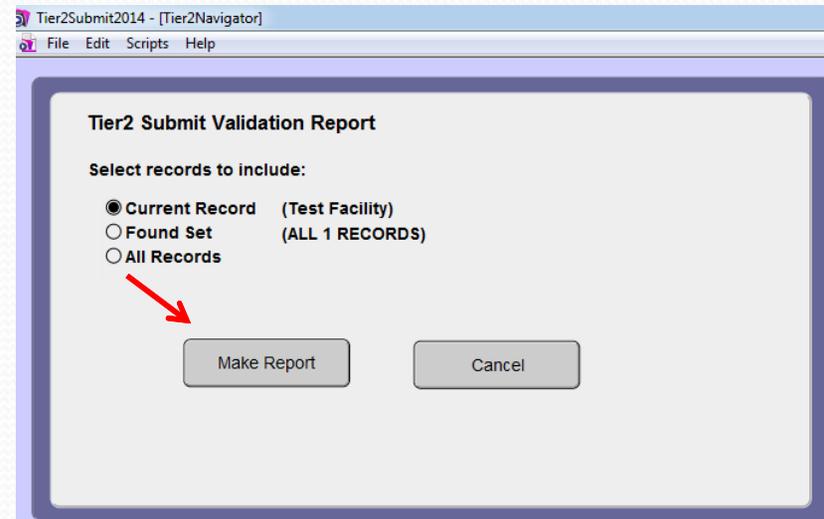
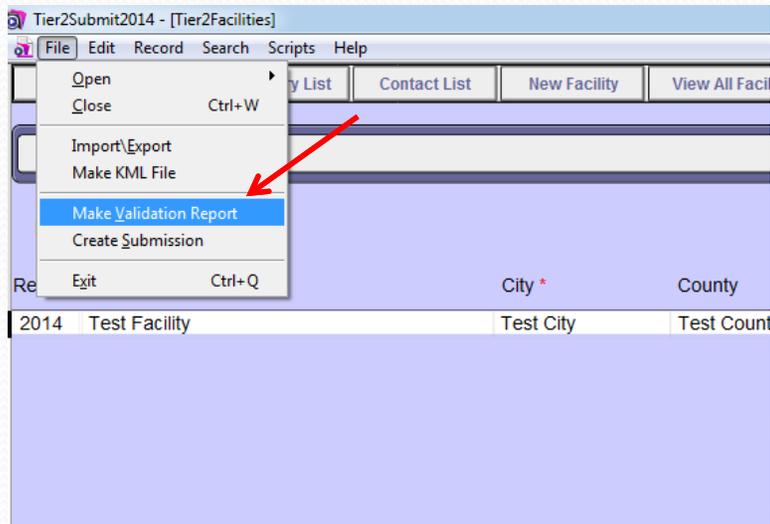
- On the Certification tab, enter the authorized signatory's full name and title
- Enter the date the report was signed
- The State of Virginia has no fees for filing Tier II reports
- **Note:** A certification letter with a wet signature is still required to be emailed or mailed to the DEQ.

The screenshot displays the 'Tier2Submit2014 - [Tier2Facilities]' web application. The interface includes a menu bar (File, Edit, Record, Search, Scripts, Help) and a navigation pane with tabs: View List, Chem Inventory List, Contact List, New Facility, Quick Report, Help, and Certification (which is circled in red). The main content area is titled 'Facilities' and shows a form for 'Test Facility' with a 'Report Year' of 2014. A 'State / Local Fees Total' field is present, along with a checkbox for 'Check if all facility information (not including chemical information) is identical to last year's submission.' A certification statement is provided: 'I certify under penalty of law that I have personally examined and am familiar with the information contained in this submission, and that based on my inquiry of those individuals responsible for obtaining the information, I believe the information submitted is true, accurate, and complete.' Below this, there are fields for 'Signature \* Full Name, Title' and 'Date Signed \* 3/1/2015', both with red arrows pointing to them. A 'Notes' section is at the bottom. A footer note states: 'A red \* indicates a federal or state requirement.'

# Report Validation

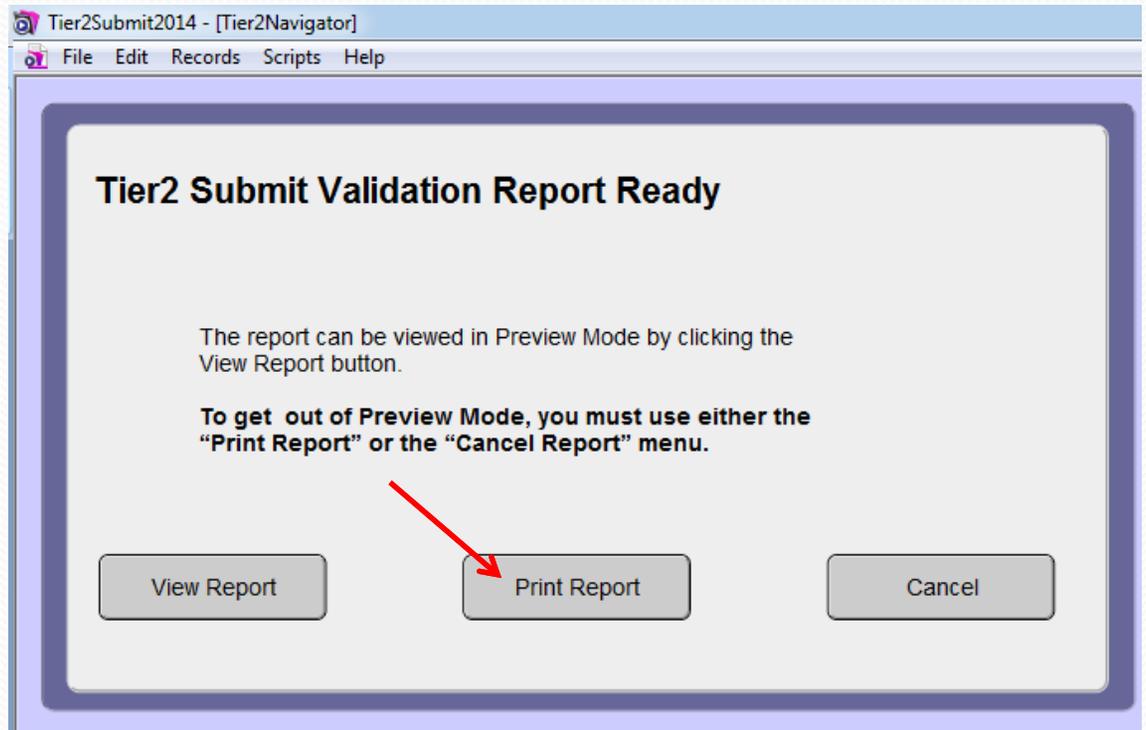
- Select “Make Validation Report” from the File menu

- Select “Current Record” for a single facility
- Select “Found Set” for multiple facilities
- Click on “Make Report”



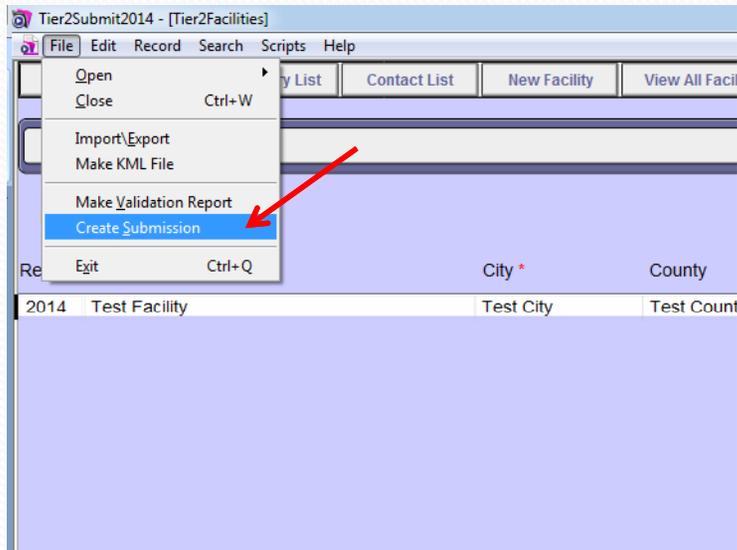
# Report Validation

- On this screen, you can view and/or print the validation report
- If you have errors, they will show up when you view or print the report
- Correct any errors (if applicable) , and re-run the validation report until you fix all errors
- If you have zero errors, please proceed to creating your submission.

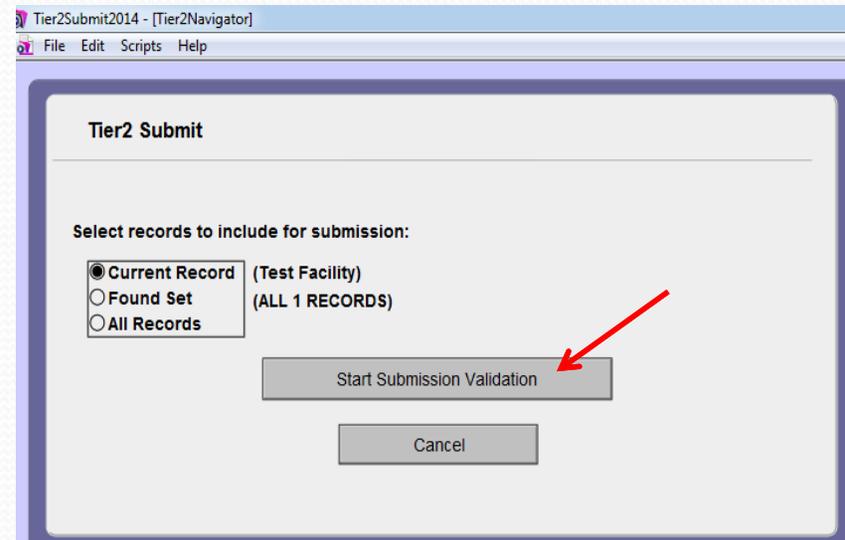


# Creating The Submission

- Select “Create Submission” from the File menu



- Select “Current Record” for a single facility
- Select “Found Set” for multiple facilities
- Click on “Start Submission Validation”



# Creating The Submission

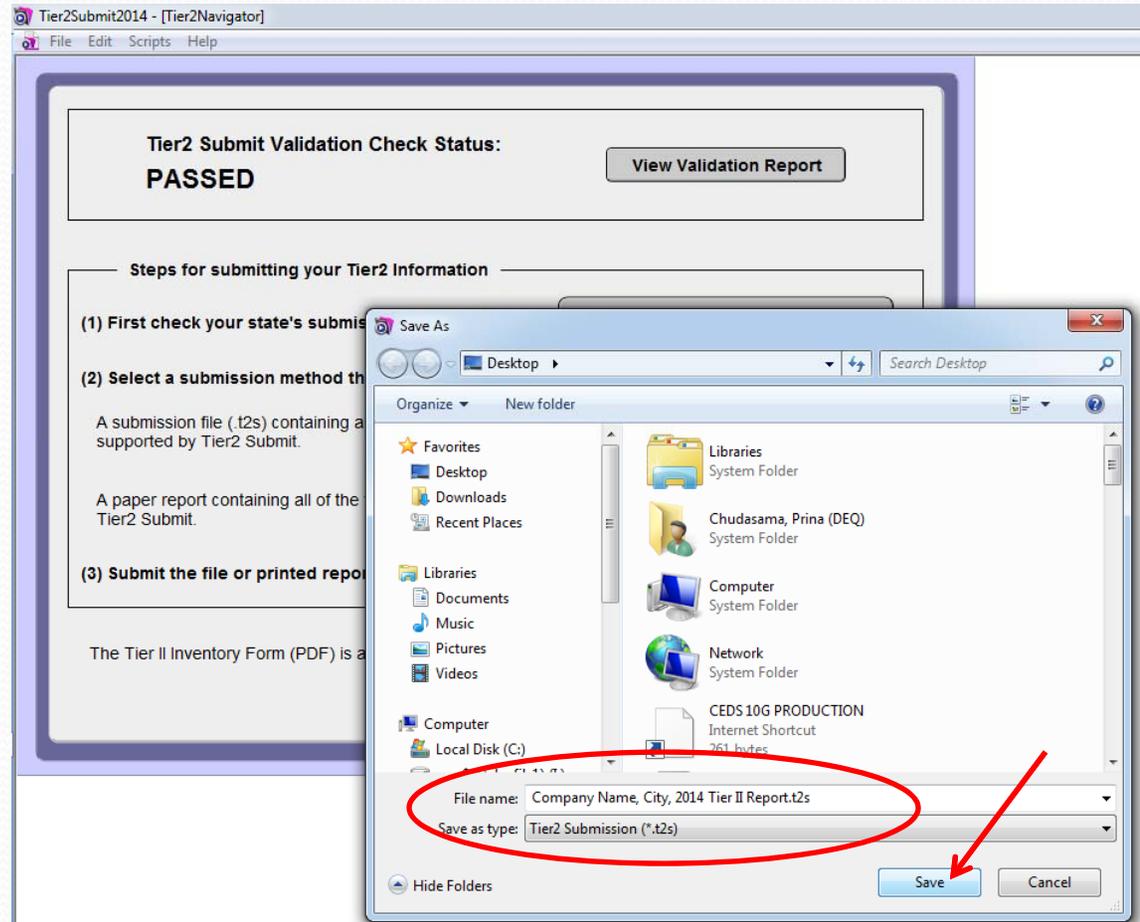
- Your Tier2 Submit Validation Check Status should say “PASSED”
- Click on “Create Electronic Submission File” to create the electronic .t2s file
- Select “Create Paper Report” to create a pdf of the report

The screenshot shows a web application window titled "Tier2Submit2014 - [Tier2Navigator]". The interface includes a menu bar with "File", "Edit", "Scripts", and "Help". The main content area is divided into several sections:

- Tier2 Submit Validation Check Status:** This section displays "PASSED" in large, bold letters, which is circled in red. To its right is a button labeled "View Validation Report".
- Steps for submitting your Tier2 Information:** This section contains three numbered steps:
  - (1) First check your state's submission requirements:** A button labeled "State Submission Requirements" is provided.
  - (2) Select a submission method that is accepted by your state:** This step includes two options, both circled in red:
    - A submission file (.t2s) containing all of the fields supported by Tier2 Submit. A button labeled "Create Electronic Submission File" is next to it.
    - A paper report containing all of the fields supported by Tier2 Submit. A button labeled "Create Paper Report" is next to it.
  - (3) Submit the file or printed report per your state submission requirements.**
- The Tier II Inventory Form (PDF) is available from:** A button labeled "EPA Website" is provided.
- A "Cancel" button is located at the bottom right of the interface.

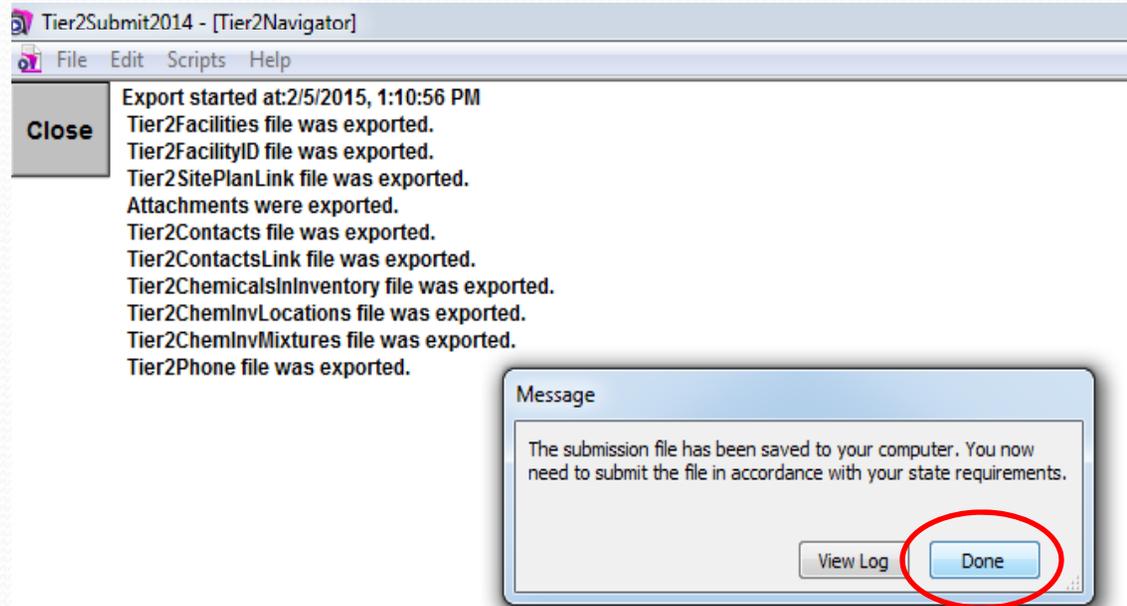
# Creating the Electronic .t2s File

- Click on “Create Electronic Submission File”
- Save the File as: Company Name, City, (year) Tier II Report.



# Creating the Electronic .t2s File

- A dialog box will pop up saying that file has been saved to your computer and the file needs to be submitted in accordance with your state requirements.
- Click “Done” to exit from the screen





# DEQ Submission Options

## 1. Electronic File Submission:

- Email the electronic .t2s file as an attachment to [va-epcra@deq.virginia.gov](mailto:va-epcra@deq.virginia.gov)
- Include a signed certification statement

## 2. Report PDF Submission:

- Email a signed PDF of the report as an attachment to [va-epcra@deq.virginia.gov](mailto:va-epcra@deq.virginia.gov)

## 3. Hardcopy Submission:

- Mail a hard copy of the Tier II Report to:  
Virginia Emergency Response Council (VERC)  
c/o Virginia DEQ  
SARA Title III Program Office  
P.O. Box 1105  
Richmond, VA 23218



# Common Discrepancies with SARA Reporting

- **General – Applicable to all sections:**
  - Failure to notify promptly
  - Not knowing the extent of reporting responsibility
  - Failure to submit written notifications
  - Change of personnel and loss of records
  - Threshold determination
- **Section 312 – Tier II reports:**
  - Using outdated forms
  - Incomplete chemical and storage information
  - Date and signature omission
  - Latitude and longitude omission

# Hazardous Waste Contingency Plans - LQGs

- Large Quantity Generators (LQGs):
  - Facilities that generate 1,000 kg/month or more of hazardous waste or more than 1 kg/month of acutely hazardous waste.
  - Prepare a formal contingency plan that prepares for fires, explosions, and releases of hazardous waste
  - Must meet requirements of §262.34(a)(4)
  - Maintain at the facility, be available for inspections, and submit to local emergency response authorities (VERC, LEPC, Fire Department, etc.)
  - Review regularly and submit revised plans to local emergency response authorities to keep them up-to-date
  - Attach written agreements between the facility and local authorities to the contingency plan (if attained)



# Hazardous Waste Contingency Plans – SQGs & CESQGs

- Small Quantity Generators (SQGs):
  - Facilities that generate more than 100 kg/month, but less than 1,000 kg/month, of hazardous waste
  - Not required to develop a formal contingency plan
  - Comply with emergency response provisions in §262.34(d)(5)
  - List of emergency contacts near 180/270-day accumulation areas along with locations of fire extinguishers, alarms, and spill control material.
- Conditionally Exempt Small Quantity Generators (CESQGs):
  - Facilities that generate less than 100 kg/month of hazardous waste or less than 1kg/month of acutely hazardous waste
  - Not required to have a contingency plan



## Additional Resources

- **Virginia DEQ SARA Title III Webpage:**  
<http://www.deq.virginia.gov/Programs/Air/AirQualityPlanningEmissions/SARATitleIII.aspx>
- **EPA EPCRA Website:**  
<http://www2.epa.gov/epcra>
- **EPA Tier2 Submit Software:**  
<http://www2.epa.gov/epcra/tier2-submit-software>
- **EPA Frequently Asked Questions:**  
<https://emergencymanagement.zendesk.com/hc/en-us/categories/201455628>
- **EPA EPCRA Hotline:**  
(800) 424-9346

# Questions?

Contact Info:

Sanjay Thirunagari

[sanjay.thirunagari@deq.virginia.gov](mailto:sanjay.thirunagari@deq.virginia.gov)

(804)698-4193

Prina Chudasama

[prina.chudasama@deq.virginia.gov](mailto:prina.chudasama@deq.virginia.gov)

(804)698-4159