



Protocol for Conducting Environmental Compliance Audits under the Comprehensive Environmental Response, Compensation, and Liability Act



EPA Office of Compliance

Protocol for Conducting Environmental Compliance Audits under CERCLA

Notice

This document has been developed to assist in conducting environmental audits. The use of this document should be restricted to environmental audits only. For example, areas such as safety, transportation, occupational health, and fire protection are mentioned solely for clarification purposes. It is a summary of environmental regulations under CERCLA, but it is not a substitute for a comprehensive knowledge of the regulations themselves. Any variation between applicable regulations and the summaries contained in this guidance document are unintentional, and, in the case of such variations, the requirements of the regulations govern.

This document is intended solely as guidance to explain performance objectives for environmental auditors. Following the steps set forth in this guidance generally should result in compliance with those aspects of the regulations that it covers. The U.S. Environmental Protection Agency (EPA) does not make any guarantee or assume any liability with respect to the use of any information or recommendations contained in this document. Regulated entities requiring additional information or advice should consult a qualified professional.

This guidance does not constitute rulemaking by the EPA and may not be relied on to create a substantive or procedural right or benefit enforceable, at law or in equity, by any person. EPA may take action at variance with this guidance and its internal procedures.

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Section I: Introduction

Background

The Environmental Protection Agency (EPA) is responsible for ensuring that businesses and organizations comply with federal laws that protect the public health and the environment. Recently, EPA has begun combining traditional enforcement activities with more innovative compliance approaches. In its Strategic Plan, the Agency recognizes the need to assist the regulated community by providing compliance assistance and guidance that will promote improved compliance and overall environmental performance (see Exhibit 1). EPA encourages regulated entities to recognize compliance as the floor, rather than the ceiling, of environmental performance by internalizing and implementing sound environmental practices. As part of that effort, EPA is encouraging the development of self-assessment programs at individual facilities. Voluntary audit programs play an important role in helping companies meet their obligation to comply with environmental requirements. Such assessments can be a critical link, not only to improved compliance, but also to improvements in other aspects of an organization's performance. For example, environmental audits may identify pollution prevention opportunities that can substantially reduce an organization's operating costs.

Over the years, EPA has encouraged regulated entities to initiate environmental audit programs that support and document compliance with environmental regulations. EPA has developed this audit protocol to provide regulated entities with specific guidance in periodically evaluating their compliance with federal environmental requirements.

Exhibit 1 - EPA's Credible Deterrent Goal

Within its Strategic Plan, EPA has established a goal to ensure full compliance with the laws intended to protect human health and the environment. Within the framework of this goal, EPA's objectives are as follows:

- Identify and reduce significant non-compliance in high priority program areas, while maintaining a strong enforcement presence in all regulatory program areas,
- Promote the regulated communities' voluntary compliance with environmental requirements through compliance incentives and assistance programs.

EPA's Policy on Environmental Audits

In 1986, in an effort to encourage the use of environmental auditing, EPA published its "Environmental Auditing Policy Statement" (see 51 FR 25004). The 1986 audit policy states that "it is EPA policy to encourage the use of environmental auditing by regulated industries to help achieve and maintain compliance with environmental laws and regulation, as well as to help identify and correct unregulated environmental hazards." In addition, EPA defined environmental auditing as "a systematic, documented, periodic, and objective review of facility operations and practices related to meeting environmental requirements." The policy also identified several objectives for environmental audits:

- ▶ verifying compliance with environmental requirements,
- ▶ evaluating the effectiveness of in-place environmental management systems, and
- ▶ assessing risks from regulated and unregulated materials and practices.

Exhibit 2 - EPA's 1995 Audit Policy

Under the final Audit/Self Policing Policy, EPA will not seek gravity-based penalties and will not recommend criminal prosecutions for companies that meet the requirements of the Policy. Gravity-based penalties represent the "seriousness" or punitive portion of penalties over and above the portion representing the economic gain from non-compliance. The policy requires companies:

- to promptly disclose and correct violations,
- to prevent recurrence of the violation, and
- to remedy environmental harm

The policy excludes:

- repeated violations,
- violations that result in serious actual harm, and
- violations that may present an imminent and substantial endangerment

Corporations remain criminally liable for violations resulting from conscious disregard of their legal duties, and individuals remain liable for criminal wrongdoing. EPA retains discretion to recover the economic benefit gained as a result of noncompliance, so that companies will not be able to obtain an economic advantage over their competitors by delaying investment in compliance. Where violations are discovered by means other than environmental audits or due diligence efforts, but are promptly disclosed and expeditiously corrected, EPA will reduce gravity-based penalties by 75% provided that all of the other conditions of the policy are met.

As a result of EPA's new audit policy, through March 1998, 247 companies have disclosed environmental violations at more than 760 facilities and EPA has reduced or waived penalties for 89 companies and 433 facilities.

The final Audit/Self-Policing Policy was published in the Federal Register on December 22, 1995 (60 FR 66706). It took effect on January 22, 1996. For further information, contact the Audit Policy Docket at (202) 260-7548 or call (202) 564-4187.

In 1995, EPA published "Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations" which both reaffirmed and expanded its 1986 audit policy. The 1995 audit policy offers major incentives for entities to discover, disclose and correct environmental violations. Under the 1995 policy, EPA will not seek gravity-based penalties or recommend criminal charges be brought for violations that are discovered through an "environmental audit" (as defined in the 1986 audit policy) or a management system reflecting "due diligence" and that are promptly disclosed and corrected, provided that other important safeguards are met (see Exhibit 2). These safeguards protect health and the environment by precluding policy relief for violations that cause serious environmental harm or may have presented an imminent and substantial endangerment, for example.

Purpose of the *Protocols for Conducting Environmental Compliance Audits*

This protocol, which is part of a set containing other area or statutory specific audit protocols, is a tool to assist you in conducting environmental audits, which should inform you whether your facility is in compliance with federal regulations. EPA has developed these audit protocols to assist and encourage businesses and organizations to perform environmental audits and disclose violations in accordance with EPA's audit policy. The audit protocols are intended to promote consistency among regulated entities when conducting environmental audits and to ensure that audits are conducted in a thorough and comprehensive manner.

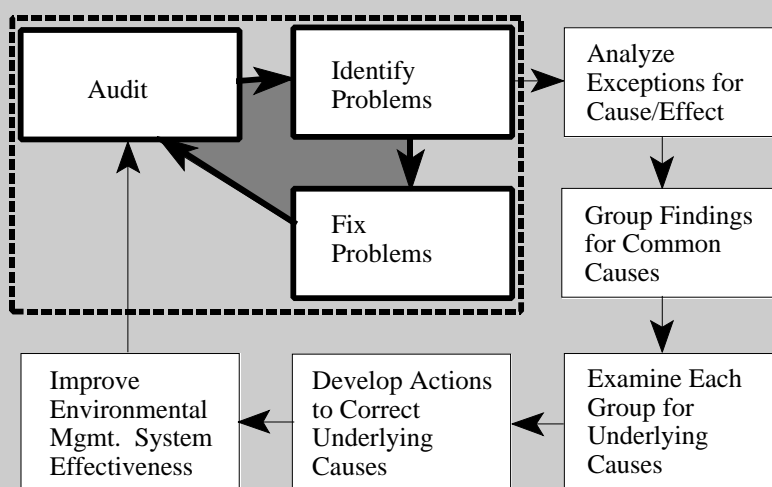
Each protocol provides guidance on key requirements, defines regulatory terms, and gives an overview of the federal laws affecting a particular environmental management area. It also includes a checklist containing detailed procedures for conducting a review of facility conditions. In order to use these documents effectively, you should be familiar with

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basic environmental auditing practices and the relevant environmental regulations under Title 40 of the Code of Federal Regulations (CFR). The audit protocols are not intended to be exclusive or limiting with respect to procedures that may be followed. EPA recognizes that other audit approaches and techniques may be effective in identifying and evaluating a facility's environmental status and in formulating recommendations to correct observed deficiencies.

These protocols can be used as a basis to implement, upgrade, or benchmark environmental management activities. The protocols are a management tool for measuring and improving environmental performance by correcting deficiencies uncovered by the audit (see Exhibit 3). This process is perhaps the key element to a high quality environmental management program and will function best when an organization identifies the "root causes" of each audit finding. Root causes are those breakdowns in management oversight, information exchange, and evaluation that allow environmental problems to recur. Thus, while an organization may have developed an excellent record of dealing with a symptom, such as spill response, the underlying problem or "root cause" has not been addressed. Furthermore, identifying the root cause of an audit finding can mean identifying not only the failures that require correction but also the successes. In each case a root cause analysis should uncover the failures while promoting the successes so that an organization can make continual progress toward environmental excellence.

Exhibit 3 - Corrective Action Model



How to Use This Protocol

To conduct effective compliance audits, the auditor or audit team needs to possess sound working knowledge of the operations and processes to be reviewed, the relevant regulations that apply to a given facility, and of acceptable auditing practices. The audit protocol should be used as a planning tool to assist the auditor in understanding the requirements for conducting a comprehensive audit. This document will provide the user with a generic audit approach to identify regulatory issues that may require closer examination. Once the general issues are identified through the use of this protocol, the auditor should perform a more detailed investigation to determine the specific area of noncompliance to be corrected. The auditor should review federal, state and local environmental requirements and annotate the protocol, as required, to include other applicable requirements not included in the protocol.

The auditor also should determine which regulatory agency has authority for implementing an environmental program so that the proper set of regulations is consulted. State programs that implement federally mandated programs may contain more stringent requirements. This protocol should not be used as a substitute for the applicable regulations.

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The collective set of the audit protocols developed by EPA is designed to support a wide range of environmental auditing needs; therefore several of the protocols in this set or sections of an individual protocol may not be applicable to a particular facility. Each protocol is not intended to be an exhaustive set of procedures; rather it is meant to inform the auditor, about the degree and quality of evaluation essential to a thorough environmental audit. EPA is aware that other audit approaches may provide an effective means of identifying and assessing facility environmental status and in developing corrective actions.

Each protocol contains the following information:

- ☐ List of acronyms and abbreviations used in the document,
- ☐ Applicability - provides guidance on the major activities and operations included in the protocol and a brief description of how the protocol is applied,
- ☐ Review of federal legislation - identifies key issues associated with the subject protocol area,
- ☐ State and local regulations - identifies typical issues normally addressed in state and local regulations but does not present individual state/local requirements,
- ☐ Key compliance requirements - summarizes the overall thrust of the regulations for that particular protocol,
- ☐ Key compliance definitions - defines important terms,
- ☐ Typical records to review - highlights documents, permits and other pertinent paperwork that should be reviewed by an auditor and reconciled against regulatory requirements,
- ☐ Typical physical features to inspect - highlights pollution control equipment, manufacturing and process equipment and other areas that should be visited and evaluated during an audit,
- ☐ Index for checklist users - outlines different areas of the checklist that may pertain to the facility being audited,
- ☐ Checklist - matches the regulatory requirements with the tasks that should be accomplished by the auditor,
- ☐ Appendices - supporting information for the checklist (e.g., regulatory deadlines, lists of contaminants, wastes, and required testing procedures). Note: information contained in the appendices is dated and should be verified with a current version of the applicable federal regulations.

The checklist delineates what should be evaluated during an audit. The left column states either a requirement mandated by regulation or a good management practice that exceeds the requirements of the federal regulations. Good management practices are distinguished from regulatory requirements in the checklist by the acronym (MP) and are printed in italics. The regulatory citation is given in parentheses after the requirement. The right column gives instructions to help conduct the evaluation. These instructions are performance objectives that should be accomplished by the auditor. Some of the performance objectives may be simple documentation checks that take only a few minutes; others may require a time-intensive physical inspection of a facility.

EPA is presently in the process of developing a series of audit protocol application guides to serve as companion documents to the set of protocols. The application guides will provide the auditor with a matrix which identifies and cross references certain site-specific activities or unit operations with particular environmental aspects of that activity. For example, managing hazardous waste containers is a site-specific activity with environmental concerns, such as possible releases to air, and water, that may require additional review through auditing. By using the application guide the user can identify facility specific practices that require more in-depth review. In addition, the application guides will also direct the user to specific protocols and sections (e.g., checklist items) of the protocol to determine areas that are regulated and require auditing.

List of Acronyms

| | |
|---------|---|
| ACL | Alternative concentration limit |
| ARAR | Applicable or relevant and appropriate requirement |
| CAA | Clean Air Act |
| CAS | Chemical Abstract Service |
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act |
| CERCLIS | CERCLA Information System |
| CFR | Code of Federal Regulations |

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| | |
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| CMS | Corrective measures study |
| CRP | Community relations plan |
| CWA | Clean Water Act |
| EE/CA | Engineering evaluation/cost analysis |
| EPA | Environmental Protection Agency |
| FS | Feasibility study |
| HRS | Hazard ranking system |
| MCL | Maximum contaminant level |
| MCLG | Maximum contaminant level goal |
| MP | Management practice |
| NCP | National Contingency Plan |
| NFRAP | No further response action planned |
| NOV | Notice of Violation |
| NPL | National Priorities List |
| NRC | National Response Center |
| O&M | Operations and maintenance |
| OSC | On-scene coordination |
| PA | Preliminary assessment |
| PL | Public law |
| PRP | Potentially responsible party |
| QAPP | Quality assurance project plan |
| RA | Remedial action |
| RCRA | Resource Conservation and Recovery Act |
| RD | Remedial design |
| RD/RA | Remedial design/remedial action |
| RFA | RCRA facility assessment |
| RI | Remedial investigation |
| RI/FS | Remedial investigation/feasibility study |
| ROD | Record of decision |
| RPM | Remedial Project Manager |
| SARA | Superfund Amendments and Reauthorization Act |
| SDWA | Safe Drinking Water Act |
| SI | Site inspection |
| SWMU | Solid waste management units |
| TRI | Toxic Release Inventory |
| U.S. | United States |
| USC | United States Code |

Section II: Audit Protocol

Applicability

This protocol addresses facilities where hazardous substances were released or pose a substantial threat of release. This document does not include protocols for determining compliance with the Emergency Planning and Community Right-to-Know Act (EPCRA). These requirements are contained in a separate EPA document, *Protocol for Conducting Compliance Audits under the Emergency Planning and Community Right-to-Know Act* (EPA-305-B-98-007). Specific state regulations are not included in this protocol.

There are numerous environmental regulatory requirements administered by federal, state, and local governments. Each level of government may have a major impact on areas at the facility that are subject to the audit. Therefore, auditors are advised to review federal, state, and local regulations in order to perform a comprehensive audit.

Federal Legislation

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980

This act, Public Law (PL) 96-510 (42 U.S. Code (USC) 9601 et seq), as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986 (PL 99-499) provides for liability, compensation, cleanup, and emergency response for hazardous substances released into the environment and cleanup of inactive hazardous waste disposal sites. CERCLA, commonly known as "Superfund," established a fund which was financed by hazardous substance generators to financially support cleanup and response actions of abandoned hazardous waste sites when no financially responsible party(ies) can be found. The taxing authority for replenishing the "Superfund" tax fund expired in December 1995. Parties responsible for the contamination of hazardous waste sites are liable for all costs incurred in the cleanup and remediation process. The EPA has generated and periodically updates a list of sites requiring cleanup under CERCLA, known as the National Priorities List (NPL).

State and Local Regulations

In addition to the federal requirements mentioned in this document, many states have (or are in the process of establishing) release reporting requirements and clean-up requirements that place additional responsibilities on facility owners and operators and other potentially responsible parties. States and localities or states and municipalities may establish release reporting requirements and other related legal obligations that are more stringent than those under CERCLA. Therefore, regulated entities that are not subject to the requirements of CERCLA may be subject to state or local regulations regarding release reporting and site evaluation and clean-up.

Key Compliance Requirements

Hazardous Substance Release Reporting

Under CERCLA Section 103, facilities are required to notify the National Response Center (NRC) immediately if they release hazardous substances in excess of or equal to reportable quantities. Facilities with continuous and stable releases have limited notification requirements (40 CFR 302.1 through 302.6, and 302.8).

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National Contingency Plan

Section 104(a) of CERCLA requires that whenever there is a release or the substantial threat of a release of any pollutant or contaminant to the environment or which may present an imminent and substantial danger to the public health or welfare, the President is authorized to respond in a manner consistent with the National Contingency Plan (NCP). The NCP outlines procedures and standards for the cleanup of releases and hazardous waste sites and establishes the framework for site evaluations, remedial investigations/feasibility studies, remedy selection and design, removal actions, community involvement, and administrative records. The NCP requires that the cleanup is to be conducted by the "lead agency" (the definition of which is found in 40 CFR 300.5). Under the NCP, the lead agency is responsible for conducting the following activities as they apply to the hazardous waste site's situation.

Site Evaluation

If a release has, may have occurred, or could potentially occur, the first requirement is a site evaluation, the goal of which is to collect data and evaluate releases of hazardous substances, pollutants, or contaminants to determine the extent of the release and the release's impact to public health and the environment. The regulations which outline the requirements for a site evaluation are found in 40 CFR 300.420. A site evaluation consists of the following three components:

- A preliminary assessment (PA), which is a review of existing site information and an off-site reconnaissance, if appropriate, to determine if further investigations or response actions may be necessary;
- A site inspection (SI), which is an on-site investigation to determine whether a release has occurred, to identify the preliminary public health and environmental threats associated with the release or potential release, and it includes, as appropriate, both on- and off-site field sampling and analysis; and
- A review to determine if the site should be included on the NPL.

If it is determined that the site will need remediation actions, then the lead agency is required to conduct a remedial investigation/feasibility study (or equivalent investigation, e.g., engineering evaluation/cost analysis (EE/CA)), unless the release "may present an imminent and substantial danger to public health, welfare or the environment," in which case the lead agency must mitigate the threat through a removal action, or oversee implementation of the removal action by the potentially responsible party (PRP).

Remedial Investigation/Feasibility Study (RI/FS)

A remedial investigation/feasibility study (RI/FS) is intended to assess site conditions and evaluate remedial alternatives to the extent necessary to select a site remedy. The regulations promulgated under CERCLA that apply to RI/FSs are in 40 CFR 300.430(a)-(e) and require that an RI/FS consist of the following four steps:

- Project scoping, which is a plan developed by the lead agency or PRP for conducting an RI/FS such that the detail of analysis is appropriate to the complexity of the release site problems being addressed;
- A remedial investigation, which is the collection of the necessary field data to adequately characterize the release site in order to assist in developing and evaluating remedial alternatives;
- A risk assessment which, as a component of the RI, characterizes potential threats to human health and the environment that may be posed by site contaminants in the absence of site remediation; and
- A feasibility study, which is a study of potential remedial alternatives to address site risks.

Following the completion of the RI/FS, a report is prepared by the lead agency or PRP and a public comment period is held on the proposed remedy (discussed further in 'Community Relations'). Then the lead agency selects a remedy and the design process commences.

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Remedial Selection and Design

The regulations related to the selection and design of a remedy are promulgated at 40 CFR 300.430(f) and describe the required process. The lead agency must select, in conjunction with the lead regulatory agency, a preferred proposed alternative for remediation which can be presented to the public (and state) for their review and comment. The public comments must be considered and a response to comments prepared before the lead agency can issue a Record of Decision (ROD). Upon receiving new information from the public or regulatory agencies, the lead agency should reassess its initial remedial alternative determination. The public comments may prompt the lead agency to modify aspects of their preferred alternative or cause the lead agency to select a different alternative. The lead agency and the lead regulatory agency will make the final remedy selection decision and they will document that decision in the ROD before remedial design/remedial action (RD/RA) commences.

Removal Actions

If at any point during the remediation process, a determination has been made that there is an imminent threat to public health welfare, or the environment, the lead agency is required by CERCLA to take an appropriate removal action to abate, prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release. When the determination has been made that a removal action is appropriate, 40 CFR 300.410 requires that the following steps be undertaken as promptly as possible:

- A removal preliminary assessment which includes the collection or review of readily available information such as site management practices, information from waste generator, document review, and facility interviews;
- A removal site inspection, if necessary, to gather information that was not obtained during the removal preliminary assessment; and
- A removal action which is performed in response to a specific release.

The lead agency will have the latitude to respond as necessary to ensure the minimization of harm to public health, welfare, or the environment.

Community Involvement

Section 117 of CERCLA requires (through 40 CFR 300.430 and 300.435) that the lead agency conduct various community involvement activities throughout the inactive waste site evaluation process. The intention is to promote active communication between communities affected by the release site and the PRP's response for implementing remedial actions. Community involvement activities must be undertaken in the RI/FS, RD/RA, and removal actions processes and may include interviewing community interest groups and developing a Community Relations Plan (CRP). The CRP is designed to ensure that the public has been provided the appropriate opportunity to become involved in site-related decision making, to identify the appropriate activities for ensuring such public involvement, and to provide the appropriate opportunity for the community to learn about the release site.

Administrative Record

Section 133(k) of CERCLA requires the establishment and maintenance of an administrative record which contains all documents pertaining to information used or potentially relied upon to select response actions, information on the RI/FS and RD/RA processes, the ROD and all public comments received. There are specific requirements in CERCLA that are promulgated at 40 CFR 300.800-300.805 which require the administrative record to be maintained at a central location near the release site and that it must be easily accessible to community interest groups.

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For further information regarding the CERCLA regulations, contact U.S. EPA's Superfund, RCRA/UST, and EPCRA Hotline at 800-424-9346 (or 703-412-9810 in the D.C. area) from 9 a.m. to 6 p.m., Monday through Friday.

This EPA hotline provides up-to-date information on regulations developed under CERCLA (Superfund), RCRA and the Oil Pollution Act. The hotline can assist with Section 112(r) of the Clean Air Act (CAA) and Spill Prevention, Control and Countermeasures (SPCC) regulations. The hotline also responds to requests for relevant documents and can direct the caller to additional tools that provide a more detailed discussion of specific regulatory requirements.

Key Terms and Definitions

Applicable or Relevant and Appropriate Requirements (ARARs)

Those cleanup standards, standards of control, and other substantive requirements, criteria, or limitations promulgated under federal environmental or state environmental or facility citing laws that, while not "applicable" to a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance at a CERCLA site, address problems or situations sufficiently similar to those encountered at the CERCLA site that their use is well suited to the particular site. Only those state standards that are identified in a timely manner and are more stringent than federal requirements may be relevant and appropriate (40 CFR 300.5).

CERCLA Information System (CERCLIS)

EPA's comprehensive database and management system that inventories and tracks releases addressed or needing to be addressed by the Superfund program. CERCLIS contains the official inventory of CERCLA sites and supports EPA's site planning and tracking functions. Sites that EPA decides do not warrant moving further in the site evaluation process are given a "No Further Response Action Planned" (NFRAP) designation in CERCLIS. This means that no additional federal steps under CERCLA will be taken at the site unless future information so warrants. NFRAP designated sites are removed from the main CERCLIS database after completion of evaluations; however, information pertaining to these sites are archived at the lead agency in order to document that these evaluations took place and to preclude the possibility that evaluations be needlessly repeated. Inclusion of a specific site or area in the CERCLIS database does not represent a determination of any party's liability, nor does it represent a finding that any response action is necessary. Sites that are deleted from the NPL are not designated NFRAP sites. Deleted sites are listed in a separate category in the CERCLIS database (40 CFR 300.5).

Community Involvement Coordinator

Lead agency staff who work with the On-Scene Coordinator/Remedial Project Manager (OSC/RPM) to involve and inform the public about the Superfund process and response actions in accordance with the interactive community involvement requirements set forth in the NCP (40 CFR 300.5).

Environment

As defined by section 101(8) of CERCLA, environment means the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson Fishery Conservation and Management Act; and any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States (40 CFR 300.5).

Facility

As defined by section 101(9) of CERCLA, facility means any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, aircraft, or any site or area, where a hazardous substance

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has been deposited, stored, disposed of, placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel (40 CFR 300.5).

Feasibility Study (FS)

A study undertaken by the lead agency or PRP to develop and evaluate options for remedial action. The FS emphasizes data analysis and is generally performed concurrently and in an interactive fashion with the RI, using data gathered during the RI. The RI data are used to define the objectives of the response action, to develop remedial action alternatives, and to undertake an initial screening and detailed analysis of the alternatives. The term also refers to a report that describes the results of the study (40 CFR 300.5).

Hazard Ranking System (HRS)

The method used by EPA to evaluate the relative potential of hazardous substance releases to cause health or safety problems, or ecological or environmental damage (40 CFR 300.5).

Hazardous Substance

As defined by section 101(4) of CERCLA, any substance designated pursuant to section 311(b)(2)(A) of the Clean Water Act (CWA); any element, compound mixture, solution, or substance designated pursuant to section 102 of CERCLA; any hazardous waste having the characteristics identified under or listed pursuant to section 3001 of the Solid Waste Disposal Act (but not including any waste the regulation of which under the Solid Waste Disposal Act has been suspended by Act of Congress); any toxic pollutant listed under section 307(a) of the CWA; any hazardous air pollutant listed under section 112 of the Clean Air Act; and any imminently hazardous chemical substance or mixture with respect to which the EPA Administrator has taken action pursuant to section 7 of the Toxic Substances Control Act. The term does not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance in the first sentence of this paragraph, and the term does not include natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas (40 CFR 300.5).

Lead Agency

The federal or state agency that provides the On-Scene Coordinator (OSC) or the responsible official for a CERCLA response action.

Management Practice (MP)

Practices that, although not mandated by law, are encouraged to promote safe operating procedures.

National Priorities List (NPL)

The list, compiled by EPA pursuant to CERCLA section 105, of uncontrolled hazardous substance releases in the United States that are priorities for long-term remedial evaluation and response (40 CFR 300.5).

Person

An individual, firm, corporation, association, partnership, consortium, joint venture, commercial entity, United States government, state, municipality, commission, political subdivision of a state, or any interstate body (40 CFR 300.5 and 302.3).

Pollutant or Contaminant

As defined by section 101(33) of CERCLA, pollutant or contaminant includes, but is not limited to, any element, substance, compound, or mixture, including disease-causing agents, which after release into the environment and upon exposure, ingestion, inhalation, or assimilation into any organism, either directly from the environment or indirectly by ingestion through food chains, will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction) or physical deformations, in such organisms or their offspring. The term does not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under section

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101(4)(A) through (F) of CERCLA, nor does it include natural gas of pipeline quality (or mixtures of natural gas and such synthetic gas). For purposes of the NCP, the term pollutant or contaminant means any pollutant or contaminant that may present an imminent and substantial danger to public health or welfare (40 CFR 300.5).

Preliminary Assessment (PA)

Review of existing information and an off-site reconnaissance, if appropriate, to determine if a release may require additional investigation or action. A PA may include an on-site reconnaissance, if appropriate (40 CFR 300.5).

Release

As defined by section 101(22) of CERCLA, release means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant). It excludes any release which results in exposure to persons solely within a workplace, with respect to a claim which such persons may assert against the employer of such persons; emissions from the engine exhaust of a motor vehicle, rolling stock, aircraft, vessel, or pipeline pumping station engine; release of source byproduct, or special nuclear material from a nuclear incident, as those terms are defined in the Atomic Energy Act of 1954, if such release is subject to requirements with respect to financial protection established by the Nuclear Regulatory Commission under section 170 of such Act, or, for the purposes of section 104 of CERCLA or any other response action, any release of source, byproduct, or special nuclear materials from any processing site designated under section 102(a)(1) or 302(a) of the Uranium Mill Tailings Radiation Control Act of 1978; and the normal application of fertilizer. For purposes of the NCP, release also means threat of release (40 CFR 300.5 and 302.3).

Remedial Design (RD)

The technical analysis and procedures which follow the selection of remedy for a site and result in a detailed set of plans and specifications for implementation of the remedial actions (40 CFR 300.5).

Remedial Investigation (RI)

A process undertaken by the lead agency to determine the nature and extent of the problem presented by the release. The RI emphasizes data collection and site characterization and is generally performed concurrently and in an interactive fashion with the feasibility study. The RI includes sampling and monitoring, as necessary, and includes the gathering of sufficient information to determine the necessity for remedial action and to support the evaluation of remedial alternatives (40 CFR 300.5).

Remedy or Remedial Action (RA)

Those actions consistent with permanent remedy taken instead of, or in addition to, removal actions in the event of a release or threatened release of a hazardous substance into the environment, to prevent or minimize the release of hazardous substances so that they do not migrate to cause substantial danger to present or future public health or welfare or the environment. The term includes, but is not limited to, such actions at the location of the release as storage; confinement; perimeter protection using dikes, trenches, or ditches; clay cover; neutralization; cleanup of released hazardous substances and associated contaminated materials; recycling or reuse diversion, destruction, or segregation of reactive wastes; dredging or excavations; repair or replacement of leaking containers; collection of leachate and run-off; on-site treatment or incineration; provision of alternative water supplies; any monitoring reasonably required to assure that such actions protect the public health and welfare and the environment; and, where appropriate, post-removal site control activities. The term includes the costs of permanent relocation of residents and businesses and community facilities (including the cost of providing "alternative land of equivalent value" to an Indian tribe pursuant to CERCLA section 126(b)) where EPA determines that, alone or in combination with other measures, such relocation is more cost-effective than, and environmentally preferable to, the transportation, storage, treatment, destruction, or secure disposition off-site of such hazardous substances, or may otherwise be necessary to protect the public health or welfare; the term includes off-site transport and off-site storage, treatment, destruction, or secure disposition of hazardous substances and associated contaminated materials. For the purpose of the NCP, the term also includes enforcement activities related thereto (40 CFR 300.5).

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Remove or Removal

As defined by section 311(a)(8) of the CWA, refers to removal of oil or hazardous substances from the water and shorelines or the taking of such other actions as may be necessary to minimize or mitigate damage to the public health or welfare or to the environment. As defined by section 101(23) of CERCLA, removal of released hazardous substances from the environment; such actions as may be necessary taken in the event of the threat of release of hazardous substances into the environment; such actions as may be necessary to monitor, assess, and evaluate the release or threat of release of hazardous substances; the disposal of removed material; or the taking of such other actions as may be necessary to prevent, minimize, or mitigate damage to the public health or welfare or the environment, which may otherwise result from a release or threat of release. The term includes, in addition, without being limited to, security fencing or other measures to limit access, provision of alternative water supplies, temporary evacuation and housing of threatened individuals not otherwise provided for, action taken under section 104(b) of CERCLA, post-removal site control, where appropriate, and any emergency assistance which may be provided under the Disaster Relief Act of 1974. For the purpose of the NCP, the term also includes enforcement activities related thereto (40 CFR 300.5).

Reportable Quantity

That quantity, as set forth in 40 CFR 302, the release of which requires notification pursuant to 40 CFR 302 (40 CFR 302.3).

Site Inspection (SI)

An on-site investigation to determine whether there is a release or potential release and the nature of the associated threats. The purpose is to augment the data collected in the preliminary assessment and to generate, if necessary, sampling and other field data to determine if further action or investigation is appropriate (40 CFR 300.5).

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Typical Records to Review

- Spill/release records
- Hazardous substance inventory records
- National Response Center Notification Document
- Preliminary Assessment (CERCLA)
- Remedial Investigation documentation
- Soil sample and groundwater monitoring data related to areas targeted for removal and cleanup
- Engineering and cost evaluations
- Sampling and analysis plans.

Typical Physical Features to Inspect

- Cleanup sites
- Disposal sites
- Groundwater monitoring wells
- Contaminated areas
- Treatment technologies employed for site cleanup.

Index for Checklist Users

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| Release Discovery and Notification | C.4 through C.7 | 9-10 |
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| Remedial Investigation and Feasibility Study | C.10 | 13-15 |
| Remedial Selection and Design | C.11 | 16 |
| Removal Action | C.12 | 17 |

Protocol for Conducting Environmental Compliance Audits under CERCLA

Checklist

| Regulatory Requirement or Management Practice: | |
|--|--|
| All Facilities | |
| C.1 The current status of any ongoing or unresolved Consent Orders, Compliance Agreements, Notices of Violation (NOVs), or equivalent state enforcement actions should be examined. | <p>Determine if noncompliance issues have been resolved by reviewing a copy of the previous report, Consent Orders, Compliance Agreements, NOVs, or equivalent state enforcement actions.</p> <p>For those open items, indicate what corrective action is planned and milestones established to correct problems.</p> <p>Determine how many dockets, if any, your facility has.</p> |
| C.2 Facilities are required to comply with all applicable federal regulatory requirements not contained in this checklist. | <p>Determine if any new regulations have been issued since the finalization of the guide. If so, annotate checklist to include new standards.</p> <p>Determine if the facility has activities or facilities which are federally regulated, but not addressed in this checklist.</p> <p>Verify that the facility is in compliance with all applicable and newly issued regulations.</p> |
| C.3 Facilities are required to abide by state and local regulations concerning hazardous materials. | <p>Verify that the facility is abiding by state and local requirements.</p> <p>Verify that the facility is operating according to permits issued by the state or local agencies.</p> <p>(NOTE: Issues typically regulated by state and local agencies include:</p> <ul style="list-style-type: none">- Transportation of hazardous materials- Notification requirements- Response plan requirements- Spill response requirements.) |
| Release Discovery and Notification | |
| C.4. Facilities that are determined: 1) to own or operate, or 2) who at the time owned or operated, or 3) who accepted hazardous substances for transport and selected a facility at which hazardous substances are or have been stored, treated, or disposed of, are required to notify the EPA unless such facility has been properly permitted under RCRA (40 CFR 302). | <p>Verify that the facility has procedures in place to identify areas where hazardous substances are or may have been stored, treated, or released at the facility.</p> <p>Confirm that the facility maintains an inventory of potential inactive waste sites and determine whether the inventory contains the following information for each site:</p> <ul style="list-style-type: none">- The site location.- The site history (i.e., types of waste or hazardous substance that may have been released).- Facility responses to environmental problems. |

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| Regulatory Requirement or Management Practice: | |
|---|---|
| C.5. Facilities are required to notify EPA of the existence of hazardous waste sites (CERCLA s.103, 40 CFR 300.405(b), 300.135(j), 300.120(b)). | <p>Confirm through interviewing facility personnel and reviewing facility release reporting procedures that the facility has performed the following:</p> <ul style="list-style-type: none"> - If any hazardous substances are found to have been stored, treated, or disposed of at the facility, the EPA is notified of the existence of the site(s) unless the site(s) has been issued a valid RCRA permit. - Notified the EPA if the facility accepted hazardous substances for transport and selected a facility where hazardous substances are or have been stored, treated, or disposed of without a valid RCRA permit. - Notified the National Response Center (NRC) when a hazardous substance release exceeded a CERCLA Reportable Quantity. - Promptly notified trustees for natural resources of hazardous substance releases that are injuring or may injure natural resources under their jurisdiction. |
| C.6. Releases in excess of or equal to reportable quantities of hazardous substances shall be reported to the NRC immediately (40 CFR 302.1 through 302.6). | <p>Verify that spills in excess of the reportable quantities listed in Appendix A have been reported. (Also, refer to 40 CFR 302, Table 302.4.)</p> <p>Verify that a procedure is in place for the notification of the NRC immediately after becoming aware of the release.</p> <p>Verify that if mixtures or solutions of hazardous substances are released, except for radionuclides, it is reported when either of the following occur:</p> <ul style="list-style-type: none"> - The quantity of all hazardous constituents of the mixture or solution is known and a reportable quantity or more of any hazardous constituent is released. - The quantity of one or more of the hazardous constituents of the mixture or solution is unknown and the total amount of the mixture or solution released equals or exceeds the reportable quantity for the hazardous constituent with the lowest reportable quantity. <p>(NOTE: Notification requirements for radionuclide releases are not included in this guide.)</p> |
| C.7. Facilities with releases that are continuous and stable in quantity and rate are required to meet limited notification requirements (40 CFR 302.8). | <p>Determine if the facility has any releases that are continuous and stable in quantity and rate.</p> <p>Verify that the following notifications have been given:</p> <ul style="list-style-type: none"> - Initial telephone notification - Initial written notification within 30 days of the initial telephone notification - Follow-up notification within 30 days of the first anniversary date of the initial written notification - Notification of changes in: <ul style="list-style-type: none"> -- the composition or source of the release -- information submitted in the initial written notification -- the follow-up notification required on the first anniversary date of the initial written notification - Notification of when there is an increase in the quantity of the hazardous substances in any 24-hour period that represents a statistically significant increase. <p>(NOTE: Instead of the initial written report or follow-up report, the facility may submit a copy of the Toxic Release Inventory (TRI) form submitted under SARA Title III section 313 for the previous July 1, provided that conditions are met as described in 40 CFR 302.8(j).)</p> |

Protocol for Conducting Environmental Compliance Audits under CERCLA

| Regulatory Requirement or Management Practice: | |
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| Site Evaluation | |
| <p>C.8. When a facility experiences a hazardous substance release to the environment, an evaluation of the release site must be performed to determine the extent of the release and the release's impact to public health and the environment. A site evaluation typically contains the following three components (40 CFR 300.420):</p> <ol style="list-style-type: none"> A preliminary assessment (PA) which is a review of existing site information and an off-site reconnaissance, if appropriate, to determine if a release may require further investigations or removal actions. Typically, when performing a PA, facility documents are reviewed and field sampling is not conducted. A site inspection (SI) which is an on-site investigation to determine whether a release has occurred and to identify the preliminary public health and environmental threats associated with the release. The SI typically builds upon the information collected during the PA. Furthermore, the SI involves, as appropriate, both on- and off-site field sampling and analysis. A review to determine if the site should be included on the National Priorities List (NPL). | <p>Verify that for all potential inactive waste sites, a preliminary assessment (PA) is conducted that contains at least the following:</p> <ul style="list-style-type: none"> - A review of existing information about the release such as: <ul style="list-style-type: none"> -- information on the pathways of exposure; -- exposure targets; and -- source and nature of release. - On-site reconnaissance. - Off-site reconnaissance. <p>When the facility performs a remedial PA, confirm that the facility completes the EPA Preliminary Assessment form or its equivalent and that it includes the following information:</p> <ul style="list-style-type: none"> - A description of the release - A description of the probable nature of the release - A recommendation on whether further action is warranted, which lead agency should conduct further action, and whether a site investigation (SI) or removal action, or both, should be undertaken. <p>Where the facility has received an interim or final RCRA facility permit, determine whether the facility has completed a RCRA Facility Assessment (RFA).</p> <p>For facility SIs verify that, prior to conducting any field sampling, the facility has developed sampling and analysis plans which consist of the following:</p> <ul style="list-style-type: none"> - A field sampling plan. - A Quality Assurance Project Plan (QAPP). <p>Determine whether the facility has included the following information when preparing an SI:</p> <ul style="list-style-type: none"> - A description/history/nature of waste handling - A description of known contaminants - A description of pathways of migration of contaminants - An identification and description of human and environmental targets - A recommendation on whether further action is warranted. <p>Determine if the facility determined whether a removal action is appropriate based upon the information collected during the PA/SI. If so, confirm that the facility initiated a removal PA pursuant to C.12.</p> |

Protocol for Conducting Environmental Compliance Audits under CERCLA

| Regulatory Requirement or Management Practice: | |
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| C.9. Sites that meet a certain criteria may be eligible for placement on the National Priorities List (NPL) (40 CFR 300.425(c), (d)). | <p>Confirm that the facility has assisted federal and state agencies in evaluating whether release sites have met one of the following criteria:</p> <ul style="list-style-type: none">- The release scores sufficiently high pursuant to the Hazard Ranking System. (NOTE: The Hazard Ranking System is the method used by EPA to evaluate the relative potential of hazardous substance releases to cause health or safety problems, ecological damage, or environmental damage.)- The state has designated a release as its highest priority (a state may have only one highest priority).- The release satisfies all of the following criteria:<ul style="list-style-type: none">-- the Agency for Toxic Substances and Disease Registry has issued a health advisory that recommends dissociation of individuals from the release;-- the EPA determines that the release poses a significant threat to public health;-- the EPA anticipates that it will be more cost-effective to use its remedial authority than to use removal authority to respond to the release. <p>If the facility determines that a release is eligible for placement on the NPL, verify that the facility has submitted the release score (using HRS model) and has provided the appropriate backup documentation.</p> |

Protocol for Conducting Environmental Compliance Audits under CERCLA

| Regulatory Requirement or Management Practice: | |
|--|--|
| Remedial Investigation and Feasibility Study | |
| <p>C.10. The purpose of the RI/FS is to assess site conditions and evaluate remedial alternatives to the extent necessary to select a site remedy. Developing and implementing an RI/FS generally includes the following (40 CFR 300.430):</p> <ol style="list-style-type: none"> Project Scoping - The facility should have developed a plan for conducting an RI/FS such that the detail of analysis is appropriate to the complexity of the release site problems being addressed. Remedial Investigation - The purpose of an RI is to collect the necessary field data to adequately characterize the release site in order to assist in developing and evaluating remedial alternatives. Site characterization may be conducted in one or more phases to focus sampling efforts and to better define the potential threat to human health or the environment. | <p>Determine whether the facility has initiated coordination with regulatory agencies to ensure that both parties have discussed and identified the appropriate sequence actions necessary to address the release site problems.</p> <p>Verify that the facility has conducted project scoping to identify the optimal set and sequence of actions necessary to address the release site problems. Specifically, the following should be incorporated into the project scope:</p> <ul style="list-style-type: none"> - The assembly and evaluation of existing data for the release site, including the results of any removal actions and PA/SI data. - The identification of likely response scenarios, potentially applicable technologies, and operable units that may address site problems. - The identification of the type, quality, and quantity of the data that will be collected during the RI/FS. - The preparation of site-specific health and safety plans that specify, at a minimum, employee training and protective equipment, medical surveillance requirements, standard operating procedures, and contingency plan that conforms with 29 CFR 1910.120(l)(1) and (l)(2). - The development of a sampling and analysis plan that meets the requirements outlined in C.8. - The identification of potential federal and state Applicable or Relevant and Appropriate Requirements (ARARs). <p>Determine whether the facility has assessed the following factors when conducting an RI:</p> <ul style="list-style-type: none"> - The physical characteristics of the site (i.e., soils, sediments, geology, hydrogeology, meteorology, and ecology). - Characteristics of air, surface water, and ground water. - The general characteristics of the waste, including quantities, physical state, concentration, toxicity, ability to bioaccumulate, and mobility. - The extent to which the source can be adequately identified and characterized (i.e., evaluation of the vertical and horizontal extent of contamination). - Actual and potential exposure routes (i.e., inhalation through air transport and ingestion through groundwater or bioaccumulation). - Actual and potential exposure pathways through environmental media. <p>Verify that the facility, in conjunction with regulatory agencies, has identified the potential ARARs for the release site.</p> <p>For each release site undergoing an RI, confirm that the facility has conducted a baseline risk assessment which contains the following:</p> <ul style="list-style-type: none"> - A characterization of the current and potential threats to human health and the environment that may be posed by site contaminants migrating through environmental media. - The establishment of acceptable exposure levels for use in developing remedial alternatives. |

Protocol for Conducting Environmental Compliance Audits under CERCLA

| Regulatory Requirement or Management Practice: | |
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| <p>C.10. (continued)</p> <p>c. Risk Assessment - As a component of the RI, the risk assessment should characterize the current and potential threats to human health and the environment that may be posed by contact to environmental media in the absence of site remediation. Typically, the risk assessment results will assist in establishing acceptable exposure levels for use in developing remedial alternatives in the FS.</p> <p>d. Feasibility Study - The purpose of the FS is to ensure that appropriate remedial alternatives are developed and evaluated. The development and evaluation of alternatives should reflect the scope and complexity of the remedial action under consideration and the release site problems being addressed.</p> | <p>Where the facility has received an interim or final RCRA facility permit, determine whether the facility has completed the following:</p> <ul style="list-style-type: none"> - A RCRA Facility Investigation (RFI) to evaluate whether releases of hazardous substances may have occurred from Solid Waste Management Units (SWMUs). <p>Verify that as a part of the FS, the facility has established remedial action objectives (i.e., acceptable exposure levels that are protective of human health and the environment) which have been developed by using the following:</p> <ul style="list-style-type: none"> - ARARs under federal or state environmental laws. - Maximum contaminant level goals (MCLGs), established under the Safe Drinking Water Act, or if the MCLG is determined not to be relevant, the corresponding maximum contaminant level (MCL). - Water quality criteria established under sections 303 or 304 of the CWA. - An alternative concentration limit (ACL) established according to CERCLA section 121(d)(2)(B)(ii). <p>For source control actions, confirm that the facility has developed alternatives tailored to the release site conditions that employ the following, as appropriate:</p> <ul style="list-style-type: none"> - Treatment techniques that reduce toxicity, mobility, or volume of the release site to the maximum extent feasible, eliminating or minimizing the need for long-term management. - One or more alternatives that involve little or no treatment, but provide protection of human health and the environment primarily by preventing or controlling exposure to the release site. - For groundwater response actions, remedial alternatives which attain site-specific remediation levels within different time periods and using one or more different technologies. <p>Confirm that, as a part of an FS, the facility has developed the following:</p> <ul style="list-style-type: none"> - One or more innovative treatment technologies for further consideration. - A no-action alternative or a no further action alternative, if some removal or remedial action has already occurred at the release site. <p>Verify that, to the extent possible, the facility has considered the short- and long-term aspects of the following criteria to guide the development and screening of remedial alternatives:</p> <ul style="list-style-type: none"> - Effectiveness (i.e., minimization of residual risks and short-term impacts, long-term protection, quickness of protection). - Implementability (i.e., technical feasibility and availability). - Cost (i.e., construction, operation, and maintenance). |

Protocol for Conducting Environmental Compliance Audits under CERCLA

| Regulatory Requirement or Management Practice: | |
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| C.10. (continued) | <p>Determine whether the facility has performed an analysis of a limited number of remedial alternatives, which have been considered a viable approach to remedial action, based on the following:</p> <ul style="list-style-type: none">- Overall protection of human health and the environment.- Compliance with ARARs.- Long-term effectiveness and permanence.- Reduction of toxicity, mobility, or volume.- Short-term effectiveness.- Implementability.- Cost.- State acceptance.- Community acceptance. <p>(NOTE: For facilities with an interim or final RCRA facility permit, federal and state authorities will request that a Corrective Measures Study (CMS) be performed as part of a Corrective Action Order (CERCLA Sect. 3008(h)) or corrective action requirement outlined in a permit application and/or permit (CERCLA Sect. 3004(u) and (v)).)</p> |

Protocol for Conducting Environmental Compliance Audits under CERCLA

| Regulatory Requirement or Management Practice: | |
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| Remedial Selection and Design | |
| <p>C.11. Upon the completion of the RI/FS, the lead agency selects a preferred proposed alternative for remediation which can be presented to the public (and state) for their review and comment. The public comments must be considered before the facility can issue a final remedial design/remedial action (RD/RA). Upon receiving new information from the public or regulatory agencies, the lead agency should reassess its initial remedial alternative determination. The public comments may prompt the lead agency to modify aspects of their preferred alternative or cause the lead agency to select a different alternative. The lead agency and the lead regulatory agency will make the final remedy selection decision and they will document that decision in the Record of Decision (ROD) (40 CFR 300.430(f), 300.435(b), (c), (f)).</p> | <p>When the facility has, in conjunction with the regulatory agency, identified a preferred proposed remedial action alternative, verify that the proposed plan has been presented to the public for comment.</p> <p>Determine whether the proposed plan presented to the public contains the following:</p> <ul style="list-style-type: none"> - A brief summary of the alternatives. - The rationale used to develop the preferred alternative. - A summary of comments received from regulatory agencies. - A summary of any proposed waiver from an ARAR. <p>Verify that the facility conducts the following community relations activities to support the selection of the remedy:</p> <ul style="list-style-type: none"> - Publishes a notice of availability and a brief analysis of the proposed plan in a major local newspaper. - Makes the proposed plan and supporting information available in the Administrative Record. - Provides for a public comment period of not less than 30 days. - Provides for a public meeting at or near the facility during the public comment period. - Keeps a transcript of the meeting and makes the transcript available to the public. - Prepares a written summary of significant comments and new information received during the public comment period. <p>Verify that the facility has developed an RD/RA that is consistent with the selected and implemented remedy as set forth in the ROD.</p> <p>Confirm that Operations and Maintenance (O&M) measures have been initiated after the remedial action objectives/goals outlined in the ROD have been achieved.</p> |

Protocol for Conducting Environmental Compliance Audits under CERCLA

| Regulatory Requirement or Management Practice: | |
|---|---|
| Removal Action | |
| <p>C.12. At any release site, regardless of whether the site has been included on the NPL, where the facility has made the determination that there is a threat to public health, welfare, or the environment, the facility may take an appropriate removal action to abate, prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release. When the facility has determined that a removal action is appropriate, the facility should undertake the action as promptly as possible. The action typically consists of the following three stages (40 CFR 300.410, 300.415):</p> <ol style="list-style-type: none"> A removal preliminary assessment which includes the collection or review of readily available information such as site management practices, information from waste generator, document review, and facility interviews. A removal site inspection, if necessary, to gather information that was not obtained during the removal preliminary assessment. A removal action which is performed in response to a specific release. | <p>Confirm that the following information has been considered by the facility when performing a removal preliminary assessment:</p> <ul style="list-style-type: none"> - Identification of the source and nature of the release or threat of release. - Evaluation by the Agency for Toxic Substances and Disease Registry or by other sources (e.g., state public health agencies) of the threat to public health. - Evaluation of the magnitude of the threat. - Evaluation of factors necessary to make the determination of whether a removal is necessary. <p>Determine whether a removal site inspection has been performed.</p> <p>Verify that the facility has documented the results obtained from a removal site evaluation.</p> <p>Verify that the facility evaluated the following factors prior to initiating a removal action to determine whether or not the action was appropriate:</p> <ul style="list-style-type: none"> - Actual or potential exposure of contaminants to nearby human populations, animals, or the food chain. - Actual or potential contamination of drinking water supplies or sensitive ecosystems. - Hazardous substances or contaminants stored at the facility that may pose a threat of release. - High levels of hazardous substances or contaminants in surface soils that may migrate. - Weather conditions that may cause hazardous substances or contaminants to be released. - Threat of fire or explosion. - The availability of appropriate release response mechanisms. <p>If the removal action requires a planning period of greater than six months, verify that the facility has developed the following:</p> <ul style="list-style-type: none"> - An Engineering Evaluation/Cost Analysis (EE/CA) on the removal alternatives for the site. - A sampling and analysis plan that has been reviewed and approved by the EPA. <p>If removal actions have been implemented, determine whether the selected action, to the extent practicable, has contributed to the anticipated long-term remedial action for the release site.</p> <p>(NOTE: 40 CFR 300.415(d) provides several removal action examples.)</p> |

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**Protocol for Conducting Environmental Compliance
Audits under the Comprehensive Environmental Response,
Compensation, and Liability Act**

**Appendix A:
Consolidated List of Hazardous Substances and Reportable
Quantities Under CERCLA and EPCRA**

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Protocol for Conducting Environmental Compliance Audits under CERCLA

Appendix A: Consolidated List of Hazardous Substances and Reportable Quantities Under CERCLA and EPCRA

(NOTE: This list is constantly changing; consult the Federal Register for the most up-to-date information.)

Consolidated List of Chemicals Covered Under CERCLA and EPCRA

This consolidated list includes hazardous substances and other chemicals subject to reporting requirements under 40 CFR 302 of CERCLA and EPCRA. This list does not contain all chemicals that are subject to reporting requirements in Sections 311 and 312 of EPCRA. Those hazardous chemicals for which Material Safety Data Sheets (MSDSs) must be developed under the Occupational Safety and Health Act Hazard Communication Standards are identified by broad criteria, rather than enumeration. There are over 500,000 such substances that meet the criteria. The consolidated list has been prepared to help determine whether there is a need to report releases under CERCLA (40 CFR 302) or submit reports under Section 304 or 313 of EPCRA and, for a specific chemical, what reports need to be submitted.

The list includes chemicals under the four following federal statutory provisions:

1. *EPCRA Section 302 Extremely Hazardous Substances* - The presence of extremely hazardous substances (EHSs) in sufficient quantities requires certain emergency planning activities to be conducted. Releases of these substances are also subject to reporting under Section 304 of EPCRA. The final rule listing the extremely hazardous substances and their threshold planning quantities (TPQs), is found in 40 CFR 355.
2. *CERCLA Hazardous Substances* - Releases of CERCLA hazardous substances are subject to reporting under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund) of 1980. Such releases are also subject to reporting under Section 304 of EPCRA. CERCLA hazardous substances and their reportable quantities (RQs) are listed in 40 CFR 302, Table 302.4.
3. *EPCRA Section 313 Toxic Chemicals* - Emissions or releases of EPCRA Section 313 toxic chemicals must be reported annually as part of EPCRA's community right-to-know provisions. A list of these toxic chemicals is found in 40 CFR 372.65.
4. *RCRA Hazardous Wastes* - The consolidated list includes specific chemicals from the RCRA P and U lists only (40 CFR 261.33). RCRA hazardous wastes from the "F" and "K" lists are not included here; such waste streams are also CERCLA hazardous substances. This listing is provided as an indicator that you may already have data on a specific chemical that can be used for EPCRA reporting.

There are four columns in the consolidated list corresponding to these four statutory provisions. If a chemical is listed as an extremely hazardous substance under Section 302, its TPQ is given in the extremely hazardous substance column. Similarly, the RQ is given for those chemicals that are listed as CERCLA hazardous substances. A key to the symbols used in the Section 302 and CERCLA columns precedes the list. An "X" in the column for Section 313 indicates that the chemical is subject to reporting under Section 313.

The letter-and-digit code in the column for 40 CFR 261.33 is the chemical's RCRA hazardous waste code. A blank in any of these columns indicates that the chemical is not subject to the corresponding statutory authorities.

The Chemical Abstract Service (CAS) registry number is provided for each chemical on the list.

Protocol for Conducting Environmental Compliance Audits under CERCLA
Appendix A: Consolidated List of Hazardous Substances and Reportable Quantities Under CERCLA and EPCRA

(NOTE: This list is constantly changing; consult the Federal Register for the most up-to-date information.)

Keys to Symbols in the Consolidated Chemical List

- + Indicates polyaromatic compounds (PACs).
- * Indicates carbamate wastes under RCRA; statutory one pound RQ applies until RQs are adjusted.
- # Indicates diisocyanates.

Protocol for Conducting Environmental Compliance Audits under CERCLA
Appendix A: Consolidated List of Hazardous Substances and Reportable Quantities Under CERCLA and EPCRA

(NOTE: This list is constantly changing; consult the Federal Register for the most up-to-date information.)

This is an alphabetical listing of the consolidated list of chemicals. Numbered chemicals are listed first.

| Chemical Name | Extremely Hazardous Substances 40 CFR 355 (TPQ, lbs.) | Hazardous Substances 40 CFR 302.4 (RQ, lbs.) | Toxic Chemicals 40 CFR 372.65(a) | Hazardous Materials which are RCRA wastes | CAS No. |
|--|--|---|----------------------------------|---|-----------|
| 1-Amino-2-methylantraquinone | | | x | | 82-28-0 |
| 1-Chloro-1,1-difluoroethane (HCFC-142b) | | | x | | 75-68-3 |
| 1-Chloro-1,1,2,2-tetrafluoroethane (HCFC-124a) | | | x | | 354-25-6 |
| 1-Methylbutadiene | | 100 | | U186 | 504-60-9 |
| 1-Naphthalamine | | 100 | x | U167 | 134-32-7 |
| 1-Propanamine | | 5,000 | | U194 | 107-10-8 |
| 1-Propanol ,2,3-dibromo-phosphate (3:1) | | 10 | x | U235 | 126-72-7 |
| (1,1'-Biphenyl)-4,4'diamine, 3,3'-dimethoxy- | | 100 | x | U091 | 119-90-4 |
| (1,1'-Biphenyl)-4,4'-diamine, 3,3'-dimethyl- | | 10 | x | U095 | 119-93-7 |
| 1,1-Dichloro-1-fluoroethane (HCFC-141b) | | | x | | 1717-80-6 |
| 1,1-Dichloro-1,2,2-trifluoroethane (HCFC-123b) | | | x | | 812-04-4 |
| 1,1-Dichloroethane | | 1,000 | | U076 | 75-34-3 |
| 1,1-Dichloroethylene | | 100 | x | U078 | 75-35-4 |
| 1,1-Dichloropropane | | 1,000 | | | 78-99-9 |
| 1,1,2-Trichloroethane | | 100 | x | U227 | 79-00-5 |
| 1,1,1,2-Tetrachloroethane | | 100 | x | U208 | 630-20-6 |
| 1,1,2,2-Tetrachloroethane | | 100 | x | U209 | 79-34-5 |
| 1,2-Benzenedicarboxylic acid, [bis(2-ethylhexyl)]ester | | 100 | x | U028 | 117-81-7 |
| 1,2-Benzenedicarboxylic acid, diethyl ester (diethyl phthlate) | | 1,000 | | U088 | 84-66-2 |
| 1,2-Benzenediol, 4-[1-hydroxy-2-(methylamino) ethyl]- | | 1,000 | | P042 | 51-43-4 |
| 1,2-Benzisothiazolin-3(2H)one, 1,1-dioxide | | 100 | x | U202 | 81-07-2 |
| 1,2-Benzphenanthrene | | 100 | x ⁺ | U050 | 218-01-9 |
| 1,2-Butylene oxide | | 100 | x | | 106-88-7 |

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| Chemical Name | Extremely Hazardous Substances 40 CFR 355 (TPQ, lbs.) | Hazardous Substances 40 CFR 302.4 (RQ, lbs.) | Toxic Chemicals 40 CFR 372.65(a) | Hazardous Materials which are RCRA wastes | CAS No. |
|--|--|---|----------------------------------|---|-----------|
| 1,2-Dibromo-3-chloropropane | | 1 | x | U066 | 96-12-8 |
| 1,2-Dibromoethane | | 1 | x | U067 | 106-93-4 |
| 1,2-Dichloro-1,1,2-trifluoroethane (HCFC-123a) | | | x | | 354-23-4 |
| 1,2-Dichlorobenzene | | 100 | x | U070 | 95-50-1 |
| 1,2-Dichloroethane | | 100 | x | U077 | 107-06-2 |
| 1,2-Dichloroethylene | | | x | | 540-59-0 |
| 1,2-Dichloropropane | | 1,000 | x | U083 | 78-87-5 |
| 1,2-Dimethylhydrazine | | 1 | | U099 | 540-73-8 |
| 1,2-Diphenylhydrazine | | 10 | x | U109 | 122-66-7 |
| 1,2-Oxathiolane, 2,2-dioxide | | 10 | x | U193 | 1120-71-4 |
| 1,2-trans-Dichloroethylene | | 1,000 | | U079 | 156-60-5 |
| 1,2,4-Trichlorobenzene | | 100 | x | | 120-82-1 |
| 1,2,4,5-Tetrachlorobenzene | | 5,000 | | U207 | 95-94-3 |
| 1,3-Benzenediol | | 5,000 | | U201 | 108-46-3 |
| 1,3-Benzodioxole, 5-propyl | | 10 | x | U090 | 94-58-6 |
| 1,3-Benzodioxole, 5-)1-1 propenyl | | 100 | x | U141 | 120-58-1 |
| 1,3-Benzodioxole, 5-) 2,propenyl | | 100 | x | U203 | 94-59-7 |
| 1,3-Butadiene | | 10 | x | | 106-99-0 |
| 1,3-Dichlorobenzene | | 100 | x | U071 | 541-73-1 |
| 1,3-Dichloropropane | | 5,000 | | | 142-28-9 |
| 1,3-Dichloropropylene | | 100 | x | U084 | 542-75-6 |
| 1,3-Isobenzofurandione | | 5,000 | x | U190 | 85-44-9 |
| 1,3,5-Trinitrobenzene | | 10 | | U234 | 99-35-4 |
| 1,4-Dichloro-2-butene | | 1 | x | U074 | 764-41-0 |
| 1,4-Dichlorobenzene | | 100 | x | U072 | 106-46-7 |

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|---|--|---|----------------------------------|---|-----------|
| 1,4-Diethylene dioxide (1,4-Dioxane) | | 100 | x | U108 | 123-91-1 |
| 1,4-Naphthalenedione | | 5,000 | | U166 | 130-15-4 |
| 2-Acetylaminofluorene | | 1 | x | U005 | 53-96-3 |
| 2-Aminoanthraquinone | | | x | | 117-79-3 |
| 2-Butanone peroxide | | 10 | | U160 | 1338-23-4 |
| 2-Butanone (Methyl ethyl ketone) | | 5,000 | x | U159 | 78-93-3 |
| 2-Butene, 1,4-dichloro- | | 1 | x | U074 | 764-41-0 |
| 2-Chloro-1,1,2,2-tetrafluoroethane (HCFC 124) | | | x | | 2837-89-0 |
| 2-Chloroacetophenone | | 100 | x | | 532-27-4 |
| 2-Chloroethyl vinyl ether | | 1,000 | | U042 | 110-75-8 |
| 2-Chlorophenol | | 100 | | U048 | 95-57-8 |
| 2-Cyclohexyl-4,6-dinitrophenol | | 100 | | P034 | 131-89-5 |
| 2-Ethoxyethanol | | 1,000 | x | U359 | 110-80-5 |
| 2-Furancarboxaldehyde | | 5,000 | | U125 | 98-01-1 |
| 2-Methoxyethanol | | | x | | 109-86-4 |
| 2-Methylpyridine | | 5,000 | x | U191 | 109-06-8 |
| 2-Naphthylamine | | 10 | x | U168 | 91-59-8 |
| 2-Nitrophenol | | 100 | x | | 88-75-5 |
| 2-Nitropropane | | 10 | x | U171 | 79-46-9 |
| 2-Phenylphenol | | | x | | 90-43-7 |
| 2-Picoline | | 5,000 | | U191 | 109-06-8 |
| 2,2-Dichloro-1,1,1-trifluoroethane (HCFC-123) | | | x | | 306-83-2 |
| 2,2-Dichloropropionic acid | | 5,000 | | | 75-99-0 |
| 2,2,4-Trimethylpentane | | 1,000 | | | 540-84-1 |
| 2,3-Dichloropropene | | 100 | x | | 78-88-6 |

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|--|--|---|----------------------------------|---|------------|
| 2,3,4-Trichlorophenol | | 10 | | | 15950-66-0 |
| 2,3,4,6-Tetrachlorophenol | | 10 | | | 58-90-2 |
| 2,3,5-Trichlorophenol | | 10 | | | 933-78-8 |
| 2,3,6-Trichlorophenol | | 10 | | | 933-75-5 |
| 2,3,7,8-Tetrachlorodibenzo p-dioxin (TCDD) | | 1 | | | 1746-01-6 |
| 2,4-D acid | | 100 | x | U240 | 94-75-7 |
| 2,4-D esters | | 100 | x | | 94-11-1 |
| 2,4-D esters | | 100 | | | 94-79-1 |
| 2,4-D esters | | 100 | x | | 94-80-4 |
| 2,4-D esters | | 100 | x | | 1320-18-9 |
| 2,4-D esters | | 100 | | | 1928-38-7 |
| 2,4-D esters | | 100 | x | | 2971-38-2 |
| 2,4-D esters | | 100 | | | 53467-11-1 |
| 2,4-D esters | | 100 | | | 1928-61-6 |
| 2,4-D esters | | 100 | x | | 1929-73-3 |
| 2,4-D esters | | 100 | | | 25168-26-7 |
| 2,4-Diaminoanisoie sulfate | | | x | | 39156-41-7 |
| 2,4-Diaminotoluene | | 10 | x | | 95-80-7 |
| 2,4-Dichlorophenol | | 100 | x | U081 | 120-83-2 |
| 2,4-Dimethylphenol | | 100 | x | U101 | 105-67-9 |
| 2,4-Dinitrophenol | | 10 | x | P048 | 51-28-5 |
| 2,4-Dinitrotoluene | | 10 | x | U105 | 121-14-2 |
| 2,4,5-T esters | | 1,000 | | | 25168-15-4 |
| 2,4,5-T salts | | 1,000 | | | 13560-99-1 |
| 2,4,5-T amines | | 5,000 | | | 1319-72-8 |

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|--|---|--|--|--|------------|
| 2,4,5-T amines | | 5,000 | | | 3813-14-7 |
| 2,4,5-T amines | | 5,000 | | | 6369-96-6 |
| 2,4,5-T amines | | 5,000 | | | 6369-97-7 |
| 2,4,5-T amines | | 5,000 | | | 2008-46-0 |
| 2,4,5-T esters | | 1,000 | | | 93-79-8 |
| 2,4,5-T esters | | 1,000 | | | 1928-47-8 |
| 2,4,5-T esters | | 1,000 | | | 2545-59-7 |
| 2,4,5-T esters | | 1,000 | | | 61792-07-2 |
| 2,4,5-T acid | | 1,000 | | | 93-76-5 |
| 2,4,5-TP acid esters | | 100 | | | 32534-95-5 |
| 2,4,5-Trichlorophenol | | 10 | x | | 95-95-4 |
| 2,4,6-Tribromophenol | | 100 | | U408 | 118-79-6 |
| 2,4,6-Trichlorophenol | | 10 | x | | 88-06-2 |
| 2,5-Dinitrophenol | | 10 | | | 329-71-5 |
| 2,5-Furandione | | 5,000 | x | U147 | 108-31-6 |
| 2,6-Diaminotoluene | | 10 | | U221 | 823-40-5 |
| 2,6-Dichlorophenol | | 100 | | U082 | 87-65-0 |
| 2,6-Dinitrophenol | | 10 | | | 573-56-8 |
| 2,6-Dinitrotoluene | | 100 | x | U106 | 606-20-2 |
| 2,6-Xylidine | | | x | | 87-62-7 |
| 3,3-Dichlorobenzidine | | 1 | x | U073 | 91-94-1 |
| 3,3'-Dimethylbenzidine dihydrochloride | | | x | | 612-82-8 |
| 3,4-Dinitrotoluene | | 10 | | | 610-39-9 |
| 3,4,5-Trichlorophenol | | 10 | | | 609-19-8 |
| 3,5-Dichloro-N-(1,1-dimethyl-2-propynyl) benzamide | | 5,000 | x | U192 | 23950-58-5 |

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|--|--|---|----------------------------------|---|-----------|
| 4-Aminoazobenzene | | | x | | 60-09-3 |
| 4-Aminobiphenyl | | 1 | x | | 92-67-1 |
| 4-Chloro-m-cresol | | 5,000 | | U039 | 59-50-7 |
| 4-Chlorophenyl phenyl ether | | 5,000 | | | 7005-72-3 |
| 4-Nitrobiphenyl | | 10 | x | | 92-93-3 |
| 4,4'-Diaminodiphenyl ether | | | x | | 101-80-4 |
| 4,4'-Isopropylidenediphenol | | | x | | 80-05-7 |
| 4,4'-Methylene bis(N,N-dimethyl) benzenamine | | | x | | 101-61-1 |
| 4,4'-Methylenedianiline | | 10 | x | | 101-77-9 |
| 4,4'-Thiodianiline 6-dinitrophenol | | | x | | 139-65-1 |
| 4,6-Dinitro-o-cresol | 10/10,000 | 10 | x | P047 | 534-52-1 |
| 5-Nitro-o-anisidine | | | x | | 99-59-2 |
| 5-Nitro-o-toluidine | | 100 | x | U181 | 99-55-8 |
| Acenaphthene | | 100 | | | 83-32-9 |
| Acenaphthylene | | 5,000 | | | 208-96-8 |
| Acetaldehyde | | 1,000 | x | U001 | 75-07-0 |
| Acetaldehyde, trichloro- | | 5,000 | | U034 | 75-87-6 |
| Acetamide | | 100 | x | | 60-35-5 |
| Acetamide, N-(4-ethoxyphenyl)- | | 100 | | U187 | 62-44-2 |
| Acetamide, N-(aminothi-oxomethyl)- | | 1,000 | | P002 | 591-08-2 |
| Acetic acid | | 5,000 | | | 64-19-7 |
| Acetic acid, ethyl ester | | 5,000 | | U112 | 141-78-6 |
| Acetic acid, fluoro, sodium salt | 10/10,000 | 10 | x | P058 | 62-74-8 |
| Acetic acid, lead (2+) salt | | 10 | | U144 | 301-04-2 |
| Acetic acid, thallium (1+) salt | | 100 | | U214 | 563-68-8 |

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|-------------------------------------|--|---|----------------------------------|---|-----------|
| Acetic anhydride | | 5,000 | | | 108-24-7 |
| Acetone | | 5,000 | | U002 | 67-64-1 |
| Acetone cyanohydrin | 1,000 | 10 | x | P069 | 75-86-5 |
| Acetone thiosemicarbazide | 1,000/10,000 | | | | 1752-30-3 |
| Acetonitrile | | 5,000 | x | U003 | 75-05-8 |
| Acetophenone | | 5,000 | x | U004 | 98-86-2 |
| Acetyl bromide | | 5,000 | | | 506-96-7 |
| Acetyl chloride | | 5,000 | | U006 | 75-36-5 |
| Acrolein | 500 | 1 | x | P003 | 107-02-8 |
| Acrylamide | 1,000/10,000 | 5,000 | x | U007 | 79-06-1 |
| Acrylic acid | | 5,000 | x | U008 | 79-10-7 |
| Acrylonitrile | 10,000 | 100 | x | U009 | 107-13-1 |
| Acrylyl chloride | 100 | | | | 814-68-6 |
| Aldicarb | 100/10,000 | 1 | x | P070 | 116-06-3 |
| Aldicarb sulfone | | 1* | | P203 | 1646-88-4 |
| Adipic acid | | 5,000 | | | 45,390 |
| Adiponitrile | 1,000 | | | | 111-69-3 |
| Aldrin | 500/10,000 | 1 | x | P004 | 309-00-2 |
| Allyl alcohol | 1,000 | 100 | x | P005 | 107-18-6 |
| Allyl chloride | | 1,000 | x | | 107-05-1 |
| Allylamine | 500 | | x | | 107-11-9 |
| alpha,alpha-Dimethyl phenethylamine | | 5,000 | | P046 | 122-09-8 |
| alpha-Endosulfan | | 1 | | | 959-98-8 |
| alpha-BHC | | 10 | x | | 319-84-6 |
| Aluminum (fume or dust) | | | x | | 7429-90-5 |

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|--------------------------------|--|---|----------------------------------|---|------------|
| Aluminum oxide (fibrous forms) | | | x | | 1344-28-1 |
| Aluminum phosphide | 500 | 100 | x | P006 | 20859-73-8 |
| Aluminum sulfate | | 5,000 | | | 10043-01-3 |
| Aminopterin | 500/10,000 | | | | 54-62-6 |
| Amiton | 500 | | | | 78-53-5 |
| Amiton oxalate | 100/10,000 | | | | 3734-97-2 |
| Amitrole | | 10 | x | U011 | 61-82-5 |
| Ammonia | 500 | 100 | x | | 7664-41-7 |
| Ammonium acetate | | 5,000 | | | 631-61-8 |
| Ammonium benzoate | | 5,000 | | | 1863-63-4 |
| Ammonium bicarbonate | | 5,000 | | | 1066-33-7 |
| Ammonium bichromate | | 10 | | | 7789-09-5 |
| Ammonium bifluoride | | 100 | | | 1341-49-7 |
| Ammonium bisulfite | | 5,000 | | | 10192-30-0 |
| Ammonium carbamate | | 5,000 | | | 1111-78-0 |
| Ammonium carbonate | | 5,000 | | | 506-87-6 |
| Ammonium chloride | | 5,000 | | | 12125-02-9 |
| Ammonium chromate | | 10 | | | 7788-98-9 |
| Ammonium citrate, dibasic | | 5,000 | | | 3012-65-5 |
| Ammonium fluoborate | | 5,000 | | | 13826-83-0 |
| Ammonium fluoride | | 100 | | | 12125-01-8 |
| Ammonium hydroxide | | 1,000 | | | 1336-21-6 |
| Ammonium oxalate | | 5,000 | | | 5972-73-6 |
| Ammonium oxalate | | 5,000 | | | 6009-70-7 |
| Ammonium oxalate | | 5,000 | | | 14258-49-2 |

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|----------------------------------|--|---|----------------------------------|---|------------|
| Ammonium picrate | | 10 | | P009 | 131-74-8 |
| Ammonium silicofluoride | | 1,000 | | | 16919-19-0 |
| Ammonium sulfamate | | 5,000 | | | 7773-06-0 |
| Ammonium sulfide | | 100 | | | 12135-76-1 |
| Ammonium sulfite | | 5,000 | | | 10196-04-0 |
| Ammonium tartrate | | 5,000 | | | 14307-43-8 |
| Ammonium tartrate | | 5,000 | | | 3164-29-2 |
| Ammonium thiocyanate | | 5,000 | | | 1762-95-4 |
| Ammonium vanadate | | 1,000 | | P119 | 7803-55-6 |
| Amphetamine | 1,000 | | | | 300-62-9 |
| Amyl acetate | | 5,000 | | | 628-63-7 |
| Analine, 2,4,6-trimethyl- | 500 | 500 | | | 88-05-1 |
| Aniline | 1,000 | 5,000 | x | U012 | 62-53-3 |
| Anthracene | | 5,000 | x | | 120-12-7 |
| Antimony | | 5,000 | x | | 7440-36-0 |
| Antimony pentachloride | | 1,000 | | | 7647-18-9 |
| Antimony pentafluoride | 500 | | | | 7783-70-2 |
| Antimony potassium tartrate | | 100 | | | 28300-74-5 |
| Antimony tribromide | | 1,000 | | | 7789-61-9 |
| Antimony trichloride | | 1,000 | | | 10025-91-9 |
| Antimony trifluoride | | 1,000 | | | 7783-56-4 |
| Antimony trioxide | | 1,000 | | | 1309-64-4 |
| Antimycin A | 1,000/10,000 | | | | 1397-94-0 |
| ANTU (Thiourea, 1-naphthalenyl-) | 500/10,000 | 100 | | P072 | 86-88-4 |
| Aroclor 1016 | | 1 | | | 12674-11-2 |

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|----------------------|--|---|----------------------------------|---|------------|
| Aroclor 1221 | | 1 | | | 11104-28-2 |
| Aroclor 1232 | | 1 | | | 11141-16-5 |
| Aroclor 1242 | | 1 | | | 53469-21-9 |
| Aroclor 1248 | | 1 | | | 12672-29-6 |
| Aroclor 1254 | | 1 | | | 11097-69-1 |
| Aroclor 1260 | | 1 | | | 11096-82-5 |
| Arsenic | | 1 | x | | 7440-38-2 |
| Arsenic acid | | 1 | | | 1327-52-2 |
| Arsenic acid | | 1 | | P010 | 7778-39-4 |
| Arsenic disulfide | | 1 | | | 1303-32-8 |
| Arsenic pentoxide | 100/10,000 | 1 | | P011 | 1303-28-2 |
| Arsenic trioxide | 100/10,000 | 1 | | P012 | 1327-53-3 |
| Arsenic trisulfide | | 1 | | | 1303-33-9 |
| Arsenous trichloride | 500 | 1 | | | 7784-34-1 |
| Arsine | 100 | | | | 7784-42-1 |
| Arsine, diethyl- | | 1 | | P038 | 692-42-2 |
| Asbestos | | 1 | x | | 1332-21-4 |
| Azaserine | | 1 | | U015 | 115-02-6 |
| Azinophos-ethyl | 100/10,000 | | | | 2642-71-9 |
| Azinophos-methyl | 10/10,000 | 1 | | | 86-50-0 |
| Barban | | 1* | | U280 | 101-27-9 |
| Barium and compounds | | | x | | 7440-39-3 |
| Barium cyanide | | 10 | | P013 | 542-62-1 |
| Bendiocarb | | 1* | x | U278 | 22781-23-3 |
| Bendiocarb phenol | | 1* | | U364 | 22961-82-6 |

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|--|--|---|----------------------------------|---|------------|
| Benomyl | | 1* | x | U271 | 17804-35-2 |
| Benzal chloride | 500 | 5,000 | x | U017 | 98-87-3 |
| Benzamide | | | x | | 55-21-0 |
| Benz[a]anthracene | | 10 | x ⁺ | U018 | 56-55-3 |
| Benz[a]anthracene, 7,12-dimethyl- | | 1 | x ⁺ | U094 | 57-97-6 |
| Benz[c]acridine | | 100 | | U016 | 225-51-4 |
| Benzenamine, 2-methyl-5-nitro- | | 100 | x | U181 | 99-55-8 |
| Benzenamine, 2-methyl-, hydrochloride | | 100 | x | U222 | 636-21-5 |
| Benzenamine, 3-(trifluoro-methyl)- | 500 | | | | 98-16-8 |
| Benzenamine, 4-chloro | | 1,000 | x | P024 | 106-47-8 |
| Benzenamine, 4-chloro-2-methyl-hydrochloride | | 100 | | U049 | 3165-93-3 |
| Benzenenamine, 4-methyl | | 100 | | U353 | 106-49-0 |
| Benzenamine, 4-nitro- | | 5,000 | x | P077 | 100-01-6 |
| Benzenamine 4,4'-methylenebis-2-chloro- | | 10 | x | U158 | 101-14-4 |
| Benzenamine, N,N-dimethyl-4-phenylazo- | | 10 | x | U093 | 60-11-7 |
| Benzene | | 10 | x | U019 | 71-43-2 |
| Benzene, 1-bromo-4-phenoxy- | | 100 | | U030 | 101-55-3 |
| Benzene, 1-(chloromethyl)-4-nitro- | 500/10,000 | | | | 100-14-1 |
| Benzene, 1-methylethyl- (cumene) | | 5,000 | x | U055 | 98-82-8 |
| Benzene, 1,3-diisocyanatomethyl- | | 100 | x | U223 | 26471-62-5 |
| Benzene, chloro- | | 100 | x | U037 | 108-90-7 |
| Benzene, dimethyl- | | 100 | x | U239 | 1330-20-7 |
| Benzene, hexachloro- | | 10 | x | U127 | 118-74-1 |
| Benzene, hexahydro- (cyclohexane) | | 1,000 | x | U056 | 110-82-7 |
| Benzene, m-dimethyl- | | 1,000 | x | U239 | 108-38-3 |

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Appendix A: Consolidated List of Hazardous Substances and Reportable Quantities Under CERCLA and EPCRA

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| Chemical Name | Extremely Hazardous Substances 40 CFR 355 (TPQ, lbs.) | Hazardous Substances 40 CFR 302.4 (RQ, lbs.) | Toxic Chemicals 40 CFR 372.65(a) | Hazardous Materials which are RCRA wastes | CAS No. |
|---|--|---|----------------------------------|---|------------|
| Benzene, methyl- (toluene) | | 1,000 | x | U220 | 108-88-3 |
| Benzene, o-dimethyl- | | 1,000 | x | U239 | 95-47-6 |
| Benzene, p-dimethyl- | | 100 | x | U239 | 106-42-3 |
| Benzenearsonic acid | 10/10,000 | | | | 98-05-5 |
| Benzenesulfonyl chloride | | 100 | | U020 | 98-09-9 |
| Benzidine | | 1 | x | U021 | 92-87-5 |
| Benzimidazole, 4,5-dichloro-2-(trifluoromethyl) | 500/10,000 | | | | 3615-21-2 |
| Benz[j]aceanthrylene, 1,2-dihydro-3-methyl- | | 10 | | U157 | 56-49-5 |
| Benzo[a]pyrene | | 1 | x ⁺ | U022 | 50-32-8 |
| Benzo[b]fluoranthene | | 1 | x ⁺ | | 205-99-2 |
| Benzo[ghi]perylene | | 5,000 | | | 191-24-2 |
| Benzoic acid | | 5,000 | | | 65-85-0 |
| Benzo[jk]fluorene | | 100 | | U120 | 206-44-0 |
| Benzo[k]fluoranthene | | 5,000 | x ⁺ | | 207-08-9 |
| Benzonitrile | | 5,000 | | | 100-47-0 |
| Benzotrichloride | 100 | 10 | x | U023 | 98-07-7 |
| Benzoyl chloride | | 1,000 | x | | 98-88-4 |
| Benzoyl peroxide | | | x | | 94-36-0 |
| Benzyl chloride | 500 | 100 | x | P028 | 100-44-7 |
| Benzyl cyanide | | 500 | | | 140-29-4 |
| Beryllium | | 10 | x | P015 | 7440-41-7 |
| Beryllium chloride | | 1 | | | 7787-47-5 |
| Beryllium fluoride | | 1 | | | 7787-49-7 |
| Beryllium nitrate | | 1 | | | 13597-99-4 |
| Beryllium nitrate | | 1 | | | 7787-55-5 |

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|--|--|---|----------------------------------|---|------------|
| beta-Endosulfan | | 1 | | | 33213-65-9 |
| beta-BHC | | 1 | | | 319-85-7 |
| beta-Chloronaphthalene | | 5,000 | | U047 | 91-58-7 |
| Bicyclo[2.2.1]heptane-2-carbonitrile, 5-chloro-6-(methylamino)carbonyloxy imino)-, | 500/10,000 | | | | 15271-41-7 |
| Biphenyl | | 100 | x | | 92-52-4 |
| Bis(2-chloroethoxy) methane | | 1,000 | x | U024 | 111-91-1 |
| Bis(2-chloroisopropyl) ether | | 1,000 | x | U027 | 108-60-1 |
| Bis(chloromethyl)ketone | 10/10,000 | | | | 534-07-6 |
| Bitoscanate | 500/10,000 | | | | 4044-65-9 |
| Boron trichloride | 500 | | x | | 10294-34-5 |
| Boron trifluoride | 500 | | x | | 7637-07-2 |
| Boron trifluoride compound with methyl ether (1:1) | 1,000 | | | | 353-42-4 |
| Bromadiolone | 100/10,000 | | | | 18772-56-7 |
| Bromine | 500 | | x | | 7726-95-6 |
| Bromoacetone | | 1,000 | | P017 | 598-31-2 |
| Bromochlorodifluoromethane (Halon 1211) | | | x | | 353-59-3 |
| Bromoform | | 100 | x | U225 | 75-25-2 |
| Bromotrifluoromethane (Halon 1311) | | | x | | 75-63-8 |
| Brucine | | 100 | x | P018 | 357-57-3 |
| Butanoic acid, 4-[bis(2-chloroethyl)amino] benzene- | | 10 | | U035 | 147,985 |
| Butyl acetate | | 5,000 | | | 123-86-4 |
| Butyl acrylate | | | x | | 141-32-2 |
| Butyl benzyl phthalate | | 100 | | | 85-68-7 |
| Butylamine | | 1,000 | | | 109-73-9 |

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|---------------------------------|--|---|----------------------------------|---|------------|
| Butyraldehyde | | | x | | 123-72-8 |
| Butyric acid | | 5,000 | | | 107-92-6 |
| CI Acid Green 3 | | | x | | 4680-78-8 |
| CI Basic Green 4 | | | x | | 569-64-2 |
| CI Basic Red 1 | | | x | | 989-38-8 |
| CI Direct Black 38 | | | x | | 1937-37-7 |
| CI Direct Blue 6 | | | x | | 2602-46-2 |
| CI Direct Brown 95 | | | x | | 16071-86-6 |
| CI Disperse Yellow 3 | | | x | | 2832-40-8 |
| CI Food Red 5 | | | x | | 3761-53-3 |
| CI Food Red 15 | | | x | | 81-88-9 |
| CI Solvent Orange 7 | | | x | | 3118-97-6 |
| CI Solvent Yellow 3 | | | x | | 97-56-3 |
| CI Solvent Yellow 14 | | | x | | 824-07-0 |
| CI Solvent Yellow 34 (Auramine) | | 100 | x | U014 | 492-80-8 |
| CI Vat Yellow 4 | | | x | | 128-66-5 |
| Cacodylic acid | | 1 | | U136 | 75-60-5 |
| Cadmium | | 10 | x | | 7440-43-9 |
| Cadmium acetate | | 10 | | | 543-90-8 |
| Cadmium bromide | | 10 | | | 7789-42-6 |
| Cadmium chloride | | 10 | | | 10108-64-2 |
| Cadmium oxide | 100/10,000 | | | | 1306-19-0 |
| Cadmium stearate | 1,000/10,000 | | | | 2223-93-0 |
| Calcium arsenate | 500/10,000 | 1 | | | 7778-44-1 |
| Calcium arsenite | | 1 | | | 52740-16-6 |

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|--|--|---|----------------------------------|---|------------|
| Calcium carbide | | 10 | | | 75-20-7 |
| Calcium chromate | | 10 | | U032 | 13765-19-0 |
| Calcium cyanamide | | 1,000 | x | | 156-62-7 |
| Calcium cyanide | | 10 | | P021 | 592-01-8 |
| Calcium dodecylbenzene sulfonate | | 1,000 | | | 26264-06-2 |
| Calcium hypochlorite | | 10 | | | 7778-54-3 |
| Cantharidin | 100/10,000 | | | | 56-25-7 |
| Caprolactam | | 5,000 | | | 105-60-2 |
| Captan | | 10 | x | | 133-06-2 |
| Carbachol chloride | 500/10,000 | | | | 51-83-2 |
| Carbamic acid, ethyl ester | | 100 | x | U238 | 51-79-6 |
| Carbamic acid, methyl- nitroso-, ethyl ester | | 1 | | U178 | 615-53-2 |
| Carbamic acid, methyl-o- (((2,4-dimethyl-1,3 dithiolan-2-yl)methylene) amino)- | 100/10,000 | 1* | | P185 | 26419-73-8 |
| Carbamic chloride, dimethyl- | | 1 | x | U097 | 79-44-7 |
| Carbamothioic acid, dipropyl-, S-(phenylmethyl) ester | | 1* | | U387 | 52888-80-9 |
| Carbaryl | | 100 | x | U279 | 63-25-2 |
| Carbendazim | | 1* | | U372 | 10605-21-7 |
| Carbofuran | 10/10,000 | 10 | x | P127 | 1563-66-2 |
| Carbofuran phenol | | 1* | | U367 | 1563-38-8 |
| Carbon disulfide | 10,000 | 100 | x | P022 | 75-15-0 |
| Carbon oxyfluoride | | 1,000 | | U033 | 353-50-4 |
| Carbon tetrachloride | | 10 | x | U211 | 56-23-5 |
| Carbonyl sulfide | | 100 | x | | 463-58-1 |
| Carbophenothion | 500 | | | | 786-19-6 |

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| Chemical Name | Extremely Hazardous Substances 40 CFR 355 (TPQ, lbs.) | Hazardous Substances 40 CFR 302.4 (RQ, lbs.) | Toxic Chemicals 40 CFR 372.65(a) | Hazardous Materials which are RCRA wastes | CAS No. |
|--------------------------------------|--|---|----------------------------------|---|------------|
| Carbosulfan | | 1* | | P189 | 55285-14-8 |
| Catechol | | 100 | x | | 120-80-9 |
| Chloramben | | 100 | x | | 133-90-4 |
| Chlordane | 1,000 | 1 | x | U036 | 57-74-9 |
| Chlorfenvinfos | 500 | | | | 470-90-6 |
| Chlorinated fluorocarbon (Freon 113) | | | x | | 76-13-1 |
| Chlorine | 100 | 10 | x | | 7782-50-5 |
| Chlorine cyanide | | 10 | | P033 | 506-77-4 |
| Chlorine dioxide | | | x | | 10049-04-4 |
| Chlormephos | 500 | | | | 24934-91-6 |
| Chlormequat chloride | 100/10,000 | | | | 999-81-5 |
| Chlornaphazine | | 100 | | U026 | 494-03-1 |
| Chloroacetaldehyde | | 1,000 | | P023 | 107-20-0 |
| Chloroacetic acid | 100/10,000 | 100 | x | | 79-11-8 |
| Chlorobenzilate | | 10 | x | U038 | 510-15-6 |
| Chlorodibromomethane | | 100 | | | 124-48-1 |
| Chlorodifluoromethane (HCFC-22) | | | x | | 75-45-6 |
| Chloroethane | | 100 | x | | 75-00-3 |
| Chloroethanol | 500 | | | | 107-07-3 |
| Chloroethyl chloroformate | 1,000 | | | | 627-11-2 |
| Chloroform | 10,000 | 10 | x | U044 | 67-66-3 |
| Chloromethyl methyl ether | 100 | 10 | x | U046 | 107-30-2 |
| Chlorophacinone | 100/10,000 | | | | 3691-35-8 |
| Chloroprene | | 100 | x | | 126-99-8 |
| Chlorosulfonic acid | | 1,000 | | | 7790-94-5 |

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|--|--|---|----------------------------------|---|------------|
| Chlorotetrafluoroethane | | | x | | 63938-10-3 |
| Chlorothalonil | | | x | | 1897-45-6 |
| Chloroxuron | 500/10,000 | | | | 1982-47-4 |
| Chlorpyrifos | | 1 | | | 2921-88-2 |
| Chlorthiophos | 500 | | | | 21923-23-9 |
| Chromic acetate | | 1,000 | | | 1066-30-4 |
| Chromic acid | | 10 | | | 11115-74-5 |
| Chromic acid | | 10 | | | 7738-94-5 |
| Chromic chloride | 1/10,000 | | | | 10025-73-7 |
| Chromic sulfate | | 1,000 | | | 10101-53-8 |
| Chromium | | 5,000 | x | | 7440-47-3 |
| Chromous chloride | | 1,000 | | | 10049-05-5 |
| Cobalt | | | x | | 7440-48-4 |
| Cobalt,((2,2'-1,2- ethanediylbis (ni- trilomethylidyne))bis(6-fluorophenylato))(2-)- N,N',O,O')- | 100/10,000 | | | | 62207-76-5 |
| Cobalt carbonyl | 10/10,000 | | | | 10210-68-1 |
| Cobaltous bromide | | 1,000 | | | 7789-43-7 |
| Cobaltous formate | | 1,000 | | | 544-18-3 |
| Cobaltous sulfamate | | 1,000 | | | 14017-41-5 |
| Colchicine | 10/10,000 | | | | 64-86-8 |
| Copper | | 5,000 | x | | 7440-50-8 |
| Copper cyanide | | 10 | | P029 | 544-92-3 |
| Coumaphos | 100/10,000 | 10 | | | 56-72-4 |
| Coumatetralyl | 500/10,000 | | | | 5836-29-3 |
| Creosote | | 1 | x | U051 | 8001-58-9 |

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|--|--|---|----------------------------------|---|------------|
| Cresol(s) (mixed isomers) | | 100 | x | U052 | 1319-77-3 |
| Crimidine | 100/10,000 | | | | 535-89-7 |
| Crotonaldehyde | 1,000 | 100 | x | U053 | 4170-30-3 |
| Crotonaldehyde, (E)- | 1,000 | 100 | | U053 | 123-73-9 |
| Cumene hydroperoxide | | 10 | x | U096 | 80-15-9 |
| Cupferron | | | x | | 135-20-6 |
| Cupric acetate | | 100 | | | 142-71-2 |
| Cupric chloride | | 10 | | | 7447-39-4 |
| Cupric nitrate | | 100 | | | 3251-23-8 |
| Cupric oxalate | | 100 | | | 5893-66-3 |
| Cupric sulfate | | 10 | | | 7758-98-7 |
| Cupric sulfate, ammoniated | | 100 | | | 10380-29-7 |
| Cupric tartrate | | 100 | | | 815-82-7 |
| Cyanides (soluble cyanide salts and complexes) | | 10 | | P030 | 57-12-5 |
| Cyanogen | | 100 | | P031 | 460-19-5 |
| Cyanogen bromide | 500/10,000 | 1,000 | | U246 | 506-68-3 |
| Cyanogen iodide | 1,000/10,000 | | | | 506-78-5 |
| Cyanophos | | 1,000 | | | 2636-26-2 |
| Cyanuric fluoride | | 100 | | | 675-14-9 |
| Cyclohexanone | | 5,000 | | U057 | 108-94-1 |
| Cycloheximide | 100/10,000 | | | | 66-81-9 |
| Cyclohexylamine | 10,000 | | | | 108-91-8 |
| Cyclophosphamide | | 10 | | U058 | 50-18-0 |
| D-Glucopyranose, 2-deoxy-2-(3-methyl-3-nitrosoureido)- | | 1 | | U206 | 18883-66-4 |
| Daunomycin | | 10 | | U059 | 20830-81-3 |

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|--|--|---|----------------------------------|---|------------|
| DDD | | 1 | | U060 | 72-54-8 |
| DDE | | 1 | | | 72-55-9 |
| DDE | | 5,000 | | | 3547-04-4 |
| DDT | | 1 | | U061 | 50-29-3 |
| Decaborane(14) | 500/10,000 | | | | 17702-41-9 |
| Decabromodiphenyl oxide | | | x | | 1163-19-5 |
| Delta-BHC | | 1 | | | 319-86-8 |
| Demeton | 500 | | | | 8065-48-3 |
| Demeton-S-methyl | 500 | | | | 919-86-8 |
| Di-(2-ethylhexyl)phthalate (DEHP) | | 100 | x | U028 | 117-81-7 |
| Di-n-octyl phthalate | | 5,000 | | U107 | 117-84-0 |
| Di-n-propylnitrosamine (N-Nitrosodi-n-propylamine) | | 10 | x | U111 | 621-64-7 |
| Dialifor | 100/10,000 | | | | 10311-84-9 |
| Diallate | | 100 | x | U062 | 2303-16-4 |
| Diaminotoluene (mixed isomers) | | 10 | x | U221 | 25376-45-8 |
| Diaminotoluene | | 10 | | U221 | 496-72-0 |
| Diazinon | | 1 | x | | 333-41-5 |
| Diazomethane | | 100 | x | | 334-88-3 |
| Dibenz[a,i]pyrene | | 10 | x | U064 | 189-55-9 |
| Dibenz[a,h] anthracene | | 1 | x ⁺ | U063 | 53-70-3 |
| Dibenzofuran | | 100 | x | | 132-64-9 |
| Diborane | | 100 | | | 19287-45-7 |
| Dibromotetrafluorethane (Halon 2402) | | | x | | 124-73-2 |
| Dibutyl phthalate | | 10 | x | U069 | 84-74-2 |
| Dicamba | | 1,000 | x | | 1918-00-9 |

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|---|--|---|----------------------------------|---|------------|
| Dichlone | | 1 | | | 117-80-6 |
| Dichloro-1,1,2-trifluoroethane | | | x | | 90454-18-5 |
| Dichlorobenil | | 100 | | | 1194-65-6 |
| Dichlorobenzene (mixed isomers) | | 100 | x | | 25321-22-6 |
| Dichlorobromomethane | | 5,000 | x | | 75-27-4 |
| Dichlorodifluoromethane (CFC-12) | | 5,000 | x | U075 | 75-71-8 |
| Dichloroethyl ether | 10,000 | 10 | x | U025 | 111-44-4 |
| Dichloromethyl ether | 100 | 10 | x | P016 | 542-88-1 |
| Dichloromethylphenylsilane | 1,000 | | | | 149-74-6 |
| Dichloropropane | | 1,000 | | | 26638-19-7 |
| Dichloropropane-dichloropropene (mixture) | | 100 | | | 8003-19-8 |
| Dichloropropene | | 100 | | | 26952-23-8 |
| Dichlorotetrafluoroethane (CFC-114) | | | x | | 76-14-2 |
| Dichlorotrifluoroethane | | | x | | 34077-87-7 |
| Dichlorvos | 1,000 | 10 | x | | 62-73-7 |
| Dicofol | | 10 | x | | 115-32-2 |
| Dicrotophos | 100 | | | | 141-66-2 |
| Dieldrin | | 1 | | P037 | 60-57-1 |
| Diepoxybutane | 500 | 10 | x | U085 | 1464-53-5 |
| Diethanolamine | | 100 | x | | 111-42-2 |
| Diethyl chlorophosphate | 500 | | | | 814-49-3 |
| Diethyl-p-nitrophenylphosphate | | 100 | | P041 | 311-45-5 |
| Diethyl sulfate | | 10 | x | | 64-67-5 |
| Diethylamine | | 100 | | | 109-89-7 |
| Diethylstilbestrol | | 1 | | U089 | 56-53-1 |

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|-----------------------------------|--|---|----------------------------------|---|------------|
| Digitoxin | 100/10,000 | | | | 71-63-6 |
| Diglycidyl ether | 1,000 | | | | 2238-07-5 |
| Digoxin | 10/10,000 | | | | 20830-75-5 |
| Dihydrosafrole | | 10 | x | U090 | 94-58-6 |
| Diisopropylfluorophosphate | 100 | 100 | | P043 | 55-91-4 |
| Dimefox | 500 | | | | 115-26-4 |
| Dimethoate | 500/10,000 | 10 | x | P044 | 60-51-5 |
| Dimethylformamide | | 100 | x | | 25,173 |
| Dimethyl-p-phenylenediamine | 10/10,000 | | | | 99-98-9 |
| Dimethyl phosphorochloridothioate | 500 | | x | | 2524-03-0 |
| Dimethyl phthalate | | 5,000 | x | U102 | 131-11-3 |
| Dimethyl sulfate | 500 | 100 | x | U103 | 77-78-1 |
| Dimethylamine | | 1,000 | x | U092 | 124-40-3 |
| Dimethyldichlorosilane | 500 | | x | | 75-78-5 |
| Dimethylhydrazine | 1,000 | 10 | x | U098 | 57-14-7 |
| Dimetilan | 500/10,000 | 1* | | P191 | 644-64-4 |
| Dinitrobenzene (mixed isomers) | | 100 | | | 25154-54-5 |
| Dinitrophenol | | 10 | | | 25550-58-7 |
| Dinitrotoluene (mixed isomers) | | 10 | x | | 25321-14-6 |
| Dinoseb | 100/10,000 | 1,000 | x | P020 | 88-85-7 |
| Dinoterb | 500/10,000 | | | | 1420-07-1 |
| Dioxathion | 500 | | | | 78-34-2 |
| Diphacinone | 10/10,000 | | | | 82-66-6 |
| Diphenylamine | | | x | | 122-39-4 |
| Diphosphoramidate, octamethyl- | 100 | 100 | | P085 | 152-16-9 |

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|---|---|--|----------------------------------|---|------------|
| Dipropylamine | | 5,000 | | U110 | 142-84-7 |
| Diquat | | 1,000 | | | 85-00-7 |
| Diquat | | 1,000 | | | 2764-72-9 |
| Disulfoton | 500 | 1 | | P039 | 298-04-4 |
| Dithiazinine iodide | 500/10,000 | | | | 514-73-8 |
| Dithiobiuret | 100/10,000 | 100 | x | P049 | 541-53-7 |
| Diuron | | 100 | x | | 330-54-1 |
| Dodecylbenzenesulfonic acid | | 1,000 | | | 27176-87-0 |
| Emetine, dihydrochloride | 1/10,000 | | | | 316-42-7 |
| Endosulfan | 10/10,000 | 1 | | P050 | 115-29-7 |
| Endosulfan sulfate | | 1 | | | 1031-07-8 |
| Endothall | | 1,000 | | P088 | 145-73-3 |
| Endothion | 500/10,000 | | | | 2778-04-3 |
| Endrin | 500/10,000 | 1 | | P051 | 72-20-8 |
| Endrin aldehyde | | 1 | | | 7421-93-4 |
| Epichlorohydrin | 1,000 | 100 | x | U041 | 106-89-8 |
| EPN | 100/10,000 | | | | 2104-64-5 |
| Ergocalciferol | 1,000/10,000 | | | | 50-14-6 |
| Ergotamine tartrate | 500/10,000 | | | | 379-79-3 |
| Ethanamine, N-ethyl-N-nitroso- | | 1 | x | U174 | 55-18-5 |
| Ethane, 1,1'-oxybis- | | 100 | | U117 | 60-29-7 |
| Ethanesulfonyl chloride, 2-chloro- | 500 | | | | 1622-32-8 |
| Ethanethioamide | | 10 | x | U218 | 62-55-5 |
| Ethanimidothioic acid, 2-(dimethylamino)-N-hydroxy- | | 1* | | U394 | 30558-43-1 |
| Ethanol, 1,2-dichloro-acetate | 1,000 | | | | 10140-87-1 |

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| Chemical Name | Extremely Hazardous Substances 40 CFR 355 (TPQ, lbs.) | Hazardous Substances 40 CFR 302.4 (RQ, lbs.) | Toxic Chemicals 40 CFR 372.65(a) | Hazardous Materials which are RCRA wastes | CAS No. |
|--|--|---|----------------------------------|---|------------|
| Ethanol, 2,2'-(nitroso imino) bis- | | 1 | | U173 | 1116-54-7 |
| Ethanol, 2,2'-oxybis-, dicarbamate | | 1* | | U395 | 5952-26-1 |
| Ethene, chloro- | | 1 | x | U043 | 75-01-4 |
| Ethion | 1,000 | 10 | | | 563-12-2 |
| Ethoprophos | 1,000 | | x | | 13194-48-4 |
| Ethyl acrylate | | 1,000 | x | U113 | 140-88-5 |
| Ethyl chloroformate | | | x | | 541-41-3 |
| Ethyl methacrylate | | 1,000 | | U118 | 97-63-2 |
| Ethyl methanesulfonate | | 1 | | U119 | 62-50-0 |
| Ethylbenzene | | 1,000 | x | | 100-41-4 |
| Ethylbis(2-chloroethyl)amine | 500 | | | | 538-07-8 |
| Ethylene | | | x | | 74-85-1 |
| Ethylene glycol | | 5,000 | x | | 107-21-1 |
| Ethylene oxide | 1,000 | 10 | x | U115 | 75-21-8 |
| Ethylene thiourea | | 10 | x | U116 | 96-45-7 |
| Ethylenebisdithiocarbamic acid, salts & esters | | 5,000 | x | U114 | 111-54-6 |
| Ethylenediamine | 10,000 | 5,000 | | | 107-15-3 |
| Ethylenediamine tetra-acetic acid (EDTA) | | 5,000 | | | 60-00-4 |
| Ethyleneimine | 500 | 1 | x | P054 | 151-56-4 |
| Ethylenethiocyanate | 10,000 | | | | 542-90-5 |
| Ethylidene dichloride | | 1,000 | x | U076 | 75-34-3 |
| Famphur | | 1,000 | x | P097 | 52-85-7 |
| Fenamiphos | 10/10,000 | | | | 22224-92-6 |
| Fensulfothion | 500 | | | | 115-90-2 |
| Ferric ammonium citrate | | 1,000 | | | 1185-57-5 |

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|---------------------------|--|---|----------------------------------|---|------------|
| Ferric ammonium oxalate | | 1,000 | | | 2944-67-4 |
| Ferric ammonium oxalate | | 1,000 | | | 55488-87-4 |
| Ferric chloride | | 1,000 | | | 7705-08-0 |
| Ferric fluoride | | 100 | | | 7783-50-8 |
| Ferric nitrate | | 1,000 | | | 10421-48-4 |
| Ferric sulfate | | 1,000 | | | 10028-22-5 |
| Ferrous ammonium sulfate | | 1,000 | | | 10045-89-3 |
| Ferrous chloride | | 100 | | | 7758-94-3 |
| Ferrous sulfate | | 1,000 | | | 7720-78-7 |
| Ferrous sulfate | | 1,000 | | | 7782-63-0 |
| Flueneetil | 100/10,000 | | | | 4301-50-2 |
| Fluometuron | | | x | | 2164-17-2 |
| Fluorene | | 5,000 | | | 86-73-7 |
| Fluorine | 500 | 10 | x | P056 | 7782-41-4 |
| Fluoroacetamide | 100/10,000 | 100 | | P057 | 640-19-7 |
| Fluoroacetic acid | 10/10,000 | | | | 144-49-0 |
| Fluoroacetyl chloride | 10 | | | | 359-06-8 |
| Fluorouracil | 500/10,000 | | x | | 51-21-8 |
| Fonofos | 500 | | | | 944-22-9 |
| Formaldehyde | 500 | 100 | x | U122 | 50-00-0 |
| Formaldehyde cyanohydrin | 1,000 | | | | 107-16-4 |
| Formetanate hydrochloride | 500/10,000 | 1* | | P198 | 23422-53-9 |
| Formic acid | | 5,000 | x | U123 | 64-18-6 |
| Formothion | 100 | | | | 2540-82-1 |
| Formparanate | 100/10,000 | 1* | | P197 | 17702-57-7 |

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|--|--|---|----------------------------------|---|------------|
| Fosthietan | 500 | | | | 21548-32-3 |
| Fuberidazole | 100/10,000 | | | | 3878-19-1 |
| Fulminic acid, mercury (II) salt | | 10 | | P065 | 628-86-4 |
| Fumaric acid | | 5,000 | | | 110-17-8 |
| Furan | 500 | 100 | | U124 | 110-00-9 |
| Furan, tetrahydro- | | 1,000 | | U213 | 109-99-9 |
| Gallium trichloride | 500/10,000 | | | | 13450-90-3 |
| Glycidylaldehyde | | 10 | | U126 | 765-34-4 |
| Guanidine, N-nitroso-N methyl-N'-nitro | | 10 | | U163 | 70-25-7 |
| Heptachlor | | 1 | x | P059 | 76-44-8 |
| Heptachlor epoxide | | 1 | | | 1024-57-3 |
| Hexachloro-1,3-butadiene | | 1 | x | U128 | 87-68-3 |
| Hexachlorocyclopentadiene | 100 | 10 | x | U130 | 77-47-4 |
| Hexachloroethane | | 100 | x | U131 | 67-72-1 |
| Hexachloronaphthalene | | | x | | 1335-87-1 |
| Hexachlorophene | | 100 | x | U132 | 70-30-4 |
| Hexachloropropene | | 1,000 | | U243 | 1888-71-7 |
| Hexaethyl tetraphosphate | | 100 | | P062 | 757-58-4 |
| Hexamethylene-1,6-diisocyanate | | 100 | x [#] | | 300,380 |
| Hexamethylenediamine, N,N'-dibutyl- | | 500 | | | 4835-11-4 |
| Hexamethylphosphoramide | | 1 | x | | 680-31-9 |
| Hexane | | 5,000 | x | | 110-54-3 |
| Hydrazine | 1,000 | 1 | x | U133 | 302-01-2 |
| Hydrazine sulfate | | | x | | 10034-93-2 |
| Hydrochloric acid (hydrogen chloride (aerosol forms only)) | | 5,000 | x | | 7647-01-0 |

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|--|--|---|----------------------------------|---|-------------|
| Hydrochloric acid | | 5,000 | | | 7647-01-0 |
| Hydrochloric acid (conc. 37% or greater) | | 5,000 | | | 7647-01-0 |
| Hydrocyanic acid | 100 | 10 | x | P063 | 74-90-8 |
| Hydrogen fluoride | 100 | 100 | x | U134 | 7664-39-3 |
| Hydrogen peroxide (conc > 52%) | 1,000 | | | | 7722-84-1 |
| Hydrogen selenide | 10 | | | | 7783-07-5 |
| Hydrogen sulfide | 500 | 100 | x | U135 | 7783-06-4 |
| Hydroquinone | 500/10,000 | 100 | x | | 123-31-9 |
| Indeno(1,2,3-cd)pyrene | | 100 | x ⁺ | U137 | 193-39-5 |
| Iron, pentacarbonyl- | 100 | | x | | 13463-40-06 |
| iso-Amyl acetate | | 5,000 | | | 123-92-2 |
| iso-Butyl acetate | | 5,000 | | | 110-19-0 |
| iso-Butylamine | | 1,000 | | | 78-81-9 |
| iso-Butyric acid | | 5,000 | | | 79-31-2 |
| Isobenzan | 100/10,000 | | | | 297-78-9 |
| Isobutyl alcohol | | 5,000 | | U140 | 78-83-1 |
| Isobutyraldehyde | | | x | | 78-84-2 |
| Isobutyronitrile | 1,000 | | | | 78-82-0 |
| Isocyanic acid, 3,4-dichlorophenyl ester | 500/10,000 | | | | 102-36-3 |
| Isodrin | 100/10,000 | 1 | x | P060 | 465-73-6 |
| Isophorone | | 5,000 | | | 78-59-1 |
| Isophorone diisocyanate | 100 | | x [#] | | 4098-71-9 |
| Isoprene | | 100 | | | 78-79-5 |
| Isopropanolamine dodecylbenzene sulfonate | | 1,000 | | | 42504-46-1 |
| Isopropyl alcohol (mfg- strong acid processes) | | | x | | 67-63-0 |

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|--|---|--|--|--|------------|
| Isopropyl chloroformate | 1,000 | | | | 108-23-6 |
| Isopropylmethylpyrazolyl dimethylcarbamate | 500 | 1* | | P192 | 119-38-0 |
| Kepon | | 1 | | U142 | 143-50-0 |
| Lactonitrile | 1,000 | | | | 78-97-7 |
| Lasiocarpine | | 10 | | U143 | 303-34-4 |
| Lead | | 10 | x | | 7439-92-1 |
| Lead arsenate | | 1 | | | 10102-48-4 |
| Lead arsenate | | 1 | | | 7645-25-2 |
| Lead arsenate | | 1 | | | 7784-40-9 |
| Lead chloride | | 10 | | | 7758-95-4 |
| Lead fluoborate | | 10 | | | 13814-96-5 |
| Lead fluoride | | 10 | | | 7783-46-2 |
| Lead iodide | | 10 | | | 10101-63-0 |
| Lead nitrate | | 10 | | | 10099-74-8 |
| Lead phosphate | | 10 | | U145 | 7446-27-7 |
| Lead stearate | | 10 | | | 1072-35-1 |
| Lead stearate | | 10 | | | 52652-59-2 |
| Lead stearate | | 10 | | | 7428-48-0 |
| Lead stearate | | 10 | | | 56189-09-4 |
| Lead subacetate | | 10 | | U146 | 1335-32-6 |
| Lead sulfate | | 10 | | | 15739-80-7 |
| Lead sulfate | | 10 | | | 7446-14-2 |
| Lead sulfide | | 10 | | | 1314-87-0 |
| Lead thiocyanate | | 10 | | | 592-87-0 |
| Leptophos | 500/10,000 | | | | 21609-90-5 |

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|---|--|---|----------------------------------|---|------------|
| Lewisite | 10 | | | | 541-25-3 |
| Lindane | 1,000/10,000 | 1 | x | U129 | 58-89-9 |
| Lithium chromate | | 10 | | | 14307-35-8 |
| Lithium hydride | 100 | | | | 7580-67-8 |
| m-Cresol | | 1,000 | x | U052 | 108-39-4 |
| m-Dinitrobenzene | | 100 | x | | 99-65-0 |
| m-Nitrophenol | | 100 | | | 554-84-7 |
| m-Nitrotoluene | | 1,000 | | | 99-08-1 |
| Malathion | | 100 | x | | 121-75-5 |
| Maleic acid | | 5,000 | | | 110-16-7 |
| Maleic anhydride | | 5,000 | x | U147 | |
| Maleic hydrazide | | 5,000 | | U148 | 123-33-1 |
| Malononitrile | 500/10,000 | 1,000 | x | U149 | 109-77-3 |
| Maneb | | | x | | 12427-38-2 |
| Manganese | | | x | | 7439-96-5 |
| Manganese, bis(dimethylcarbamodithioato-S,S') | | 1* | | P196 | 15339-36-3 |
| Manganese, tricarbonyl methylcyclopentadienyl | 100 | | | | 12108-13-3 |
| Mechlorethamine | 10 | | x | | 51-75-2 |
| Melphalan | | 1 | | U150 | 148-82-3 |
| Mephosfolan | 500 | | | | 950-10-7 |
| Mercuric acetate | 500/10,000 | | | | 1600-27-7 |
| Mercuric chloride | 500/10,000 | | | | 7487-94-7 |
| Mercuric cyanide | | 1 | | | 592-04-1 |
| Mercuric nitrate | | 10 | | | 10045-94-0 |
| Mercuric oxide | 500/10,000 | | | | 21908-53-2 |

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|--------------------------------------|--|---|----------------------------------|---|------------|
| Mercuric sulfate | | 10 | | | 7783-35-9 |
| Mercuric thiocyanate | | 10 | | | 592-85-8 |
| Mercurous nitrate | | 10 | | | 7782-86-7 |
| Mercurous nitrate | | 10 | | | 10415-75-5 |
| Mercury | | 1 | x | U151 | 7439-97-6 |
| Methacrolein diacetate | 1,000 | | | | 10476-95-6 |
| Methacrylic anhydride | 500 | | | | 760-93-0 |
| Methacryloyl chloride | 100 | | | | 920-46-7 |
| Methacryloyloxyethyl isocyanate | 100 | | | | 30674-80-7 |
| Methacrylonitrile | 500 | 1,000 | x | U152 | 126-98-7 |
| Methamidophos | 100/10,000 | | | | 10265-92-6 |
| Methanesulfonyl chloride, trichloro- | 500 | 100 | x | | 594-42-3 |
| Methanesulfonyl fluoride | 1,000 | | | | 558-25-8 |
| Methanol | | 5,000 | x | U154 | 67-56-1 |
| Methapyrilene | | 5,000 | | U155 | 91-80-5 |
| Methidathion | 500/10,000 | | | | 950-37-8 |
| Methiocarb | 500/10,000 | 10 | x | P199 | 2032-65-7 |
| Methomyl | 500/10,000 | 100 | | P066 | 16752-77-5 |
| Methoxychlor | | 1 | x | U247 | 72-43-5 |
| Methoxyethylmercuric acetate | 500/10,000 | | | | 151-38-2 |
| Methyl 2-chloroacrylate | | 500 | | | 80-63-7 |
| Methyl acrylate | | | x | | 96-33-3 |
| Methyl bromide | 1,000 | 1,000 | x | U029 | 74-83-9 |
| Methyl chloride | | 100 | x | U045 | 74-87-3 |
| Methyl chlorocarbonate | 500 | 1,000 | x | U156 | 79-22-1 |

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|--|--|---|----------------------------------|---|-----------|
| Methyl chloroform | | 1,000 | x | U226 | 71-55-6 |
| Methyl chloroformate (Methylchlorocarbonate) | 500 | 1,000 | | U156 | 79-22-1 |
| Methyl hydrazine | 500 | 10 | x | P068 | 60-34-4 |
| Methyl iodide | | 100 | x | U138 | 74-88-4 |
| Methyl isobutyl ketone | | 5,000 | x | U161 | 108-10-1 |
| Methyl isocyanate | 500 | 10 | x | P064 | 624-83-9 |
| Methyl isothiocyanate | 500 | | x | | 556-61-1 |
| Methyl mercaptan | 500 | 100 | x | U153 | 74-93-1 |
| Methyl methacrylate | | 1,000 | x | U162 | 80-62-6 |
| Methyl phenkapton | 500 | | | | 3735-23-7 |
| Methyl phosphonic dichloride | 100 | | | | 676-97-1 |
| Methyl tert-butyl ether | | 1,000 | x | | 1634-04-4 |
| Methyl thiocyanate | 10,000 | | | | 556-64-9 |
| Methyl vinyl ketone | 10 | | | | 78-94-4 |
| Methylenebis(phenylisocyanate) (MBI) | | 5,000 | x [#] | | 101-68-8 |
| Methylene bromide | | 1,000 | x | U068 | 74-95-3 |
| Methylene chloride | | 1,000 | x | U080 | 75-09-2 |
| Methylmercuric dicyanamide | 500/10,000 | | | | 502-39-6 |
| Methylthiouracil | | 10 | | U164 | 56-04-2 |
| Methyltrichlorosilane | 500 | | x | | 75-79-6 |
| Metolcarb | 100/10,000 | 1* | | P190 | 1129-41-5 |
| Mevinphos | 500 | 10 | x | | 7786-34-7 |
| Mexacarbate | 500/10,000 | 1,000 | | P128 | 315-18-4 |
| Michler's ketone | | | x | | 90-94-8 |
| Mitomycin C | 500/10,000 | 10 | | U010 | 50-07-7 |

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|---|--|---|----------------------------------|---|------------|
| Molybdenum trioxide | | | x | | 1313-27-5 |
| Monocrotophos | 10/10,000 | | | | 6923-22-4 |
| (Mono)chloropentafluoroethane (CFC 115) | | | x | | 76-15-3 |
| Monoethylamine | | 100 | | | 75-04-7 |
| Monomethylamine | | 100 | | | 74-89-5 |
| Muscimol | 500/10,000 | 1,000 | | P007 | 2763-96-4 |
| Mustard gas | 500 | | x | | 505-60-2 |
| n-Butyl alcohol | | 5,000 | x | U031 | 71-36-3 |
| N,N-Diethylaniline | | 1,000 | | | 91-66-7 |
| N,N'-Diethylhydrazine | | 10 | | U086 | 1615-80-1 |
| N,N'-Dimethylaniline | | 100 | x | | 121-69-7 |
| N-Nitrosodi-n-butylamine | | 10 | x | U172 | 924-16-3 |
| N-Nitroso-N-ethylurea | | 1 | x | U176 | 759-73-9 |
| N-Nitroso-N-methylurea | | 1 | x | U177 | 684-93-5 |
| N-Nitrosodiphenylamine | | 100 | x | | 86-30-6 |
| N-Nitrosomethylvinylamine | | 10 | x | P084 | 4549-40-0 |
| N-Nitrosomorpholine | | 1 | x | | 59-89-2 |
| N-Nitrosornicotine | | | x | | 16543-55-8 |
| N-Nitrosopiperidine | | 10 | x | U179 | 100-75-4 |
| N-Nitrosopyrrolidine | | 1 | | U180 | 930-55-2 |
| Naled | | 10 | x | | 300-76-5 |
| Naphthalene | | 100 | x | U165 | 91-20-3 |
| Naphthenic acid | | 100 | | | 1338-24-5 |
| Nickel | | 100 | x | | 7440-02-0 |
| Nickel ammonium sulfate | | 100 | | | 15699-18-0 |

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|--------------------------------------|--|---|----------------------------------|---|------------|
| Nickel carbonyl | 1 | 10 | | P073 | 13463-39-3 |
| Nickel chloride | | 100 | | | 37211-05-5 |
| Nickel chloride | | 100 | | | 7718-54-9 |
| Nickel cyanide | | 10 | | P074 | 557-19-7 |
| Nickel hydroxide | | 10 | | | 12054-48-7 |
| Nickel nitrate | | 100 | | | 14216-75-2 |
| Nickel sulfate | | 100 | | | 7786-81-4 |
| Nicotine | 100 | 100 | | P075 | 54-11-5 |
| Nicotine sulfate | 100/10,000 | 100 | | | 65-30-5 |
| Nitric acid | 1,000 | 1,000 | x | | 7697-37-2 |
| Nitric oxide | 100 | 10 | | P076 | 10102-43-9 |
| Nitrilotriacetic acid | | | x | | 139-13-9 |
| Nitrobenzene | 10,000 | 1,000 | x | U169 | 98-95-3 |
| Nitrocyclohexane | 500 | | | | 1122-60-7 |
| Nitrofen | | | x | | 1836-75-5 |
| Nitrogen dioxide | 100 | 10 | | P078 | 10102-44-0 |
| Nitrogen dioxide | | 10 | | | 10544-72-6 |
| Nitroglycerine | | 10 | x | P081 | 55-63-0 |
| Nitrophenol (mixed isomers) | | 100 | | | 25154-55-6 |
| Nitrosodimethylamine | 1,000 | 10 | x | P082 | 62-75-9 |
| Nitrotoluene | | 1,000 | | | 1321-12-6 |
| Norbormide | 100/10,000 | 100 | | | 991-42-4 |
| O,O-Diethyl S-methyl dithiophosphate | | 5,000 | | U087 | 3288-58-2 |
| o-Anisidine | | 100 | x | | 90-04-0 |
| o-Anisidine hydrochloride | | | x | | 134-29-2 |

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|----------------------------------|--|---|----------------------------------|---|------------|
| o-Cresol | 1,000/10,000 | 100 | x | U052 | 95-48-7 |
| o-Dinitrobenzene | | 100 | x | | 528-29-0 |
| o-Nitrotoluene | | 1,000 | | | 88-72-2 |
| o-Toluidine | | 100 | x | U328 | 95-53-4 |
| o-Toluidine hydrochloride | | 100 | x | U222 | 636-21-5 |
| Octachloronaphthalene | | | x | | 2234-13-1 |
| Osmium tetroxide | | 1,000 | x | P087 | 20816-12-0 |
| Ouabain | 100/10,000 | | | | 630-60-4 |
| Oxamyl | 100/10,000 | 1* | | P194 | 23135-22-0 |
| Oxetane, 3,3- bis(chloromethyl)- | 500 | | | | 78-71-7 |
| Oxydisulfoton | 500 | | | | 2497-07-6 |
| Ozone | 100 | | x | | 10028-15-6 |
| p-Anisidine | | | x | | 104-94-9 |
| p-Benzoquinone | | 10 | x | U197 | 106-51-4 |
| p-Cresidine | | | x | | 120-71-8 |
| p-Cresol | | 100 | x | U052 | 106-44-5 |
| p-Dinitrobenzene | | 100 | x | | 100-25-4 |
| p-Nitrophenol | | 100 | x | U170 | 100-02-7 |
| p-Nitrosodiphenylamine | | | x | | 156-10-5 |
| p-Nitrotoluene | | 1,000 | | | 99-99-0 |
| p-Phenylenediamine | | 5,000 | x | | 106-50-3 |
| Paraformaldehyde | | 1,000 | | | 30525-89-4 |
| Paraldehyde | | 1,000 | x | U182 | 123-63-7 |
| Paraquat dichloride | 10/10,000 | | | | 1910-42-5 |
| Paraquat methosulfate | 10/10,000 | | | | 2074-50-2 |

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|--|--|---|----------------------------------|---|------------|
| Parathion | 100 | 10 | x | P089 | 56-38-2 |
| Parathion, methyl | 100/10,000 | 100 | x | P071 | 298-00-0 |
| Paris green (Cuprie acetoarsenite) | 500/10,000 | 1 | | | 12002-03-8 |
| Pentaborane | 500 | | | | 19624-22-7 |
| Pentachlorobenzene | | 10 | | U183 | 608-93-5 |
| Pentachloroethane | | 10 | x | U184 | 76-01-7 |
| Pentachloronitrobenzene | | 100 | x | U185 | 82-68-8 |
| Pentachlorophenol | | 10 | x | | 87-86-5 |
| Pentadecyclamine | 100/10,000 | | | | 2570-26-5 |
| Peracetic acid | 500 | | x | | 79-121-0 |
| Phenanthrene | | 5,000 | x | | 85-01-8 |
| Phenol | 500/10,000 | 1,000 | x | U188 | 108-95-2 |
| Phenol, 2,2'-thiobis [4-chloro-6-methyl | 100/10,000 | | | | 4418-66-0 |
| Phenol, 3-(1-methylethyl), methylcarbamate | 500/10,000 | 1* | | P202 | 64-00-6 |
| Phenoxarsine, 10,10'-oxydi- | 500/10,000 | | | | 58-36-6 |
| Phenyl dichloroarsine | 500 | 1 | | P036 | 696-28-6 |
| Phenylhydrazine hydrochloride | 1,000/10,000 | | | | 59-88-1 |
| Phenylmercury acetate | 500/10,000 | 100 | | P092 | 62-38-4 |
| Phenylsilatrane | 100/10,000 | | | | 2097-19-0 |
| Phenylthiourea | 100/10,000 | 100 | | P093 | 103-85-5 |
| Phorate | 10 | 10 | | P094 | 298-02-2 |
| Phosacetim | 100/10,000 | | | | 4104-14-7 |
| Phosfolan | 100/10,000 | | | | 947-02-4 |
| Phosgene | 10 | 10 | x | P095 | 75-44-5 |
| Phosmet | 10/10,000 | | | | 732-11-6 |

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Appendix A: Consolidated List of Hazardous Substances and Reportable Quantities Under CERCLA and EPCRA

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| Chemical Name | Extremely Hazardous Substances 40 CFR 355 (TPQ, lbs.) | Hazardous Substances 40 CFR 302.4 (RQ, lbs.) | Toxic Chemicals 40 CFR 372.65(a) | Hazardous Materials which are RCRA wastes | CAS No. |
|--|--|---|----------------------------------|---|------------|
| Phosphamidon | 100 | | | | 13171-21-6 |
| Phosphine | 500 | 100 | x | P096 | 7803-51-2 |
| Phosphonothioic acid, methyl-, O-(4-nitrophenyl) O-phenyl ester | 500 | | | | 2665-30-7 |
| Phosphonothioic acid, methyl-, O-ethyl O-(4-(methylthio)phenyl ester | 500 | | | | 2703-13-1 |
| Phosphonothioic acid, methyl-, S-(2-(bis(1-methylethyl)amino)ethyl O-ethyl ester | 100 | | | | 50782-69-9 |
| Phosphoric acid | | 5,000 | x | | 7664-38-2 |
| Phosphoric acid, dimethyl 4-(methylthio)phenyl ester | 500 | | | | 3254-63-5 |
| Phosphorothioic acid, O,O-diethyl, O-pyrazinyl ester | 500 | 100 | | P040 | 297-97-2 |
| Phosphorothioic acid, O,O-dimethyl-S-(2-methylthio)ethyl est | 500 | | | | 2587-90-8 |
| Phosphorus | 100 | 1 | x | | 7723-14-0 |
| Phosphorus oxychloride | 500 | 1,000 | | | 10025-87-3 |
| Phosphorus pentachloride | 500 | | | | 10026-13-8 |
| Phosphorus pentasulfide | | 100 | | U189 | 1314-80-3 |
| Phosphorus trichloride | 1,000 | 1,000 | | | 7719-12-2 |
| Physostigmine | 100/10,000 | 1* | | P204 | 57-47-6 |
| Physostigmine, salicylate (1:1) | 100/10,000 | 1* | | P188 | 57-64-7 |
| Picric acid | | | x | | 88-89-1 |
| Picrotoxin | 500/10,000 | | | | 124-87-8 |
| Piperidine | 1,000 | | | | 110-89-4 |
| Pirimifos-ethyl | 1,000 | | | | 23505-41-1 |
| Polychlorinated biphenyls | | 1 | x | | 1336-36-3 |
| Potassium arsenate | | 1 | | | 7784-41-0 |

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|---|--|---|----------------------------------|---|------------|
| Potassium arsenite | 500/10,000 | 1 | | | 10124-50-2 |
| Potassium bichromate | | 10 | | | 7778-50-9 |
| Potassium chromate | | 10 | | | 7789-00-6 |
| Potassium cyanide | 100 | 10 | | P098 | 151-50-8 |
| Potassium hydroxide | | 1,000 | | | 1310-58-3 |
| Potassium N-methyldithiocarbamate | | | x | | 137-41-7 |
| Potassium permanganate | | 100 | | | 7722-64-7 |
| Potassium silver cyanide | 500 | 1 | | P099 | 506-61-6 |
| Promecarb | 500/10,000 | 1* | | P201 | 2631-37-0 |
| Pronamide | | 5,000 | x | U192 | 23950-58-5 |
| Propargite | | 10 | x | | 2312-35-8 |
| Propargyl alcohol | | 1,000 | x | P102 | 107-19-7 |
| Propargyl bromide | 10 | | | | 106-96-7 |
| Propham | | 1* | | U373 | 122-42-9 |
| Propiolactone, beta- | 500 | 10 | x | | 57-57-8 |
| Propionaldehyde | | 1,000 | x | | 123-38-6 |
| Propionic acid | | 5,000 | | | 79-09-4 |
| Propionic acid, 2-(2,4,5-trichlorophenoxy)- | | 100 | | | 93-72-1 |
| Propionic anhydride | | 5,000 | | | 123-62-6 |
| Propionitrile | 500 | 10 | | P101 | 107-12-0 |
| Propionitrile, 3-chloro- | 1,000 | 1,000 | x | P027 | 542-76-7 |
| Propiophenone, 4'-amino- | 100/10,000 | | | | 70-69-9 |
| Propoxur | | 100 | x | U411 | 114-26-1 |
| Propyl chloroformate | 500 | | | | 109-61-5 |
| Propylene (Propene) | | | x | | 115-07-1 |

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| Chemical Name | Extremely Hazardous Substances 40 CFR 355 (TPQ, lbs.) | Hazardous Substances 40 CFR 302.4 (RQ, lbs.) | Toxic Chemicals 40 CFR 372.65(a) | Hazardous Materials which are RCRA wastes | CAS No. |
|-----------------------------|--|---|----------------------------------|---|------------|
| Propylene oxide | 10,000 | 100 | x | | 75-56-9 |
| Propyleneimine | 10,000 | 1 | x | P067 | 75-55-8 |
| Prothoate | 100/10,000 | | | | 2275-18-5 |
| Pyrene | 1,000/10,000 | 5,000 | | | 129-00-0 |
| Pyrethrins | | 1 | | | 121-21-1 |
| Pyrethrins | | 1 | | | 121-29-9 |
| Pyrethrins | | 1 | | | 8003-34-7 |
| Pyridine | | 1,000 | x | U196 | 110-86-1 |
| Pyridine, 2-methyl-5-vinyl- | 500 | | | | 140-76-1 |
| Pyridine, 4-amino- | 500/10,000 | 1,000 | | P008 | 504-24-5 |
| Pyridine, 4-nitro-1-oxide | 500/10,000 | | | | 1124-33-0 |
| Pyriminil | 100/10,000 | | | | 53558-25-1 |
| Quinoline | | 5,000 | x | | 91-22-5 |
| Reserpine | | 5,000 | | U200 | 50-55-5 |
| Salcomine | 500/10,000 | | | | 14167-18-1 |
| Sarin | 10 | | | | 107-44-8 |
| sec-Amyl acetate | | 5,000 | | | 626-38-0 |
| sec-Butyl acetate | | 5,000 | | | 105-46-4 |
| sec-Butyl alcohol | | | x | | 78-92-2 |
| sec-Butylamine | | 1,000 | | | 13952-84-6 |
| sec-Butylamine | | 1,000 | | | 513-49-5 |
| Selenious acid | 1,000/10,000 | 10 | | U204 | 7783-00-8 |
| Selenium | | 100 | x | | 7782-49-2 |
| Selenium dioxide | | 10 | | | 7446-08-4 |
| Selenium oxychloride | 500 | | | | 7791-23-3 |

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| Chemical Name | Extremely Hazardous Substances 40 CFR 355 (TPQ, lbs.) | Hazardous Substances 40 CFR 302.4 (RQ, lbs.) | Toxic Chemicals 40 CFR 372.65(a) | Hazardous Materials which are RCRA wastes | CAS No. |
|--|--|---|----------------------------------|---|------------|
| Selenium sulfide | | 10 | | U205 | 7488-56-4 |
| Selenourea | | 1,000 | | P103 | 630-10-4 |
| Semicarbazide hydrochloride | 1,000/10,000 | | | | 563-41-7 |
| Silane, (4-aminobutyl) diethoxymethyl- | 1,000 | | | | 3037-72-7 |
| Silver | | 1,000 | x | | 7440-22-4 |
| Silver cyanide | | 1 | | P104 | 506-64-9 |
| Silver nitrate | | 1 | | | 7761-88-8 |
| Simazine | | | x | | 122-34-9 |
| Sodium | | 10 | | | 7440-23-5 |
| Sodium arsenate | 1,000/10,000 | 1 | | | 7631-89-2 |
| Sodium arsenite | 500/10,000 | 1 | | | 7784-46-5 |
| Sodium azide (Na(N ³)) | 500 | 1,000 | x | P105 | 26628-22-8 |
| Sodium bichromate | | 10 | | | 10588-01-9 |
| Sodium bifluoride | | 100 | | | 1333-83-1 |
| Sodium bisulfite | | 5,000 | | | 7631-90-5 |
| Sodium cacodylate | 100/10,000 | | | | 124-65-2 |
| Sodium chromate | | 10 | | | 7775-11-3 |
| Sodium cyanide (Na(CN)) | 100 | 10 | | P106 | 143-33-9 |
| Sodium dodecylbenzene sulfonate | | 1,000 | | | 25155-30-0 |
| Sodium fluoride | | 1,000 | | | 7681-49-4 |
| Sodium fluoroacetate | 10/10,000 | 10 | x | P058 | 62-74-8 |
| Sodium hydrosulfide | | 5,000 | | | 16721-80-5 |
| Sodium hydroxide | | 1,000 | | | 1310-73-2 |
| Sodium hypochlorite | | 100 | | | 10022-70-5 |
| Sodium hypochlorite | | 100 | | | 7681-52-9 |

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|---------------------------------|---|--|--|--|------------|
| Sodium methylate | | 1,000 | | | 124-41-4 |
| Sodium nitrite | | 100 | x | | 7632-00-0 |
| Sodium pentachlorophenate | | | x | | 131-52-2 |
| Sodium phosphate, dibasic | | 5,000 | | | 10039-32-4 |
| Sodium phosphate, dibasic | | 5,000 | | | 10140-65-5 |
| Sodium phosphate, dibasic | | 5,000 | | | 7558-79-4 |
| Sodium phosphate, tribasic | | 5,000 | | | 10101-89-0 |
| Sodium phosphate, tribasic | | 5,000 | | | 10124-56-8 |
| Sodium phosphate, tribasic | | 5,000 | | | 10361-89-4 |
| Sodium phosphate, tribasic | | 5,000 | | | 7601-54-9 |
| Sodium phosphate, tribasic | | 5,000 | | | 7758-29-4 |
| Sodium phosphate, tribasic | | 5,000 | | | 7785-84-4 |
| Sodium selenate | 100/10,000 | 100 | | | 13410-01-0 |
| Sodium selenite | 100/10,000 | 100 | | | 10102-18-8 |
| Sodium selenite | | 100 | | | 7782-82-3 |
| Sodium tellurite | 500/10,000 | | | | 10102-20-2 |
| Strannane, acetoxy-triphenyl- | 500/10,000 | | | | 900-95-8 |
| Strontium chromate | | 10 | | | 7789-06-2 |
| Strychnine | 100/10,000 | 10 | | P108 | 57-24-9 |
| Strychnine, sulfate | 100/10,000 | 10 | | | 60-41-3 |
| Styrene | | 1,000 | x | | 100-42-5 |
| Styrene oxide | | 100 | x | | 96-09-3 |
| Sulfotep | 500 | 100 | | P109 | 3689-24-5 |
| Sulfoxide, 3-chloropropyl octyl | 500 | | | | 3569-57-1 |
| Sulfur dioxide | 500 | | | | 7446-09-5 |

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|------------------------------------|--|---|----------------------------------|---|------------|
| Sulfur monochloride | | 1,000 | | | 12771-08-3 |
| Sulfur tetrafluoride | 100 | | | | 7783-60-0 |
| Sulfur trioxide | 100 | | | | 7446-11-9 |
| Sulfuric acid | 1,000 | 1,000 | | | 7664-93-9 |
| Sulfuric acid (aerosol forms only) | 1,000 | 1,000 | x | | 7664-93-9 |
| Sulfuric acid (fuming) | | 1,000 | | | 8014-95-7 |
| Tabun | 10 | | | | 77-81-6 |
| Tellurium hexafluoride | 100 | | | | 7783-80-4 |
| Terbufos | 100 | | | | 13071-79-9 |
| tert-Amyl acetate | | 5,000 | | | 625-16-1 |
| tert-Butyl acetate | | 5,000 | | | 540-88-5 |
| tert-Butyl alcohol | | | x | | 75-65-0 |
| tert-Butylamine | | 1,000 | | | 75-64-9 |
| Tetrachloroethylene | | 100 | x | U210 | 127-18-4 |
| Tetrachlorvinphos | | | x | | 961-11-5 |
| Tetraethyl lead | 100 | 10 | | P110 | 78-00-2 |
| Tetraethyl pyrophosphate | 500 | 100 | | P111 | 107-49-3 |
| Tetraethyl tin | 100 | | | | 597-64-8 |
| Tetramethyl lead | 100 | | | | 75-74-1 |
| Tetranitromethane | 500 | 10 | | P112 | 509-14-8 |
| Thallic oxide | | 100 | | P113 | 1314-32-5 |
| Thallium | | 1,000 | x | | 7440-28-0 |
| Thallium (I) carbonate | 100/10,000 | 100 | | U215 | 6533-73-9 |
| Thallium (I) sulfate | 100/10,000 | 100 | | | 10031-59-1 |
| Thallium (I) nitrate | | 100 | | U217 | 10102-45-1 |

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|------------------------------|--|---|----------------------------------|---|------------|
| Thallium (I) selenide | | 1,000 | | P114 | 12039-52-0 |
| Thallous chloride | 100/10,000 | 100 | | U216 | 2,151,976 |
| Thallous malonate | 100/10,000 | | | | 2757-18-8 |
| Thallous sulfate | 100/10,000 | 100 | | P115 | 7446-18-6 |
| Thiocarbazine | 1,000/10,000 | | | | 2231-57-4 |
| Thiodicarb | | 1* | x | U410 | 59669-26-0 |
| Thiofanox | 100/10,000 | 100 | | P045 | 39196-18-4 |
| Thiophanate-methyl | | 1* | x | U409 | 23564-05-8 |
| Thiophenol | 500 | 100 | | P014 | 108-98-5 |
| Thiosemicarbazide | 100/10,000 | 100 | x | P116 | 79-19-6 |
| Thiourea | | 10 | x | U219 | 62-56-6 |
| Thiourea, (2-chlorophenyl)- | 100/10,000 | 100 | | P026 | 5344-82-1 |
| Thiourea, (2- methylphenyl)- | 500/10,000 | | | | 614-78-8 |
| Thiram | | 10 | x | U244 | 137-26-8 |
| Thorium dioxide | | | x | | 1314-20-1 |
| Titanium dioxide | | | x | | 13463-67-7 |
| Titanium tetrachloride | 100 | 1,000 | x | | 7550-45-0 |
| Toluene 2,4-diisocyanate | 500 | 100 | x | | 584-84-9 |
| Toluene 2,6-diisocyanate | 100 | 100 | x | | 91-08-7 |
| Toxaphene (Campheclor) | 500/10,000 | 1 | x | P123 | 8001-35-2 |
| Trans-1,4-dichlorobutene | 500 | | x | | 110-57-6 |
| Triallate | | 1* | x | U389 | 2303-17-5 |
| Triamiphos | 500/10,000 | | | | 1031-47-6 |
| Triaziquone | | | x | | 68-76-8 |
| Triazofos | 500 | | | | 24017-47-8 |

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|--|--|---|----------------------------------|---|------------|
| Trichlorfon | | 100 | x | | 52-68-6 |
| Trichloroacetyl chloride | 500 | | x | | 76-02-8 |
| Trichloro(chloromethyl) silane | 100 | | | | 1558-25-4 |
| Trichloro(dichlorophenyl) silane | 500 | | | | 27137-85-5 |
| Trichloroethylene | | 100 | x | U228 | 79-01-6 |
| Trichloroethylsilane | 500 | | | | 115-21-9 |
| Trichlorofluoromethane (CFC-11) | | 5,000 | x | U121 | 75-69-4 |
| Trichloronate | 500 | | | | 327-98-0 |
| Trichlorophenol | | 10 | | | 25167-82-2 |
| Trichlorophenylsilane | 500 | | | | 98-13-5 |
| Triethanolamine dodecylbenzene sulfonate | | 1,000 | | | 27323-41-7 |
| Triethoxysilane | 500 | | | | 998-30-1 |
| Triethylamine | | 5,000 | x | U404 | 121-44-8 |
| Trifluralin | | 10 | x | | 1582-09-8 |
| Trimethylamine | | 100 | | | 75-50-3 |
| Trimethylchlorosilane | 1,000 | | x | | 75-77-4 |
| Trimethylolpropane phosphite | 100/10,000 | | | | 824-11-3 |
| Trimethyltin chloride | 500/10,000 | | | | 1066-45-1 |
| Triphenyltin chloride | 500/10,000 | | | | 639-58-7 |
| Tris(2-chloroethyl) amine | 100 | | | | 555-77-1 |
| Trypan blue | | 10 | x | U236 | 72-57-1 |
| Uracil mustard | | 10 | | U237 | 66-75-1 |
| Uranyl acetate | | 100 | | | 541-09-3 |
| Uranyl nitrate | | 100 | | | 10102-06-4 |
| Uranyl nitrate | | 100 | | | 36478-76-9 |

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|---|--|---|----------------------------------|---|------------|
| Valinomycin | 1,000/10,000 | | | | 2001-95-8 |
| Vanadium (fume or dust) | | | x | | 7440-62-2 |
| Vanadium pentoxide | 100/10,000 | 1,000 | | P120 | 1314-62-1 |
| Vanadyl sulfate | | 1,000 | | | 27774-13-6 |
| Vinyl acetate | 1,000 | 5,000 | x | | 108-05-4 |
| Vinyl bromide | | 100 | x | | 593-60-2 |
| Warfarin | 500/10,000 | 100 | x | P001 | 81-81-2 |
| Warfarin and salts, conc. > 0.3% | | 100 | x | P001 | 81-81-2 |
| Warfarin sodium | 100/10,000 | 100 | | | 129-06-6 |
| Xylenol | | 1,000 | | | 1300-71-6 |
| Xylylene dichloride | 100/10,000 | | | | 28347-13-9 |
| Zinc | | 1,000 | | | 7440-66-6 |
| Zinc (fume or dust) | | 1,000 | x | | 7440-66-6 |
| Zinc acetate | | 1,000 | | | 557-34-6 |
| Zinc ammonium chloride | | 1,000 | | | 52628-25-8 |
| Zinc ammonium chloride | | 1,000 | | | 14639-97-5 |
| Zinc ammonium chloride | | 1,000 | | | 14639-98-6 |
| Zinc borate | | 1,000 | | | 1332-07-6 |
| Zinc bromide | | 1,000 | | | 7699-45-8 |
| Zinc carbonate | | 1,000 | | | 3486-35-9 |
| Zinc chloride | | 1,000 | | | 7646-85-7 |
| Zinc cyanide | | 10 | | P121 | 557-21-1 |
| Zinc, dichloro(4,4-dimethyl-5(((methylamino)carbonyl)oxy)imino)pentanenitrile)-, (T-4)- | 100/10,000 | | | | 58270-08-9 |
| Zinc fluoride | | 1,000 | | | 7783-49-5 |

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|------------------------------|--|---|----------------------------------|---|------------|
| Zinc formate | | 1,000 | | | 557-41-5 |
| Zinc hydrosulfite | | 1,000 | | | 7779-86-4 |
| Zinc nitrate | | 1,000 | | | 7779-88-6 |
| Zinc phenolsulfonate | | 5,000 | | | 127-82-2 |
| Zinc phosphide | 500 | 100 | | P122 | 1314-84-7 |
| Zinc silicofluoride | | 5,000 | | | 16871-71-9 |
| Zinc sulfate | | 1,000 | | | 7733-02-0 |
| Zineb | | | x | | 12122-67-7 |
| Ziram | | 1* | | P205 | 137-30-4 |
| Zirconium nitrate | | 5,000 | | | 13746-89-9 |
| Zirconium potassium fluoride | | 1,000 | | | 16923-95-8 |
| Zirconium sulfate | | 5,000 | | | 14644-61-2 |
| Zirconium tetrachloride | | 5,000 | | | 10026-11-6 |