



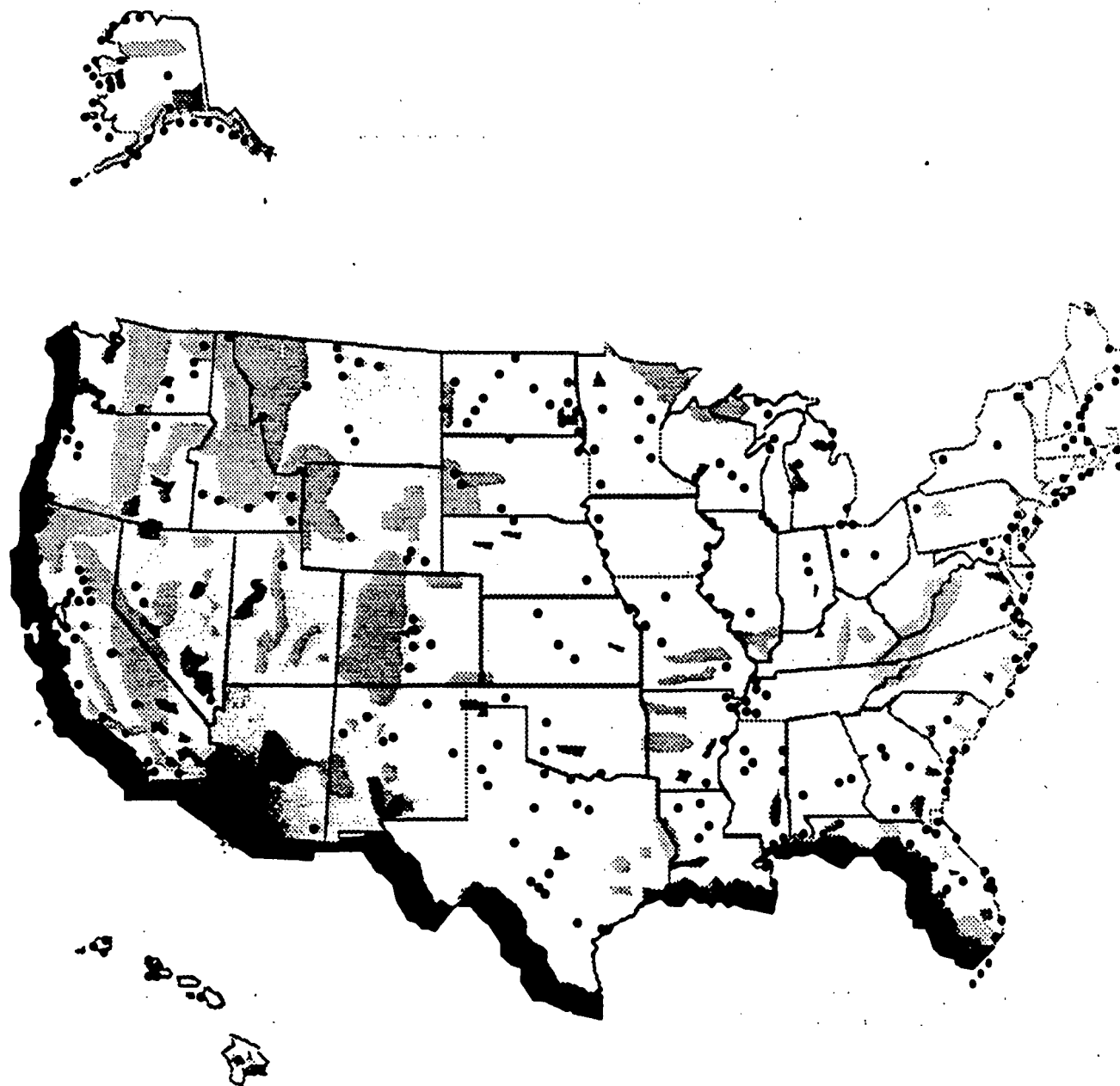
United States
Environmental Protection
Agency

Office of
Federal Activities
Washington, D.C.

EPA/130/9-90/001
February 1990

SUMMARY REPORT OF FEDERAL AGENCY TITLE III PROGRAMS

INTERIM FINAL REPORT



Summary Report of Federal Agency Title III Programs

Interim Final Report

Office of Federal Activities
U.S. Environmental Protection Agency

February 1990

Acknowledgement

This document was developed by EPA's Office of Federal Activities (OFA) with assistance provided by Booz-Allen and Hamilton Inc. in partial fulfillment of Contract No. 68-W8-0097. Kathleen A. Hutson served as EPA Project Manager, with assistance from the EPA Federal Facilities Title III Workgroup. The Booz Allen project team included Amelia Heffernan, Gabriele Loebbert and Ted Yoder.

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SUMMARY REPORT OF FEDERAL AGENCY TITLE III PROGRAMS

INTRODUCTION

This report summarizes Federal agency activities regarding compliance with the Emergency Planning and Community Right-to-Know Act of 1986 (also referred to as Title III of the Superfund Amendments and Reauthorization Act). Title III encourages and supports emergency planning efforts at the State and local level and provides residents and local governments with information concerning potential chemical hazards present in their communities. Although Federal agencies are not legally obligated to comply with Title III, it is EPA's goal to encourage Federal agency voluntary compliance with the emergency planning and notification requirements so that all citizens can benefit from full implementation of this statute.

In an effort to achieve this goal, EPA formed a workgroup to develop and examine various options to encourage voluntary compliance. Following a review of several options, the workgroup developed a letter and questionnaire from the EPA Administrator to the heads of Federal agencies strongly encouraging voluntary compliance with Title III and requesting information on the current status of each agency's Title III program, policies and guidance. The information presented in this report was obtained through the letter and questionnaire which was issued on September 30, 1988. EPA intends to use this information to provide Federal agencies with technical assistance necessary to develop voluntary Title III programs, enhance already established programs, help identify the universe of Federal installations that would be affected by Title III were they private installations and possibly develop guidance for Federal agencies concerning various aspects of Title III.

BACKGROUND

Title III of SARA establishes requirements for Federal, State and local governments and industry regarding emergency planning and "community right-to-know" reporting on hazardous and toxic chemicals. This legislation was enacted on October 17, 1986, to ensure proper response to incidents similar to the release of methyl isocyanate in Bhopal, India in 1985. Title III builds upon EPA's Chemical Emergency Preparedness Program (CEPP) and numerous State and local programs aimed at helping communities to better prepare for potential chemical emergencies.

The Title III provisions, which are described in the Findings section to this report, consist of four major sections: emergency planning (Sections 301-303), emergency release notification (Section 304), community right-to-know reporting requirements (Sections 311-312) and toxic chemical release reporting emissions inventory (Section 313). These provisions will help increase public knowledge and access to information on the presence of

hazardous chemicals in their communities and releases into the environment. States and communities, working with facilities, will improve safety and protection of public health and the environment through compliance with Title III.

Federal agencies are not legally obligated to comply with Title III requirements, as Federal agencies are not included in the definition of "person" contained in section 329(7) of the Statute.¹ However, EPA is encouraging Federal agency voluntary compliance and has urged Federal facilities to comply with all Title III reporting requirements. EPA believes it is the responsibility of all sectors of society, including Federal agencies, to work together to prevent, prepare for and respond to potential chemical hazards. Only through this "cooperative spirit" can the goal of protecting the health and safety of all citizens be achieved.

Consistence with its goal to encourage and achieve full Federal facility compliance, EPA issued Order 1480.1 on March 13, 1989, which addressed EPA compliance with each of the Title III provisions. This order was issued to all agency Assistant Administrators and Regional Administrators, and directed all EPA facilities to comply with applicable Title III regulations despite the statutory exclusion for Federal agencies in the definition of "person." EPA facilities were instructed to review the regulations, determine and comply with all reporting requirements, and develop and implement a system to monitor compliance. A copy of this order is provided in Appendix A to this report.

Another accomplishment toward the goal of voluntarily compliance is the Memorandum of Understanding (MOU) between the National Institute of Standards and Technology (NIST) and the Montgomery County, Maryland Emergency Planning Council. This MOU is the first such agreement to be entered into by a Federal agency. The voluntary agreement was executed to ensure the best possible coordination between county emergency facilities and NIST in the event of an environmental emergency and to promote the availability of accurate information to all county residents during normal NIST operation or during an emergency situation involving the institute. A copy of the MOU is provided in Appendix B.

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It is important to note that contract operators of government-owned contractor-operated (GOCO) facilities are subject to Title III to the same extent as any other operator. GOCOs, therefore, are statutorily required to comply with the full range of Title III planning, notification and reporting requirements.

FINDINGS

The EPA Administrator's letter to the Federal agencies urging voluntary compliance included a request for specific information relevant to determining the universe of facilities potentially affected by Title III requirements. A copy of the Administrator's letter is provided in Appendix C along with Enclosure 3 of this letter which includes the specific questions directed to each Federal agency.

EPA requested information from a total of 28 Federal agencies including EPA. A list of these agencies is provided in Exhibit 1. Of the 28 agencies, 21 are conducting Title III activities, 5 have determined that their facilities are not affected by Title III, and 2 have not provided responses. Each agency based their decision of applicability on an evaluation of the quantities or activities associated with any hazardous substances that may be used on their facilities. Regardless of whether the agency will comply or not, all Federal agencies support the concept of voluntary compliance and will work to promote the "cooperative spirit" of Title III.

Many of the Federal agencies have already issued policies and procedures concerning compliance with the planning, notification and reporting requirements of Title III. Specifically, 13 agencies have issued a directive or some form of guidance. Seven of these agencies, the U.S. Departments of Agriculture (USDA), Energy (DOE), Defense (DOD) and Transportation, EPA, National Aeronautics and Space Administration (NASA) and the Tennessee Valley Authority (TVA) have well-established Title III programs. For example, USDA and NASA notified their facilities as early as January 1987 of responsibilities under Title III, and DOD issued a policy directive in July 1987 which was designed to provide substantive compliance with Title III, by building on existing emergency response plans and activities. These agencies have also conducted inventories of hazardous substances on their facilities and notified appropriate State and local planning authorities.

Provided below is a description of the various Title III requirements along with a summary of the overall findings by section. Exhibit 2 provides a summary table of the Federal agencies' responses. A separate program description sheet for each of the 21 agencies that are conducting Title III activities can be found in Appendix D. It is important to note that the findings in this report are based entirely on the responses received from each Federal agency. In some cases, agencies may not have provided specific information requested in the questionnaire. This lack of information, therefore, may not accurately reflect their ongoing Title III activities.

EXHIBIT 1

LIST OF FEDERAL AGENCIES

Federal Agencies That Are Conducting Title III Activities

Department of Agriculture (USDA)
Central Intelligence Agency (CIA)
Department of Defense (DOD)
 Defense Logistics Agency (DLA)
 Department of the Air Force
 Department of the Army
 Department of the Navy
Department of Energy (DOE)
Environmental Protection Agency (EPA)
General Services Administration (GSA)
Department of Health and Human Services (HHS)
Department of the Interior (DOI)
Department of Justice (DOJ)
Department of Labor (DOL)
National Aeronautics and Space Administration (NASA)
National Science Foundation (NSF)
U.S. Postal Service
Smithsonian Institution
Department of Transportation (DOT)
Tennessee Valley Authority (TVA)
Department of the Treasury
Department of Veterans Affairs (VA)

Federal Agencies That Have Determined That Their Facilities Are Not Affected By Title III

Department of Commerce
Federal Emergency Management Agency
Department of Housing and Urban Development
National Archives and Records Administration
Nuclear Regulatory Commission

Federal Agencies that Have Not Responded

Department of Education
Department of the State

EXHIBIT 2

SUMMARY OF FEDERAL AGENCY RESPONSES BY TITLE III SECTION

AGENCY	Issued Policies or Guidances	Sections 301-303						Section 304	Section 311-312		Section 313		
		Directed Facilities to Determine TPOs	Conducted Inventories of Hazardous Substances	Meet or Exceed TPOs	Notified LEPCs of TPOs	Directed Facilities to Designate Facility Coord.	Contacted LEPC and/or Designated Facility Coordinator	Directed Facilities to Report Releases	Directed Facilities to Provide List or MSDSs	Facilities Have Submitted List/ MSDSs	Exceed Manufacturing, Importing and Processing Thresholds	Exceed 10,000 Pound Use Threshold	Toxic Chem. Release Forms Will Be Completed
Agriculture	●	●	●	●	●	●	●	●	●	●			
CIA		●	●				●	●				●	●
Defense													
• Air Force	●	●				●		●	●				
• Army	●	●				●		●					
• DLA	●	●	●	●		●	●	●					
• Navy	●	●				●		●					
Energy	●	●	●	●	●	●	●	●	●	●		●	●
EPA	●	●	●			●	●	●	●	●			
GSA	○												
HHS	●	●											
Interior	○	●	●	●				○	○				
Justice	○	●	●			○		○	○				
Labor	●					●			●				
NASA	●	●	●	●	●	●	●	●	●	●		●	●
NSF	○	●	●				●						
Postal Service	●	●				○		●	●				
Smithsonian	○	●	●				●	○	○				
TVA	●	●	●	●	●	●	●	●	●	●		●	●
Transportation	●	●	●	●	●	●	●	●	●				
Treasury	○						●						
VA	○					○		○					

Key: ● Federal agency reported that activity has occurred.
○ Federal agency reported that activity will occur.

Sections 301-303: Emergency Planning

The emergency planning sections are designed to develop State and local emergency response and preparedness capabilities through better coordination and planning, especially within the local community. The principal components of these sections include the:

- o Requirement for each governor to designate a State Emergency Response Commission (SERC)
- o Designation of local planning districts and local emergency planning committees (LEPCs) whose primary responsibilities are to develop emergency response plans
- o Requirement that any facility that has present any of the 366 Extremely Hazardous Substances in a quantity greater than the Threshold Planning Quantity (TPQ) is subject to the emergency planning requirements and, therefore, must notify the SERCs and LEPCs that they are subject to these requirements and designate a facility coordinator.

Of the 21 Federal agencies that are conducting Title III activities, 17 indicated that they will comply with the emergency planning requirements. In addition:

- o Seventeen agencies indicated they have directed their facilities to conduct an inventory of hazardous substances or to specifically determine whether TPQs of Extremely Hazardous Substances have been met or exceeded.
- o Of these 17 agencies, 12 agencies have initiated inventories, with 7 agencies (Agriculture, DLA, Energy, Interior, NASA, Transportation, and TVA) determining that 1 or more facilities meet or exceed the TPQs. Agriculture, Energy, NASA, Transportation, and TVA have notified the SERCs, LEPCs and fire departments of the TPQs.
- o Fourteen agencies indicated they have directed or will direct their facilities to designate a facility coordinator or to initiate contact with the State and local planning authorities. Eleven agencies specifically mentioned that facility coordinators have been designated or contact with planning authorities has been made.

Lists of Facility Coordinators are provided with the individual program description sheets in Appendix C.

Section 304: Emergency Notification

Facilities are required to immediately notify the appropriate LEPCs and SERCs if there is a release into the environment of a hazardous substance that exceeds the reportable quantity for that substance. The substances subject to this requirement are the 366 Extremely Hazardous Substances or the substances subject to the CERCLA emergency notification requirements. Notification can be made by telephone, radio or in person. A written follow-up emergency notice is also required.

Of the 21 Federal agencies that are conducting Title III activities, 16 have or will direct their facilities to comply with the emergency notification requirements. Another agency, the National Science Foundation, determined that Extremely Hazardous Substances are not present at their facilities and, therefore, has not directed facilities to provide notification. Four agencies did not provide specific information concerning compliance with Section 304. In several cases, the respondents expressed a concern for the need to preserve security interests while meeting the notification requirements.

Sections 311-312: Community Right-to-Know

There are two community right-to-know reporting requirements within Title III. Section 311 requires facilities that must prepare Material Safety Data Sheets (MSDSs) under the Occupational Safety and Health Administration (OSHA) regulations to submit either copies of MSDSs or a list of MSDS chemicals to the LEPC, SERC and local fire department. EPA has established threshold quantities for Section 311 below which no facility is required to report.

Section 312 requires a facility to submit an emergency and hazardous chemical inventory form to the LEPC, SERC and local fire department. Hazardous chemicals covered by Section 312 are those for which facilities are required to prepare or have available an MSDS under OSHA regulations and that were present at the facility at any time during the previous calendar above specified thresholds. The inventory form incorporates a "two-tier" approach. Under Tier I, facilities must submit specified information for various hazard categories. The SERC or LEPC also may request the facility to provide additional Tier II information which includes specific inventory information by chemical.

Twelve Federal agencies have directed or will direct their facilities to provide MSDSs or a list of MSDS chemicals to the LEPC or SERC. Of these 12 agencies, 5 have already done so. The Department of Agriculture has determined that it does not meet the reporting requirements of Section 311 and 312, but will provide lists and MSDSs to the LEPCs when requested, or when the need arises.

Section 313: Toxic Chemical Release Reporting

Section 313 requires EPA to establish an inventory of routine toxic chemical emissions from certain facilities. Facilities subject to this reporting requirement must complete a Toxic Chemical Release Form for specified chemicals.

The reporting requirement applies to owners and operators of facilities that have 10 or more full-time employees, that are in SIC codes 20 through 39 and that manufacture, process or otherwise use a listed toxic chemical in excess of specified threshold quantities. These thresholds are:

- o Facilities manufacturing or processing any of these chemicals in excess of:
 - 75,000 pounds in calendar year 1987
 - 50,000 pounds in calendar year 1988
 - 25,000 pounds in calendar year 1989 and thereafter.
- o Facilities otherwise using listed toxic chemicals in quantities over 10,000 pounds in calendar year 1987 and thereafter.

The forms must be submitted to EPA and the SERCs.

None of the Federal agencies indicated that they manufacture, import or process toxic chemicals above the 75,000 pound, 50,000 pound or 25,000 pound thresholds. However, four agencies (CIA, Energy, NASA and TVA) stated that facilities use these chemicals in excess of the 10,000 pound threshold, and all four indicated that they would complete Toxic Chemical Release Forms. In addition, the Department of Justice and the Postal Service have directed their facilities to complete the inventories if a determination is made that compliance is required. The Department of Defense, however, has determined that Section 313 is procedural in nature and therefore has not specifically directed its components to respond to these requirements.

CONCLUSION

The results of this report demonstrate that Federal agencies have taken the initiative to voluntarily comply with the Title III provisions. Furthermore, it appears that only a small number of Federal agencies are in the planning phase for Title III initiatives, whereas the majority have issued policy directives or guidelines and have progressed to the implementation phase.

In summary, a total of ten Federal agencies reported the number of facilities that are affected by SARA Title III provisions. These 10 agencies represent approximately 214 affected

facilities or installations. This number, however, is likely to increase as ongoing facility surveys are completed.

EPA intends to submit this interim final report to the Title III Workgroup members for review and comment, and to update the document to reflect recent Federal agency accomplishments. In addition, the Title III Workgroup will continue to develop and examine various options to further promote Federal agency compliance.

APPENDIX A

EPA ORDER ON TITLE III



TRANSMITTAL

Classification No.:

1480.1

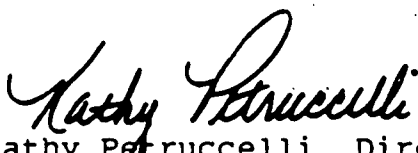
Approval Date:

March 13, 1989

Addressee

EPA ORDER - EMERGENCY PLANNING AND COMMUNITY
RIGHT-TO-KNOW COMPLIANCE WITH SARA TITLE III

1. PURPOSE. This Transmittal provides a new EPA Order 1480.1 -- Emergency Planning and Community Right-to-Know Compliance with SARA Title III.
2. EXPLANATION. This Order implements an Emergency Planning and Community Right-To-Know Program at EPA facilities.
3. FILING INSTRUCTIONS. File the attached material in a three-ring binder established for the Directives System.


Kathy Petruccelli, Director
Management and Organization Division

Originator

EPA Form 1315-12 (5-86)

Environmental Health and Safety Division, Office
of Administration and Resources Management

EPA **ORDER**

Classification No :

Approval Date: 1480.1
March 13, 1989

Emergency Planning and Community-Right-To-Know

Compliance with SARA Title III

1. PURPOSE. This Order implements an Emergency Planning and Community Right-To-Know Program at Environmental Protection Agency (EPA) facilities.

2. AUTHORITY. The Regulations promulgated in 40 CFR Parts 355-370 support the statutory requirements under the Superfund Amendments and Reauthorization Act (SARA) of 1986, Sections 302, 303, 304, 311, 312 and 313.

3. BACKGROUND. In 1986, the U.S. Congress passed the Emergency Planning and Community Right-To-Know Act (SARA Title III) to ensure that we would properly respond to incidents similar to the release the methlisocyanate in Bhopal, India in 1985. The Act mandates emergency planning efforts at the State and local level and provides residents and local governments with access to information concerning potential chemical hazards present in their communities.

Federal agencies are not required to implement the provisions of SARA Title III because the statutory definition of "person" in Section 329(7) does not include Federal agencies and the sovereign immunity of the United States government is not otherwise waived. However, the EPA believes that all sectors of society, including Federal agencies, must work collectively to identify potential chemical hazards and develop emergency response procedures to cooperatively protect the health and safety of our citizens. In support of the EPA interest, this Order implements the provisions of SARA Title III at EPA facilities.

4. SCOPE. This Order applies to all EPA facilities that use, store, dispose of, or release chemicals identified or listed under the Emergency Planning and Community Right-To-Know Act.

March 13, 1989

5. RESPONSIBILITIES.

a. Assistant Administrators and Regional Administrators are responsible for ensuring that the provisions of this Order are fully implemented at facilities under their control.

b. The Director of the Environmental Health and Safety Division is responsible for ensuring that technical assistance is provided as necessary to implement this Order.

6. IMPLEMENTATION. This Order shall be implemented consistent with the requirements of the regulations contained in 40 CFR Parts 355-370. Assistant Administrators and Regional Administrators shall develop and implement Emergency Planning and Community-Right-To-Know Programs at facilities under their control. The implementation programs should encompass:


a. reviewing the regulations;

b. determining reporting requirements and submitting the appropriate reports to the appropriate State and local authorities; and

c. developing and implementing a system to monitor compliance.

7. AMENDMENTS PROVISION. Changes in the law or the regulations concerning Emergency Planning and Community-Right-To-Know Programs which occur after the effective date of this Order will automatically come under the purview of this Order on the effective date of the change.

8. EFFECTIVE DATE. Implementation of this Order shall occur within sixty (60) days of the date that it is signed.


Charles L. Grizzle
Assistant Administrator

APPENDIX B

**MEMORANDUM OF UNDERSTANDING BETWEEN NATIONAL
INSTITUTE OF STANDARDS AND TECHNOLOGY AND
THE MONTGOMERY COUNTY EMERGENCY PLANNING COUNCIL**

MEMORANDUM OF UNDERSTANDING
BETWEEN
THE NATIONAL INSTITUTE OF STANDARDS AND TECHNOLOGY
AND
THE MONTGOMERY COUNTY LOCAL EMERGENCY PLANNING COUNCIL

PURPOSE

This Memorandum of Understanding is executed to ensure the best possible coordination between county emergency facilities and NIST in the event of an environmental emergency and to promote accurate information availability to all county residents during normal NIST operation or during an emergency situation involving NIST.

NIST RESPONSIBLE OFFICIALS

The Chief, Reactor Radiation Division, will be the NIST initiating official for all reportable radiological events involving the NIST reactor.

The Chief, Occupational Health and Safety Division, will be the NIST initiating official for all reportable events involving environmental release of hazardous materials other than those falling within the purview of the TR-5 Reactor License.

The NIST initiating official shall assume the responsibility for prompt notification of the Chief, Public Information Division (PID), whenever a reportable event occurs. The initiating official shall serve as an information resource to the PID or to county officials when requested by the Chief, PID.

EMERGENCY NOTIFICATION

The NIST Public Information Division shall promptly notify the Montgomery County Local Emergency Planning Council (LEPC) of any class of emergency declared at the NIST reactor as a result of an actual or projected release of radiological effluent at the NIST site boundary or as a result of a prolonged fire that threatens the reactor. Definitions of emergency classes and Nuclear Regulatory Commission notification time limits are given in the NBSR Emergency Plan.

The NIST PID shall promptly notify the Montgomery County LEPC whenever a regulatory reportable event occurs involving the release of chemical/hazardous materials into the environment and that may extend beyond the NIST site boundary.

For any NIST-site event not requiring a regulatory report, but in the professional judgment of the NIST initiating official could cause apprehension/alarm to the surrounding community, the initiating official shall communicate the circumstances of the event to PID with the recommendation that an informational report should be made to the Montgomery County LEPC.

INFORMATION AVAILABILITY

The NIST PID will make available to the Montgomery County LEPC, the NBSR Annual Report to the U. S. Nuclear Regulatory Commission and the NIST Radiation Safety Committee's Annual Report to the NIST Director. The NIST initiating officer will make available to PID any other formal NIST reports which, in their professional judgment, will assist LEPC in public awareness during an emergency situation.

Copies of NIST policy or procedure documents which relate to environmental protection are available from the Chief, Occupational Health and Safety Division. These documents will be available to county officials as requested in areas where joint county/NIST planning activities are ongoing.

The county may appoint an observer, with NIST approval, to the annual NIST Radiation Safety Committee meeting. The observer should be technically trained and knowledgeable in matters dealing with radiation safety.

Raymond G. Kammer
Acting Director, NIST

Ramon Granados
Director, LEPC

APPENDIX C

**EPA ADMINISTRATOR'S LETTER
TO FEDERAL AGENCIES**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

SEP 30 1986

THE ADMINISTRATOR

Honorable Frank C. Carlucci
Secretary
Department of Defense
3E880 The Pentagon
Washington, D.C. 20301

Dear Mr. Secretary:

The U.S. Environmental Protection Agency (EPA) has promulgated regulations to implement the Emergency Planning and Community Right-to-Know Act of 1986 (also referred to as Title III of the Superfund Amendments and Reauthorization Act). This statute, which provides an innovative new approach to environmental protection, encourages and supports emergency planning efforts at the State and local level and provides residents and local governments with information concerning potential chemical hazards present in their communities. Title III was enacted to ensure that we could properly respond to incidents similar to the release of methyl isocyanate in Bhopal, India in 1985.

The requirements of the Emergency Planning and Community Right-to-Know Act constitute a comprehensive mandate for emergency planning and an assurance that citizens have the information necessary to understand and assess chemical hazards in their communities. It is the responsibility of all sectors of society, including Federal agencies, to work together to prevent, prepare for and respond to potential chemical hazards. Only through this "cooperative spirit" can we achieve the goal of protecting the health and safety of all citizens.

Federal agencies are not legally obligated to comply with the requirements of Title III, as Federal agencies are not included in the statute's definition of "person" contained in section 329(7). However, EPA is encouraging your agency's voluntary compliance with the emergency planning and notification efforts that are underway and strongly urges your facilities to comply with all of the community right-to-know reporting requirements outlined in Enclosure 1. Although several of the statutory reporting deadlines have passed, it is important that Federal agencies attempt to fulfill all applicable requirements of the statute as soon as practicable. EPA is aware of several Federal agencies that have established or initiated programs to address implementation of Title III at their facilities. We commend these efforts and encourage all Federal agencies to pursue such action.

Every agency should be aware that contract operators of government-owned, contractor-operated (GOCO) facilities are subject to Title III to the same extent as any other operator and, therefore, are statutorily required to comply with the full range of planning, notification and reporting requirements of the Emergency Planning and Community Right-to-Know Act. Federal agencies that have GOCO facilities may wish to determine whether their contractors know of and are complying with all applicable provisions of Title III described in Enclosure 1.

EPA realizes that the disclosure of certain information relating to Federal facilities or activities may be prohibited under various statutes governing national security. However, facilities that withhold information because of national security concerns should, to the extent possible, provide other information to assist communities in planning for and responding to emergency situations. EPA is currently examining alternatives for reporting "classified" information concerning chemical hazards that will not compromise national security.

We strongly recommend that all Federal agencies develop internal policies to address all the major provisions of Title III, in particular the facility requirements under:

- ° Sections 301 - 303: Report the presence of extremely hazardous substances in excess of the Threshold Planning Quantities (TPQ) to the applicable State emergency response commission (SERC) and local emergency planning committee (LEPC).
- ° Section 304: Provide emergency release notification for extremely hazardous substances and all CERCLA hazardous substances to the LEPC and SERC of any area likely to be affected by the release.
- ° Sections 311 and 312: Submit a material safety data sheet (MSDS) for each chemical for which a MSDS must be prepared under the Occupational Safety and Health Act of 1970 and its implementing regulations or a list of such substances and a Tier I or Tier II inventory form to the appropriate LEPC, SERC and fire department.
- ° Section 313: Report annually on the amounts of chemicals released to each environmental medium. The purpose of this reporting requirement is to inform the public and government officials about routine releases of toxic chemicals into the environment.

In order to assist each Federal agency in developing a comprehensive Title III program, we would like to extend an invitation to your staff to attend a workshop on the Emergency Planning and Community Right-to-Know Act on October 6, 1988. The purpose of this workshop is to provide Federal agencies with a thorough understanding of the Title III provisions and provide technical assistance to enable your agency to design and implement an efficient voluntary program that, were the Federal agency considered a private facility, would satisfy the requirements of the statute. Additional information concerning the workshop is provided in Enclosure 2. Representatives from your agency that attend the EPA Federal Agency Environmental Roundtable have been informed about the upcoming workshop.

We would like to request information from each agency on the current status of your Title III program, policies and guidance as outlined in Enclosure 3. This information will enable EPA to provide Federal agencies with technical assistance necessary to develop their voluntary Title III programs, enhance those that are already established, identify the universe of Federal installations that would be affected by Title III were they private installations and possibly develop guidance for Federal agencies concerning various aspects of Title III.

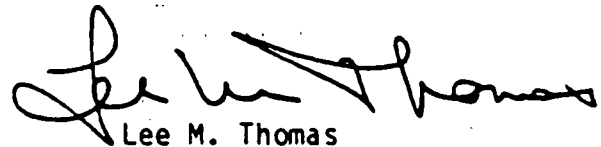
As stated previously, it is important that Federal agencies initiate appropriate actions to meet the requirements of the Emergency Planning and Community Right-to-Know Act. A Federal Facilities Title III Workgroup has been established at EPA to examine various approaches to promote the voluntary compliance by Federal agencies with the statute and we welcome your agency's participation in the workgroup. As the workgroup considers and develops various approaches, we will be seeking your comments and assistance through agency representatives on the National Response Team and the EPA Federal Agency Environmental Roundtable.

Finally, it is critical that Federal agencies contribute to the "cooperative spirit" of the Emergency Planning and Community Right-to-Know Act so that all citizens can benefit from the full implementation of this statute. Only by ensuring that communities and States have a complete picture of all potential chemical hazards can they succeed in meeting the important goals of Title III.

Please submit, as soon as possible, the name of a contact person for the October 6 workshop to Ms. Kathy Hutson, Office of Federal Activities (A-104), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, D.C. 20460, (202) 475-8789. In addition, your response to Enclosure 3 would be appreciated no later than November 4, 1988.

Thank you for your time and cooperation in this matter. Together we can make Title III a real success story.

Sincerely,



Lee M. Thomas

Enclosures

cc: Honorable Edward C. Aldridge, Jr.
Secretary of the Air Force

Honorable John O. Marsh, Jr.
Secretary of the Army

Honorable William L. Ball, III
Secretary of the Navy

Lieutenant General Vincent M. Russo
Director, Defense Logistics Agency

ENCLOSURE 3

INFORMATION REQUESTED ON THE STATUS
OF EACH FEDERAL AGENCY
TITLE III PROGRAM

1. Has your agency issued or are you planning to issue guidance and/or policies concerning Title III? If so, please provide EPA a copy of pertinent policies and/or guidance.
2. Has your agency directed facility staff to determine whether any of the threshold planning quantities of extremely hazardous substances are present at the facility? If so, do you know how many facilities have met these thresholds? Have these facilities notified local planning committees and the appropriate State emergency response commissions?
3. Have your facilities been in contact with local emergency planning committees and identified a facilities coordinator (a contact person) to discuss emergency planning concerns with respect to the Federal facility? If so, could you provide us a copy of a list of facility coordinators?
4. Has your agency directed its facilities to report releases of reportable quantities (or 1 pound where no reportable quantity has been assigned) of hazardous substances, including extremely hazardous substances, to the state emergency response commission and the local planning committee?
5. Are your facilities going to provide the local emergency planning committees or the local fire department with lists of "hazardous chemicals," under the Occupational Safety and Health Act of 1970 and its implementing regulations or Material Safety Data Sheets for those chemicals, in addition to the lists of extremely hazardous substances? If so, how many of your facilities have done so?
6. How many of your facilities manufacture, import, process or use any of the chemicals on the attached list above the following thresholds?
 - a) Manufacture, import and process:
 - 75,000 pounds during calendar year 1987
 - 50,000 pounds during calendar year 1988
 - 25,000 pounds during calendar year 1989, and subsequent years.
 - b) Use:
 - 10,000 pounds in calendar year 1987 and subsequent years.
 - c) Are these facilities planning to complete toxic chemical release forms to be submitted to appropriate State emergency response commissions and the Environmental Protection Agency?

APPENDIX D

FEDERAL AGENCY TITLE III
PROGRAM SUMMARIES

LIST OF FEDERAL AGENCY TITLE III
PROGRAM SUMMARIES

Department of Agriculture
Central Intelligence Agency
Department of Defense

- Department of the Air Force
- Department of the Army
- Defense Logistics Agency
- Department of the Navy

Department of Energy
Environmental Protection Agency
General Services Administration
Department of Health and Human Services
Department of Interior
Department of Justice
Department of Labor
National Aeronautics and Space Administration
National Science Foundation
U.S. Postal Service
Smithsonian Institution
Tennessee Valley Authority
Department of Transportation
Department of Treasury
Department of Veterans Affairs

Department/Service: Department of Agriculture

Contact/Title: John Teske, Chief
Safety and Occupational Health Branch

Address: Office of Assistant Secretary for
Administration
OFM: SHMO: Room 0324 - South Building
Washington, DC 20250-9000

Phone Number: (202) 382-1045

Program Description:

The Department of Agriculture has a well established Title III program. As early as January 1987 the Department notified all Agriculture Research Service area managers of their responsibilities under Title III. The Forest Service and the Agricultural Stabilization and Conservation Service have also notified their facilities regarding compliance with Title III.

Program Scope:

Sections 301-303: Two facilities of the Animal and Plant Inspection Service have accumulated hazardous materials in excess of the Threshold Planning Quantity (TPQ). One facility formulates vertebrate control devices and poison grain baits, and local emergency planning committees have been notified. The second facility produces a poisonous attractant for insect control. They have not notified local emergency planning committees since they are a self-contained facility which is approximately 20 miles from the nearest fire department and, therefore, have their own fire fighting capability. In addition, the chemicals are overpacked in 85-gallon drums which are stored in a secure area minimizing the risk.

The Agricultural Research Service has surveyed their facilities and found that 30 out of 123 locations had chemicals in excess of the TPQ. In late spring of 1987, these 30 locations notified their respective SERCs. Since local planning committees had not been formed at this time, they were unable to provide notification to these committees.

Various USDA facilities have been in contact with local planning committees but specific facility coordinators have not been designated. Local management handles this on an as-needed basis. Until facility coordinators are formally designated, the Chief of the Safety and Occupational Health Branch will serve as a contact point during emergencies.

Section 304: The Forest Service directed its facilities to notify the local planning committees in its May 1987 directive. The Agricultural Research Service directed its facilities to notify local planning committees in its November 17, 1987, memorandum.

Sections 311-312: USDA determined that it does not meet the reporting requirements of Sections 311 and 312 of Title III. USDA does, however, provide lists and Material Safety Data Sheets to LEPCs when requested, or when the need arises.

Section 313: USDA does not manufacture, import, process or use chemicals in excess of the specified threshold quantities.

Program Directives/Guidance:

Forest Service Memorandum
Department of Agriculture notice
Regulatory Alert
Technical Alert

May 27, 1987
September 1, 1987
January 13, 1987
February 2, 1987

Number of Facilities Affected:

Two facilities of the Animal and Plant Inspection Service, and 30 facilities of the Agricultural Research Service have chemicals in excess of the TPQs.

Department/Service: Central Intelligence Agency

Contact/Title: James H. New, Chief
Safety Division
Office of Medical Services

Address: Office of Medical Services
Central Intelligence Agency
Washington, DC 20505

Phone Number: (703) 281-8836

Program Description:

The Central Intelligence Agency (CIA) has initiated actions to implement the requirements of Title III but has not yet issued any formal policy. The agency is in the process of determining the quantities of Extremely Hazardous Substances at each facility.

Program Scope:

Sections 301-303: Although no LEPC has yet been established, local county emergency response personnel are familiar with the substances used at CIA headquarters.

Section 304: The CIA's Office of Medical Services reports releases of all hazardous substances to appropriate local and state offices. All appropriate permits and operating functions are registered with these officials.

Sections 311-312: The CIA will not distribute Material Safety Data Sheets (MSDSs) to local emergency response personnel but will maintain a complete volume of MSDSs in the Security Office, where emergency response personnel may review MSDSs 24 hours a day.

Section 313: More than 10,000 pounds of chemicals such as isopropyl alcohol and a solvent mixture called "blanket wash" are used at CIA headquarters annually. If toxic releases occur at CIA headquarters, the appropriate local and state officials will be notified.

Program Directives/Guidance:

Although the CIA has initiated actions to implement provisions of Title III, no formal policy regarding compliance with Title III requirements has been issued.

Number of Facilities Affected:

The number of facilities identified with Extremely Hazardous Substances is considered classified.

Department/Service: Department of Defense

Contact/Title: Brian Higgins
Environmental Specialist

Address: Defense Environmental Support Office
201 N. Washington Street
Suite 100
Alexandria, Virginia 22314

Phone Number: (703) 325-2211

Program Description:

The Department of Defense (DOD) issued a policy directive on July 3, 1987 to each of the Armed Services concerning the applicability of Title III provisions to DOD installations. This directive states that "although neither the substantive nor procedural aspects of Title III apply to DOD, all DOD components should comply with the conceptual objectives of the Act to the extent practicable." Specifically, the directive indicates that DOD components should respond to the requirements of Sections 301(c), 303(d)1, and 304 of Subtitle A - Emergency Planning and Notification and not respond to Subtitles B and C which the directive describes as procedural in nature.

The directive also suggests that preventative programs such as Spill Prevention, Control and Countermeasures (SPCC) plans be upgraded to address hazardous materials. Response programs such as Spill Contingency Plans (SCP) should include requirements for training On Scene Coordinators (OSCs) in hazardous materials response, and notification of LEPCs in the event of a release of a reportable quantity of material. Also, each installation should identify one official to act as a point of contact for local preparedness committees such as LEPCs.

[Refer to the program summaries on each DOD component for additional information.]

Department/Service: Department of the Air Force
Contact/Title: Major Tim Middleton
Address: Department of the Air Force
Washington, DC 20330-1000
Phone Number: (301) 404-7788

Program Description:

The Air Force issued the "Emergency Planning and Community Right-to-Know Act of 1986 Implementation Guidance" on November 9, 1987, and intends to issue expanded guidance in the near future. This guidance is designed to provide substantive compliance with Title III, by building on existing plans and activities. The Air Force intends to have installation emergency response plans that are fully coordinated at the base level and include active participation in off-base planning activities at the Federal, State and local level. Personnel at the base level who are responsible for disaster preparedness and spill response plans and fire and safety plans are also responsible for developing and implementing installation emergency response plans.

Program Scope:

Sections 301-303: The Title III implementation guidance requires each Air Force installation to identify a point of contact to the LEPC to participate in the planning process and in Regional and State planning activities as well. Installations are also required to develop response plans (generally already in existence) and coordinate them with appropriate local authorities. In addition, Air Force requirements instruct the Base Bioenvironmental Engineer to develop a comprehensive listing of hazardous chemicals used and stored on the base and to assess the hazards associated with their use. This information is to be incorporated into response plans.

Section 304: Air Force installations are required to report all releases of hazardous substances, as defined in Section 302 of SARA, which exceed the specified reportable quantities pursuant to Air Forces Regulations 19-8, para. 5d(1)(c)2. The Air Force plans to issue updated guidance specifically directing all installations to report to the SERC and the LEPC.

Sections 311-312: Air Force guidance directs installations to provide, upon request of the LEPC, unclassified information on the nature and amount of listed substances used and/or stored on installations. The guidance further directs installations to submit Material Safety Data Sheets (MSDSs) or a list of MSDS chemicals to the LEPC, the SERC and the cognizant fire department. The base fire departments are updating their hazardous chemical data bank which will be provided to local fire departments or planning committees.

Section 313: The Air Force is not requiring installations to complete and submit the Toxic Chemical Release Inventory Reporting Form. Substantive compliance, however, is strongly encouraged where appropriate.

Program Directives/Guidance:

DOD issued a policy directive to the Armed Services concerning applicability of Title III to DOD installations on July 3, 1987.

The Air Force issued the "Emergency Planning and Community Right-to-Know Act of 1986 Implementation Guidance" on November 9, 1987.

Number of Facilities Affected:

Information not provided.

Department/Service: Department of the Army

Contact/Title: Rhea Cohen
Senior Environmental Protection
Specialist
Army Environmental Office

Address: HQDA, OCE, ATTN: ENVR-EH
The Pentagon
Washington, DC 20310-2600

Phone Number: (202) 693-5032

Program Description:

The Army is revising Army Regulation 200-1, "Environmental Protection and Enhancement," which provides, in Chapter 8, the Army policy and procedures for the prevention and control of spills of oil and hazardous substances. This chapter also addresses prompt coordinated response to contain and clean up spills that might occur and conformance to Title III. The Army Environmental Office has distributed Chapter 8, Oil and Hazardous Substances Spill Contingency Planning, Control, and Emergency Response as interim guidance until AR 200-1 is printed and distributed. Chapter 8 requires installations to adhere to the DOD policy to conform to Sections 301(c), 303(d)1 and 304 of the act to the greatest extent possible, as described below.

Program Scope:

Sections 301-303: According to Chapter 8 of AR 200-1, Installation Commanders have the primary responsibility for emergency planning activities. This responsibility includes developing and implementing a Spill Prevention, Control, and Countermeasures Plan (SPCCP) and the Spill Contingency Plan. All installations will prepare, maintain and implement the SPCCP for hazardous substances if: (1) because of location, the installation or activity has the potential to spill hazardous substances in such quantity that it would be harmful to human health, welfare or the environment and (2) one or more hazardous substances are stored in quantities that would be harmful if a spill were to occur.

Additional planning responsibilities of the installation commander include:

- o Designating an Army employee to represent the installation commander at LEPC meetings and to provide, to the extent practical, the information requested by the LEPC or any other party.
- o Responding to LEPC requests for information, when possible, by providing documents that are available under the Freedom of Information Act and are not classified, but without creating new reports or completing additional forms.

- o Identifying those resources and capabilities that could be made available to the LEPC or Regional Response Team (RRT) if requested to assist in containing or cleaning up a spill not due to Army activities.
- o Requiring contractors and subcontractors, whether or not located on the installation, and tenants to comply with all of the Title III requirements that apply to their operations on or for the installation.
- o Appointing an Installation On Scene Coordinator (IOSC) and an Installation Response Team (IRT) and ensure they are adequately trained and prepared to act in accordance with the National Contingency Plan.

The IOSC has primary responsibility for overseeing response actions following a spill, coordinating response plans, and providing spill notification as described below.

Section 304: In the event of a spill, the IOSC will report by telephone any spill of a reportable quantity of hazardous substance to the National Response Center (NRC) and State and local authorities including the LEPC. The IOSC will also prepare a written report for EPA, if required, and submit a copy concurrently to the LEPC. All unclassified information concerning a spill of a hazardous substance will be made available to the public.

Sections 311-312: The July 1987 DOD policy directive concerning Title III compliance does not require DOD components to respond to the requirements of Subtitle B which includes Sections 311 and 312. As described earlier, however, the installation commander will respond to LEPC requests for information, when possible, by providing documents that are available under the Freedom of Information Act and are not classified, but will not create new reports or complete additional forms.

Section 313: The July 1987 policy directive states that DOD components should not respond to the requirements of Subtitle B which includes Section 313.

Program Directives/Guidance:

DOD issued a policy directive to the Armed Services concerning applicability of Title III to DOD installations on July 3, 1987.

DOD issued Chapter 8, Oil and Hazardous Substances Spill Contingency Planning, Control and Emergency Response of AR 200-1, "Environmental Protection and Enhancement," as interim guidance until AR 200-1 is printed and distributed.

Number of Facilities Affected:

Information not provided.

Department/Service: Defense Logistics Agency

Contact/Title: William Randall
Installation Services and Environmental
Protection

Address: DLA Headquarters
Cameron Station
Alexandria, Virginia 22304-6100

Phone Number: (703) 274-6124

Program Description:

The Defense Logistics Agency (DLA) issued guidance on August 4, 1987, to implement Title III programs for DLA activities. These programs will ensure that facility emergency plans are comparable wherever feasible to State Title III programs at DLA-managed installations. DLA's objective is to establish programs within its fencelines which provide the same level of hazard awareness and community protection as the Title III programs established outside the fencelines. A key aspect of the programs will be the expansion of existing contingency plans to cover releases during catastrophic events and the establishment of emergency planning committees.

Program Scope:

Sections 301-304: The Agency Title III guidance directed all DLA activities to establish emergency planning committees that are analogous to LEPCs. Each committee is required to establish procedures for receiving and processing information requests and to expand the Spill Contingency Plan to meet the hazardous materials emergency plan requirements in Title III. The Agency guidance also directs each DLA-managed activity to appoint representatives to local planning committees, where appropriate, and to identify all sites where Extremely Hazardous Substances are stored or used and note where Threshold Planning Quantities (TPQs) are exceeded. The agency has determined that four of the non-tenant, DLA-managed facilities have TPQs of one or more listed substances. These facilities have not notified the LEPCs or SERCs. DLA facilities, however, have been in contact with local committees and have identified facility coordinators.

Section 304: DLA activities will fully notify LEPCs and SERCs in the event of a DLA release that might result in exposure to persons outside of DLA facilities.

Sections 311-312: DLA activities will not comply with reporting requirements and other procedural requirements established under Title III. Inventories, lists of materials or annual reports will not be submitted to states or local committees. The DLA Title III Guidance, however, requires DLA-managed activities to prepare a central file of MSDSs for all listed Extremely Hazardous Substances on the installation. The goal is to have current and accurate

manufacturers' MSDSs readily available to fire, spill response and safety and health personnel.

Section 313: No DLA facilities fall within SIC codes 20 through 29. Therefore, Section 313 does not apply to DLA, and its facilities will not be completing Toxic Chemical Release Forms.

Program Directives/Guidance:

DOD issued a policy directive to the Armed Services concerning applicability of Title III to DOD installations on July 3, 1987.

DLA issued "Guidance for DLA Emergency Planning and Community Right-to-Know Program" on August 4, 1987.

Number of Facilities Affected:

Four of the non-tenant, DLA-managed facilities have TPQs of one or more listed substances.

FACILITY COORDINATORS
Defense Logistics Agency

<u>Facility</u>	<u>Coordinator</u>	<u>Telephone No.</u>
Defense Construction Supply Center, Columbus, OH	Mr. Mike Mott	(614)238-4220
Defense Electronics Supply Center, Dayton, OH	Mr. Dave Wagner	(513)296-5111
Defense General Supply Center, Richmond, VA	Mr. Ed Grossman	(804)275-4838
Defense Personnel Support Center, Philadelphia, PA	Mr. Reid Parramore	(215)952-5883
Defense Depot Memphis, Memphis, TN	Mr. Danny Chumney	(901)775-6969
Defense Depot Ogden, Ogden, UT	Mr. David Weaver	(801)399-7211
Defense Depot Tracy, Tracy, CA	Mr. Jim King	(209)832-9341

Department/Service: Department of the Navy

Contact/Title: Carl R. Webb
Deputy Chief of Naval Operations

Address: Office of the Chief of Naval Operations
Washington, DC 20360-2000

Phone Number:

Program Description:

The Department of the Navy issued policy guidance, "Navy Participation in Actions under Title III of the Superfund Amendments and Reauthorization Act (SARA)" on January 25, 1988. This policy requires Navy installations to coordinate emergency planning and release notification activities with State and local emergency planning organizations.

Program Scope:

Sections 301-303: The policy guidance directs staff to determine whether the installation (including tenant commands) contains more than the Threshold Planning Quantity (TPQ) of an Extremely Hazardous Substance. If TPQs are exceeded, the installation is subject to State and local emergency planning requirements, while preserving Navy security interests. Installations not "subject" to these planning requirements are encouraged to participate in response planning in order to coordinate efforts with existing Navy hazardous substance contingency plans. In addition, these installations are required to designate an individual to serve as the official point of contact with the LEPC and SERC.

Section 304: The Navy policy guidance directs installations to notify the LEPC and SERC if there is a release of a listed hazardous substance that exceeds the reportable quantity for that substance.

Sections 311-312: The Navy does not intend to comply with the provisions of Sections 311 and 312 as part of their voluntary implementation with Title III.

Section 313: These provisions have not been included in the Navy's voluntary implementation of Title III.

Program Directives/Guidance:

DOD issued a policy directive to the Armed Services concerning applicability of Title III to DOD installations on July 3, 1987.

The Navy issued "Navy Participation in Actions under Title III of the Superfund Amendments and Reauthorization Act (SARA)" on January 25, 1988.

Number of Facilities Affected:

Information not provided.

Department/Service: Department of Energy

Contact/Title: Richard Daley
Office of Environmental Guidance and Compliance

Address: Department of Energy
Washington, DC 20585

Phone Numbers: (202) 586-7117

Program Description:

The Department of Energy (DOE) issued two guidance memoranda outlining the requirements of Title III and its applicability to government-owned contractor-operated (GOCO) facilities. Many of DOE's facilities are GOCOs and therefore are required to comply with Title III. Although DOE as a Federal entity is not required to implement a formal Title III program, the department is attempting to ensure that its facilities are in full adherence with the statute.

In response to the EPA Administrator's letter, DOE contacted each of its Programs, Naval Reactions, Operations, and Power Marketing Administration offices as well as other offices in the DOE system to gather information concerning compliance with Title III. DOE received responses for 20 offices, covering 57 facilities and programs. A discussion of these responses is provided below.

Program Scope:

Sections 301-303: Most DOE facilities have been directed to determine if they have Threshold Planning Quantities (TPQs) of Extremely Hazardous Substances. Forty-eight DOE facilities indicated that they have been so directed, and thirty-six facilities exceed TPQs with two facilities still uncertain. Each of the 36 facilities that have exceeded TPQs have notified the LEPCs and SERCs. In addition, several facilities have notified or intend to notify the planning committees even though they do not exceed TPQs. A large majority (49) of the DOE facilities have been in contact with LEPCs, and two facilities are in the process of doing so. Finally, out of 57 facilities 45 facilities have identified a facility coordinator.

Section 304: Most DOE facilities have been directed to report releases of reportable quantities. Specifically, 45 have been directed to do so, 2 have not been directed but will notify authorities if they had such a release, 3 stated that they have not been directed, 2 anticipate that direction will be provided in the near future and 4 indicated that the notification requirements are not applicable to their facilities.

Sections 311-312: Forty-six DOE facilities have already provided lists of hazardous chemicals to the appropriate emergency response

Sections 311-312: Forty-six DOE facilities have already provided lists of hazardous chemicals to the appropriate emergency response organizations. Five other facilities are in the process of determining whether this activity applies to their installation and indicated they would comply if necessary.

Section 313: None of the DOE facilities indicated that they manufacture, import and process toxic chemicals above the 75,000 pound, 50,000 pound or 25,000 pound thresholds or fall under the applicable SIC Codes. Twenty-six facilities indicated, however, that they use these chemicals in excess of the 10,000 pound threshold. Of these 26 facilities, 14 are planning to complete Toxic Chemical Release Forms and 8 are not planning to do so because they fall outside of the applicable SIC Codes. Three of the remaining sites did not provide a reason and one site is determining whether it needs to do so. In addition, four facilities that do not exceed the 10,000 pound threshold are planning to complete the forms.

Program Directives/Guidance:

SARA Title III - Emergency Planning and Community Right-to-Know Memorandum, May 14, 1987.

"Clarification of the Applicability of SARA Title III," July 22, 1988.

Number of Facilities Affected:

As stated above, 36 DOE sites indicated that they exceed TPQs for Extremely Hazardous Substances, and 26 sites use "toxic" chemicals in excess of the 10,000 pound threshold.

Department of Energy

CONTACT	FACILITY	CERCLA Title III DOE Site Emergency Coordinators
Chicago Ops. Office	Ames Argonne Brookhaven Fermi PPPL SERI	Lowell Mathison Ronald Kolzow Leonard C. Emma Rudolph Dorner John E. Anderson Dave Stewart
Oak Ridge Ops. Office	FMPC PORTS ORGDP PGDP ORNL Y-12 RMI CEBAF SPR-PMO	Richard Debusk Carl Weghorst John Bolling Norm Windt Joe Inman Larry Moore Rick Mason Tom Hassler None
Idaho Ops. Office	INEL West Valley	G. C. Bowman T. G. Adams
Albuquerque Ops. Office	Kansas City Los Alamos Mound Pantex Pinellas Rocky Flats Sandia-Albuquerque Sandia-Livermore WIPP	P. T. Hoopes D. K. Winston David Heitz Bob Gage David Ingle H. L. Turner D. L. Hughes V. W. Ormond K. T. Campbell
Richland Ops. Office	Hanford	Larry Musen
San Francisco Ops. Office	SLAC ETEC LBL LLNL	Paul Dana Steve Lafflam None None

CONTACT	FACILITY	CERCLA Title III DOE Site Emergency Coordinators
Savannah River Ops.Office	Savannah River Plant	Dave Lassiter
Nevada Ops. Office	Nevada Test Site Tonopah Test Range EG&G North Las Vegas EG&G Sunset-Clark Cnty	Stephen A. Mellington Stephen A. Mellington Jackson P. Maddox No response
Bartlesville Proj.Office	NIPER	Greg Steele
METC		Judy Anderson
PETC		John E. Sourbeer
Naval Reactors	Bettis, West Mifflin Naval Reactors, INEL Knolls, Niskayuna Kesselring, West Milton Windsor Site	C. K. Gaddis G. C. Bowman C. Schimikowski T. M. Hauser K. A. Berta
Alaska Power Admin.	Facility No. 1 Facility No. 2	None None
Bonneville Power Admin.		None
Southeastern Power Admin.		None
Southwestern Power Admin.		None
Western Area Power Admin.		None
NPR - Calif.		Steve Toth

CONTACT	FACILITY	CERCLA Title III DOE Site Emergency Coordinators
Naval Petrol/ Oil Shale	NPR-3, Wyoming	Dave McCallister
Reserve, CO,	NOSR-1, Colorado	Dave McCallister
UT, WY	NOSR-3, Colorado	Dave McCallister
	NOSR-2, Utah	Dave McCallister
Civilian Radwaste Mgmt		N/A

LEGEND

PPPL - Princeton Plasma Physics Laboratory
 SERI - Solar Energy Research Institute
 FMPC - Feed Materials Production Center
 PORTS - Portsmouth Gaseous Diffusion Plant
 ORGDP - Oak Ridge Gaseous Diffusion Plant
 PGDP - Paducah Gaseous Diffusion Plant
 ORNL - Oak Ridge National Laboratory
 RMI - RMI Co. Extrusion Plant
 CEBAF - Continuous Electron Beam Accelerator Facility
 SPR-PMO - Strategic Petroleum Reserve Project Mgt. Office
 INEL - Idaho National Engineering Laboratory
 WIPP - Waste Isolation Pilot Plant
 SLAC - Stanford Linear Accelerator
 ETEC - Energy Technology Engineering Center
 LBL - Lawrence Berkeley Laboratory
 LLNL - Lawrence Livermore National Laboratory
 NIPER - National Institute for Petroleum and Energy Research
 METC - Morgantown Energy Technology Center
 PETC - Pittsburgh Energy Technology Center
 NPR - Naval Petroleum Reserve
 NOSR - Naval Oil Shale Reserve

Department: Environmental Protection Agency

Contact/Title: Howard Wilson, Manager
Environmental Compliance Program
Environmental Health and Safety Division

Address: 401 M Street, SW
Washington, D.C. 20460

Telephone: (202) 382-3640

Program Description:

On August 28, 1987, EPA issued a memorandum to facility environmental compliance coordinators clarifying that the statute was not applicable to Federal facilities but urged EPA field offices to comply with information requests from local governments and private parties. As a follow-up to this memorandum, EPA issued an order on March 13, 1989, which dealt with EPA facility compliance with SARA Title III. EPA Order 1480.1 was sent to all Assistant Administrators and Regional Administrators; in addition to all of the individual laboratory facilities across the country. The order instructed EPA facilities to disregard the statutory exclusion for Federal agencies under the definition of "person", and to reexamine the regulations, determine reporting requirements, submit appropriate reports to Federal, State and local authorities, and implement a system to monitor compliance with SARA Title III. EPA Headquarters helps to ensure environmental compliance by performing comprehensive environmental compliance audits at all of the field laboratories and research facilities on a biannual basis. SARA Title III is one of the environmental regulatory areas addressed in these audits. Results of the audits are compiled in written reports and are also entered into a database tracking system at Headquarters. In this manner Headquarters has the capacity to track SARA Title III compliance at all of its facilities.

Program Scope:

Sections 301-303: Environmental audits identified two EPA facilities that were for a brief time subject to Sections 301-303 due to the presence of Extremely Hazardous Substances in excess of TPQs. The facilities were in compliance with the emergency planning requirements. All EPA facilities have assigned personnel to act as facility coordinators, and all facilities have been instructed through the EPA Order to comply with this requirement if they meet TPQs.

Section 304: No EPA facility has encountered a situation where they have had to report emergency releases of hazardous substances. All EPA facilities have been instructed to comply with this provision should a release occur which meets the criteria in Section 304.

Sections 311-312: Certain EPA facilities have been requested to submit MSDSs by local fire response personnel even though they did not meet applicable thresholds. EPA has instructed its facilities to submit such information when requested by fire response and emergency personnel. No EPA facility has yet exceeded the threshold for submitting Tier I and Tier II forms under Section 312.

Section 313: No EPA facility has exceeded the thresholds for required reporting of toxic chemical releases per Section 313. EPA facilities have been instructed to comply with these requirements should they meet the applicable thresholds and reporting criteria.

Program Directives/Guidance

Memorandum to Facility Environmental Compliance Coordinators
Concerning Implementation of Title III, August 28, 1987.

EPA Order 1480.1 March 13, 1989

Number of Facilities Affected:

The EPA Order was sent to all 34 EPA field facilities under the supervision of the Environmental Health and Safety Division. All facilities have been instructed to comply with applicable provisions of Title III. All 34 facilities are potentially affected by this EPA Order.

Department/Service: General Services Administration

Contact/Title: James Hensley, Chief
Environmental Management Branch

Address: Public Buildings Service
Washington, DC 20405

Phone Number: (202) 566-1464

Program Description:

The General Services Administration (GSA) intends to develop and implement a program designed to comply with the conceptual objectives of SARA Title III. GSA plans to develop a program during fiscal year 1990.

Program Scope:

Information not provided.

Program Directives/Guidance:

None

Number of Facilities Affected:

No information was provided on the number of facilities affected by SARA Title III.

Department/Service: Department of Health & Human Services
Contact/Title: Jim Johnson, Director
Division of Special Programs Coordination
Address: Room 4700, Cohen Building
330 Independence Avenue, SW
Washington, DC 20201
Phone Number: (202) 245-7426

Program Description:

The Department of Health and Human Services (HHS) fully supports compliance with Title III requirements and has initiated a survey of its facilities to determine the applicability of Title III to HHS activities.

Program Scope:

Information not provided.

Program Directives/Guidance:

HHS issued a directive on July 6, 1989.

Number of Facilities Affected:

Information not provided.

Department/Service: Department of the Interior

Contact/Title: Bruce Blanchard, Director
Office of Environmental Project Review
or
Libby Stone

Address: 18th & C Streets, NW
PEP, Room 4239
Washington, DC

Phone Numbers: (202) 343-3343 (Blanchard)
(202) 343-3891 (Stone)

Program Description:

The Department of Interior (DOI) reports that currently 25 facilities meet the reporting and notification criteria under Title III. DOI encourages its facilities to comply with the emergency planning and notification requirements of Title III. DOI guidance will be prepared following an inventory of its facilities.

Program Scope:

Sections 301-303: Information not provided.

Section 304: Information not provided.

Sections 311-312: Submission of Material Safety Data Sheet (MSDS) lists will be coordinated with the local fire departments, and SERCs may be contacted.

Section 313: Information not provided.

Program Directives/Guidance:

DOI will prepare guidance following an inventory of its facilities.

Number of Facilities Affected:

Currently there are 25 facilities, out of 1500, which have been identified with Extremely Hazardous Substances above the Threshold Planning Quantities (TPQs).

Department/Services: Department of Justice

Contact/Title: Marvin Fink, Manager
Safety and Health

Address: 5111 Main Justice Building
Tenth Street and Constitution Avenue, NW
Washington, DC 20530

Phone Number: (202) 633-5076

Program Description:

The Department of Justice (DOJ) recently completed an audit of their facilities for the presence of Threshold Planning Quantities (TPQs) of Extremely Hazardous Substances. The results of the audit revealed that only small amounts of chemical reagents were stored or used in the analytical laboratories. Therefore, most DOJ facilities do not meet the criteria established for reporting/notification under Title III. However, the agency intends to issue a draft Order to all Department components that establishes a hazardous waste management program and discusses the requirements of Title III. The Order will require DOJ facilities which meet the applicable statutory criteria to comply with all aspects of Title III, as described below.

Program Scope:

Sections 301-303: The draft Order will require that if a facility should have Extremely Hazardous Substances that exceed the TPQs they are to cooperate with and notify the SERC. Also, the Order will state that "each facility in the Department shall cooperate with the local emergency planning group within their State and shall develop the plans necessary for identifying hazardous materials and their potential for release." In addition, there are trained safety personnel at all Bureau of Prisons and DOJ laboratories who can serve as the facilities coordinator with State and local planning committees.

Section 304: DOJ will direct that if a release of an Extremely Hazardous Substance occurs, the operator of the facility must immediately report the release as required by Sections 304 and 313 of Title III.

Sections 311-312: The draft Order will stipulate that the operator of each facility is required to prepare or have available Material Safety Data Sheets (MSDSs) for each hazardous chemical defined under OSHA and as required under Title III. Reporting of chemical inventory forms also will be accomplished as described by the appropriate regulation. At this time, however, there are no DOJ facilities which meet the thresholds for reporting as required by Sections 311 and 312.

Section 313: DOJ facilities will report as required by this section if a release of an Extremely Hazardous Substance occurs.

Program Directives/Guidance:

None.

Number of Facilities Affected:

Currently, there are no DOJ facilities that have been identified with extremely hazardous substances above the TPQs.

Department/Service:

Department of Labor

Contact/Title:

Charles I. Hochman
Safety and Health Manager

Address:

Office of the Assistant Secretary
for Administration and Management
Washington, DC 20210

Phone Number:

(202) 523-6687

Program Description:

The Department of Labor (DOL) has developed two paragraphs (887 and 888) relating to SARA Title III compliance which are proposed for inclusion in the DOL policy document DLMS 4, Chapter 800.

Program Scope:

Sections 301-303: Paragraph 887 of the DOL policy document requires that DOL facilities support emergency planning efforts at the State and local level.

Section 304: No information provided.

Sections 311-312: Paragraph 888 of the DOL policy document requires that DOL facilities submit Material Safety Data Sheets and chemical inventory forms to State and local planning commissions and the local fire department.

Section 313: Response from DOL reveals that there are no facilities which use chemicals that exceed threshold quantities of 10,000 pounds in a calendar year.

Program Directives/Guidance:

Proposed paragraphs 887 and 888 for the DOL policy document DLMS 4, Chapter 800.

Lesson 8, DOL Hazard Communication Training Program.

Number of Facilities Affected:

No information provided.

Department/Service: National Aeronautics and Space
Administration

Contact/Title: Michael Green
Facilities Engineer

Address: Facilities Operation and Maintenance
Division
NASA Headquarters
Attention: NXG
Washington, DC 20546

Phone Number: (202) 453-1962

Program Description:

The National Aeronautics and Space Administration (NASA) issued memoranda in January and April 1987 recommending that NASA centers conduct an inventory of their facilities and notify the State of listed materials exceeding Threshold Planning Quantities (TPQs). NASA advised the centers that Title III does not apply to Federal facilities, but they should make a decision regarding voluntary compliance locally. Contractor-operated facilities have been advised that they are subject to the legal requirements of the law. Surveys of the facilities have indicated good voluntary participation, and thus NASA has no plan to issue further guidance or policies.

Program Scope:

Sections 301-303: NASA centers have, when appropriate, notified State and local authorities of the presence of Extremely Hazardous Substances and provided contacts to the LEPCs. Thirteen centers meet these thresholds, five centers do not meet the thresholds, and one center is currently performing an inventory and will report if necessary.

Section 304: All centers indicate that they would notify authorities of releases of reportable quantities of hazardous substances.

Sections 311-312: Fourteen centers have provided an inventory to the local fire departments. Four centers are still compiling their inventory and will submit it when complete. One center has determined that it is exempt from the reporting requirements due to a laboratory exclusion.

Section 313: No NASA center manufactures, imports or processes any Section 313 chemicals. Seven centers do, however, use some chemicals in excess of the 10,000 pound threshold. Three of these centers are contractor operated and fall within the covered SIC Codes and have submitted forms under this section.

NASA issued guidance memoranda on January 14, 1987 and April 20, 1987.

Number of Facilities Affected:

Thirteen NASA centers have TPQS of Extremely Hazardous Substances and are therefore subject to requirements under Sections 301-303. One center has not yet determined its inventory of these substances, and five centers do not meet the thresholds.

Fourteen centers meet the thresholds under Sections 311-312 and are therefore subject to MSDS and inventory reporting. Four centers have not yet determined their inventory, and one center has determined it is exempt.

FACILITY COORDINATORS
National Aeronautics and Space Administration

Ames Research Center, CA	Ms. Sandy Olliges
Dryden Flight Research Facility, CA	Mr. Tom Ambrose
Edwards Test Station, CA	Ms. Vanessa Damron
Ellington Field, TX	Mr. Ken Gilbreath
Goddard Space Flight Center, MD	Mr. Joe Letourneau
Goldstone Communications Complex, CA	Mr. Harold Anderson
Jet Propulsion Laboratory, CA	Ms. Elizabeth Stetz
Johnson Space Center, TX	Mr. Ken Gilbreath
Kennedy Space Center, FL	Mr. Kirby Key
Langley Research Center, VA	Mr. John Lee
Lewis Research Center, OH	Mr. Michael Mapp
Marshall Space Flight Center, AL	Mr. Marshall Corlew
Plum Brook Station, OH	Ms. Amy Bower
Rockwell - Downey, CA	Mr. Jerry Tucker
Stennis Space Center, MS	Ms. Becky McCaleb
Santa Susana Field Laboratory, CA	Ms. Michelle Levesque
Wallops Flight Facility, VA	Ms. Terry Rodriguez
White Sands Test Facility, NM	Mr. I.D. Smith

Department/Service: National Science Foundation

Contact/Title: Julian Shedlovsky, Chair
Committee on Environmental Matters

Address: Office of the Assistant Director for
Geosciences
1800 G Street, NW
Washington, DC 20550

Phone Number: (202) 357-9752

Program Description:

The National Science Foundation (NSF) has directed facility staff to determine whether Threshold Planning Quantities (TPQs) of Extremely Hazardous Substances are present at their government-owned contractor-operated (GOCO) facilities. Because there are no Extremely Hazardous Substances present at these facilities, NSF has not directed its facilities to report releases of reportable quantities of these substances. NSF does, however, encourage its facilities to comply with Title III and will provide written guidance to the facilities.

Program Scope:

Sections 301-303: NSF reports that one of its GOCO facilities has selected a facility coordinator to interact with LEPCs, and has initiated discussions with the fire marshall.

Section 304: As stated above, facilities have not been directed to provide notification because Extremely Hazardous Substances are not present at these facilities.

Sections 311-312: No facilities have provided LEPCs or local fire departments with Material Safety Data Sheets for hazardous chemicals defined under OSHA and as required under Title III.

Section 313: NSF facilities are not subject to this reporting requirement because their facilities do not manufacture, import, process or use any hazardous chemicals above designated thresholds.

Program Directives/Guidance:

NSF will provide written guidance to the facilities directing them to comply with Title III requirements.

Number of Facilities Affected:

NSF currently operates 11 GOCO facilities, and none have been identified with Extremely Hazardous Substances above the TPQ.

FACILITY COORDINATOR
National Science Foundation

1 of 4 GOCO facilities has named a facility coordinator

National Center for Atmospheric Research (NCAR) Facilities
located in Boulder and Broomfield, Colorado, and at
Maunaloa, Hawaii

Steve Sadler, NCAR Safety & Environmental Services Manager

Department/Service: United States Postal Service

Contact/Title: Frank Lundblad
Headquarters Industrial Hygienist

Address: Office of Safety and Health
475 L'Enfant Plaza, SW
Washington, DC 20260-4231

Phone Number: (202) 268-3692

Program Description:

The Postal Service issued a memorandum on March 15, 1989 to field and headquarters facility managers relating to Title III compliance. Managers are expected to assess the use of hazardous chemicals in their facilities and comply with all regulations if necessary.

Program Scope:

Section 301-303: The memorandum directed managers to inventory all hazardous substances. This process will be facilitated by the Postal Service's compliance with the Occupational Safety and Health Administration's Hazard Communication Standard, which requires an inventory of hazardous materials. The Postal Service does not anticipate any facilities having Extremely Hazardous Substances on hand. Although maintenance centers do conduct some limited metal stripping and painting operations and use solvent dip tanks, the type and quantity of materials should not come under the Act.

Many facilities are already in contact with local fire departments and other agencies as part of the Postal Service's internal program to deal with spills and leaks of limited quantities of hazardous materials encountered in the mails. Facility managers will be directed to follow Title III requirements, if necessary, regarding emergency planning.

Section 304: The memorandum requires facilities to notify appropriate agencies of releases of hazardous chemical releases.

Sections 311-312: The memorandum outlines Material Safety Data Sheets, Tier I and Tier II requirements and provides schedules for phased-in thresholds and reporting dates.

Section 313: The memorandum requires compliance with toxic chemical release reporting. The Postal Service considers it unlikely, however, that any of their facilities will be required to comply.

Program Directives/Guidances:

The Assistant Postmaster General issued a memorandum on March 15, 1989, to all field units.

Number of Facilities Affected:

The Postal Service did not provide information on the number of facilities affected by Title III.

Department/Service:

Smithsonian Institution

Contact/Title:F. William Billingsley, Director
Office of Environmental Management
and Safety**Address:**955 L'Enfant Plaza, Suite 3300
Washington, DC 20560**Phone Number:**

(202) 287-3611

Program Description:

The Smithsonian is developing a policy document about Title III and its application to Smithsonian facilities and museums. The Smithsonian conducted a review of its facilities in March 1988 and determined that no facilities are affected by SARA Title III.

Program Scope:

Sections 301-303: The Smithsonian has been in contact with the SERC of the District of Columbia. Additionally, the Smithsonian's Office of Risk Management is developing a disaster preparedness plan which will include hazardous material emergencies.

Section 304: Once the Smithsonian's Title III policy is implemented, each facility will be required to report any releases of reportable hazardous substances to the local and state committees.

Sections 311-312: The Smithsonian will provide the LEPCs and local fire departments with copies of Material Safety Data Sheets and/or an inventory list of hazardous chemicals at each facility.

Section 313: There are no Smithsonian facilities that meet any of the applicable thresholds for toxic chemical release reporting.

Program Directives/Guidance:

None

Number of Facilities Affected:

A survey of Smithsonian facilities determined that no facilities are presently affected by SARA Title III.

Department/Service: Tennessee Valley Authority
Contact/Title: M. Paul Schmierbach, Manager
Environmental Quality Staff
Address: 201 Summer Place Building
Knoxville, Tennessee 37902
Phone Number: (615) 632-6578

Program Description:

The Tennessee Valley Authority (TVA) has issued an internal memorandum directing all TVA offices to comply with the substantive requirements of Title III. This directive includes planning, notification and reporting requirements.

Program Scope:

Sections 301-303: TVA has determined that the Threshold Planning Quantity of Extremely Hazardous Substances was exceeded for at least one chemical in 99 facilities, and those facilities have notified the appropriate SERCs and LEPCs.

Section 304: Emergency release notification will also be provided to the appropriate SERCs and LEPCs when spills of reportable materials have occurred.

Sections 311-312: Numerous facilities, where there are chemicals for which MSDSs are required, have provided MSDSs to the LEPCs, SERCs and fire departments.

Section 313: Currently only one TVA facility needs to complete the Toxic Chemical Release Form, and it has already submitted its annual report.

Program Directives/Guidance:

The Director of the Environmental Quality Staff issued an internal memorandum dated May 1, 1987 stating that it is TVA's policy to comply with the Title III requirements.

Number of Facilities Affected:

TVA has identified approximately 100 facilities as affected by Title III requirements, all of which have made efforts to comply with the reporting requirements.

**FACILITY COORDINATORS
Tennessee Valley Authority**

<u>Facility</u>	<u>LEPC</u>	<u>Facility Coordinator</u>	Chem. or MSDS Report
Albertville 161-kV Substation	Notified	Vernon McDonald or J. B. Hendrix (205) 386-2841	Yes
Alcoa 161-kV Substation	Notified	Freddy R. Horne (615) 632-6750	Yes
Allen Fossil Plant	Shelby County LEPC	Frank Dominioni (901) 789-0860 (125) 721-1206 (PAX)	Yes
Ardmore 161-kV Substation	Notified	Vernon McDonald or J. B. Hendrix (205) 386-2841	Yes
Athens 161-kV Substation	Notified	Vernon McDonald or J. B. Hendrix (205) 386-2841	Yes
Athens 161-kV Substation	Notified	Freddy R. Horne (615) 632-6750	Yes
Basin 161-kV Substation	Notified	Freddy R. Horne (615) 632-6750	Yes
Belfast 161-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Yes
Bellefonte Nuclear Plant	Notified July 15, 1988	Roy Russell (205) 574-8210	Yes
Boone Hydro Plant	Sullivan County LEPC	George Sykes (615) 542-2922 (125) 529-1112 (PAX)	Yes
Bowling Green 161-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Yes
Browns Ferry Nuclear Plant	Notified April 20, 1988	Mike Bolch (205) 729-2038	Yes
Bull Run Fossil Plant	Anderson County	James Rouse (615) 945-3430 (125) 524-1245	Yes

Calvert 161-kV Substation	Notified	Glenn E. Parrish (901) 668-6136	Ye
Centerville 161-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Ye
Charleston 161-kV Substation	Notified	Freddy R. Horne (615) 632-6750	Ye
Chesterfield 161-kV Substation	Notified	Glenn E. Parrish (901) 668-6136	Ye
Chickamauga Hydro Plant	Chattanooga-Hamilton County LEPC	H. H. Hodges (615) 697-4170 (125) 240-1112	Ye
Clarksville 161-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Ye
Colbert Fossil Plant	Colbert County EMA	Jeff Littrell (205) 383-8605 (125) 324-1381 (PAX)	Ye
Columbia 161-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Ye
Columbia 46-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Ye
Concord 161-kV Substation	Notified	Freddy R. Horne (615) 632-6750	Ye
Cordova 500-kV Substation	Notified	Glenn E. Parrish (901) 668-6136	Ye
Covington 161-kV Substation	Notified	Glenn E. Parrish (901) 668-6136	Ye
Cullman 161-kV Substation	Notified	Vernon McDonald or J. B. Hendrix (205) 386-2841	Ye
Cumberland Fossil Plant	Stewart County	J. W. Steele (615) 827-2472 (125) 425-1272 (PAX)	Ye
Davidson 500-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Ye
Douglas Hydro Plant	Sevier County LEPC	Joe M. Epps (615) 475--3415 (125) 521-1112 (PAX)	Ye
Dyersburg 69-kV Substation	Notified	Glenn E. Parrish (901) 668-6136	Ye

E. Bowling Green 161-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Yes
East Cleveland 161-kV Substation	Notified	Freddy R. Horne (615) 632-6750	Yes
Fontana Hydro Plant	Graham County	L. J. Miller (615) 986-8139 (125) 234-1112	Yes
Fort Payne 161-kV Substation	Notified	Vernon McDonald or J. B. Hendrix (205) 386-2841	Yes
Franklin 500-kV Substation	Notified	Freddy R. Horne (615) 632-6750	Yes
Freeport 500-kV Substation	Notified	Glenn E. Parrish (901) 668-6136	Yes
Gallatin Fossil Plant	Sumner County	M. W. Stanfield (615) 452-2202 (125) 429-1212 (PAX)	Yes
Goose Pond 161-kV Substation	Notified	Vernon McDonald or J. B. Hendrix (205) 386-2841	Yes
Haney Building	Chattanooga-Hamilton County	Henry F. Lackenby (615) 651-7326	Yes
Hickory Valley 161-kV Substation	Notified	Glenn E. Parrish (901) 668-6136	Yes
Hiwassee Hydro Plant	Cherokee County EMS	D. M. Keith (704) 644-5121 (125) 534-1112	Yes
Hopkinsville 161-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Yes
Hopkinsville 69-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Yes
John Sevier Fossil Plant	Hawkins County	Ed Pace (615) 272-8152 (125) 523-1391 (PAX)	Yes
John Sevier Fossil Plant	Hawkins County	Art Williams (615) 272-8152 (125) 523-1245 (PAX)	
Johnsonville Fossil Plant	Humphreys County	Chester Vole (615) 535-2501 (125) 430-1221 (PAX)	Yes

Kingston Fossil Plant	Roane County	Rick Keyser (615) 376-6135 (125) 224-1272	Ye
Lafayette 161-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Ye
Land Between the Lakes	Trigg County	E. Keith Pardue (502) 924-5602	Ye
Lawrenceburg 46-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Ye
Lebanon 161-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Ye
Lonsdale 161-kV Substation	Notified	Freddy R. Horne (615) 632-6750	Ye
Madison 500-kV Substation	Notified	Vernon McDonald or J. B. Hendrix (205) 386-2841	Ye
Marshall 500-kV Substation	Notified	Glenn E. Parrish (901) 668-6136	Ye
Martin 161-kV Substation	Notified	Glenn E. Parrish (901) 668-6136	Ye
Maury 500-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Ye
Mayfield 161-kV Substation	Notified	Glenn E. Parrish (901) 668-6136	Ye
Mayfield 69-kV Substation	Notified	Glenn E. Parrish (901) 668-6136	Ye
Melton Hill Hydro Plant	Loudon County	Lewis J. Miller (615) 986-8139 (125) 521-1112 (PAX)	Ye
Milan 46-kV Substation	Notified	Glenn E. Parrish (901) 668-6136	Ye
Mocassin 161-kV Substation	Notified	Freddy R. Horne (615) 632-6750	Ye
Monsanto 161-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Ye
Montgomery 500-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Ye
Morristown 161-kV Substation	Notified	Freddy R. Horne (615) 632-6750	Ye

Mt. Pleasant 161-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Yes
Murfreesboro 161-kV	Notified	G. Glenn Burgess (615) 360-1562	Yes
N. E. Johnson City 161-kV Substation	Notified	Freddy R. Horne (615) 632-6750	Yes
N. Nashville 161-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Yes
National Carbide 161-kV Substation	Notified	Glenn E. Parrish (901) 668-6136	Yes
National Fertilizer Development Center	Colbert County	Jack Henson (205) 386-2183	Yes
Norris Hydro Plant	Anderson County	Joe M. Epps (615) 475-3415 (125) 521-1112 (PAX)	Yes
Oglethorpe 161-kV Substation	Notified	F. R. Horne (615) 632-6750	Yes
Paradise Fossil Plant	Muhlenbert County	Dennis Allen (502) 476-2250 (125) 428-1466 (PAX)	
Phipps Bend 500-kV Substation	Notified	Freddy R. Horne (615) 632-6750	Yes
Pickwick Hydro Plant	Hardin County	Frank Cagle (901) 925-4342 (125) 328-1212 (PAX)	Yes
Power System Control	Notified	Freddy R. Horne (615) 632-6750	Yes
Raccoon Mountain Pumped Storage	Marion County LEPC	Gilbert F. Lindsey (615) 751-8096 (125) 237-1112 (PAX)	Yes
Radnor 161-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Yes
Roane 500-kV Substation	Notified	Freddy R. Horne (615) 632-6750	Yes
S. Jackson 161-kV Substation	Notified	Glenn E. Parrish (901) 668-6136	Yes
Sequoyah Nuclear Plant	Notified August 15, 1988	T. H. Youngblood, Jr. (615) 874-5095	Yes

Shawnee Fossil Plant	McCracken County	David Fish (502) 433-3626 (125) 435-1272	Yes
Shelby 500-kV Substation	Notified	Glenn E. Parrish (901) 668-6136	Yes
Shelbyville 46-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Yes
South Nashville 161-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Yes
Sullivan 500-kV Substation	Notified	Freddy R. Horne (615) 632-6750	Yes
Summer Shade 161-kV Substation	Notified	Glen Burgess (615) 360-1562	Yes
Trinity 500-kV Substation	Notified	Vernon McDonald or J. B. Hendrix (205) 386-2841	Yes
Volunteer 500-kV Substation	Notified	Freddy R. Horne (615) 632-6750	Yes
W. Cookeville 161-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Yes
W. Nashville 161-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Yes
Wartrace 161-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Yes
Watts Bar Hydro Plant	Rhea County LEPC	Ralph Finch (615) 365-6300 (125) 235-1221 (PAX)	Yes
Watts Bar Nuclear Plant	Notified March 25, 1988	D. E. Crawley (615) 365-8821	Yes
Weakley 500-kV Substation	Notified	Glenn E. Parrish (901) 668-6136	Yes
Wheeler Hydro Plant	Lawrence County EMA	L. L. Harmon (205) 247-0153 (125) 326-1112	Yes
Widows Creek Fossil Plant	Jackson County	Ed Jones (205) 437-2937 (125) 225-1235 (PAX)	Yes
Wilson 500-kV Substation	Notified	G. Glenn Burgess (615) 360-1562	Yes

Wilson Hydro Plant

Colbert County EMA

Fred W. German
(205) 386-2422
(125) 344-1212

Yes

Winchester 161-kV Substation

Notified

Freddy R. Horne
(615) 632-6750

Yes

Department/Service: Department of Transportation
Contact/Title: Charles James, Mechanical Engineer
Address: Real Property Division
400 Seventh Street, SW
Washington, DC 20590
Phone Number: (202) 366-0038

Program Description:

The Department of Transportation (DOT) has issued two policy directives that address compliance with the requirements of Title III. These policy directives clearly state that the department's facilities will comply with emergency planning and notification requirements for Extremely Hazardous Substances pursuant to Subtitle A, section 302(a). Emergency release notification will be made to the SERC and LEPC for Extremely Hazardous Substances and all CERCLA hazardous substances. For all facilities where there are chemicals for which MSDSSs are required under OSHA, the facility manager will establish a point of contact with the SERC, LEPC and local fire department. In addition, DOT facilities will coordinate MSDSSs with LEPCs and provide copies of such information upon request.

Program Scope:

Sections 301 - 303: As stated above, DOT facilities will report the presence of Extremely Hazardous Substances in accordance with Title III requirements.

Section 304: All facilities have been directed to provide notification.

Sections 311-312: Chemicals required to have MSDSSs under OSHA will be provided to the appropriate LEPC, SERC and fire department upon request.

Section 313: Facilities do not meet the criteria outlined in 40 CFR 372.22.

Program Directives/Guidance:

DOT issued two policy directives on February 5, 1987 and December 29, 1988.

Number of Facilities Affected:

Four DOT facilities with Extremely Hazardous Substances above the Threshold Planning Quantities have been identified. A facilities coordinator has been designated and the LEPCs notified.

FACILITY COORDINATORS
Department of Transportation

Mr. Murrey Chappell
U.S. Coast Guard Support Center
Elizabeth City, NC

CDR Hopkins
U.S. Coast Guard Yard
Curtis Bay, MD

Mr. Jim Long
Mike Monroney Aeronautical Center
Oklahoma City, OK

Mr. Mike Beres
Federal Aviation Administration
Technical Center
Atlantic City, NJ

Department/Service: Department of the Treasury
Contact/Title: Tony DiSilvestre
Environmental Programs Officer
Address: 1500 Pennsylvania Avenue, NW
Washington, DC 20220
Phone Number: (202) 634-2292

Program Description:

The Department of the Treasury intends to issue a Treasury Directive which will establish policy and procedures implementing Title III.

Program Scope:

Sections 301-303: The Bureau of Engraving has designated a Title III contact and provided information to District of Columbia officials.

Section 304: Information not provided.

Sections 311-312: Information not provided.

Section 313: Information not provided.

Program Directives/Guidance:

A Treasury Directive on Title III is planned.

Number of Facilities Affected:

Treasury consists of twelve bureaus, however, there is no information at present on how many bureaus and corresponding facilities are affected.

Department: Department of Veterans Affairs

Contact/Title: Jack Staudt, Chief
Hazardous Materials
Management Division

Address: Office of Facilities
Washington, DC 20420

Phone Number: (202) 233-3729

Program Description:

The Department of Veterans Affairs (VA) is currently preparing directives for their facilities to use in establishing SARA Title III programs. These directives have been circulated in draft form within the VA for comments. The VA is currently incorporating these comments into final directives.

Program Scope:

Sections 301-303: Through the directives, the VA will instruct its facilities to contact the state and local planning authorities concerning Title III responsibilities. The VA has not directed their facilities to evaluate whether Threshold Planning Quantities of hazardous chemicals are present.

Section 304: The VA will direct its facilities to report any chemical releases to the SERC or LEPC.

Sections 311-312: Facility directors have been instructed to maintain a list of hazardous chemicals and Material Safety Data Sheets, but have not been directed to forward a copy of the list to LEPCs.

Section 313: The VA does not monitor whether it has facilities that manufacture, import, process or use chemicals in quantities exceeding established thresholds.

Program Directives/Guidance:

None

Number of Facilities Affected:

The VA provided no information on number of facilities affected by Title III.