Changes to EPCRA, CERCLA, CAA 112(r) Consolidated List of Lists USEPA Office of Emergency Management October 2012

The following are the changes made to the EPCRA, CERCLA, CAA 112(r) Consolidated List of Lists in October 2012 as compared to the July 2011 version.

Changes to Introductory Text

Page ii under TPQ paragraph. Added the following explanatory language for applying TPQs for EHS that are molten solids or solids in solution: "If a solid EHS is in molten form, the facility must multiply the amount of EHS on-site by 0.3 before comparing to the lower listed TPQ. If a solid EHS is in solution form, the facility must multiply amount EHS on-site by 0.2 before comparing to the lower listed TPQ. The reducing factors of 0.2 for molten solids and 0.3 for solids in solution are not to be used for the 12 solid reactive chemicals are noted by footnote "a" in Appendix A and B in 40 CFR part 355."

Pages iv and v under EPCRA Section 313 Additions and Stayed Chemicals. Eliminated the tables of Section 313 (TRI) specific chemicals (from introductory text only) that were newly added to the TRI list at one point, but are no longer considered new. Also eliminated the list of TRI persistent and bioaccumulator chemicals (from introductory text only) and their thresholds. A webpage link has been provided to these specific chemicals and their lower reporting thresholds. Both sets of these chemicals already appear in the larger List of Lists tables of chemicals by alphabetical and by CAS number order.

<u>Page v under EPCRA Section 313 Stayed Chemicals.</u> Added the following: On October 11, 2011 EPA reinstated the TRI reporting requirements for hydrogen sulfide. This action will be effective for the 2012 TRI reporting year, with the first 2012 TRI reports due from facilities by July 1, 2013. For more information, see http://www.epa.gov/tri/lawsandregs/hydrogensulfide/indexf.html

<u>Page vi under RCRA Hazardous Wastes</u> Deleted sentence indicating that carbamate wastes added to CERCLA list having a one pound statutory RQ have an asterisk "* " after the RQ. These chemicals had their RQs changed in 2006 and the updated RQs were in the chemical tables, but the introductory text had not been corrected. Added this language: *RCRA waste K181 has with a statutory one-pound RQ (indicated by an asterisk "*" following the RQ)*.

Page vi and vii under Summary of Codes Amended summary of codes by substituting the use of multiple asterisks such as "***" and "****" with other symbols to make easier reading. These new symbols appear in the chemical list tables where appropriate. "**" is now "PMN", "***" is now "&" and "****" and "****" are now both "@", using same symbol to apply to nitrogen oxide and nitrogen dioxide. Also the "***" and "****" notations were missing from the chemicals tables in the Excel file and the file has been corrected, but by using the new "@" notation. Deleted notation of "^" that indicated a change in reporting threshold for Section 313

chemicals from 1998, because this is outdated news and reporting thresholds for Section 313 chemicals are not covered in this document anyway. Rearranged the order of the codes to aggregate the Section 313 information together.

Changes to list of chemicals tables in Alphabetical chemical list and Appendix B (CAS Order)

Changed "313s" notation to "313" in the table listings for hydrogen sulfide because hydrogen sulfide is no longer stayed from Section 313 (TRI) list.

Deleted three CERCLA chemicals for sodium phosphate, tribasic listed with three CAS Nos. 7758-29-4, 7785-84-4 and 10124-56-8 because the CAS numbers were incorrect.

Added CERCLA RQ of 100 lbs to Warfarin and Salts with 313 Category code N874. RQ column was blank before.

Added CERCLA RQ of 10 lbs to Strychine and salts with 313 Category Code N746. RQ column was blank before.

Added CERCLA RQ of 100 lbs to Nicotine and salts with 313 Category Code N503. RQ column was blank before.

Added CERCLA RQ of 100 lbs to Ethylenebisdithiocarbanic acid, salts and esters with 313 Category Code N171. RQ column was blank before.

Deleted listings for "Except C.I. Pigment Blue 15", "Except C.I. Pigment Green 36", "Except C.I. Pigment Green 7", and "Except copper phthalocyanine compounds (under 313)", in the chemical tables. They appeared after "Copper Compounds" in the alphabetical chemical list and in the CAS number order list with CAS number of 0. These chemicals are not reportable, having them in the table with no information is confusing and the Section 313 category definitions in Appendix D clarify the copper compounds category

Changes to Appendix B Radionuclides listed under CERCLA

Updated list of radionuclides in Appendix B so it matches the current list in 40 CFR 302.4 Appendix B and includes additional Notes listed after the table.

In the CAS number order list (Appendix A), all chemical categories are now moved up to the front of the list where they won't be overlooked. In the older version of the document, some of CERCLA categories were in front, a few were in back and a few scattered within the CAS ordered list. CERCLA categories now appear with a CAS number of N.A. first, followed by the Section 313 categories with their Section 313 Nxxx category code in the CAS number column.

Changes to Appendix C RCRA Waste Streams and Unlisted Hazardous Wastes

RQ on page C-5 for RCRA Code K181 waste has been changed from "1" to "1*" because there is a statutory RQ of 1 pound for RCRA waste K181. The description for RCRA K181 waste has been revised to: "*Non-wastewaters generated from the production of certain dyes, pigments, and FD&C colorants, exceeding constituent mass loading levels, subject to disposal exceptions in 40 CFR 261.32.*" to better reflect the description in 40 CFR 261.32, although the revised description has been abbreviated somewhat.

Page C-5, the description for RCRA hazardous waste K174 has been revised to: "Wastewater treatment sludges from the production of ethylene dichloride or vinyl chloride monomer (including sludges that result from commingled EDC or VCM wastewater and other wastewater), unless the sludges meet certain disposal conditions. (See 40 CFR 261.32)." The description for this waste in 40 CFR 302.4 for CERCLA reporting was inexplicably left blank, so the original description of the waste from the RCRA regulation (40 CFR 261.32) was substituted in abbreviated form.

Page C-5, the description for RCRA hazardous waste K175 has been revised to: "Wastewater treatment sludges from the production of vinyl chloride monomer using mercuric chloride catalyst in an acetylene-based process (See 40 CFR 261.32)." The description for this waste in 40 CFR 302.4 for CERCLA reporting was inexplicably left blank, so the original description of the waste from the RCRA regulation (40 CFR 261.32) was substituted.

Added new Appendices D and E for Section 313 and CERCLA Chemical Categories

A new Appendix D- EPCRA Section 313 Chemical Categories and Appendix E for CERCLA Chemical Categories was added to the document because information was lacking for what chemicals are included within the categories. The Section 313 (TRI) program has already developed definitions and explanations for the TRI chemical categories, so this information was included in this Appendix for greater usability of the document. Also provided was a webpage link to more detailed chemical-specific guidance documents for the Section 313 chemical categories.

Added a new Appendix E, for any CERCLA chemical category name listed with a CAS Number of N. A. in the chemical tables. This includes any available information such as definitions or chemical names included within the category that could be obtained from the relevant statutes, CFR text or EPA published guidance for these categories.