# EPCRA/Tier II Reporting Program Audit

Program Audit Checklist

| | |
|---|---|
| **Facility Name:** | |
| **Auditor:** | |
| **Date:** | |
| **Audit Period:** | |

## Regulatory References

*The following regulations and guidance documents are applicable to this program audit. Click any link to view the full text.*

| Regulation / Guidance Document |
|---|
| 40 CFR Part 370 — Hazardous Chemical Reporting: Community Right-to-Know (Tier II) |
| 40 CFR Part 372 — Toxic Chemical Release Reporting: Community Right-to-Know (TRI) |
| 40 CFR Part 355 — Emergency Planning and Notification (EHS/RQ) |
| EPA EPCRA Overview and Fact Sheets |
| EPA List of Extremely Hazardous Substances (EHS) with TPQs |
| EPA TRI-MEweb — Toxics Release Inventory Reporting Portal |
| EPA Tier2 Submit Software Download |

**Instructions:** Review each audit item and record findings in the Status and Notes columns. Use C (Compliant), NC (Non-Compliant), NA (Not Applicable), or NR (Needs Review) for the status. Document specific findings, evidence reviewed, and any corrective actions needed in the Notes column.

## Emergency Planning (Sections 302/303)

| Audit Item | Expected Finding | Status | Notes / Evidence |
|---|---|---|---|
| **EHS identification** | All extremely hazardous substances (EHS) present at the facility have been identified from EPA's list of 355 EHS chemicals. Maximum on-site quantities are tracked against threshold planning quantities (TPQs). Facility has determined whether any EHS is present above its TPQ.<br>» *Ref: EPCRA §302; 40 CFR 355.30* | | |
| **SERC/LEPC notification** | If any EHS exceeds its TPQ, initial notification has been submitted to the SERC and LEPC within 60 days. LEPC contact information is current. Facility emergency coordinator has been designated and contact information provided to the LEPC.<br>» *Ref: EPCRA §302(c); 40 CFR 355.30(b)* | | |
| **Emergency planning participation** | Facility provides information requested by the LEPC for local emergency planning purposes. Facility emergency coordinator participates in LEPC emergency planning activities when requested. Any changes in EHS inventory that | | |

| Audit Item | Expected Finding | Status | Notes / Evidence |
|---|---|---|---|
| | affect the local emergency plan have been communicated.<br>» *Ref: EPCRA §303; 40 CFR 355.30(c)-(d)* | | |

## Emergency Release Notification (Section 304)

| Audit Item | Expected Finding | Status | Notes / Evidence |
|---|---|---|---|
| **Reportable quantity identification** | Reportable quantities (RQs) are known for all CERCLA hazardous substances and EHS chemicals stored at the facility. RQ reference list is current and accessible to operations personnel. Continuous release reporting provisions are understood and applied where applicable.<br>» *Ref: EPCRA §304; 40 CFR 355.40, 40 CFR 302.4* | | |
| **Notification procedures** | Written procedures exist for immediate notification of the LEPC and SERC upon discovery of a release exceeding a reportable quantity. Procedures include notification of the National Response Center (1-800-424-8802) when CERCLA substances are involved. Contact numbers are posted at key locations throughout the facility.<br>» *Ref: EPCRA §304(b)-(c); 40 CFR 355.40(b)* | | |
| **Release documentation** | All releases exceeding RQs have been documented. Follow-up written notices have been submitted to LEPC and SERC as soon as practicable after the release, including updated information on response actions, health risks, and medical advice. Release records are retained.<br>» *Ref: EPCRA §304(c); 40 CFR 355.40(b)(3)* | | |

## SDS and Chemical Inventory (Sections 311/312)

| Audit Item | Expected Finding | Status | Notes / Evidence |
|---|---|---|---|
| **SDS submission compliance** | Initial SDS or chemical lists were submitted to the LEPC, SERC, and local fire department for all hazardous chemicals present above thresholds. Updated SDS have been submitted when new chemicals are introduced or significant new hazard information is discovered.<br>» *Ref: EPCRA §311; 40 CFR 370.20-370.21* | | |
| **Tier II report submission** | Annual Tier II reports are submitted by March 1 to the SERC, LEPC, and local fire department. Reports cover the prior calendar year (January 1 – December 31). Submission uses the state's required format (Tier2 Submit software or state-specific portal). Submission receipts or confirmations are retained.<br>» *Ref: EPCRA §312; 40 CFR 370.40-370.45* | | |
| **Tier II data accuracy** | Tier II reports accurately reflect maximum amount, average daily amount, and number of days on site for each reportable chemical. Chemical identities match SDS information. Storage locations, types, and conditions (temperature, pressure) are correctly reported. | | |

| Audit Item | Expected Finding | Status | Notes / Evidence |
|---|---|---|---|
| | CAS numbers and hazard categories are accurate.<br>» Ref: 40 CFR 370.40(a)-(b) | | |
| **Threshold tracking** | Maximum on-site quantities are tracked throughout the year for all hazardous chemicals. Threshold determinations account for all storage locations and containers. For EHS chemicals, the lower of 500 pounds or the TPQ is used. For all other hazardous chemicals, the 10,000-pound threshold applies. Mixtures are evaluated per 40 CFR 370.28.<br>» Ref: 40 CFR 370.10, 370.28 | | |
| **Chemical inventory management** | Current chemical inventory list is maintained with chemical name, CAS number, maximum quantity, average daily quantity, and storage location(s). Inventory is updated as chemicals are added or removed. SDS library is current for all chemicals on site and accessible to employees.<br>» Ref: 40 CFR 370.40-370.45 [best practice] | | |

## Toxic Release Inventory (Section 313)

| Audit Item | Expected Finding | Status | Notes / Evidence |
|---|---|---|---|
| **TRI applicability determination** | Facility has evaluated TRI applicability based on: SIC/NAICS code, employee count (≥10 full-time equivalent), and manufacturing, processing, or otherwise using listed toxic chemicals above applicable thresholds (25,000 lbs manufactured/processed, 10,000 lbs otherwise used, or lower thresholds for PBT chemicals). Determination is documented annually.<br>» Ref: EPCRA §313; 40 CFR 372.22-372.28 | | |
| **TRI report submission** | Form R or Form A (certification) reports are submitted to EPA and the state by July 1 for each TRI chemical exceeding thresholds. Reports cover the prior calendar year. Submission is through EPA's TRI-MEweb (Toxics Release Inventory – Made Easy). Confirmation receipts are retained.<br>» Ref: EPCRA §313(a); 40 CFR 372.30 | | |
| **Release and transfer calculations** | Releases to air, water, and land are quantified using the best readily available data. Off-site transfers for treatment, disposal, recycling, and energy recovery are documented. Source reduction and waste management data (Section 8) is reported. Calculation methodologies are documented.<br>» Ref: 40 CFR 372.30, 372.85 (Form R) | | |
| **Supplier notification** | If the facility sells or distributes TRI-listed chemicals as part of mixtures, supplier notifications have been provided to purchasers per 40 CFR 372.45. Notifications include the TRI chemical name, CAS number, and percent by weight in the mixture.<br>» Ref: 40 CFR 372.45 | | |

## Recordkeeping and Program Management

| Audit Item | Expected Finding | Status | Notes / Evidence |
|---|---|---|---|
| **Record retention** | All EPCRA-related records are retained for the required period: Tier II reports and supporting data for at least three years, TRI reports and calculations for at least three years, emergency release notifications and follow-up reports for at least five years.<br>» *Ref: 40 CFR 370.45, 372.10* | | |
| **Local agency coordination** | Contact information for SERC, LEPC, and local fire department is current. Copies of all submissions are on file. Facility responds to information requests from these agencies within required timeframes. Relationships with local emergency planners are maintained.<br>» *Ref: EPCRA §312(a); 40 CFR 370.40(a)* | | |
| **Staff training and awareness** | Personnel responsible for chemical inventory tracking, Tier II reporting, and TRI reporting are trained on applicable requirements. Emergency response personnel know the Section 304 notification procedures. All employees are aware of the facility's community right-to-know obligations.<br>» *Ref: EPCRA §304, 312, 313 [best practice]* | | |
| **Annual compliance review** | Facility conducts an annual review of EPCRA obligations covering: new chemicals that may trigger reporting, changes in quantities that affect threshold determinations, updates to EPA's TRI chemical list, and changes in state-specific requirements. Review is documented and any new obligations are addressed before the next reporting deadline.<br>» *Ref: EPCRA §311-313 [best practice]* | | |

## Corrective Actions Summary

| # | Finding | Corrective Action | Responsible | Due Date |
|---|---|---|---|---|
| 1 | | | | |
| 2 | | | | |
| 3 | | | | |
| 4 | | | | |
| 5 | | | | |

## Audit Sign-Off

**Auditor Name:**

**Auditor Signature:**

**Date Completed:**

**Reviewed By:**

**Review Date:**

**Status Key:** C = Compliant | NC = Non-Compliant | NA = Not Applicable | NR = Needs Review