Section D.1
University of South Carolina Sumter Safety Program Guide

EMERGENCY PLANNING AND COMMUNITY RIGHT TO KNOW ACT

Introduction

SARA stands for the Superfund Amendments and Reauthorization Act. This law was enacted in 1986 and encompasses a huge number of environmental regulations and reforms. One section of SARA, named the Emergency Planning and Community Right-to-Know Act (EPCRA), was included in SARA in response to a growing concern about the effect of chemical releases on communities.

EPCRA mandates that industry make vast amounts of information publicly available about its chemical processes, chemical storage and emissions, and safety procedures. This regulation is intended to encourage and support community planning efforts at the state and local levels, and to provide citizens and local governments with information concerning potential chemical hazards present in their communities.

What this translates into for most of the University of South Carolina Sumter community is a requirement that an annual report be made to state and local authorities on the types, quantities, locations and storage methods of all chemicals that are stored in all areas on campus. As one can imagine, this is a daunting task when one considers the wide variety of such substances which are kept on any one of the USC campuses.

Scope and Application

The Community Right to Know laws apply to any University of South Carolina Sumter operations that store, produce, or use any of the chemical substances regulated by the Community Right to Know Laws. There are two broad categories of chemical that must be inventoried and reported on the annual Community Right To Know Survey:

- Substances defined by the Environmental Protection Agency as "Extremely Hazardous Substances" if present in amounts equal to or above the Threshold Planning Quantity (TPQ), [listed in the EPA Title III List of Lists] specified for each substance on the list.
- Any product or substance for which a Material Safety Data Sheet (MSDS) is required (by Occupational Health and Safety Administration Standards) if the material was present at the facility (e.g., Main Campus) in excess of 10,000 pounds at any one time during the reporting period.

The survey covers the calendar year and must be submitted to South Carolina State Emergency Response Commission (SC SERC) by March 1 of the following year.

The following materials are exempt from reporting:

- Food and Drug Administration (FDA) regulated substances
  - any food, food additive, color additive, drug, or cosmetic regulated by FDA
- Solid manufactured items
  - any substance present as a solid in any manufactured item to the extent exposure to the substance does not occur under normal conditions of use
- Substances packaged as consumer products
  - any substance to the extent it is used for personal, family, or household purposes, or is present in the same form and concentration as a product packaged for distribution and use by the general public
- Medical and research lab materials
  - any substance, to the extent it is used in a research laboratory or a hospital or other medical facility under the direct supervision of a technically qualified individual
- Substances used in agricultural operations
  - any substance to the extent it is used in routine agricultural operations or is a fertilizer held for sale by a retailer to the ultimate customer

Program Description

Annual Survey
On behalf of the USC and the office of Environmental Health and Safety, near the end of each calendar year, the hazardous waste manager will contact the SC SERC office and obtain all relevant information from them pertaining to SARA reporting. The hazardous waste manager in turn will contact all Department Chairs, Unit Directors, Regional Campus Contacts, and Operation Managers to conduct the annual hazardous materials inventory to complete the annual survey. In order to be thorough and accurate each department must conduct a physical inventory of all hazardous materials present that is not specifically exempted from the reporting requirements. Such an inventory must contain information like the name of the chemical, amount present, number and type of containers and the location. The completed inventory shall be forwarded to the Hazardous Waste Manager for review and further reporting, if necessary.

Roles and Responsibilities

Department

- Conduct a thorough annual hazardous materials inventory or update the existing one.
- Forward a copy of your inventory to the Hazardous Waste Manager.

Environmental Health and Safety

- Prepare and file the finalized SARA report to the SC SERC and other agencies
- Keep up with the regulatory changes and forward all the necessary regulatory changes to the appropriate departments, within the USC.

For more information:

Contact the Hazardous Waste Manager Belinda Gravel at 777-2839.