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Central Intelligence Agency



Washington, D.C. 20505

27 OCT 1988

Mr. Lee M. Thomas
United States Environmental
Protection Agency
Washington, D.C. 20460

Dear Mr. Thomas:

Your letter, dated 30 September 1988, to the Director of the Central Intelligence Agency regarding voluntary 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) has been referred to me for response.

I am pleased to advise that the Central Intelligence Agency has initiated actions to implement provisions of the Emergency Planning and Community Right-to-Know Act, although no formal policy has been issued to date. The current status is reflected in the enclosure which is in response to your Enclosure 3.

The CIA Headquarters Compound is listed in the Federal Agency Hazardous Waste Compliance Docket as a small quantity generator of hazardous waste under the Resource Conservation and Recovery Act, Section 3010. Our hazardous waste activities are a part of public record and kept to a minimum.

Additional concerns or questions on this matter may be directed to [redacted] Chief, Safety Division, Office of Medical Services, at [redacted]

Please be assured that the protection of citizens, as well as our employees, from the hazards of chemicals is a matter of great interest to the Central Intelligence Agency.

Sincerely,

[Redacted Signature]

Gary E. Foster
Director of Medical Services

Enclosure

Distribution:

- Orig - Addressee
- 1 - DDA (w/enc)
- 1 - D/MS (w/enc)
- 1 - ER (w/enc) ref: ER 88-3814X
- 2 - OMS/SD (w/enc)

OMS/SD [redacted] ks [redacted]



L-266-15

CENTRAL INTELLIGENCE AGENCY
SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT, TITLE III PROGRAM

1. The Central Intelligence Agency (CIA) will issue guidance on the policies under Title III of the Superfund Amendments and Reauthorization Act (SARA) of 1986. At this time, no formal policy is available.

2. The Safety Division, Office of Medical Services, is the directed focal point for the policies under this program. The Division is in the process of determining the quantities of "extremely hazardous substances" at each facility. The number of facilities this entails is classified, but the information will be disseminated through appropriate channels. All local county emergency response personnel are familiar with the Headquarters Compound and with substances used there.

3. No local emergency planning committee has yet been established. A list of facility coordinators will be provided to the Office of Federal Programs, EPA, when completed.

4. The Safety Division, Office of Medical Services, reports "releases" of all hazardous substances to the following local and state officials:

Fairfax County Water, Department of Public Works
Lower Potomac/Blue Plains Treatment Facility
550-9740, ext 252

Fairfax County Air Pollution Control Board
246-5544

VA State Water Control Board,
Northern Regional Office
Alexandria, VA
750-9111

VA State Air Pollution Control Board,
Northern Regional Office
Springfield, VA
644-0311

All appropriate permits and operating functions are registered with these officials. A recent underground gasoline tank leak was reported to all those noted above.

5. The listing of MSDS on the Headquarters Compound will not be distributed to local emergency response personnel, but rather a completed volume of these sheets (approximately 2,500) are "housed" within the Agency's Security Duty Office. This office is a 24-hour operation and will be the focal point for any emergency response personnel entering the compound. At that time, all MSDSs will be available.

6. The Compound does not manufacture, import or process the listed substances; however, we do use more than 10,000 pounds of such chemicals as isopropyl alcohol and blanket wash (solvent mixture) within one calendar year. These two products are stored in one month supplies requirements of approximately two 55 gallon drums. If toxic releases are experienced by the CIA, the appropriate local and state officials listed above will be notified.

EXECUTIVE SECRETARIAT

ROUTING SLIP

TO:

		ACTION	INFO	DATE	INITIAL
1	DCI				
2	DDCI				
3	EXDIR				
4	D/ICS				
5	DDI				
6	DDA	X (w/att)			
7	DDO				
8	DDS&T				
9	Chm/NIC				
10	GC				
11	IG				
12	Compt				
13	D/OCA				
14	D/PAO				
15	D/PERS				
16	D/Ex Staff				
17	D/Safety Div/OMS		X(w/o att)		
18	<i>EP</i>				
19					
20					
21					
22					

SUSPENSE _____

Date

Remarks

STAT

ER 88-3814X

Executive Secretary

4 Oct '88

Date

3637 (10-81)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

SEP 30 1986

THE ADMINISTRATOR

Honorable William H. Webster
Director
Central Intelligence Agency
Washington, D.C. 20505

Dear Mr. Webster:

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.



L-2661R

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.

-3-

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.

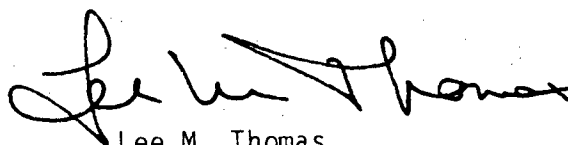
As stated previously, it is important that Federal agencies initiate appropriate actions to meet the requirements of the Emergency Planning and Community Right-to-Know Act. A Federal Facilities Title III Workgroup has been established at EPA to examine various approaches to promote the voluntary compliance 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:

Chief
Safety Staff

STAT

TITLE III FACT SHEET



EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW

August 1988
(Revised)

U.S. Environmental Protection Agency

INTRODUCTION

The Emergency Planning and Community Right-to-Know Act of 1986 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 builds upon EPA's Chemical Emergency Preparedness Program (CEPP) and numerous state and local programs aimed at helping communities to better meet their responsibilities in regard to potential chemical emergencies. The community right-to-know provisions will help to increase the public's knowledge and access to information on the presence of hazardous chemicals in their communities and releases of these chemicals into the environment. States and communities, working with facilities, will be better able to improve chemical safety and protect public health and the environment.

Nothing in this document should be construed to indicate that EPA has determined states have Title III authority over Indian reservations. For purposes of this document, definition of the terms "state" and "governor" includes "Indian tribe" and "Tribal Chairman." EPA has issued a draft policy for comment regarding the application of the emergency

planning and community right-to-know law to Indian lands.

The emergency planning and community right-to-know (also known as Title III) provisions have four major sections: emergency planning (Section 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). Information from these four reporting requirements will help states and communities develop a broad perspective of chemical hazards for the entire community as well as for individual facilities.

SECTION 301-303: Emergency Planning

The emergency planning sections are designed to develop state and local governments' emergency response and preparedness capabilities through better coordination and planning, especially within the local community.

The Emergency Planning and Community Right-to-Know Act required the governor of each state to designate a state emergency response commission. Many state emergency response commissions include public agencies and departments

concerned with issues relating to environment, natural resources, emergency services, public health, occupational safety, and transportation. Also, interested public and private sector groups and associations with experience in emergency planning and community right-to-know issues may be included in the state commission. At this time, all governors have established state emergency response commissions.

The state commission must also have designated local emergency planning districts and appointed local emergency planning committees for each district. State commissions have designated over 4,000 local districts. Thirty-five state commissions chose counties as the basic district designation (often with separate districts for municipalities), ten state commissions designated substate planning districts and five state commissions designated the entire state as a district. The state commission is responsible for supervising and coordinating the activities of the local emergency planning committees, for establishing procedures for receiving and processing public requests for information collected under other sections of Title III, and for reviewing local emergency plans.

This local emergency planning

KEY DATES TO REMEMBER

November 17, 1986	EPA published Interim List of Extremely Hazardous Substances and Threshold Planning Quantities in Federal Register (Sections 302, 303, 304)
November 17, 1986	EPA initiated comprehensive review of emergency systems (Section 305 (b))
January 27, 1987	EPA published proposed format for Emergency Inventory Forms and reporting requirements in Federal Register (Sections 311 & 312)
March 17, 1987	National Response Team published guidance for preparation and implementation of emergency plans (Section 303(f))
April 17, 1987	State governors appointed state emergency response commissions (Section 301(a))
April 22, 1987	EPA published Final List of Extremely Hazardous Substances and Threshold Planning Quantities in Federal Register (Sections 302, 303, 304)
May 17, 1987	Facilities subject to Section 302 planning requirements notified state emergency response commission (Section 302(c)). Interim report on emergency system review submitted to Congress (Section 305(b))
June 4, 1987	EPA published proposed toxic chemical release (i.e., emissions inventory) form (Section 313(g))
July 17, 1987	State emergency response commission designated emergency planning districts (Section 301 (b))
August 17, 1987 (or 30 days after designation of districts, whichever is sooner)	State emergency response commission appointed members of local emergency planning committees (Section 301 (c))
September 17, 1987 (or 30 days after local committee is formed, whichever is earlier)	Facilities notified local planning committee of selection of a facility representative (Section 303(d)(1))

(Continued on Page 4)

committee must include, at a minimum, elected state and local officials, police, fire, civil defense, public health professionals, environmental, hospital, and transportation officials as well as representatives of facilities subject to the emergency planning requirements, community groups, and the media. As soon as facilities are subject to the emergency planning requirements, they must designate a representative to participate in the planning process. The local committee must establish rules, give public notice of its activities, and establish procedures for handling public requests for information.

The local committee's primary responsibility is to develop an emergency response plan by October 17, 1988 and review it at least annually thereafter. In developing this plan, the local committee evaluates available resources for preparing for and responding to a potential chemical accident. The plan must:

- identify facilities and transportation routes of extremely hazardous substances;
- describe emergency response procedures, on-site and off-site;
- designate a community coordinator and facility coordinator(s) to implement the plan;
- outline emergency notification procedures;
- describe methods for determining the occurrence of a release and the probable affected area and population;

- describe community and industry emergency equipment and facilities and the identity of persons responsible for them;
- outline evacuation plans;
- describe a training program for emergency response personnel (including schedules); and,
- present methods and schedules for exercising emergency response plans.

In order to assist the local committees in preparing and reviewing plans, Congress required the National Response Team (NRT), composed of 14 federal agencies with emergency response responsibilities, to publish guidance on emergency response planning. This guidance, the "Hazardous Materials Emergency Planning Guide," was published by the NRT in March 1987.

The emergency response plan must be initially reviewed by the state commission and, at least, annually by the local committee. Regional Response Teams, composed of federal regional officials and state representatives, may review the plans and provide assistance to the local committees upon request.

Planning activities of local committees and facilities should be initially focused on, but not limited to, the 366 extremely hazardous substances published in the Federal Register. Plans should be comprehensive, addressing all hazardous materials of concern and transportation as well as fixed facilities. The list includes the threshold planning quantities (minimum limits) for each substance. Through rulemaking, EPA can revise the list and threshold

planning quantities based on the toxicity, reactivity, volatility, dispersability, combustibility, or flammability of a substance.

Any facility that has present any of the listed chemicals in a quantity equal to or greater than its threshold planning quantity is subject to the emergency planning requirements. In addition, the state commission or the Governor can designate additional facilities, after public comment, to be subject to these requirements. Covered facilities must notify the state commission and local committee that they are subject to these requirements within 60 days after they begin to have present any of the extremely hazardous substances in threshold planning quantities.

Each state commission must notify the EPA Regional Office of all facilities subject to the emergency planning requirements, including facilities designated by the state commission or the governor.

SECTION 304: Emergency Notification

Facilities must immediately notify the local emergency planning committees and the state emergency response commissions likely to be affected if there is a release into the environment of a listed hazardous substance that exceeds the reportable quantity for that substance. Substances subject to this requirement are those on the list of 366 extremely hazardous substances as published in Federal Register (40 CFR 355) or on a list of 721 substances subject to the emergency notification requirements under CERCLA Section 103(a) (40 CFR 302.4). Some chemicals are common to both lists.

Initial notification can be made by telephone, radio, or in person. Emergency notification requirements involving transportation incidents can be met by dialing 911, or in the absence of a 911 emergency number, calling the operator.

This emergency notification needs to include:

- the chemical name;
- an indication of whether the substance is extremely hazardous;
- an estimate of the quantity released into the environment;
- the time and duration of the release;
- whether the release occurred into air, water, and/or land;
- any known or anticipated acute or chronic health risks associated with the emergency, and where necessary, advice regarding medical attention for exposed individuals;
- proper precautions, such as evacuation; and,
- name and telephone number of contact person.

Section 304 also requires a written follow-up emergency notice after the release. The follow-up notice or notices must:

- update information included in the initial notice, and
- provide information on
 - actual response actions taken; and,

KEY DATES TO REMEMBER (Continued)

October 15, 1987	EPA published final format for emergency inventory forms and reporting requirements in the Federal Register (Sections 311 and 312)
	EPA published proposed regulation governing trade secret claims (Sections 322 and 323)
October 17, 1987	Manufacturing facilities submitted MSDS's or lists of MSDS chemicals to state commission, local committee and local fire department (Section 311 (d))
December 17, 1987	EPA published a final rule delisting four chemicals from the Extremely Hazardous Substance List (Section 302)
February 16, 1988	EPA published final toxic chemical release regulations, form and instructions (Section 313 (g))
February 25, 1988	EPA published a final rule delisting 36 chemicals from the Extremely Hazardous Substance List (Section 302)
March 1, 1988 (and annually thereafter)	Manufacturing facilities submit their hazardous chemical inventory forms to state commission, local committee and local fire department (Section 312(a)(2))
June 1988	Final report on emergency systems study submitted to Congress (Section 305(b))
June 20, 1988	EPA published final rule delisting titanium dioxide from the Toxic Chemical List (Section 313)
July 1, 1988 (and annually thereafter)	Covered facilities submitted initial toxic chemical forms to EPA and designated state officials (Section 313 (a))
July 29, 1988	EPA published final regulation governing trade secret claims (Sections 322 and 323)
August 4, 1988	EPA clarified Reporting Dates for facilities newly covered by the OSHA expansion of the Hazard Communication Standard (Sections 311 and 312)

(Continued on Page 6)

•advice regarding medical attention necessary for exposed individuals.

If local committees are not yet formed, releases should be reported to appropriate local response officials.

**SECTION 311-312:
Community Right-To-Know Requirements**

There are two community right-to-know reporting requirements within the Emergency Planning and Community Right-to-Know Act. Section 311 requires facilities that must prepare material safety data sheets (MSDS) under the Occupational Safety and Health Administration (OSHA) regulations to submit either copies of their MSDSs or a list of MSDS chemicals to:

- the local emergency planning committee;
- the state emergency response commission; and,
- the local fire department.

If the facility owner or operator chooses to submit a list of MSDS chemicals, the list must include the chemical or common name of each substance and must identify the applicable hazard categories. These hazard categories are:

- immediate (acute) health hazard;
- delayed (chronic) health hazard;
- fire hazard;
- sudden release of pressure hazard; and,
- reactive hazard.

If a list is submitted, the facility must submit a copy of the MSDS for any chemical on the list upon the request of the local emergency planning committee or state commission. Also, EPA has established threshold quantities for hazardous chemicals below which no facility must report. The current thresholds for Section 311 are:

- for extremely hazardous substances: 500 pounds or the threshold planning quantity, whichever is lower.
- for all other hazardous chemicals: before October 17, 1989: 10,000 pounds; on or after October 17, 1989: zero pounds (Note: the zero threshold will be revised pending further study.)

The initial submission of the MSDSs or a list of MSDS chemicals was due on October 17, 1987, or three months after the facility is required to prepare or have available an MSDS under OSHA regulations. Currently, OSHA regulations require only manufacturers and importers in Standard Industrial Classification (SIC) codes 20-39 to have or prepare MSDSs for their chemicals. But as of June 24, 1988, those OSHA regulations expanded to include non-manufacturers except the construction industry. Thus, under the emergency planning and community right-to-know statute, facilities newly covered by the expanded OSHA regulations must submit MSDSs or a list of MSDS chemicals within 3 months after they become covered.

An MSDS or a revised list must be provided when new hazardous chemicals become present at a facility in quantities above

the established threshold levels after the deadline. A revised MSDS must be provided to update the original MSDS if significant new information is discovered about the hazardous chemical.

Reporting under Section 312 requires a facility to submit an emergency and hazardous chemical inventory form to the local emergency planning committee, the state emergency response commission, and the 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's Hazard Communication Standard and that were present at the facility at any time during previous calendar year above specified thresholds.

EPA established threshold quantities for Section 312 for hazardous chemicals below which no facility must report. Currently those thresholds are:

- for extremely hazardous substances: 500 pounds or the threshold planning quantity, whichever is lower
- for all other hazardous chemicals:

January to December 1987 or first year of reporting... 10,000 pounds.

January to December 1988 or second year of reporting... 10,000 pounds.

January to December 1989 or third year of reporting... zero pounds. (Note: the zero threshold will be revised pending further study.)

The inventory form incorporates

a "two-tier" approach. Under Tier I, facilities must submit the following aggregate information for each applicable hazard category:

- an estimate (in ranges) of the maximum amount of chemicals for each category present at the facility at any time during the preceding calendar year;
- an estimate (in ranges) of the average daily amount of chemicals in each category; and,
- the general location of hazardous chemicals in each category.

If requested by a local committee, state commission or local fire department, the facility must provide the following Tier II information for each substance subject to the request:

- the chemical name or the common name as indicated on the MSDS;
- an estimate (in ranges) of the maximum amount of the chemical present at any time during the preceding calendar year;
- a brief description of the manner of storage of the chemical;
- the location of the chemical at the facility; and,
- an indication of whether the owner elects to withhold location information from disclosure to the public.

EPA published a uniform format for the inventory forms on October 15, 1987. Since many state commissions have additional requirements or have incorporated the federal con-

tents in their own forms. Tier I/II forms should be obtained from the state commission. Tier I information must be submitted for covered manufacturing facilities on or before March 1, 1988 and annually thereafter on March 1, for all covered facilities.

The Tier II form may be sent by the facility instead of a Tier I form. The public may also request Tier II information from the state commission and the local committee. The information submitted by facilities under Sections 311 and 312 must generally be made available to the public by local emergency planning committees (LEPCs) and state emergency response commissions (SERCs)

during normal working hours.

SECTION 313: Toxic Chemical Release Reporting

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986 requires EPA to establish an inventory of routine toxic chemical emissions from certain facilities. Facilities subject to this reporting requirement are required to complete a Toxic Chemical Release Form (Form R) for specified chemicals. The form must be submitted to EPA and those state officials designated by the governor, on or before July 1, 1988, and annually thereafter on July 1.

These reports should reflect releases during the preceding calendar year.

The purpose of this reporting requirement is to inform the public and government officials about routine releases of toxic chemicals to the environment. It will also assist in research and the development of regulations, guidelines, and standards.

The reporting requirement applies to owners and operators of facilities that have 10 or more full-time employees, that are in Standard Industrial Classification (SIC) codes 20 through 39 (i.e., manufacturing facilities) and that manufacture (including importing), process or otherwise use a listed toxic chemical in excess of specified threshold quantities.

KEY DATES TO REMEMBER (Concluded)

September 24, 1988 (three months after the OSHA expansion)	Non-manufacturing facilities covered under the new OSHA expansion as of June 24, 1988 submit MSDSs or a list of chemicals present in quantities over the first year threshold to the state commission, local committee, and local fire department (Section 311)
October 17, 1988 (and review at least annually thereafter)	Local emergency planning committees complete preparation of an emergency plan (Section 303(a))
March 1, 1989	Non-manufacturing facilities submit their emergency inventory forms to state commission, local committee, and local fire department (Section 312 (a)(2))
October 17, 1989	Manufacturing facilities submit MSDS or a list of chemicals over the final threshold to the state commission, local committee, and local fire department (Section 311)
June 20, 1991	Comptroller General submits Report to Congress on toxic chemical release information collection, use and availability (Section 313 (k))
October 17, 1991	EPA submits to Congress a Mass Balance Study (Section 313 (1))

Facilities manufacturing or processing any of these chemicals in excess of 75,000 pounds in 1987 must report by July 1, 1988. Facilities manufacturing or processing in excess of 50,000 pounds in 1988 must report by July 1, 1989; thereafter, facilities manufacturing or processing more than 25,000 pounds in a year are required to submit the form. Facilities otherwise using listed toxic chemicals in quantities over 10,000 pounds in a calendar year are required to submit toxic chemical release forms by July 1 of the following year. EPA can revise these threshold quantities and covered SIC codes.

The list of toxic chemicals subject to reporting consisted initially of chemicals listed for similar reporting purposes by the States of New Jersey and Maryland. There are over 300 chemicals and categories on these lists. Through rule-

making. EPA can modify this combined list.

The final Toxic Chemical Release Form and regulations were published in the Federal Register on February 16, 1988. The following information is required on the form:

- the name, location and type of business;
- off-site locations to which the facility transfers toxic chemicals in waste;
- whether the chemical is manufactured (including importation), processed, or otherwise used and the general categories of use of the chemical;
- an estimate (in ranges) of the maximum amounts of the toxic chemical present at the facility at any time during the preceding year;
- quantity of the chemical entering each medium--air, land, and water--annually;
- waste treatment/disposal methods and efficiency of methods for each waste stream;
- optional information on waste minimization; and,
- a certification by a senior facility official that the report is complete and accurate.

Reports are sent to EPA and designated state agencies. EPA must establish and maintain a national toxic chemical inventory based on the data submitted. The public must be able to access this national database, and obtain the data through other means.

In addition to the toxic chemical release reporting requirements, Section 313 authorizes EPA to arrange for a Mass Balance Study to be carried out by the National Academy of Sciences (NAS). The study will determine the feasibility, utility, and alternatives to collecting mass balance type information as a supplement to the currently required toxic release data. A report of this study must be submitted by EPA to Congress no later than October 17, 1991. An interim report from NAS is due to EPA in early 1989.

OTHER TITLE III PROVISIONS

Trade Secrets

Section 322 of the Emergency Planning and Community Right-to-Know Act addresses trade secrets as they apply to emergency planning, community right-to-know, and toxic chemical release reporting. Any facility may withhold the specific chemical identity on these submittals. No trade secrets are allowed to be claimed under Section 304 of the statute. The withholder must show that:

- the information has not been disclosed to any person other than a member of the local planning committee, a government official, an employee of the withholder or someone bound by a confidentiality agreement; measures have been taken to protect the confidentiality; and the withholder intends to continue to take such measures;
- the information is not required to be disclosed to the public under any other Federal or State law;

- the information is likely to cause substantial harm to the competitive position of the withholder; and,
- the chemical identity is not readily discoverable through reverse engineering.

However, even if chemical identity information can be legally withheld from the public, Section 323 provides for disclosure of this information to health professionals who need the information for diagnostic and treatment purposes or local health officials who need the information for prevention and treatment activities. In non-emergency cases, the health professional receiving the information must sign a confidentiality agreement with the facility and provide a written statement of need. In medical emergency situations, the health professional must, if requested by the facility, provide these documents as soon as circumstances permit.

Information claimed as a trade secret and substantiation for that claim must be submitted to EPA. More detailed information on the procedure for submitting trade secrecy claims can be found in the trade secrets final rule, published in the Federal Register on July 29, 1988. Any person may challenge trade secret claims by petitioning EPA. The Agency must then review the claim and rule on its validity.

The trade secret regulations cover the process for submission of claims, petitions for disclosure and the review process for petitions.

Title III Penalties

Section 325 of the Emergency Planning and Community Right-to-Know Act addresses the penalties for failure to comply with the requirements of this law. Civil and administrative penalties ranging from up to \$10,000 - \$75,000 per violation or per day per violation can be assessed to facilities that fail to comply with the emergency planning (Section 302), emergency notification (Section 304), community right-to-know (Sections 311 and 312), toxic chemical release (Section 313) and trade secret (Sections 322 and 323) reporting requirements.

Criminal penalties up to \$50,000 or five years in prison may also be given to any person who knowingly and willfully fails to provide emergency release notification. Penalties of not more than \$20,000 and/or up to one year in prison may be given to any person who knowingly and willfully discloses any information entitled to protection as a trade secret. In addition, Section 326 allows citizens to initiate civil actions against EPA, state emergency response commissions, and/or the owner or operator of a facility for failure to meet the requirements of the emergency planning and community right-to-know provisions. A state emergency response commission, local emergency planning committee, state or local government may institute actions against facility owner/operators for failure to comply with Title III requirements. In addition, states may sue EPA for failure to provide trade secret information.

Training Grants

Section 305(a) of the Emergency Planning and Community Right-to-Know Act authorizes the Federal Emergency Management Agency to provide \$5 million for each of fiscal years 1987, 1988, 1989, and 1990 for training grants to support state and local governments. These training grants are designed to improve emergency planning, preparedness, mitigation, response, and recovery capabilities. Such programs must provide special emphasis to hazardous chemical emergencies. The training grants may not exceed 80 percent of the cost of any such programs. The remaining 20 percent must come from non-federal sources. These training grants are coordinated within each state by the state emergency response commission.

Emergency Systems Study

Under Section 305(b), EPA is required to review emergency systems for monitoring, detecting, preventing and warning of accidental releases of extremely hazardous substances at representative U.S. facilities that produce, use, or store these substances. EPA reported interim findings to Congress in May 1987 and issued a final report of findings and recommendations to Congress in June 1988.

Public Access

Section 324 of the Emergency Planning and Community Right-to-Know Act provides for public access to information gathered under this law. Under this section, all material safety data sheets, hazardous chemical inventory forms, toxic chemical release form follow-up emergency notices, and the emergency response plan must be made available during normal working hours by the state commissions and local committees. In order to inform the public of the availability and location of the information provided to the local emergency planning committee, the local committee must publish a notice annually in the local newspaper. In addition, Toxic Release Inventory (Section 313) information is being collected by EPA and will be made available by telecommunications and other means.

For more information, contact the Emergency Planning & Community Right-to-Know Information Hotline:

Hotline: 1-800-535-0202
(in Washington, D.C. -
(202) 479-2449)

Hours: 8:30 am - 7:30 pm
(Eastern Time) Monday - Friday

—
This is NOT an
emergency number.

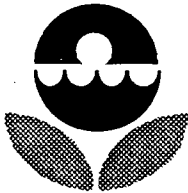
CHEMICAL LISTS ASSOCIATED WITH EMERGENCY PLANNING/COMMUNITY RIGHT-TO-KNOW

LIST	SECTION	PURPOSE
<p><u>List of Extremely Hazardous Substances</u> (366 Substances) (40 CFR 355)</p>	<p>§302: Emergency Planning §304: Emergency Notification §311/312: Material Safety Data Sheets and Emergency Inventory</p>	<ul style="list-style-type: none"> • Facilities with more than estimated planning quantities of these substances must notify the State commission and local committee • Initial focus for preparation of emergency plans by local emergency planning committees. • Certain releases of these substances trigger Section 304 notification to State commission and local committees. • Separate and lower thresholds are established for these substances of concern for the MSDS and Tier I/II reporting requirements.
<p>Substances requiring notification under Section 103(a) of CERCLA [721 substances] (40 CFR 302.4)</p>	<p>§304: Emergency Notification</p>	<ul style="list-style-type: none"> • Certain releases of these trigger Section 304 notification to State commission and local communities as well as Section 104(a) requirement for National Response Center notification.
<p><u>Hazardous Chemicals</u> considered physical or health hazards under OSHA's Hazard Communication Standard (29 CFR 1910.1200) [This is a performance standard; there is no specific list of chemicals.]</p>	<p>§304: Emergency Notification §311: Material Safety Data Sheets §312: Emergency Inventory</p>	<ul style="list-style-type: none"> • Identifies facilities subject to emergency notification requirements. • MSDS or list of MSDS chemicals provided by covered facilities to state commissions, local committees and local fire departments. • Tier I/II hazardous chemical inventory forms must be provided by facilities to state commissions, local committees and local fire departments.
<p><u>Toxic Chemicals</u> [327 chemical/chemical categories] (40 CFR 372)</p>	<p>§313: Toxic Chemical Release Reporting</p>	<ul style="list-style-type: none"> • These chemicals are reported on an emissions inventory to inform government officials and the public about the release of toxic chemicals into the environment.

**FEDERAL AGENCY WORKSHOP
ON THE
EMERGENCY PLANNING AND
COMMUNITY RIGHT-TO-KNOW ACT
(TITLE III)**

OCTOBER 6, 1988

ROOM 4234
(SOUTHEAST ENTRANCE)
U.S. DEPT. OF TRANSPORTATION
400 7TH ST., S.W., WASHINGTON, D.C.



SPONSORED BY THE U.S. EPA



WORKSHOP INFORMATION

The U.S. Environmental Protection Agency's (EPA) Office of Federal Activities is hosting a Federal Agency Workshop on the Emergency Planning and Community Right-To-Know Act (referred to as Title III). The purpose of this workshop is to provide Federal agencies with a thorough understanding of the Title III provisions and assist them in designing and implementing a voluntary program that will satisfy the requirements of the statute.

The workshop agenda, as outlined on the back of the flyer, has been structured to address all the provisions of Title III, provide a glimpse into industry's approach to compliance, highlight Federal facility issues, and describe other Federal agency Title III policies/programs. Workshop speakers include a mix of EPA senior management and staff, State, local and industry representatives, and environmental managers from other Federal Agencies.

WORKSHOP REGISTRATION

You must pre-register by phoning in your reservation to the Office of Federal Activities. To pre-register, please contact Kathy Hutson or Vickie Nelson at (202) 475-8790. There is no fee for the workshop. Attendees should pre-register if possible.

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?

SECTION 313 TOXIC CHEMICAL LIST (Including Chemical Categories)

[Note: Chemicals may be added or deleted to the list. The Emergency Planning and Community Right-to-Know Hotline, (800) 535-0202 or (202) 479-2449 in Washington, D.C. or Alaska, will provide up-to-date information on the status of these changes.]

a. Alphabetical List (Effective Date January 1, 1987)

CAS Number	Chemical Name		
75-07-0	Acetaldehyde	4680-78-8	C.I. Acid Green 3
60-35-5	Acetamide	569-64-2	C.I. Basic Green 4
67-64-1	Acetone	989-38-8	C.I. Basic Red 1
75-05-8	Acetonitrile	1937-37-7	C.I. Direct Black 38
53-96-3	2-Acetylanthraquinone	2602-46-2	C.I. Direct Blue 6
107-02-8	Acrolein	16071-86-6	C.I. Direct Brown 95
79-06-1	Acrylamide	2832-40-8	C.I. Disperse Yellow 3
79-10-7	Acrylic acid	3761-53-3	C.I. Food Red 5
107-13-1	Acrylonitrile	81-88-9	C.I. Food Red 15
309-00-2	Aldrin [1,4:5,8-Dimethanonaphthalene, 1,2,3,4,10,10-hexachloro-1,4,4a, 5,8,8a-hexahydro-(1.alpha., 4.alpha., 4a.beta., 5.alpha., 8.alpha., 8a.beta.)-]	3118-97-6	C.I. Solvent Orange 7
107-05-1	Allyl chloride	97-56-3	C.I. Solvent Yellow 3
7429-90-5	Aluminum (fume or dust)	842-07-9	C.I. Solvent Yellow 14
1344-28-1	Aluminum oxide	492-80-8	C.I. Soivent Yellow 34 (Auramine)
117-79-3	2-Aminoanthraquinone	128-66-5	C.I. Vat Yellow 4
60-09-3	4-Aminoazobenzene	7440-43-9	Cadmium
92-67-1	4-Aminobiphenyl	156-62-7	Calcium cyanamide
82-28-0	1-Amino-2-methylantraquinone	133-06-2	Captan [1H-Isoindole-1,3(2H)-dione, 3a,4,7,7a-tetrahydro-2- [(trichloromethyl)thio]-]
7664-41-7	Ammonia	63-25-2	Carbaryl [1-Naphthalenol, methylcarbamate]
6484-52-2	Ammonium nitrate (solution)	75-15-0	Carbon disulfide
7783-20-2	Ammonium sulfate (solution)	56-23-5	Carbon tetrachloride
62-53-3	Aniline	463-58-1	Carbonyl sulfide
90-04-0	o-Anisidine	120-80-9	Catechol
104-94-9	p-Anisidine	133-90-4	Chloramben [Benzoic acid, 3-amino- 2,5-dichloro-]
134-29-2	o-Anisidine hydrochloride	57-74-9	Chlordane [4,7-Methanoindan, 1,2,4,5,6,7,8,8- octachloro- 2,3,3a,4,7,7a-hexahydro-]
120-12-7	Anthracene	7782-50-5	Chlorine
7440-36-0	Antimony	10049-04-4	Chlorine dioxide
7440-38-2	Arsenic	79-11-8	Chloroacetic acid
1332-21-4	Asbestos (friable)	532-27-4	2-Chloroacetophenone
7440-39-3	Barium	108-90-7	Chlorobenzene
98-87-3	Benzal chloride	510-15-6	Chlorobenzilate [Benzeneacetic acid, 4-chloro-.alpha.-(4-chlorophenyl)- .alpha.-hydroxy-, ethyl ester]
55-21-0	Benzamide	75-00-3	Chloroethane (Ethyl chloride)
71-43-2	Benzene	67-66-3	Chloroform
92-87-5	Benzidine	74-87-3	Chloromethane (Methyl chloride)
98-07-7	Benzoic trichloride (Benzotrichloride)	107-30-2	Chloromethyl methyl ether
98-88-4	Benzoyl chloride	126-99-8	Chloroprene
94-36-0	Benzoyl peroxide	1897-45-6	Chlorothalonil [1,3- Benzenedicarbonitrile, 2,4,5,6-tetrachloro-]
100-44-7	Benzyl chloride	7440-47-3	Chromium
7440-41-7	Beryllium	7440-48-4	Cobalt
92-52-4	Biphenyl	7440-50-8	Copper
111-44-4	Bis(2-chloroethyl) ether	120-71-8	p-Cresidine
542-88-1	Bis(chloromethyl) ether	1319-77-3	Cresol (mixed isomers)
108-60-1	Bis(2-chloro-1-methylethyl) ether	108-39-4	m-Cresol
103-23-1	Bis(2-ethylhexyl) adipate	95-48-7	o-Cresol
75-25-2	Bromoform (Tribromomethane)	106-44-5	p-Cresol
74-83-9	Bromomethane (Methyl bromide)	98-82-8	Cumene
106-99-0	1,3-Butadiene	80-15-9	Cumene hydroperoxide
141-32-2	Butyl acrylate	135-20-6	Cupferron [Benzeneamine, N-hydroxy- N-nitroso, ammonium salt]
71-36-3	n-Butyl alcohol		
78-92-2	sec-Butyl alcohol		
75-65-0	tert-Butyl alcohol		
85-68-7	Butyl benzyl phthalate		
106-88-7	1,2-Butylene oxide		
123-72-8	Butyraldehyde		
2650-18-2	C.I. Acid Blue 9, diammonium salt		
3844-45-9	C.I. Acid Blue 9, disodium salt		

110-82-7	Cyclohexane	76-44-8	Heptachlor [1,4,5,6,7,8,8-Heptachloro-3a,4,7,7a-tetrahydro-4,7-methano-1H-indene]
94-75-7	2,4-D [Acetic acid, (2,4-dichloro-phenoxy)-]	118-74-1	Hexachlorobenzene
1163-19-5	Decabromodiphenyl oxide	87-68-3	Hexachloro-1,3-butadiene
2303-16-4	Diallate [Carbamothioic acid, bis (1-methylethyl)-, S-(2,3-dichloro-2-propenyl) ester]	77-47-4	Hexachlorocyclopentadiene
615-05-4	2,4-Diaminoanisole	67-72-1	Hexachloroethane
39156-41-7	2,4-Diaminoanisole sulfate	1335-87-1	Hexachloronaphthalene
101-80-4	4,4'-Diaminodiphenyl ether	680-31-9	Hexamethylphosphoramide
25376-45-8	Diaminotoluene (mixed isomers)	302-01-2	Hydrazine
95-80-7	2,4-Diaminotoluene	10034-93-2	Hydrazine sulfate
334-88-3	Diazomethane	7647-01-0	Hydrochloric acid
132-64-9	Dibenzofuran	74-90-8	Hydrogen cyanide
96-12-8	1,2-Dibromo-3-chloropropane (DBCP)	7664-39-3	Hydrogen fluoride
106-93-4	1,2-Dibromoethane (Ethylene dibromide)	123-31-9	Hydroquinone
84-74-2	Dibutyl phthalate	78-84-2	Isobutyraldehyde
25321-22-6	Dichlorobenzene (mixed isomers)	67-63-0	Isopropyl alcohol (manufacturing-strong acid process, no supplier notification)
95-50-1	1,2-Dichlorobenzene	80-05-7	4,4'-Isopropylidenediphenol
541-73-1	1,3-Dichlorobenzene	7439-92-1	Lead
106-46-7	1,4-Dichlorobenzene	58-89-9	Lindane [Cyclohexane, 1,2,3,4,5,6-hexachloro-, (1.alpha.,2.alpha.,3.beta.,4.alpha.,5.alpha.,6.beta.)-]
91-94-1	3,3'-Dichlorobenzidine	108-31-6	Maleic anhydride
75-27-4	Dichlorobromomethane	12427-38-2	Maneb [Carbamodithioic acid, 1,2-ethanediybis-, manganese complex]
107-06-2	1,2-Dichloroethane (Ethylene dichloride)	7439-96-5	Manganese
540-59-0	1,2-Dichloroethylene	108-78-1	Melamine
75-09-2	Dichloromethane (Methylene chloride)	7439-97-6	Mercury
120-83-2	2,4-Dichlorophenol	67-56-1	Methanol
78-87-5	1,2-Dichloropropane	72-43-5	Methoxychlor [Benzene, 1,1'-(2,2,2-trichloroethylidene)bis [4-methoxy-]]
542-75-6	1,3-Dichloropropylene	109-86-4	2-Methoxyethanol
62-73-7	Dichlorvos [Phosphoric acid, 2 dichloroethenyl dimethyl ester]	96-33-3	Methyl acrylate
115-32-2	Dicofol [Benzenemethanol, 4-chloro-alpha.-4-chlorophenyl)-alpha.- (trichloromethyl)-]	1634-04-4	Methyl tert-butyl ether
1464-53-5	Diepoxybutane	101-14-4	4,4'-Methylenebis(2-chloro aniline) (MBOCA)
111-42-2	Diethanolamine	101-61-1	4,4'-Methylenebis(N,N-dimethyl) benzenamine
117-81-7	Di-(2-ethylhexyl) phthalate (DEHP)	101-68-8	Methylenebis(phenylisocyanate) (MBI)
84-66-2	Diethyl phthalate	74-95-3	Methylene bromide
64-67-5	Diethyl sulfate	101-77-9	4,4'-Methylenedianiline
119-90-4	3,3'-Dimethoxybenzidine	78-93-3	Methyl ethyl ketone
60-11-7	4-Dimethylaminoazobenzene	60-34-4	Methyl hydrazine
119-93-7	3,3'-Dimethylbenzidine (o-Tolidine)	74-88-4	Methyl iodide
79-44-7	Dimethylcarbonyl chloride	108-10-1	Methyl isobutyl ketone
57-14-7	1,1-Dimethyl hydrazine	624-83-9	Methyl isocyanate
105-67-9	2,4-Dimethylphenol	80-62-6	Methyl methacrylate
131-11-3	Dimethyl phthalate	90-94-8	Michler's ketone
77-78-1	Dimethyl sulfate	1313-27-5	Molybdenum trioxide
534-52-1	4,6-Dinitro-o-cresol	505-60-2	Mustard gas [Ethane, 1,1'-tahiobis [2-chloro-]]
51-28-5	2,4-Dinitrophenol	91-20-3	Naphthalene
121-14-2	2,4-Dinitrotoluene	134-32-7	alpha-Naphthylamine
606-20-2	2,6-Dinitrotoluene	91-59-8	beta-Naphthylamine
117-84-0	n-Dioctyl phthalate	7440-02-0	Nickel
123-91-1	1,4-Dioxane	7697-37-2	Nitric acid
122-66-7	1,2-Diphenylhydrazine (Hydrazobenzene)	139-13-9	Nitrilotriacetic acid
106-89-8	Epichlorohydrin	99-59-2	5-Nitro-o-anisidine
110-80-5	2-Ethoxyethanol	98-95-3	Nitrobenzene
140-88-5	Ethyl acrylate	92-93-3	4-Nitrobiphenyl
100-41-4	Ethylbenzene	1836-75-5	Nitrofen [Benzene, 2,4-dichloro-1-(4-nitrophenoxy)-]
541-41-3	Ethyl chloroformate	51-75-2	Nitrogen mustard [2-Chloro-N-(2-chloroethyl) -N-methylethanamine]
74-85-1	Ethylene	55-63-0	Nitroglycerin
107-21-1	Ethylene glycol	88-75-5	2-Nitrophenol
151-56-4	Ethyleneimine (Aziridine)	100-02-7	4-Nitrophenol
75-21-8	Ethylene oxide		
96-45-7	Ethylene thiourea		
2164-17-2	Fluometuron [Urea, N,N-dimethyl-N'-[3-(trifluoromethyl)phenyl]-]		
50-00-0	Formaldehyde		
76-13-1	Freon 113 [Ethane, 1,1,2-trichloro-1,2,2-trifluoro-]		

62-75-9	N-Nitrosodimethylamine	86-30-6	N-Nitrosodiphenylamine
63-25-2	Carbaryl [1-Naphthalenol, methylcarbamate]	87-32-7	2,6-Xylidine
64-67-5	Diethyl sulfate	87-68-3	Hexachloro-1,3-butadiene
67-56-1	Methanol	87-86-5	Pentachlorophenol (PCP)
67-63-0	Isopropyl alcohol (manufacturing-strong acid process, no supplier notification)	88-06-2	2,4,6-Trichlorophenol
67-64-1	Acetone	88-75-5	2-Nitrophenol
67-66-3	Chloroform	88-89-1	Picric acid
67-72-1	Hexachloroethane	90-04-0	o-Anisidine
68-76-8	Triaziquone [2,5-Cyclohexadiene-1,4-dione, 2,3,5-tris(1-aziridinyl)-]	90-43-7	2-Phenylphenol
71-36-3	n-Butyl alcohol	90-94-8	Michler's ketone
71-43-2	Benzene	91-08-7	Toluene-2,6-diisocyanate
71-55-6	1,1,1-Trichloroethane (Methyl chloroform)	91-20-3	Naphthalene
72-43-5	Methoxychlor [Benzene, 1,1'-(2,2,2-trichloroethylidene)bis [4-methoxy-]]	91-22-5	Quinoline
74-83-9	Bromomethane (Methyl bromide)	91-59-8	beta-Naphthylamine
74-85-1	Ethylene	91-94-1	3,3'-Dichlorobenzidine
74-87-3	Chloromethane (Methyl chloride)	92-52-4	Biphenyl
74-88-4	Methyl iodide	92-67-1	4-Aminobiphenyl
74-90-8	Hydrogen cyanide	92-87-5	Benzidine
74-95-3	Methylene bromide	92-93-3	4-Nitrobiphenyl
75-00-3	Chloroethane (Ethyl chloride)	94-36-0	Benzoyl peroxide
75-01-4	Vinyl chloride	94-59-7	Safrole
75-05-8	Acetonitrile	94-75-7	2,4-D [Acetic acid, (2,4-dichlorophenoxy)-]
75-07-0	Acetaldehyde	95-47-6	o-Xylene
75-09-2	Dichloromethane (Methylene chloride)	95-48-7	o-Cresol
75-15-0	Carbon disulfide	95-50-1	1,2-Dichlorobenzene
75-21-8	Ethylene oxide	95-53-4	o-Toluidine
75-25-2	Bromoform (Tribromomethane)	95-63-6	1,2,4-Trimethylbenzene
75-27-4	Dichlorobromomethane	95-80-7	2,4-Diaminotoluene
75-35-4	Vinylidene chloride	95-95-4	2,4,5-Trichlorophenol
75-44-5	Phosgene	96-09-3	Styrene oxide
75-55-8	Propyleneimine	96-12-8	1,2-Dibromo-3-chloropropane (DBCP)
75-56-9	Propylene oxide	96-33-3	Methyl acrylate
75-65-0	tert-Butyl alcohol	96-45-7	Ethylene thiourea
76-13-1	Freon 113 [Ethane, 1,1,2-trichloro-1,2,2-trifluoro-]	97-56-3	C.I. Solvent Yellow 3
76-44-8	Heptachlor [1,4,5,6,7,8,8-Heptachloro-3a,4,7,7a-tetrahydro-4,7-methano-1H-indene]	98-07-7	Benzoic trichloride (Benzotrachloride)
77-47-4	Hexachlorocyclopentadiene	98-82-8	Cumene
77-78-1	Dimethyl sulfate	98-87-3	Benzal chloride
78-84-2	Isobutyraldehyde	98-88-4	Benzoyl chloride
78-87-5	1,2-Dichloropropane	98-95-3	Nitrobenzene
78-92-2	sec-Butyl alcohol	99-59-2	5-Nitro-o-anisidine
78-93-3	Methyl ethyl ketone	100-02-7	4-Nitrophenol
79-00-5	1,1,2-Trichloroethane	100-21-0	Terephthalic acid
79-01-6	Trichloroethylene	100-41-4	Ethylbenzene
79-06-1	Acrylamide	100-42-5	Styrene
79-10-7	Acrylic acid	100-44-7	Benzyl chloride
79-11-8	Chloroacetic acid	100-75-4	N-Nitrosopiperidine
79-21-0	Peracetic acid	101-14-4	4,4'-Methylenebis(2-chloroaniline) (MBOCA)
79-34-5	1,1,2,2-Tetrachloroethane	101-61-1	4,4'-Methylenebis(N,N-dimethyl)benzenamine
79-44-7	Dimethylcarbamyl chloride	101-68-8	Methylenebis(phenylisocyanate) (MBI)
79-46-9	2-Nitropropane	101-77-9	4,4'-Methylenedianiline
80-05-7	4,4'-Isopropylidenediphenol	101-80-4	4,4'-Diaminodiphenyl ether
80-15-9	Cumene hydroperoxide	103-23-1	Bis(2-ethylhexyl) adipate
80-62-6	Methyl methacrylate	104-94-9	p-Anisidine
81-07-2	Saccharin (manufacturing, no supplier notification) [1,2-Benzisothiazol-3(2H)-one, 1,1-dioxide]	105-67-9	2,4-Dimethylphenol
81-88-9	C.I. Food Red 15	106-42-3	p-Xylene
82-28-0	1-Amino-2-methylanthraquinone	106-44-5	p-Cresol
82-68-8	Quintozone [Pentachloronitrobenzene]	106-46-7	1,4-Dichlorobenzene
84-66-2	Diethyl phthalate	106-50-3	p-Phenylenediamine
84-74-2	Dibutyl phthalate	106-51-4	Quinone
85-44-9	Phthalic anhydride	106-88-7	1,2-Butylene oxide
85-68-7	Butyl benzyl phthalate	106-89-8	Epichlorohydrin
		106-93-4	1,2-Dibromoethane (Ethylene dibromide)
		106-99-0	1,3-Butadiene
		107-02-8	Acrolein
		107-05-1	Allyl chloride
		107-06-2	1,2-Dichloroethane (Ethylene dichloride)
		107-13-1	Acrylonitrile
		107-21-1	Ethylene glycol
		107-30-2	Chloromethyl methyl ether
		108-05-4	Vinyl acetate

108-10-1	Methyl isobutyl ketone	510-15-6	Chlorobenzilate [Benzeneacetic acid, 4-chloro-.alpha.-(4-chlorophenyl)-.alpha.-hydroxy-,ethyl ester]
108-31-6	Maleic anhydride	532-27-4	2-Chloroacetophenone
108-38-3	<i>m</i> -Xylene	534-52-1	4,6-Dinitro- <i>o</i> -cresol
108-39-4	<i>m</i> -Cresol	540-59-0	1,2-Dichloroethylene
108-60-1	Bis(2-chloro-1-methylethyl) ether	541-41-3	Ethyl chloroformate
108-78-1	Melamine	541-73-1	1,3-Dichlorobenzene
108-88-3	Toluene	542-75-6	1,3-Dichloropropylene
108-90-7	Chlorobenzene	542-88-1	Bis(chloromethyl) ether
108-95-2	Phenol	569-64-2	C.I. Basic Green 4
109-86-4	2-Methoxyethanol	584-84-9	Toluene-2,4-diisocyanate
110-80-5	2-Ethoxyethanol	593-60-2	Vinyl bromide
110-82-7	Cyclohexane	606-20-2	2,6-Dinitrotoluene
110-86-1	Pyridine	615-05-4	2,4-Diaminoanisole
111-42-2	Diethanolamine	621-64-7	<i>N</i> -Nitrosodi- <i>n</i> -propylamine
111-44-4	Bis(2-chloroethyl) ether	624-83-9	Methyl isocyanate
114-26-1	Propoxur [Phenol, 2-(1-methylethoxy)-, methylcarbamate]	636-21-5	<i>o</i> -Toluidine hydrochloride
115-07-1	Propylene (Propene)	680-31-9	Hexamethylphosphoramide
115-32-2	Dicofol [Benzenemethanol, 4-chloro-.alpha.-(4-chlorophenyl)-.alpha.-(trichloromethyl)-]	684-93-5	<i>N</i> -Nitroso- <i>N</i> -methylurea
117-79-3	2-Aminoanthraquinone	759-73-9	<i>N</i> -Nitroso- <i>N</i> -ethylurea
117-81-7	Di(2-ethylhexyl) phthalate (DEHP)	842-07-9	C.I. Solvent Yellow 14
117-84-0	<i>n</i> -Dioctyl phthalate	924-16-3	<i>N</i> -Nitrosodi- <i>n</i> -butylamine
118-74-1	Hexachlorobenzene	961-11-5	Tetrachlorvinphos [Phosphoric acid, 2-chloro-1-(2,3,5-trichlorophenyl)ethenyl dimethyl ester]
119-90-4	3,3'-Dimethoxybenzidine	989-38-8	C.I. Basic Red 1
119-93-7	3,3'-Dimethylbenzidine (<i>o</i> -Tolidine)	1120-71-4	Propane sultone
120-12-7	Anthracene	1163-19-5	Decabromodiphenyl oxide
120-71-8	<i>p</i> -Cresidine	1310-73-2	Sodium hydroxide (solution)
120-80-9	Catechol	1313-27-5	Molybdenum trioxide
120-82-1	1,2,4-Trichlorobenzene	1314-20-1	Thorium dioxide
120-83-2	2,4-Dichlorophenol	1319-77-3	Cresol (mixed isomers)
121-14-2	2,4-Dinitrotoluene	1330-20-7	Xylene (mixed isomers)
121-69-7	<i>N,N</i> -Dimethylaniline	1332-21-4	Asbestos (friable)
122-66-7	1,2-Diphenylhydrazine (Hydrazobenzene)	1335-87-1	Hexachloronaphthalene
123-31-9	Hydroquinone	1336-36-3	Polychlorinated biphenyls (PCBs)
123-38-6	Propionaldehyde	1344-28-1	Aluminum oxide
123-72-8	Butyraldehyde	1464-53-5	Diepoxybutane
123-91-1	1,4-Dioxane	1582-09-8	Trifluralin [Benzeneamine, 2,6-dinitro- <i>N,N</i> -dipropyl-4-(trifluoromethyl)-]
126-72-7	Tris(2,3-dibromopropyl) phosphate	1634-04-4	Methyl <i>tert</i> -butyl ether
126-99-8	Chloroprene	1836-75-5	Nitrofen [Benzene, 2,4-dichloro-1-(4-nitrophenoxy)-]
127-18-4	Tetrachloroethylene (Perchloroethylene)	1897-45-6	Chlorothalonil [1,3-Benzenedicarbonitrile, 2,4,5,6-tetrachloro-]
128-66-5	C.I. Vat Yellow 4	1937-37-7	C.I. Direct Black 38
131-11-3	Dimethyl phthalate	2164-17-2	Fluometuron [Urea, <i>N,N</i> -dimethyl- <i>N'</i> -[3-(trifluoromethyl)phenyl]-]
132-64-9	Dibenzofuran	2234-13-1	Octachloronaphthalene
133-06-2	Captan [1 <i>H</i> -Isoindole-1,3(2 <i>H</i>)-dione, 3a,4,7,7a-tetrahydro-2-[(trichloromethyl)thio]-]	2303-16-4	Diallate [Carbamothioic acid, bis(1-methylethyl)-, <i>S</i> -(2,3-dichloro-2-propenyl) ester]
133-90-4	Chloramben [Benzoic acid, 3-amino-2,5-dichloro-]	2602-46-2	C.I. Direct Blue 6
134-29-2	<i>o</i> -Anisidine hydrochloride	2650-18-2	C.I. Acid Blue 9, diammonium salt
134-32-7	<i>alpha</i> -Naphthylamine	2832-40-8	C.I. Disperse Yellow 3
135-20-6	Cupferron [Benzeneamine, <i>N</i> -hydroxy- <i>N</i> -nitroso, ammonium salt]	3118-97-6	C.I. Solvent Orange 7
139-13-9	Nitrioltriacetic acid	3761-53-3	C.I. Food Red 5
139-65-1	4,4'-Thiodianiline	3844-45-9	C.I. Acid Blue 9, disodium salt
140-88-5	Ethyl acrylate	4549-40-0	<i>N</i> -Nitrosomethylvinylamine
141-32-2	Butyl acrylate	4680-78-8	C.I. Acid Green 3
151-56-4	Ethyleneimine (Aziridine)	6484-52-2	Ammonium nitrate (solution)
156-10-5	<i>p</i> -Nitrosodiphenylamine	7429-90-5	Aluminum (fume or dust)
156-62-7	Calcium cyanamide	7439-92-1	Lead
302-01-2	Hydrazine	7439-96-5	Manganese
309-00-2	Aldrin [1,4:5,8-Dimethanonaphthalene, 1,2,3,4,10,10-hexachloro-1,4,4a,5,8,8a-hexahydro-(1.alpha.,4.alpha.,4a.beta.,5.alpha.,8.alpha.,8a.beta.)-]	7439-97-6	Mercury
334-88-3	Diazomethane	7440-02-0	Nickel
463-58-1	Carbonyl sulfide	7440-22-4	Silver
492-80-8	C.I. Solvent Yellow 34 (Auramine)	7440-28-0	Thallium
505-60-2	Mustard gas [Ethane,1,1'-thiobis[2-chloro-]]	7440-36-0	Antimony
		7440-38-2	Arsenic

7440-39-3	Barium
7440-41-7	Beryllium
7440-43-9	Cadmium
7440-47-3	Chromium
7440-48-4	Cobalt
7440-50-8	Copper
7440-62-2	Vanadium (fume or dust)
7440-66-6	Zinc (fume or dust)
7550-45-0	Titanium tetrachloride
7647-01-0	Hydrochloric acid
7664-38-2	Phosphoric acid
7664-39-3	Hydrogen fluoride
7664-41-7	Ammonia
7664-93-9	Sulfuric acid
7697-37-2	Nitric acid
7723-14-0	Phosphorus (yellow or white)
7757-82-6	Sodium sulfate (solution)
7782-49-2	Selenium
7782-50-5	Chlorine
7783-20-2	Ammonium sulfate (solution)
8001-35-2	Toxaphene
10034-93-2	Hydrazine sulfate
10049-04-4	Chlorine dioxide
12122-67-7	Zineb [Carbamodithioic acid, 1,2-ethanediybis-, zinc complex]
12427-38-2	Maneb [Carbamodithioic acid, 1,2-ethanediybis-, manganese complex]
13463-67-7	Titanium dioxide
16071-86-6	C.I Direct Brown 95
16543-55-8	N-Nitrosornicotine
20816-12-0	Osmium tetroxide
25321-22-6	Dichlorobenzene (mixed isomers)
25376-45-8	Diaminotoluene (mixed isomers)
39156-41-7	2,4-Diaminoanisole sulfate

c. Chemical Categories (Effective Date January 1, 1987)

Antimony Compounds - Includes any unique chemical substance that contains antimony as part of that chemical's infrastructure.

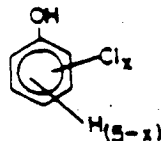
Arsenic Compounds - Includes any unique chemical substance that contains arsenic as part of that chemical's infrastructure.

Barium Compounds - Includes any unique chemical substance that contains barium as part of that chemical's infrastructure.

Beryllium Compounds - Includes any unique chemical substance that contains beryllium as part of that chemical's infrastructure.

Cadmium Compounds - Includes any unique chemical substance that contains cadmium as part of that chemical's infrastructure.

Chlorophenols -



where $x = 1$ to 5

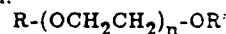
Chromium Compounds - Includes any unique chemical substance that contains chromium as part of that chemical's infrastructure.

Cobalt Compounds - Includes any unique chemical substance that contains cobalt as part of that chemical's infrastructure.

Copper Compounds - Includes any unique chemical substance that contains copper as part of that chemical's infrastructure.

Cyanide Compounds - $X^+ CN^-$ where $X = H^+$ or any other group where a formal dissociation can be made. For example KCN or $Ca(CN)_2$.

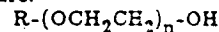
Glycol Ethers - Includes mono- and di- ethers of ethylene glycol, diethylene glycol, and triethylene glycol.



Where $n = 1, 2, \text{ or } 3$

$R =$ alkyl or aryl groups

$R' = R, H,$ or groups which, when removed, yield glycol ethers with the structure:



Polymers are excluded from this category.

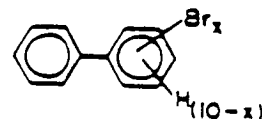
Lead Compounds - Includes any unique chemical substance that contains lead as part of that chemical's infrastructure.

Manganese Compounds - Includes any unique chemical substance that contains manganese as part of that chemical's infrastructure.

Mercury Compounds - Includes any unique chemical substance that contains mercury as part of that chemical's infrastructure.

Nickel Compounds - Includes any unique chemical substance that contains nickel as part of that chemical's infrastructure.

Polybrominated Biphenyls (PBBs)



where $x = 1$ to 10

Selenium Compounds - Includes any unique chemical substance that contains selenium as part of that chemical's infrastructure.

Silver Compounds - Includes any unique chemical substance that contains silver as part of that chemical's infrastructure.

Thallium Compounds - Includes any unique chemical substance that contains thallium as part of that chemical's infrastructure.

Zinc Compounds - Includes any unique chemical substance that contains zinc as part of that chemical's infrastructure.

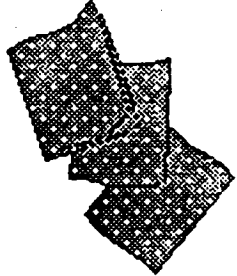
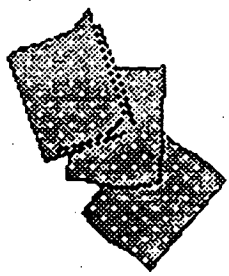


TITLE III LIST OF LISTS

Consolidated List of
Chemicals Subject to
Reporting Under Title III of
the Superfund Amendments and
Reauthorization Act (SARA)
of 1986

January 1988

Office of Toxic Substances
U.S. Environmental Protection Agency
Washington, D.C. 20460



The letter-and-digit code in the RCRA column is the chemical's RCRA hazardous waste code. A blank in any of these columns indicates that the chemical is not subject to the corresponding statutory authorities. A fifth column, headed "State," is left entirely blank, to be checked if state reporting requirements apply to a chemical. The heading "Section 304" over the Section 302 and CERCLA lists indicates that the reporting requirements in Section 304 of SARA Title III apply to Section 302 extremely hazardous substances and CERCLA hazardous substances. As indicated, most chemicals on the consolidated list are subject to reporting requirements under more than one statutory provision.

The chemicals on this list are ordered by Chemical Abstracts Service (CAS) registry number. Categories of chemicals, which do not have CAS registry numbers, but which are cited under CERCLA and Section 313, are placed at the end of the list. The listed chemicals are grouped by fours to facilitate reading.

For additional copies of this document address requests to:

Title III Hotline
U.S. Environmental Protection Agency
WH-562A
401 M Street, SW
Washington, DC 20460

Phone: (800) 535-0202

EB0167Q.mom

Section 304

GAS Number	Chemical Name	§302	CERCLA	§313	RCRA	STATE
57-57-8	Propiolactone, beta-	500		X		
57-64-7	Physostigmine, salicylate (1:1)	100/10,000				
57-74-9	Chlordane	1,000	1#	X	U036	
57-97-6	1,2-Benzanthracene, 7,12-dimethyl-		1#		U094	
58-36-6	Phenoxarsine, 10,10'-oxydi-	500/10,000				
58-89-9	Lindane	1,000/10,000	1#	X	U129	
58-90-2	Phenol, 2,3,4,6-tetrachloro-		10		U212	
59-50-7	4-Chloro-m-cresol		5000		U039	
59-88-1	Phenylhydrazine hydrochloride	1,000/10,000				
59-89-2	N-Nitrosomorpholine		5000	X		
60-00-4	Ethylenediamine tetraacetic acid (EDTA)			X		
60-09-3	4-Aminoazobenzene			X		
60-11-7	Benzenamine, N,N-dimethyl-4-phenylazo-		1#	X	U093	
60-29-7	Ethane, 1,1'-oxybis-		100		U117	
60-34-4	Methylhydrazine	500	10	X	P068	
60-35-5	Acetamide			X		
60-41-3	Strychnine, sulfate	100/10,000				
60-51-5	Dimethoate	500/10,000	10		P044	
60-57-1	Dieldrin		1#		P037	
61-82-5	Amitrole		1#		U011	
62-38-4	Phenylmercury acetate	500/10,000	100		P092	
62-44-2	Acetamide, N-(4-ethoxyphenyl)-		1#		U187	
62-50-0	Ethyl methanesulfonate		1#		U119	
62-53-3	Aniline	1,000	5000	X	U012	
62-55-5	Ethanethioamide		1#	X	U218	
62-56-6	Carbamide, thio-		1#	X	U219	
62-73-7	Dichlorvos	1,000	10	X		
62-74-8	Sodium fluoroacetate	10/10,000	10		P058	
62-75-9	Nitrosodimethylamine	1,000	1#	X	P082	
63-25-2	Carbaryl		100	X		
64-00-6	Phenol, 3-(1-methylethyl)-, methylcarbamate	500/10,000				
64-18-6	Formic acid		5000		U123	
64-19-7	Acetic acid			X		
64-67-5	Diethyl sulfate					
64-86-8	Colchicine	10/10,000				
65-30-5	Nicotine sulfate	100/10,000				
65-85-0	Benzoic acid		5000			
65-86-1	Orotic acid	10,000*				
66-75-1	Uracil, 5-[bis(2-chloroethyl)amino]-		1#		U237	
66-81-9	Cycloheximide	100/10,000				

Section 304

CAS Number	Chemical Name	§302	CERCLA	§313	RCRA	STATE
75-36-5	Acetyl chloride		5000		U006	
75-44-5	Phosgene	10	10	X	P095	
75-50-3	Trimethylamine		100			
75-55-8	Propyleneimine	10,000	1#	X	P067	
75-56-9	Propylene oxide	10,000	100	X		
75-60-5	Cacodylic acid		1#		U136	
75-64-9	tert-Butylamine		1000			
75-65-0	tert-Butyl alcohol			X		
75-69-4	Methane, trichlorofluoro-		5000		U121	
75-71-8	Dichlorodifluoromethane		5000		U075	
75-74-1	Tetramethyl lead	100				
75-77-4	Trimethylchlorosilane	1,000				
75-78-5	Dimethyldichlorosilane	500				
75-79-6	Methyltrichlorosilane	500				
75-86-5	Acetone cyanohydrin	1,000	10		P069	
75-87-6	Acetaldehyde, trichloro-		1#		U034	
75-99-0	2,2-Dichloropropionic acid		5000			
76-01-7	Pentachloroethane	10,000*	1#		U184	
76-02-8	Trichloroacetyl chloride	500				
76-13-1	Chlorinated fluorocarbon (Freon 113)			X		
76-44-8	Heptachlor		1#	X	P059	
77-47-4	Hexachlorocyclopentadiene	100	1#	X	U130	
77-78-1	Dimethyl sulfate	500	1#	X	U103	
77-81-6	Tabun	10				
78-00-2	Tetraethyllead	100	10			P110
78-34-2	Dioxathion	500				
78-53-5	Amiton	500				
78-59-1	Isophorone		5000			
78-71-7	Oxetane, 3,3-bis(chloromethyl)-	500				
78-79-5	Isoprene		100			
78-81-9	iso-Butylamine		1000			
78-82-0	Isobutyronitrile	1,000				
78-83-1	Isobutyl alcohol		5000		U140	
78-84-2	Isobutyraldehyde			X		
78-87-5	1,2-Dichloropropane		1000	X	U083	
78-88-6	2,3-Dichloropropene		100			
78-92-2	sec-Butyl alcohol			X		
78-93-3	2-Butanone		5000	X	U159	
78-94-4	Methyl vinyl ketone	10				
78-97-7	Lactonitrile	1,000				

Section 304

CAS Number	Chemical Name	§302	CERCLA	§313	RCRA	STATE
88-05-1	Aniline, 2,4,6-trimethyl-	500				
88-06-2	Phenol, 2,4,6-trichloro		10#	X	U231	
88-72-2	o-Nitrotoluene		1000			
88-75-5	o-Nitrophenol		100	X		
88-85-7	Dinoseb	100/10,000	1000		P020	
88-89-1	Picric acid			X		
90-04-0	o-Anisidine			X		
90-43-7	2-Phenylphenol			X		
90-94-8	Michler's ketone			X		
91-08-7	Toluene 2,6-diisocyanate	100	100	X		
91-20-3	Naphthalene		100	X	U165	
91-22-5	Quinoline		5000	X		
91-58-7	beta-Chloronaphthalene		5000		U047	
91-59-8	2-Naphthylamine		1#	X	U168	
91-80-5	Methapyrilene		5000		U155	
91-94-1	(1,1'-Biphenyl)-4,4'diamine,3,3'dichloro-		1#	X	U073	
92-52-4	Biphenyl			X		
92-67-1	4-Aminobiphenyl			X		
92-87-5	Benzidine		1#	X	U021	
92-93-3	4-Nitrobiphenyl			X		
93-05-0	Diethyl-p-phenylenediamine	10,000*				
93-72-1	Propionic acid, 2-(2,4,5-trichlorophenoxy)-		100		U233	
93-76-5	2,4,5-T		1000		U232	
93-79-8	2,4,5-T esters		1000			
94-11-1	2,4-D Esters		100			
94-36-0	Benzoyl peroxide			X		
94-58-6	Benzene, 1,2-methylenedioxy-4-propyl-		1#		U090	
94-59-7	Benzene, 1,2-methylenedioxy-4-allyl-		1#	X	U203	
94-75-7	2,4-D Acid		100	X	U240	
94-79-1	2,4-D Esters		100			
94-80-4	2,4-D Esters		100			
95-47-6	Benzene, o-dimethyl-		1000	X		
95-48-7	Cresol, o-	1,000/10,000	1000	X	U052	
95-50-1	Benzene, 1,2-dichloro-		100	X	U070	
95-53-4	o-Toluidine		1#	X		
95-57-8	2-Chlorophenol		100		U048	
95-63-6	Pseudocumene	10,000*		X		
95-80-7	Diaminotoluene		1#	X	U221	
95-94-3	Benzene, 1,2,4,5-tetrachloro-		5000		U207	
95-95-4	Phenol, 2,4,5-trichloro-		10#	X	U230	

Section 304

CAS Number	Chemical Name	§302	CERCLA	§313	RCRA	STATE
101-80-4	4,4'-Diaminodiphenyl ether			X		
102-36-3	Isocyanic acid, 3,4-dichlorophenyl ester	500/10,000				
103-23-1	Bis(2-ethylhexyl) adipate			X		
103-85-5	Phenylthiourea	100/10,000	100		P093	
104-94-9	p-Anisidine			X		
105-46-4	sec-Butyl acetate		5000			
105-67-9	2,4-Dimethylphenol		100	X	U101	
106-42-3	Benzene, p-dimethyl-		1000	X		
106-44-5	p-Cresol		1000#	X	U052	
106-46-7	Benzene, 1,4-dichloro-		100	X	U072	
106-47-8	Benzenamine, 4-chloro-		1000		P024	
106-49-0	4-Amino-1-methyl benzene		1#			
106-50-3	p-Phenylenediamine			X		
106-51-4	p-Benzoquinone		10	X	U197	
106-88-7	1,2-Butylene oxide			X		
106-89-8	Epichlorohydrin	1,000	1000#	X	U041	
106-93-4	Ethane, 1,2-dibromo-		1000#	X	U067	
106-96-7	Propargyl bromide	10				
106-99-0	Butadiene	10,000*		X		
107-02-8	Acrolein	500	1	X	P003	
107-05-1	Allyl chloride		1000	X		
107-06-2	1,2-Dichloroethane		5000#	X	U077	
107-07-3	Chloroethanol	500				
107-10-8	1-Propanamine		5000		U194	
107-11-9	Allylamine	500				
107-12-0	Propionitrile	500	10		P101	
107-13-1	Acrylonitrile	10,000	100#	X	U009	
107-15-3	Ethylenediamine	10,000	5000			
107-16-4	Formaldehyde cyanohydrin	1,000				
107-18-6	Allyl alcohol	1,000	100		P005	
107-19-7	Propargyl alcohol		1000		P102	
107-20-0	Chloroacetaldehyde	10,000*	1000		P023	
107-21-1	Ethylene glycol			X		
107-30-2	Chloromethyl methyl ether	100	1#	X	U046	
107-44-8	Sarin	10				
107-49-3	Tepp	100	10		P111	
107-92-6	Butyric acid		5000			
108-05-4	Vinyl acetate monomer	1,000	5000	X		
108-10-1	Methyl isobutyl ketone		5000	X	U161	
108-23-6	Isopropyl chloroformate	1,000				

Section 304

CAS Number	Chemical Name	§302	CERCLA	§313	RCRA	STATE
115-07-1	Propylene (Propene)			X		
115-21-9	Trichloroethylsilane	500				
115-26-4	Dimefox	500				
115-29-7	Endosulfan	10/10,000	1		P050	
115-32-2	Kelthane		10	X		
115-90-2	Fensulfothion	500				
116-06-3	Aldicarb	100/10,000	1		P070	
117-52-2	Coumafuryl	10,000*				
117-79-3	2-Aminoanthraquinone		1	X		
117-80-6	Dichlone		1#	X	U028	
117-81-7	1,2-Benzenedicarboxylic acid, [bis(2-ethylhexyl)] ester		5000	X	U107	
117-84-0	Dioctyl phthalate					
118-74-1	Benzene, hexachloro		1#	X	U127	
119-38-0	Isopropylmethylpyrazolyl dimethylcarbamate	500				
119-90-4	(1,1'-Biphenyl)-4,4'-diamine,3,3'-dimethoxy-		1#	X	U091	
119-93-7	(1,1'-Biphenyl)-4,4'-diamine,3,3'-dimethyl-		1#	X	U095	
120-12-7	Anthracene		5000	X		
120-58-1	Benzene, 1,2-methylenedioxy-4-propenyl-		1#		U141	
120-71-8	p-Cresidine			X		
120-80-9	Catechol			X		
120-82-1	1,2,4-Trichlorobenzene		100	X		
120-83-2	2,4-Dichlorophenol		100	X	U081	
121-14-2	Benzene, 1-methyl-2,4-dinitro-		1000#	X	U105	
121-21-1	Pyrethrins		1			
121-29-9	Pyrethrins		1			
121-44-8	Triethylamine		5000			
121-69-7	N,N-Dimethylaniline			X		
121-75-5	Malathion		100			
122-09-8	alpha,alpha-Dimethylphenethylamine		5000		P046	
122-14-5	Fenitrothion	500				
122-66-7	1,2-Diphenylhydrazine		1#	X	U109	
123-31-9	Hydroquinone	500/10,000		X		
123-33-1	1,2-Dihydro-3,6-pyridazinedione		5000		U148	
123-38-6	Propionaldehyde			X		
123-62-6	Propionic anhydride		5000			
123-63-7	Paraldehyde		1000			
123-72-8	Butyraldehyde			X		
123-73-9	Crotonaldehyde, (E)-	1,000	100		U053	
123-86-4	Butyl acetate		5000			
123-91-1	1,4-Diethylene dioxide		1#	X	U108	

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CAS Number	Chemical Name	§302	CERCLA	§313	RCRA	STATE
143-50-0	Keponc		1#		U142	
144-49-0	Fluoroacetic acid	10/10,000				
145-73-3	Endothall		1000		P088	
148-82-3	Alanine, 3-[p-bis(2-chloroethyl)amino]phenyl-, L-		1#		U150	
149-74-6	Dichloromethylphenylsilane	1,000				
151-38-2	Methoxyethylmercuric acetate	500/10,000				
151-50-8	Potassium cyanide	100	10		P098	
151-56-4	Ethyleneimine	500	1#	X	P054	
152-16-9	Diphosphoramidc, octamethyl-	100	100		P085	
156-10-5	p-Nitrosodiphenylamine			X		
156-60-5	1,2-trans-Dichloroethylene		1000		U079	
156-62-7	Calcium cyanamide			X		
189-55-9	1,2:7,8-Dibenzopyrene		1#		U064	
191-24-2	Benzo[ghi]perylene		5000			
193-39-5	Indeno(1,2,3-cd)pyrene		1#		U137	
205-99-2	Benzo[blfluoranthene		1#			
206-44-0	Benzo[j,k]fluorene		100		U120	
207-08-9	Benzo[k]fluoranthene		1#			
208-96-8	Acenaphthylene		5000			
218-01-9	1,2-Benzphenanthrene		1#		U050	
225-51-4	Benzo[c]acridine		1#		U016	
287-92-3	Cyclopentane	10,000*				
297-78-9	Isobenzan	100/10,000				
297-97-2	Thionazin	500	100		P040	
298-00-0	Parathion-methyl	100/10,000	100		P071	
298-02-2	Phorate	10	10		P094	
298-04-4	Disulfoton	500	1		P039	
300-62-9	Amphetamine	1,000				
300-76-5	Naled		10			
301-04-2	Acetic acid, lead salt		5000#		U144	
302-01-2	Hydrazine	1,000	1#	X	U133	
303-34-4	Lasiocarpine		1#		U143	
305-03-3	Butanoic acid, 4-[bis(2-chloroethyl)amino] benzene-		1#		U035	
309-00-2	Aldrin	500/10,000	1#	X	P004	
311-45-5	Diethyl-p-nitrophenyl phosphate		100		P041	
315-18-4	Mexacarbate	500/10,000	1000			
316-42-7	Emetine, dihydrochloride	1/10,000				
319-84-6	alpha - BHC		1#			
319-85-7	beta - BHC		1#			
319-86-8	delta - BHC		1			

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CAS Number	Chemical Name	§302	CERCLA	§313	RCRA	STATE
540-73-8	1,2-Dimethylhydrazine		1#		U099	
540-88-5	tert-Butyl acetate		5000			
541-09-3	Uranyl acetate		100'''			
541-25-3	Lewisite	10				
541-41-3	Ethyl chloroformate			X		
541-53-7	Dithiobiuret	100/10,000	100		P049	
541-73-1	Benzene, 1,3-dichloro-		100	X	U071	
542-62-1	Barium cyanide		10		P013	
542-75-6	1,3-Dichloropropene		100#	X	U084	
542-76-7	Propionitrile, 3-chloro-	1,000	1000		P027	
542-88-1	Chloromethyl ether	100	1#	X	P016	
542-90-5	Ethyl thiocyanate	10,000				
543-90-8	Cadmium acetate		100#			
544-18-3	Cobaltous formate		1000			
544-92-3	Copper cyanide		10		P029	
544-84-7	m-Nitrophenol		100			
555-77-1	Tris(2-chloroethyl)amine	100				
556-61-6	Methyl isothiocyanate	500				
556-64-9	Methyl thiocyanate	10,000				
557-19-7	Nickel cyanide		1#		P074	
557-21-1	Zinc cyanide		10		P121	
557-34-6	Zinc acetate		1000			
557-41-5	Zinc formate		1000			
558-25-8	Methanesulfonyl fluoride	1,000				
563-12-2	Ethion	1,000	10			
563-41-7	Semicarbazide hydrochloride	1,000/10,000				
563-68-8	Acetic acid, thallium(I) salt		100		U214	
569-64-2	C.I. Basic Green 4			X		
573-56-8	2,6-Dinitrophenol		10			
584-84-9	Toluene 2,4-diisocyanate	500	100	X		
591-08-2	Acetamide, N-(aminothioxomethyl)-		1000		P002	
592-01-8	Calcium cyanide		10		P021	
592-04-1	Mercuric cyanide		1			
592-85-8	Mercuric thiocyanate		10			
592-87-0	Lead thiocyanate		100			
593-60-2	Vinyl bromide			X		
594-42-3	Perchloromethylmercaptan	500	100		P118	
597-64-8	Tetraethyltin	100				
598-31-2	Bromoacetone		1000		P017	
606-20-2	Benzene, 1-methyl-2,6-dinitro-		1000#	X	U106	

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CAS Number	Chemical Name	§302	CERCLA	§313	RCRA	STATE
814-68-6	Acrylyl chloride	100				
815-82-7	Cupric tartrate		100			
823-40-5	Diaminotoluene		1#		U221	
824-11-3	Trimethylolpropane phosphite	100/10,000				
842-07-9	C.I. Solvent Yellow 14			X		
900-95-8	Stannane, acetoxytriphenyl-	500/10,000				
919-86-8	Demeton-S-methyl	500				
920-46-7	Methacryloyl chloride	100				
924-16-3	1-Butanamine, N-butyl-N-nitroso-		1#	X	U172	
930-55-2	N-Nitrosopyrrolidine		1#		U180	
933-75-5	2,3,6-Trichlorophenol		10#			
933-78-8	2,3,5-Trichlorophenol		10#			
944-22-9	Fonofos	500				
947-02-4	Phosfolan	100/10,000				
950-10-7	Mephosfolan	500				
950-37-8	Methidathion	500/10,000				
959-98-8	alpha - Endosulfan		1			
961-11-5	Tetrachlorvinphos			X		
989-38-8	C.I. Basic Red 1			X		
991-42-4	Norbormide	100/10,000				
998-30-1	Triethoxysilane	500				
999-81-5	Chlormequat chloride	100/10,000				
1024-57-3	Heptachlor epoxide		1#			
1031-07-8	Endosulfan sulfate		1			
1031-47-6	Triamiphos	500/10,000				
1066-30-4	Chromic acetate		1000			
1066-33-7	Ammonium bicarbonate		5000			
1066-45-1	Trimethyltin chloride	500/10,000				
1072-35-1	Lead stearate		5000#			
1111-78-0	Ammonium carbamate		5000			
1116-54-7	Ethanol, 2,2'-(nitrosoimino)bis-		1#		U173	
1120-71-4	1,2-Oxathiolane, 2,2-dioxide		1#	X	U193	
1122-60-7	Nitrocyclohexane	500				
1124-33-0	Pyridine, 4-nitro-, 1-oxide	500/10,000				
1129-41-5	Metolcarb	100/10,000				
1163-19-5	Decabromodiphenyl oxide			X		
1185-57-5	Ferric ammonium citrate		1000			
1194-65-6	Dichlobenil		100			
1300-71-6	Xylenol		1000			
1303-28-2	Arsenic pentoxide	100/10,000	5000#		P011	

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CAS Number	Chemical Name	§302	CERCLA	§313	RCRA	STATE
1600-27-7	Mercuric acetate	500/10,000				
1615-80-1	N,N'-Diethylhydrazine		1#		U086	
1622-32-8	Ethanesulfonyl chloride, 2-chloro-	500				
1634-04-4	Methyl tert-butyl ether			X		
1642-54-2	Diethylcarbamazine citrate	100/10,000				
1746-01-6	2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)		1#			
1752-30-3	Acetone thiosemicarbazide	1,000/10,000				
1762-95-4	Ammonium thiocyanate		5000			
1836-75-5	Nitrofen			X		
1863-63-4	Ammonium benzoate		5000			
1888-71-7	Hexachloropropene		1000		U243	
1897-45-6	Chlorothalonil			X		
1910-42-5	Paraquat	10/10,000				
1918-00-9	Dicamba		1000			
1928-38-7	2,4-D Esters		100			
1928-47-8	2,4,5-T esters		1000			
1928-61-6	2,4-D Esters		100			
1929-73-3	2,4-D-Esters		100			
1937-37-7	C.I. Direct Black 38			X		
1982-47-4	Chloroxuron	500/10,000				
2001-95-8	Valinomycin	1,000/10,000				
2008-46-0	2,4,5-T amines		5000			
2032-65-7	Methiocarb	500/10,000	10			
2074-50-2	Paraquat methosulfate	10/10,000				
2097-19-0	Phenylsilatrane	100/10,000				
2104-64-5	EPN	100/10,000				
2164-17-2	Fluometuron			X		
2223-93-0	Cadmium stearate	1,000/10,000				
2231-57-4	Thiocarbazine	1,000/10,000				
2234-13-1	Octachloronaphthalene			X		
2235-25-8	Ethylmercuric phosphate	10,000*				
2238-07-5	Diglycidyl ether	1,000				
2244-16-8	Carvone	10,000*				
2275-18-5	Prothoate	100/10,000				
2303-16-4	Diallate		1#	X	U062	
2312-35-8	Propargite		10			
2497-07-6	Oxydisulfoton	500				
2524-03-0	Dimethyl phosphorochloridothioate	500				
2540-82-1	Formothion	100				
2545-59-7	2,4,5-T esters		1000			

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CAS Number	Chemical Name	§302	CERCLA	§313	RCRA	STATE
4170-30-3	Crotonaldehyde	1,000	100		U053	
4301-50-2	Fluometil	100/10,000				
4418-66-0	Phenol, 2,2'-thiobis[4-chloro-6-methyl-	100/10,000				
4549-40-0	Ethenamine, N-methyl-N-nitroso-		1#	X	P084	
4680-78-8	C.I. Acid Green 3			X		
4835-11-4	Hexamethylenediamine, N,N'-dibutyl-	500				
5281-13-0	Piprotal	100/10,000				
5333-41-5	Diazinon		1			
5344-82-1	Thiourea, (2-chlorophenyl)-	100/10,000	100		P026	
5836-29-3	Coumatetralyl	500/10,000				
5893-66-3	Cupric oxalate		100			
5972-73-6	Ammonium oxalate		5000			
6009-70-7	Ammonium oxalate		5000			
6369-96-6	2,4,5-T amines		5000			
6369-97-7	2,4,5-T amines		5000			
6484-52-2	Ammonium nitrate (solution)			X		
6533-73-9	Thallos carbonate	100/10,000	100		U215	
6923-22-4	Monocrotophos	10/10,000				
7005-72-3	4-Chlorophenyl phenyl ether		5000			
7421-93	Endrin aldehyde		1			
7428-48-0	Lead stearate		5000			
7429-90-5	Aluminum (fume or dust)			X		
7439-92-1	Lead		1#	X		
7439-96-5	Manganese and compounds			X		
7439-97-6	Mercury		1	X	U151	
7440-02-0	Nickel	10,000*	1#	X		
7440-22-4	Silver		1000	X		
7440-23-5	Sodium		10			
7440-28-0	Thallium		1000	X		
7440-36-0	Antimony		5000	X		
7440-38-2	Arsenic		1#	X		
7440-39-3	Barium and compounds			X		
7440-41-7	Beryllium		1#	X	P015	
7440-43-9	Cadmium		1#	X		
7440-47-3	Chromium		1#	X		
7440-48-4	Cobalt	10,000*		X		
7440-50-8	Copper		5000	X		
7440-62-2	Vanadium (fume or dust)			X		
7440-66-6	Zinc		1000	X		
7446-08-4	Selenium dioxide		10		U204	

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CAS Number	Chemical Name	§302	CERCLA	§313	RCRA	STATE
7758-94-3	Ferrous chloride		100			
7758-95-4	Lead chloride		100			
7758-98-7	Cupric sulfate		10			
7761-88-8	Silver nitrate		1			
7773-06-0	Ammonium sulfamate		5000			
7775-11-3	Sodium chromate		1000#			
7778-39-4	Arsenic acid		1#		P010	
7778-44-1	Calcium arsenate	500/10,000	1000#			
7778-50-9	Potassium bichromate		1000#			
7778-54-3	Calcium hypochlorite		10			
7779-86-4	Zinc hydrosulfite		1000			
7779-88-6	Zinc nitrate		1000			
7782-41-4	Fluorine	500	10		P056	
7782-49-2	Selenium		100	X		
7782-50-5	Chlorine	100	10	X		
7782-63-0	Ferrous sulfate		1000			
7782-82-3	Sodium selenite		100			
7782-86-7	Mercurous nitrate		10##			
7783-00-8	Selenous acid	1,000/10,000	10		U204	
7783-06-4	Hydrogen sulfide	500	100		U135	
7783-07-5	Hydrogen selenide	10				
7783-18-8	Ammonium thiosulfate		5000			
7783-20-2	Ammonium sulfate (solution)			X		
7783-35-9	Mercuric sulfate		10			
7783-46-2	Lead fluoride		100			
7783-49-5	Zinc fluoride		1000			
7783-50-8	Ferric fluoride		100			
7783-56-4	Antimony trifluoride		1000			
7783-60-0	Sulfur tetrafluoride	100				
7783-70-2	Antimony pentafluoride	500				
7783-80-4	Tellurium hexafluoride	100				
7784-34-1	Arsenous trichloride	500	5000#			
7784-40-9	Lead arsenate		5000#			
7784-41-0	Potassium arsenate		1000#			
7784-42-1	Arsine	100				
7784-46-5	Sodium arsenite	500/10,000	1000#			
7785-84-4	Sodium phosphate, tribasic		5000			
7786-34-7	Mevinphos	500	10			
7786-81-4	Nickel sulfate		5000#			
7787-47-5	Beryllium chloride		5000#			

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CAS Number	Chemical Name	§302	CERCLA	§313	RCRA	STATE
10049-07-7	Rhodium trichloride	10,000*				
10099-74-8	Lead nitrate		100			
10101-53-8	Chromic sulfate		1000##			
10101-63-0	Lead iodide		100			
10101-89-0	Sodium phosphate, tribasic		5000			
10102-06-4	Uranyl nitrate		100***			
10102-18-8	Sodium selenite	100/10,000	100			
10102-20-2	Sodium tellurite	500/10,000				
10102-43-9	Nitric oxide	100	10		P076	
10102-44-0	Nitrogen dioxide	100	10		P078	
10102-45-1	Thallium(I) nitrate		100		U217	
10102-48-4	Lead arsenate		5000#			
10108-64-2	Cadmium chloride		100#			
10124-50-2	Potassium arsenite	500/10,000	1000#			
10124-56-8	Sodium phosphate, tribasic		5000			
10140-65-5	Sodium phosphate, dibasic		5000			
10140-87-1	Ethanol, 1,2-dichloro-, acetate	1,000				
10192-30-0	Ammonium bisulfite		5000			
10196-04-0	Ammonium sulfite		5000			
10210-68-1	Cobalt carbonyl	10/10,000				
10265-92-6	Methamidophos	100/10,000				
10294-34-5	Boron trichloride	500				
10311-84-9	Dialifos	100/10,000				
10361-89-4	Sodium phosphate, tribasic		5000			
10380-29-7	Cupric sulfate ammoniated		100			
10415-75-5	Mercurous nitrate		10			
10421-48-4	Ferric nitrate		1000			
10476-95-6	Methacrolein diacetate	1,000				
10544-72-6	Nitrogen dioxide		10		P078	
10588-01-9	Sodium bichromate		1000#			
11096-82-5	Aroclor 1260		10#			
11097-69-1	Aroclor 1254		10#			
11104-28-2	Aroclor 1221		10#			
11115-74-5	Chromic acid		1000#			
11141-16-5	Aroclor 1232		10#			
12002-03-8	Paris green (Cupric acetoarsenite)	500/10,000	100#			
12039-52-0	Thallium(I) selenide		1000		P114	
12054-48-7	Nickel hydroxide		1000#			
12108-13-3	Manganese, tricarbonyl methylcyclopentadienyl	100				
12122-67-7	Zineb			X		

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CAS Number	Chemical Name	§302	CERCLA	§313	RCRA	STATE
16752-77-5	Methomyl	500/10,000	100		P066	
16871-71-9	Zinc silicofluoride		5000			
16919-19-0	Ammonium silicofluoride		1000			
16919-58-7	Ammonium chloroplatinate	10,000*				
16923-95-8	Zirconium potassium fluoride		1000			
17702-41-9	Decaborane(14)	500/10,000				
17702-57-7	Formparanate	100/10,000				
18883-66-4	D-Glucopyranose, 2-deoxy-2-(3-methyl-3-nitrosoureido)-		1#		U206	
19287-45-7	Diborane	100				
19624-22-7	Pentaborane	500				
20816-12-0	Osmium tetroxide	10,000*	1000	X	P087	
20830-75-5	Digoxin	10/10,000				
20830-81-3	Daunomycin		1#		U059	
20859-73-8	Aluminum phosphide	500	100		P006	
21548-32-3	Fosthietan	500				
21564-17-0	Thiocyanic acid, 2-(benzothiazolylthio)methyl ester	10,000*				
21609-90-5	Leptophos	500/10,000				
21908-53-2	Mercuric oxide	500/10,000				
21923-23-9	Chlorthiophos	500				
22224-92-6	Fenamiphos	10/10,000				
23135-22-0	Oxamyl	100/10,000				
23422-53-9	Formetanate hydrochloride	500/10,000				
23505-41-1	Pirimifos-ethyl	1,000				
23950-58-5	3,5-Dichloro-N-(1,1-dimethyl-2-propynyl)benzamide		5000		U192	
24017-47-8	Triazofos	500				
24934-91-6	Chlormephos	500				
25154-54-5	Dinitrobenzene (mixed)		100			
25154-55-6	Nitrophenol (mixed)		100			
25155-30-0	Sodium dodecylbenzene sulfonate		1000			
25167-82-2	Trichlorophenol		10#			
25168-15-4	2,4,5-T esters		1000			
25168-26-7	2,4,-D Esters		100			
25321-14-6	Dinitrotoluene		1000#			
25321-22-6	Dichlorobenzene (mixed)		100	X		
25376-45-8	Diaminotoluene		1#	X	U221	
25550-58-7	Dinitrophenol		10			
26264-06-2	Calcium dodecylbenzene sulfonate		1000			
26419-73-8	Carbamic acid, methyl-, O-(((2,4-dimethyl-1,3-dithiolan-2-yl	100/10,000				
26471-62-5	Benzene, 2,4-diisocyanatomethyl-		100		U223	
26628-22-8	Sodium azide (Na(N3))	500	1000		P105	

Chemical Category	Section 304				
	§302	CERCLA	§313	RCRA	STATE
Organorhodium Complex	10/10000				
Barium Compounds			X		
Cobalt Compounds			X		
Cyanide and Compounds		**	X		
Glycol Ethers			X		
Manganese Compounds			X		
Polybrominated Biphenyls (PBBs)			X		
Antimony and Compounds		**	X		
Arsenic and Compounds		**	X		
Beryllium and Compounds		**	X		
Cadmium and Compounds		**	X		
Chlordane (Technical Mixture and Metabolites)		**			
Chlorinated Benzenes		**			
Chlorinated Ethanes		**			
Chlorinated Naphthalene		**			
Chlorinated Phenols		**	X		
Chloroalkyl Ethers		**			
Chromium and Compounds		**	X		
Coke Oven Emissions		1#			
Copper and Compounds		**	X		
DDT and Metabolites		**			
Dichlorobenzidine		**			
Diphenylhydrazine		**			
Endosulfan and Metabolites		**			
Endrin and Metabolites		**		X	
Haloethers		**			
Halomethanes		**			
Heptachlor and Metabolites		**			
Lead and Compounds		**	X		
Mercury and Compounds		**	X		
Nickel and Compounds		**	X		
Nitrophenols		**			
Nitrosamines		**			
Phthalate Esters		**			
Polynuclear Aromatic Hydrocarbons		**			
Radionuclides		1^			
Selenium and Compounds		**	X		
Silver and Compounds		**	X		
Thallium and Compounds		**	X		
Zinc and Compounds		**	X		