

**EPA ORDER 3500.1 PROGRAM-SPECIFIC TRAINING REQUIREMENTS**

**EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT (EPCRA) - TRAINING REQUIREMENTS FOR EPCRA INSPECTORS**

These training requirements are in addition to the Basic Inspector Training Course and the Health and Safety Training required by EPA Order 3500.1.

Additional requirements apply depending on what type of inspection will be conducted: EPCRA Section 313, and EPCRA Sections 302-312/CERCLA Section 103.

**Mandatory and Recommended Training and Self-Study/Review Requirements:**

**Mandatory Training**

- None

**Mandatory Self-Study/Review**

*Statutes/Regulations*

- 40 CFR Part 350 - Trade Secrecy Claims for Emergency Planning and Community Right-to-Know Information and Trade Secret Disclosures to Health Professionals

*Guidance/Reference Materials*

- Trade Secret Substantiation Form, <http://www.epa.gov/tri/report/ts-form.pdf>
- EPCRA Fact Sheet [Chemical Emergency Preparedness and Prevention Office (CEPPO), March 2000], [http://yosemite.epa.gov/oswer/ceppoweb.nsf/vwresourcesbyfilename/epcra.pdf/\\$file/epcra.pdf](http://yosemite.epa.gov/oswer/ceppoweb.nsf/vwresourcesbyfilename/epcra.pdf/$file/epcra.pdf)
- Review of a minimum of two completed inspection reports for each type of EPCRA inspection.

**Recommended Training**

- Relevant industry standards training as needed - determination made by first-line supervisor.

**Recommended Self-Study/Review**

- EPCRA website, <http://yosemite.epa.gov/oswer/ceppoweb.nsf/content/EPCRA.htm?OpenDocument>
- Protocol for Conducting Environmental Compliance Audits under the Emergency Planning and Community Right-to-Know Act and CERCLA Section 103 (March 2001), <http://www.epa.gov/Compliance/resources/policies/incentives/auditing/epcra.pdf>

**Mandatory Refresher Training:**

- Program specific refresher training as identified by supervisor.

**EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT (EPCRA) - SECTION 313**

EPCRA Section 313 Inspectors must complete the following training requirements in addition to the requirements listed above for ALL EPCRA Inspectors.

**Mandatory and Recommended Training and Self-Study/Review Requirements:**

**Mandatory Training**

- None

**Mandatory Self-Study/Review**

*Statutes/Regulations*

- EPCRA § 313 (40 CFR Part 372), [http://www.access.gpo.gov/nara/cfr/waisidx\\_01/40cfr372\\_01.html](http://www.access.gpo.gov/nara/cfr/waisidx_01/40cfr372_01.html)

*Guidance/Reference Materials*

- EPCRA § 313 Inspector Training Manual (November 2000).\* The inspector's supervisor may require classroom training in addition to manual.
- EPCRA § 313 Data Quality Training Manual - Process-Based Inspections: Techniques and Calculations (June 2000)\*
- Revised 1998 EPCRA Section 313 Questions and Answers [Office of Pollution Prevention and Toxics (OPPT), December 1998] [http://www.epa.gov/tri/guide\\_docs/1998/1998qa.pdf](http://www.epa.gov/tri/guide_docs/1998/1998qa.pdf) and 2004 addendum (Under Dev.)
- Toxics Release Inventory (TRI) Reporting Forms & Instructions, <http://www.epa.gov/tri/report/index.htm>

(\*Source: Len Lazarus, 202-564-6369)

**Recommended Training**

- None

**Recommended Self-Study/Review**

- Toxics Release Inventory (TRI) website, <http://www.epa.gov/tri/>
- Guidance documents - industry-specific, chemical-specific, and general, including EPCRA Section 313 Release Reporting Requirements "blue brochure", [http://www.epa.gov/tri/guide\\_docs/index.htm](http://www.epa.gov/tri/guide_docs/index.htm)
- TRI data quality reports, [http://www.epa.gov/tri/tridata/data\\_quality\\_reports/index.htm](http://www.epa.gov/tri/tridata/data_quality_reports/index.htm)
- TRI data analysis, <http://www.epa.gov/tri/tridata/index.htm>; [www.epa.gov/triexplorer/](http://www.epa.gov/triexplorer/); [http://intranet.epa.gov/enviro/html/tris/tris\\_query.html](http://intranet.epa.gov/enviro/html/tris/tris_query.html)
- Enforcement Response Policy (ERP) for Section 313 of EPCRA (1986), April 12, 2001, <http://www.epa.gov/compliance/resources/policies/civil/epcra/epcra-sec311-mem.pdf>

**Mandatory On-the-Job Training (OJT):**

- Inspectors must complete a minimum of four compliance inspections/field investigations with a senior lead EPCRA Section 313 inspector beginning with single or simple process facilities. The first-line supervisor may require additional compliance inspections/field investigations at his discretion. Note: This includes inspection preparation procedures with a senior inspector.
- The OJT should be constructed so that over time there is a progression of increasing responsibility for the new inspector.
- EPCRA Section 313 Data Quality Inspections are not recommended for new EPCRA Section 313 inspectors within the first year.

**EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT (EPCRA) - SECTIONS 302-312 and CERCLA SECTION 103**

EPCRA Sections 302-312, CERCLA Section 103 Inspectors must complete the following training requirements in addition to the requirements listed above for ALL EPCRA Inspectors.

**Mandatory and Recommended Training and Self-Study/Review Requirements:**

**Mandatory Training**

- None

**Mandatory Self-Study/Review**

*Statutes/Regulations*

- EPCRA §§ 302-312 (40 CFR Parts 355 & 370) and CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) §§ 101-103 (40 CFR Part 302), [http://www.access.gpo.gov/nara/cfr/waisidx\\_0140cfr302\\_01.html](http://www.access.gpo.gov/nara/cfr/waisidx_0140cfr302_01.html)

*Guidance/Reference Materials*

- EPCRA Overview (CEPPO, September 2002), <http://yosemite.epa.gov/oswer/ceppoweb.nsf/content/epcraoverview.htm>
- SARA Title III EPCRA (Section 302-312)/CERCLA (Section 103) Inspector Training Manual (November 2003). The inspector's supervisor may require additional classroom training.
- EPCRA (Section 302-312) Frequently Asked Questions (CEPPO, April 2003), <http://yosemite.epa.gov/oswer/ceppoweb.nsf/content/q&a.htm>
- Review of EPA's "Guidance on the CERCLA Section 101(10)(H) Federally Permitted Release Definition for Certain Air Emissions" [67 FR 18899 (Apr. 17, 2002)]. [http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=2002\\_register&docid=fr17ap02-72.pdf](http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=2002_register&docid=fr17ap02-72.pdf)

**Recommended Training**

- None

**Recommended Self-Study/Review**

- Chemical information, including Title III List of Lists, <http://yosemite.epa.gov/oswer/ceppoweb.nsf/content/chemicalinfo.htm>
- Tier II Submit software, <http://yosemite.epa.gov/oswer/ceppoweb.nsf/content/tier2.htm>
- CERCLA 103 release reporting requirements website, <http://www.epa.gov/superfund/programs/er/triggers/haztrigs/hazreqs.htm>
- Enforcement Response Policy (ERP) for Sections 304, 311 and 312 of EPCRA and Section 103 of CERCLA (Sept 30, 1999), <http://www.epa.gov/compliance/resources/policies/civil/epcra/epcra304.pdf>

**Mandatory On-the-Job Training (OJT):**

- Inspectors must complete a minimum of four compliance inspections/field investigations with a senior lead EPCRA Sections 302-312, CERCLA Section 103 inspector at facilities such as ammonia refrigeration facilities and tank farms. The first-line supervisor may require additional compliance inspections/field investigations at his discretion. Note: This includes inspection preparation procedures with a senior inspector.
- The first-line supervisor should determine the type of facility to be inspected to meet the OJT requirements and may require additional OJT inspections as he deems appropriate. The OJT should be constructed so that over time there is a progression of increasing responsibility for the new inspector.