



Frequently Asked Questions



1. Is this inspection program and application in addition to the existing State reporting requirements?

Yes. The Federal Statute (EPCRA) requires that occupancies make three reports; the State SERC, the local LEPC, and the local Fire Department. In Howard County, when the occupancy submits the online Tier II report to the State, they forward the information to our local LEPC, so two requirements are complete. This new program closes the gap that has existed with reporting to the local Fire Department, and thus *is* in addition to the State reporting.

2. Can we just submit the same items we submit to the State?

As the local Fire Department, we do have our own Application and Hazardous Materials Inventory Statement (HMIS) which can both be found on our homepage (howardcountymd.gov/hazmat). These will need to be filled out specifically for our program. However, the additional items that the State requires (assuming you are a facility that is required to file with the State), are the same that we require; these include the Safety Data Sheets (SDS) for each chemical, a building floor plan and property site plan. We also need some sort of proof that there is a plan or contract with a cleanup company in the event of a spill or release. Should you need additional clarification, or have any questions email hazmat@howardcountymd.gov

3. Our facility does not submit anything to the State, so are we exempt from this?

The State requirements follow the threshold limits outlined in 40 CFR Part 370, which can be found at our homepage for reference. Our Type I permits are the exact same, and both of these are based primarily on the EPA's list of Extremely Hazardous Substances (EHS) which is also on our homepage. Our Type II, III, and IV permits are also based on EHS', but at smaller amounts that do not exceed the thresholds, thus you may need these permits through us despite not meeting the requirements of State reporting. Furthermore, the thresholds set forth in NFPA 1, Chapter 1, Section 12 covers all other chemicals (non-EHS) and gives threshold limits which, if met or exceeded, requires our Type V permit. Should you need additional clarification, or have any questions email hazmat@howardcountymd.gov

4. When do we pay for the permit application?

After you submit all of the required information by email to hazmat@howardcountymd.gov, our staff will review the documents. We will then respond to your email confirming you have met the requirements, and telling you which type of permit you qualify for (which will only be the highest level

met). At that time we will indicate the permit fee and direct you how to pay. Upon successful payment, you will then be scheduled for an inspection at your facility by our staff.

5. We have multiple locations with chemicals...do we need a separate permit for each location?

Yes. The purpose of the inspection program is for emergency preparedness and response, and thus the information gained is necessary for each location that an incident could occur.

6. We have multiple types of the same chemical, such as numerous lead-acid batteries. Do we need to include each separately on the Hazardous Materials Inventory Statement?

No. The purpose is to identify hazards. Even if the batteries are of all different size and type, the hazards are the same. You would include the Lead-Acid as the chemical, give an aggregate amount, and identify that it is in a closed system (battery). The other point to make is that the locations will be shown on the floor plan or site plan, and here you would mark all the different locations (if the batteries move all day such as in golf carts, only mark their storage location when not in use). Now if in addition to these batteries you also had drums of liquid Lead-Acid, this is a completely different storage type and hence a different hazard, so this would be listed separately.

7. When are the permits required to be submitted?

The deadlines for the various permit types are as follows:

Type I: March 1, 2017

Type II: August 1, 2017

Type III: September 1, 2017

Type IV: May 1, 2017

Type V: June 1, 2017

Notice that the first deadline is March 1st. The easiest way to know if this permit applies to you is if you file Tier II reports with the State, you qualify for our Type I permit and must apply by March 1st. We understand through this inauguration year that some facilities may incorrectly classify themselves and thus will apply incorrectly. We will correct this together through the year, and all subsequent years will be based on the type of permit you obtained the previous year.