

## **VERIFYING SGP WORKSHEET DATA**

The purpose of this document is to discuss the various data elements required on the SGP worksheet, explain those data elements and provide potential sources of information that can be used by local programs to substantiate worksheet data.

Companies in the SGP are making progress on the seven core environmental goals while local programs are establishing levels of attainment (e.g., specific number of goals or overall percentages of achievement) at which various incentives are granted to companies. The local programs may also decide to implement a verification process that, prior to bestowing awards or incentives, verifies worksheet data provided by companies. Table 1 summarizes the potential sources of information that can be used to verify data.

### ***Changes in Production (normalizing factors)***

When production rates at metal finishing shops change, one would expect their water use, energy use, sludge generation and other factors to fluctuate as well. To account for changes in production volume, normalizing factors are used so that data from the current year can be compared to baseline data without the influence of the production changes. By using normalizing factors, true environmental progress can be calculated. Companies participating in the SGP must select at least one method of normalizing their data to account for changes in production. Any reasonable factor can be selected as long as it can be measured accurately for both the baseline and current years and records are available to substantiate the values submitted. The decision of which factor to use is up to the participant, but it must also be acceptable to the local SGP.

### **Annual Sales**

Sales are the most commonly selected normalizing factor by SGP participants although it is not always a good choice. Often, companies have shifts in the types of processes used or parts processed that affect sales in a disproportional manner to environmental factors such as water use. In such cases, companies may want to use a different factor. Also, captive operations usually have difficulty using sales figures because metal finishing is only one part of their manufacturing operation.

The positive aspects of sales are they can be easily tracked and substantiated. Sales figures used for normalizing should be limited to those for metal finishing operations, which are defined in the Metal Finishing Effluent Standards (40 CFR 433). For most job shops, their total annual sales are applicable. Generally, captive operations cannot use sales as a normalizing factor unless the metal finishing value of the products can be isolated.

When progress toward goals is calculated, an inflation factor (Producers Price Index) is used to adjust the current year sales to baseline year dollars. Therefore, facility worksheet data should not include an inflation factor.

### **Metal Finishing Labor Hours**

The second most frequently selected factor is metal finishing labor hours. This is usually a good normalizing factor for both job and captive operations. When using this factor it is important to

closely define which labor categories are used to compile the total hours and that these categories are tracked consistently from year to year. Labor hours counted for normalizing should be limited to those for metal finishing operations, which are defined in the Metal Finishing Effluent Standards (40 CFR 433). The labor hour count should only include those associated with operating the metal finishing lines (e.g., racking, plating, direct management). The hours should not include those associated with sales, general administration, waste treatment, facility repairs, or other non-finishing tasks.

Labor hours are not a good normalizing method in certain cases. For example, if a company has replaced manual plating lines with automated lines, and reduced labor requirements, it may be difficult for them to meet the numerical environmental goals.

### Surface Area of Product or Weight of Product

Surface area is the most accurate production-normalizing factor because it has a direct proportional relationship with chemical use and drag-out, the latter of which relates to water use and sludge generation. Unfortunately, most companies, especially job shops, are unable to track surface area because of the large number of different parts processed. A notable exception is printed wiring board manufacturers, which usually track the surface area of circuit boards manufactured.<sup>1</sup> Also, reel to reel and continuous strip plating operations often track surface area. Additionally, some captive operations are able to track surface area because they may process a limited number of the same parts.

Companies may choose to “double count” surfaces that are processed through more than one plating operation because pollution factors are related to drag-out that occurs when a part is removed from a chemical solution. However, this approach would be difficult to implement because each process may involve a different number of process steps. However, any method can be used as long as it is documented and applied consistently from year to year.

The weight of product is also an accurate measure of production in certain instances, with the best applications being barrel plating of fasteners or similar small parts.

### Rectifier Amp-Hours

Amp-hours are an effective normalizing factor for operations that employ electrolytic processes. Companies which perform both electrolytic and non-electrolytic processes (e.g., electroless nickel) cannot use this factor. Companies that have selected to track amp-hours are primarily those, which operate hard chromium plating processes.

### Unacceptable Normalizing Factors

Quantity of chemicals used and energy consumption are not acceptable normalizing factors. These are variables, which the program expects companies to reduce and therefore cannot serve as “fixed” values when calculating progress.

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<sup>1</sup> To account for processing of multilayer boards, the commonly accepted production measurement is surface layer square feet. A single-sided board with a surface area of 1 ft<sup>2</sup>, has a production factor of 1 surface layer square feet. A double-sided board with an apparent surface area of 1 ft<sup>2</sup>, has a production factor of 2 surface layer square feet. A four-layer board with an apparent surface area of 1 ft<sup>2</sup>, has a production factor of 4 surface layer square feet.

## **Water Use**

The 50% reduction in water purchased goal is achieved when a company has an annual water usage that is 50% or less of its baseline water usage, adjusted for any changes in production. Companies may choose to track water purchased or water discharged. Water purchased is a more accurate measurement because it is easily tracked using water bills. In either case, the goal is focused on water used in the metal finishing operations. Typically, water use values are more accurate because common water meters can measure it. Discharges are often not under pressure, which causes inaccurate meter readings. Companies may submit calculated values for discharges based on total water purchased and subtracting out non-process water uses such as cooling water and lavatories.

Indirect discharge facilities are required to submit bi-annual reports that include measured or estimated average and maximum daily flows for the reporting period. Direct discharge companies submit Discharge Monitoring Reports. The specific requirements and due dates of these reports are specified in NPDES permits.

Whatever methods are used to track water use, companies should be expected to:

1. Start with reliable data such as a water bill or strip chart from a meter and maintain these data in their files.
2. Develop a sound method of calculating water use and save all calculations.
3. Use the same methodology for the baseline and all subsequent reporting years.

The following are normalized (\$ sales) water use statistical values from 1998 SGP worksheets. The following figures can be used to determine the reasonableness of values submitted by companies.

Highest value	10 gal/\$ sales
Lowest value	0.1 gal/\$ sales
Average of values	2.91 gal/\$ sales
Median value	2.19 gal/\$ sales
Standard deviation	2.45 gal/\$ sales

(note: data from companies reporting zero discharge were not included in the calculations of values)

The Benchmarking data indicate that water use varies significantly among companies and is related to the type of processes performed.

## **Metals Discharged to Water**

The quantity of metals discharged to water is calculated using the average metal concentration data and wastewater discharge flow rate data.

The calculation for the 50% reduction of metals emissions goal is based on all available data for those metals regulated under 40 CFR 413 or 40 CFR 433 (whichever is applicable) and TRI listed metals. Indirect discharge facilities are required to submit bi-annual reports that include measured or estimated average and maximum daily flows for the reporting period. Direct discharge companies submit Discharge Monitoring Reports. The specific requirements and due dates of these reports are specified in NPDES permits.

Due to differences in permit requirements, not all companies will have the same number of data points from which to calculate the concentration of metals in the wastewater. All available data should be used in the calculation, unless there are special circumstances that preclude the use of certain data. Such cases should be documented. Companies regulated under 40 CFR 413 with flow rates below 10,000 gpd may only be regulated for cadmium, lead, and cyanide (amenable). If the available data are limited to these parameters, then, these are the only data used for calculating the progress.

Note that companies may monitor for cyanide at a different point than the regulated metals. In such cases, the flow rate of the cyanide stream should be provided.

Expected values for metal concentration in the discharge are shown below. The upper range of these values is based on the maximum 4-day average standard found in 40 CFR 413 standards. The lower range is a typical detection limit reported by most analytical laboratories.

<u>Parameter</u>	<u>Expected Range</u>
Cadmium	>0.005- 0.7 mg/l
Chromium	>0.05- 4.0 mg/l
Copper	>0.02- 2.7 mg/l
Lead	>0.01- 0.4 mg/l
Nickel	>0.04- 2.6 mg/l
Zinc	>0.005- 2.6 mg/l
Cyanide (total)	>0.02- 1.0 mg/l

### **Energy Use**

Values submitted for energy use are converted to BTUs and summed over all types of energy purchased to arrive at total energy use for the baseline and current years. Most metal finishing companies purchase both electricity and natural gas. Approximately 25% of these companies also purchase fuel oil. A small percentage of metal finishing companies use propane.

### **Electricity Use**

Monthly electricity bills indicate electricity use, typically in kWh. The following statistics from 1998 SGP worksheet data can be used to judge the reasonableness of electricity use data.

Highest value	0.83 kWh/sales
Lowest value	0.1 kWh \$ sales
Average of values	0.39 kWh/\$ sales
Median value	0.36 kWh/\$ sales
Standard deviation	0.17 kWh/\$ sales

### **Natural Gas Use**

Monthly natural gas bills indicate gas usage, typically in therms or hundreds of cubic feet (ccf). These two units of measure are equivalent. Some companies report cubic feet (1 cf = 0.01 therms) or BTUs (100,000 BTUs = 1 therm). The following statistics from 1998 SGP worksheet data can be used to judge the reasonableness of natural gas use data.

Highest value	0.11 therms/\$ sales
Lowest value	0.01 therms/\$ sales
Average of values	0.03 therms/\$ sales
Median value	0.02 therms/\$ sales
Standard deviation	0.02 therms/\$ sales

### Fuel Oil Use

Fuel oil, which is measured in gallons, is difficult to accurately measure since it is purchased in bulk and used as needed. To the extent possible, companies should report only the volume of fuel oil used during the reporting year, not the purchased amount. To accomplish this, companies use must take into account the quantity of fuel oil in storage at the beginning and end of each reporting year.

Due to the wide variability in the quantity of fuel oil used by metal finishers, no average values are presented in this document.

### ***Hazardous/Solid Wastes***

The types of wastes that should be reported in the SGP worksheet are wastewater treatment sludge (regardless of whether it is recycled or disposed of in a landfill), plus any other metal-bearing wastes that are disposed of in landfills. Non-metal bearing wastes that are treated/disposed of off-site do not need to be reported on the worksheet.

### Wastewater Treatment Sludge Generation

Most companies that report a wastewater discharge also generate wastewater treatment sludge. Two major exceptions are: (1) companies that use ion exchange columns which are regenerated off-site, and (2) companies that do not need to remove metals from their wastewater (e.g., sulfuric acid anodizer). It is possible for a company to report zero discharge of wastewater and still generate wastewater sludge, but this occurs infrequently.

When completing their worksheets, most companies report the quantity of sludge shipped off-site as the quantity generated. Alternatively, companies may keep waste inventory records and use these records to calculate actual annual sludge generation rates. Either procedure is acceptable as long as the same reporting method is used each year.

The following statistics from 1998 SGP worksheet data can be used to judge the reasonableness of sludge generation data.

Highest value	71.4 lbs./\$1000 sales
Lowest value	0.31 lbs./\$ 1000 sales
Average of values	17.9 lbs./\$ 1000 sales
Median value	13.5 lbs./\$ 1000 sales
Standard deviation	17.6 lbs./\$ 1000 sales

## Wastewater Treatment Sludge Shipped Off-Site to Landfill

Most metal finishing companies either send their sludge to a recycling company or to a landfill. In some cases, the waste is sent to an intermediate broker who either recycles or disposes of the sludge.

Any hazardous sludge shipped off-site must be tracked with a manifest. Companies are required by RCRA to keep copies of manifests for at least 3 years. The manifests indicate type and the quantity of waste shipped and the destination. Use this information to determine if the sludge is being shipped to a landfill or recycling facility. Companies must also submit biennial reports (EPA Form 8700-13A) detailing the type of waste generated, quantity, description of the changes in volume and toxicity (in comparison with previous years). Also, TRI reports indicate if the waste material is sent off-site for recycling or disposal.

## Water Content of Wastewater Treatment Sludge

Progress on goals involving sludge is calculated on a dry weight basis. Therefore, the water or solids content of the sludge is needed. From a regulatory standpoint, companies are not required to know the water content of their sludge. However, most companies have a sludge analysis that indicates water or solids content. If no water/solids data are available, a company can estimate this value by knowing the type of dewatering equipment used. The following are typical water contents of sludge produced by common dewatering equipment: gravity settling – 95%, centrifuge – 85%, filter press – 60%, sludge dryer – 20% or less.

## Metal Content of Wastewater Treatment Sludge

The 98% metals utilization goal may be met using one of two ways. These two methods are explained in the detailed worksheet instructions. If a company selects to use the “*less than 2% of metals being land disposed*” method, they must provide data on the metal content of the sludge (Part V of Worksheet) and the quantity of metal used (Part IX of Worksheet). If they select to use the “*50% overall sludge reduction method*”, it is not necessary to complete Parts V and IX of the Worksheet.

The primary reason that a second method for calculating progress on this goal was added is that many companies do not have Part V data. From a federal regulatory standpoint, companies are not required to measure the metal content of their sludge. Some companies have these data in the form of a sludge profile analysis performed by their laboratory or by the receiving facility (e.g., landfill, recycler). Note that Toxicity Characteristic Leaching Procedure (TCLP) data cannot be used to determine the metal content of the sludge. TCLP data can usually be identified by the low concentrations of metal reported for the analyses. Generally, the metal content of F006 sludge, not including unregulated metal (e.g., iron and aluminum) is above 1% (10,000 mg/l), whereas TCLP metal data for F006 sludge are typically below 500 mg/l for all regulated metals.

Companies should be able to produce laboratory reports that substantiate values recorded on SGP worksheets.

## **Metal Content of Other Wastes**

The 98% metals utilization goal may be met using one of two measurements. These are explained in the detailed worksheet instructions. If a company selects to use the “less than 2% of metals being land disposed” method, they must provide data on the metal content of their other waste (wastes other than wastewater treatment sludge). If they select to use the 50% overall sludge reduction method, it is not necessary to provide these data.

From a federal regulatory standpoint, companies are not required to measure the metal content of their “other wastes,” and most companies do not have this information. However, some companies have a waste profile analysis that was performed by their laboratory or by the receiving facility (e.g., landfill). Note that TCLP data cannot be used to determine the metal content of the waste.

Companies should be able to produce laboratory reports that substantiate values recorded on SGP worksheets.

## ***Metal Used***

The 98% metals utilization goal may be met using one of two measurements. These are explained in the detailed worksheet instructions. If a company selects to use the “less than 2% of metals being land disposed” method, they must provide data on the metal used in the forms of anodes or metal compounds. If they select to use the 50% overall sludge reduction method; it is not necessary to provide these data.

### **Anodes**

The quantity of anodes used can be estimated from purchasing and inventory records. To simplify tracking, it is acceptable for companies to assume that the quantity of anodes in use in the tanks were the same at the start and end of the year and therefore do not need to be considered in estimating the quantity used. Some companies maintain tank addition logs that can be used in place of or in conjunction with purchase/inventory data to arrive at an estimation of quantity used. In any case, the method selected for tracking anode use should be documented and consistent from year to year.

### **Metal Compounds**

The quantity of chemicals used can be estimated from purchasing and inventory records. To simplify tracking, it is acceptable for companies to assume that the quantity of chemicals in use in the tanks was the same at the start and end of the year. Some companies maintain tank addition logs that can be used by in place of or in conjunction with purchase/inventory data to arrive at an estimation of quantity used. If proprietary chemicals are used, technical data sheets or MSDS reports should be used to verify the quantity of metal. In any case, the method selected for tracking metal compound use should be documented and consistent from year to year.

## ***Other Emissions***

### **Air Emissions-Metals**

The calculation for the 50% reduction of metals emissions to air + water is based on available data for those metals regulated under 40 CFR 413 or 40 CFR 433 (whichever is applicable) and

TRI listed metals. SGP companies are only required to track those metals for which they are regulated or report. Most companies do not measure air emissions for metals with the notable exception of some chromium plating and anodizing operations, which are regulated under the Chromium MACT standard. Also, companies using threshold quantities of toxic metals are required to report these in annual TRI reports. Typically, air emissions reported in TRI reports are estimated values. Most reported values are less than 100 lbs./year per metal.

### Organic Chemical Emissions-Air and Water

Many TRI organic chemicals used by metal finishers, such as solvents, are almost entirely released to the air or water. In such instances, purchases less inventory amounts are equal to air + water emissions. The most frequent exceptions are certain chemicals such as ethylene glycol, found in some cleaning solutions. These solutions may be discarded off-site and the chemicals do not enter the air/water. Companies that meet the threshold quantities must submit TRI reports. These reports will indicate air and water emissions.

### ***Reduction in Human Exposure***

The SGP goal related to reduction in human exposure to toxic metals involves a range of topics, most of which are covered by environmental or worker safety regulations. This section identifies the types of rules affecting the metal finishing industry and the kinds of records companies would be expected to have on hand, which could be used to substantiate progress. In some cases, an on-site audit would be necessary to confirm accomplishments.

### Pollution Prevention

Companies can be reasonably expected to maintain copies of P2 reports and plans, internal audits, as well as documentation of implemented P2 projects. Companies submit biennial reports (EPA Form 8700-13A) detailing the type of waste generated, quantity, description of the changes in volume and toxicity (in comparison with previous years). These reports can be used to substantiate P2 claims.

### Material Storage and Utilization

Prior OSHA or RCRA audits may identify inadequate procedures with respect to material storage. Pollution prevention reports or similar documentation may describe material utilization improvements.

### Personal Protective Equipment

OSHA regulations require that employer provide and ensure that each affected employee uses appropriate personal protective equipment (PPE). Employers must verify that each affected employee has received the required training through a document that contains the following information: name of each employee trained, the date(s) of training, and type of training the employee received.

### Industrial Hygiene Practices

OSHA requires that ventilation systems are constructed to meet conditions of service found in American National Standard Fundamentals Governing the Design and Operation of Local Exhaust Systems, Z9.2-1960. Metal finishing tanks are classified by hazard potential and rate of gas evolution (OSHA 29 CFR 1926.57(h)(8)) and must meet specified control velocities.

## Employee Training in Environmental Hazards

Under RCRA most metal finishing companies are subject to regulations involving preparedness and accident prevention.

## Local Emergency Planning Committee

Section 301-303 of EPCRA requires companies that handle or store certain hazardous chemicals to plan for emergencies. These plans should be maintained on-site.

## **Compliance with Environmental Standards**

### Wastewater

Most companies have a discharge regulated under the Clean Water Act. The most applicable regulations include 40 CFR 403, 40 CFR 413, and 40 CFR 433. Local standards are often more stringent than the federal guidelines. A range of situations can cause non-compliance, the most common being reporting/recordkeeping errors, pH violations, and exceeding metal limits. Some metal finishing companies have achieved zero discharge and are not regulated for wastewater discharges. These facilities are mainly hard chromium plating shops or other shops with singular metal processes.

### Air

Metal finishing processes regulated for air emissions under federal law are limited to solvent cleaning, hard and decorative chromium plating and chromic acid anodizing. Additional local, regional, or state rules may also apply.

### Hazardous Waste

Various aspects of the Resource Conservation and Recovery Act affect metal finishing companies. The most notable deal with hazardous waste management, including wastewater treatment sludge (F006).

### Chemical Reporting

Companies that meet quantity threshold and other criteria are required to report chemical use and/or discharges under the Emergency Planning and Community Right-to-Know Act (EPCRA). This includes reporting initial information on chemicals (MSDS) (EPCRA 311), chemical inventory (EPCRA 312), and chemical releases (EPCRA 313, TRI).

**Table 1. Potential Sources of Information for Substantiating Worksheet Data**

<b>WORKSHEET DATA ELEMENTS</b>	<b>POTENTIAL SOURCES OF INFORMATION FOR SUBSTANTIATING WORKSHEET DATA</b>
<b>Normalizing Factors:</b>	
Surface Area of Product or Weight of Product	<ul style="list-style-type: none"><li>• Production logs.</li><li>• Statistical process control (SPC) data.</li><li>• Customer invoices.</li></ul>
Sales	<ul style="list-style-type: none"><li>• Annual income statements (audited or not) or similar accounting documents (typically generated by an accounting department or accounting firm).</li></ul>

<b>WORKSHEET DATA ELEMENTS</b>	<b>POTENTIAL SOURCES OF INFORMATION FOR SUBSTANTIATING WORKSHEET DATA</b>
	<ul style="list-style-type: none"> <li>• Dunn and Bradstreet reports.</li> </ul>
Metal Finishing Labor Hours	<ul style="list-style-type: none"> <li>• Time sheet or time clock data or summaries.</li> </ul>
Rectifier Amp-Hours	<ul style="list-style-type: none"> <li>• Manual logs indicating rectifier use.</li> <li>• SPC logs.</li> <li>• Chromium MACT records.</li> </ul>
<b>Water/Wastewater:</b>	
Water Use	<ul style="list-style-type: none"> <li>• Water bills.</li> <li>• Bi-annual report sent to control authority or NPDES Discharge Monitoring Report.</li> </ul>
Metals Discharged to Water	<ul style="list-style-type: none"> <li>• Bi-annual report sent to control authority or NPDES Discharge Monitoring Report.</li> <li>• Lab reports.</li> <li>• TRI reports (Form R).<sup>2</sup></li> </ul>
<b>Energy Use:</b>	
Electricity Use	<ul style="list-style-type: none"> <li>• Electric bills.</li> </ul>
Natural Gas Use	<ul style="list-style-type: none"> <li>• Gas bills.</li> </ul>
Fuel Oil Use	<ul style="list-style-type: none"> <li>• Fuel oil bills.</li> <li>• Inventory data (Jan 1).</li> </ul>
<b>Hazardous/Solid Wastes:</b>	
Sludge Generation	<ul style="list-style-type: none"> <li>• Hazardous waste manifests or other shipping documents.</li> <li>• Biennial reports (EPA Form 8700-13A).</li> <li>• TRI reports (see footnote #1).</li> </ul>
Water Content of Sludge	<ul style="list-style-type: none"> <li>• Sludge analytical report (profile)</li> </ul>
Metal Content of Sludge	<ul style="list-style-type: none"> <li>• Sludge analytical report (profile)</li> </ul>
Metal Content of Other Wastes	<ul style="list-style-type: none"> <li>• Waste analytical report (profile)</li> </ul>
<b>Metal Used:</b>	
Anodes	<ul style="list-style-type: none"> <li>• Purchasing and inventory records.</li> <li>• Tank addition logs.</li> </ul>
Metal Compounds	<ul style="list-style-type: none"> <li>• Purchasing and inventory records.</li> <li>• Tank addition logs.</li> <li>• Technical data sheets of MSDS reports.</li> </ul>
<b>Other Emissions:</b>	
Air Emissions-Metals	<ul style="list-style-type: none"> <li>• TRI reports (see footnote #1).</li> <li>• Chromium MACT reporting/records.</li> </ul>
Organic Chemical Emissions-Air and Water	<ul style="list-style-type: none"> <li>• TRI reports (see footnote #1).</li> <li>• Purchasing records.</li> <li>• MSDS</li> </ul>
<b>Reduction in Human Exposure:</b>	
Pollution Prevention	<ul style="list-style-type: none"> <li>• P2 reports/plans.</li> <li>• Biennial reports (EPA Form 8700-13A).</li> </ul>
Material Storage and	<ul style="list-style-type: none"> <li>• P2 reports/documentation</li> </ul>

<sup>2</sup> TRI Reports: note that many metal finishers are not required to report under EPCRA 313 because they do not meet the reporting criteria. Approximately 2,000 facilities in SIC 3471 reported under TRI in 1997. Also, companies that submit TRI reports are only required to submit data on chemicals that meet threshold quantity criteria, other chemicals may be released which should be reported on the SGP worksheets.

<b>WORKSHEET DATA ELEMENTS</b>	<b>POTENTIAL SOURCES OF INFORMATION FOR SUBSTANTIATING WORKSHEET DATA</b>
Utilization	<ul style="list-style-type: none"> <li>• RCRA audits.</li> </ul>
Personal Protective Equipment	<ul style="list-style-type: none"> <li>• Personnel files maintained in accordance with 29 CFR 1915.152.</li> <li>• Records retained by OSHA agency.</li> </ul>
Industrial Hygiene Practices	<ul style="list-style-type: none"> <li>• Records retained by facility and OSHA agency.</li> </ul>
Employee Training in Environmental Hazards	<ul style="list-style-type: none"> <li>• Facility's spill management and contingency plans.</li> </ul>
Local Emergency Planning Committee	<ul style="list-style-type: none"> <li>• Facility's emergency plan including communications plans with LEPC.</li> </ul>
<b>Compliance with Environmental Regulations:</b>	
Wastewater	<ul style="list-style-type: none"> <li>• Review compliance records retained by the pretreatment control authority or NPDES agency.</li> </ul>
Air	<ul style="list-style-type: none"> <li>• Compliance records retained by the state air agency.</li> </ul>
Hazardous Waste	<ul style="list-style-type: none"> <li>• Compliance records retained by the state solid waste agency.</li> </ul>
Chemical Reporting	<ul style="list-style-type: none"> <li>• Records and documentation retained by the Local Emergency Planning Committee (LEPC) (EPCRA 311 and 312).</li> <li>• Records and documentation retained by the State Emergency Response Commission (SEPC).</li> <li>• Facility's chemical inventory records (EPCRA 312)</li> <li>• Facility's Form R records (EPCRA 313).</li> </ul>