

Announcement: 2018 Hazardous Materials Inventory Reporting to Include the 24 New Federal Hazard Categories

Effective December 28, 2017, CalEPA will replace the existing five (5) federal hazard categories available in CERS used for the completion of chemical inventories as part of the annual Hazardous Materials Inventory submittal with twenty-four (24) new federal hazard categories adopted by the United States Environmental Protection Agency (U.S. EPA) as a result of changes to the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (HCS). The table below lists the existing and new federal hazard categories. Section 2 of current SDS list the appropriate new hazard categories for that hazardous material.

| Table 1 | | | |
|--|----------------------|--|--|
| Federal Hazard Categories Adopted by U.S. EPA (40 CFR part 370.66) | | | |
| Existing Categories (CERS Data Fields 216a-216e) | | NEW Categories (New CERS Data Fields 216f-216cc) | |
| PHYSICAL | HEALTH HAZARD | PHYSICAL | HEALTH HAZARD |
| Fire | Acute (Immediate) | Flammable (gases, aerosols, liquids, or solids) | Carcinogenicity |
| Reactive | Chronic (Delayed) | Gas under pressure (compressed gas) | Acute toxicity (any route of exposure) |
| Sudden release of pressure | | Explosive | Reproductive toxicity |
| | | Self-heating | Skin corrosion or irritation |
| | | Pyrophoric (liquid or solid) | Respiratory or skin sensitization |
| | | Oxidizer (liquid, solid or gas) | Serious eye damage or eye irritation |
| | | Organic peroxide | Specific target organ toxicity (single or repeated exposure) |
| | | Self-reactive | Aspiration Hazard |
| | | Pyrophoric gas | Germ cell mutagenicity |
| | | Corrosive to metal | Simple asphyxiant |
| | | In contact with water emits flammable gas | Hazard Not Otherwise Classified (HNOC) |
| | | Combustible dust | |
| | | Hazard Not Otherwise Classified (HNOC) | |

CalEPA Adopts the 24 New Federal Hazard Categories for use in the Hazardous Materials Inventory Reporting of the Annual Hazardous Materials Business Plan (HMBP) Submittals in CERS

What this means for Regulated Businesses:

Starting January 1, 2018, all California regulated businesses must use the new federal hazard categories to prepare the Hazardous Materials Inventory submittal in CERS, and must complete the submittal in accordance with the due date required by the local Unified Program Agency (UPA).

The following guidance is provided for regulated businesses to assist in the 2018 Hazardous Materials Inventory submittal:

- **In all cases, refer to Section 2 of a current SDS (previously called an MSDS) to determine which of the new federal hazard categories apply.**
- **Select the scenario below that best fits your situation and follow the recommendations:**
 - 1) Uploading a revised inventory via the new CERS Hazardous Materials Inventory Excel templates**
 - a) Download your previous inventory from the Hazardous Materials Inventory submittal element in CERS
 - b) Enter 'N' the old federal hazard category choices previously selected.
 - c) Enter 'Y' for each new federal hazard category listed in Section 2 of your SDS. Enter 'N' for all others.
 - d) Follow existing CERS instructions for completing and submitting the Hazardous Materials Inventory.
 - 2) Creating a new Hazardous Materials Inventory using the CERS User Interface to add chemicals**
 - a) In the Hazardous Materials Inventory section of CERS add a new chemical for each hazardous material that you need to report.
 - i) Use your SDS (Section 2) to determine which federal hazard categories to select for each hazardous material.
 - ii) Follow existing CERS instructions for completing and submitting the Hazardous Materials Inventory.
 - 3) Creating a new Hazardous Materials Inventory submittal element based on a previous Hazardous Materials Inventory submittal via the CERS User Interface**
 - a) Create a draft Hazardous Materials Inventory submittal based on a previous submittal
 - b) Deselect all obsolete federal hazard categories for each hazardous material carried over from previous submittal
 - c) Use your SDS (Section 2) to determine federal hazard categories for each hazardous material, and select all applicable.
 - d) Follow existing CERS instructions for completing and submitting the Hazardous Materials Inventory

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What this means for UPAs:

UPAs will continue to ensure regulated businesses complete the Hazardous Materials Inventory of the hazardous materials business plan submittal utilizing the appropriate (new) federal hazard categories.

What this means for CERS:

- **On December 28, 2017, the 24 new Federal Hazard Categories will be incorporated into CERS.** Though the existing 5 federal hazard categories will remain in CERS for historical purposes, they will be considered obsolete.
- The “**Hazardous Material Inventory Upload Template**” (MS Excel template) available in CERS will be revised to incorporate the new federal hazard categories.
- **The most commonly reported hazardous materials in the CERS Chemical Library are currently being revised by CalEPA to reference the new applicable federal hazard categories.** Hazardous materials will be restored to the CERS Chemical Library as the new classifications are updated. If the new federal hazard category is not referenced for an existing chemical in the CERS Chemical Library use the federal hazard category information listed in Section 2 of a current Safety Data Sheet (SDS).
- **CERS will display “Warning” alerts when a Hazardous Materials Inventory is submitted using the 5 obsolete federal hazard categories.**

What this means for CalEPA:

A Title 27 rulemaking to incorporate the 24 new federal hazard categories as additional data elements into the Data Dictionary (Chapter 2, Hazardous Materials Inventory- Chemical Description), relative to the chemical inventory will be adopted and effective January 1, 2018.

For additional information:

Please see: “Background: The California Environmental Protection Agency (CalEPA) Adopts the 24 New Federal Hazard Categories for use in Chemical Inventory Reporting of Annual 2018 Hazardous Materials Business Plan (HMBP) Submittals in the California Environmental Reporting System (CERS)” document available at: <https://cers.calepa.ca.gov/wp-content/uploads/sites/61/2017/12/Federal-Hazard-Class-12272017-1.pdf>

For questions, please contact:

- Your local UPA (Directory: <http://cersapps.calepa.ca.gov/Public/Directory>)
- CalEPA Unified Program, cupa@calepa.ca.gov