

**Table 1: SARA Title III Analysis Correlation**

SARA Title III Subtitle A	Topic	Legal Reporting Requirement	Database Appropriate	In R-EDMS	In SDSFIE/FMSFIE
Section 301	Establishment of SERCs, Planning Districts, and LEPCs		N	N	N
Section 302	Substances and facilities covered; notification		N <sup>2</sup>	N	N
Section 303	Comprehensive emergency response plans		Y, metadata	N	N
Section 304	Emergency release notification		N	N	N
Section 305	Emergency training and review of emergency systems		N	N	N

SARA Title III Subtitle B	Topic	Legal Reporting Requirement	Database Appropriate	Maintained in R-EDMS	In SDSFIE/FMSFIE
Section 311	Material Safety Data Sheet (MSDS) Reporting	Subject owner or operator shall prepare or have available a MSDS for all hazardous chemicals/mixtures present at the facility at any one time in amounts equal to or greater than 10,000 pounds and for all extremely hazardous substances present at the facility in an amount greater than or equal to 500 pounds or the TPQ, whichever is lower. MSDS is to be submitted within 90 days after the facility becomes subject to this subpart or within 30 days of receipt of request for MSDS from committee.	Y Y, metadata	Y <sup>3</sup>	N
Section 312	Emergency and Hazardous Chemical Inventory Forms (Tier IIs)	Subject owner or operator shall submit an inventory form (Tier I or Tier II) to the commission, the committee, and the fire department with jurisdiction over the facility. This form will contain information on hazardous chemicals/mixtures present at the facility above the established threshold levels during the preceding calendar year. Submission is due on or before March 1 of each year.	Y	Y	N
Section 313	Toxics Release Inventory (Form Rs)	Subject owner or operator shall submit an inventory form (Form R) to the EPCRA Reporting Center and the appropriate state office. This form will contain information on toxic chemical releases at the facility for any EPCRA Section 313 listed chemical or chemical category for which established threshold levels are exceeded during the preceding calendar year. Submission is due on or before July 1 of each year.	Y	Y	N

SARA Title III Subtitle C	Topic	Legal Reporting Requirement	Database Appropriate	Maintained in R-EDMS	In SDSFIE/FMSFIE
Section 321	Relationship to other laws		N	N	N
Section 322	Trade secrets		N	N	N
Section 323	Provision of information to health professionals, doctors, and nurses		Y - metadata	N	N
Section 324	Public availability of plans, data sheets, forms, and follow-up practices		Y - metadata	N	N

<sup>2</sup> Electronic maintenance would facilitate accessibility of subject data, however, typical database-type functionality not required.

<sup>3</sup> R-EDMS stores database appropriate measures material recognition and threshold evaluation. Certain standard MSDS sections are not addressed (e.g. Control Measures, Precautions for Safe Handling and Use, Transportation Data) as they are not database appropriate.

SARA Title III Subtitle C	Topic	Legal Reporting Requirement	Database Appropriate	Maintained in R- EDMS	In SDSFIE/FMSFIE
Section 325	Enforcement		N	N	N
Section 326	Civil actions		N	N	N
Section 327	Transportation exemption		N	N	N
Section 328	Regulations		N	N	N
Section 329	Definitions		N	N	N
Section 330	Authorization of appropriations		N	N	N

**Table 2: Clean Air Act Analysis Correlation**

Clean Air Act	Topic	Legal Reporting Requirement	Database Appropriate	In R-EDMS	In SDSFIE/FMSFIE
Title I	Air Pollution Prevention and Control	Consolidated in the Title V permit as necessary	N	N	N
Title II	Emission Standards for Moving Sources	Consolidated in the Title V permit as necessary	N	N	N
Title III	General	Consolidated in the Title V permit as necessary	N	N	N
Title IV	Acid Deposition Control	Consolidated in the Title V permit as necessary	N	N	N
Title V	Permits	Each permit issued under this title shall set forth inspection, entry, monitoring, compliance certification, and reporting requirements to assure compliance with the permit terms and conditions.	Y	Y	Y <sup>4</sup>
Title VI	Stratospheric Ozone Protection	Consolidated in the Title V permit as necessary	Y	N	N

North Carolina	Topic	Legal Reporting Requirement	Database Appropriate	Maintained in R-EDMS	In SDSFIE/FMSFIE
15A NCAC 2D .0202	Registration of Air Pollution Sources	<p>(a) The Director may require the owner or operator of a source of air pollution to register that source.</p> <p>(b) Any Person required to register a source of air pollution with the Division shall register the source on forms provided by the Division and shall provide the following information:</p> <ol style="list-style-type: none"> <li>(1) the name of the person, company, or corporation operating the facility;</li> <li>(2) the address, location, and county;</li> <li>(3) principal officer of the company;</li> <li>(4) quantities and kinds of raw materials used;</li> <li>(5) process flow sheets;</li> <li>(6) operating schedules;</li> <li>(7) total weights and kinds of air pollution released;</li> <li>(8) types and quantities of fuels used;</li> <li>(9) stack heights; and</li> <li>(10) Other information considered essential in evaluating the potential of the source to cause air pollution.</li> </ol> <p>The forms shall be completed and returned to the Division within 60 days of their receipt.</p>	Y	Y	Y <sup>5</sup>

<sup>4</sup> Minimal data needs are met in SDSFIE/FMSFIE.

<sup>5</sup> Minimal data needs are met in SDSFIE/FMSFIE.

North Carolina	Topic	Legal Reporting Requirement	Database Appropriate	Maintained in R-EDMS	In SDSFIE/FMSFIE
15A NCAC 2Q .0207	Annual Emissions Reporting	<p>(a) The owner or operator of a Title V facility shall report by June 30<sup>th</sup> of each year the actual emissions during the previous calendar year of:</p> <ol style="list-style-type: none"> <li>(1) volatile organic compounds,</li> <li>(2) nitrogen oxides,</li> <li>(3) total suspended particulates,</li> <li>(4) sulfur dioxide,</li> <li>(5) fluorine,</li> <li>(6) hydrogen chloride,</li> <li>(7) hydrogen fluoride,</li> <li>(8) hydrogen sulfide</li> <li>(9) methyl chloroform,</li> <li>(10) methylene chloride,</li> <li>(11) ozone,</li> <li>(12) chlorine,</li> <li>(13) hydrazine,</li> <li>(14) phosphine,</li> <li>(15) particulate matter (PM10),</li> <li>(16) carbon monoxide,</li> <li>(17) lead, and</li> <li>(18) perchloroethylene.</li> </ol> <p>(b) The owner or operator of a facility not included in Paragraph (a) of this Rule, other than a transportation facility, that has actual emissions of 25 tons per year or more of nitrogen oxides or volatile organic compounds and that is located in Davidson, Durham, Forsyth, Gaston, Guilford, Mecklenburg, or Wake County, in Dutchville Township in Granville County, or in that part of Davie County bounded by the Yadkin River, Dutchman's Creek, North Carolina Highway 801, Fulton Creek and back to the Yadkin River shall report by June 30<sup>th</sup> of each year the actual emissions of nitrogen oxides and volatile organic compounds during the previous calendar year.</p> <p>(c) The report shall be in or on such form as may be established by the Director. The Director may require reporting for sources within a facility, for other facilities, or for other pollutants, parameters, or information, by permit conditions or pursuant to 15A NCAC 2D .0202. This annual reporting requirement shall begin with calendar year 1993 emissions. The accuracy of the report shall be certified by a responsible official of the facility as defined under 40 CFR 70.2.</p>	Y, Y -Metadata <sup>6</sup>	Y	N
15A NCAC 2Q .0508(aa)	General Emission Testing and Reporting	Section details the procedural requirements for reporting if the Title V permit requires source testing.	Y, Y -Metadata <sup>6</sup>	Y	N
15A NCAC 2Q .0508(f)(3)	Permit Deviation Reporting	Section details the definition of deviations and timing requirements for reporting	Y, Y -Metadata <sup>6</sup>	Y	N
15A NCAC 2Q .0508(t)	Compliance Certification <sup>7</sup>	Section details the content and timing requirements for reporting compliance certification	Y, Y -Metadata <sup>6</sup>	Y	N
15A NCAC 2Q .0501	Refrigerant Requirements (stratospheric Ozone and Climate Protection)	The section incorporates 40 CFR 82 largely by reference.	Y -Metadata <sup>6</sup>	Y <sup>8</sup>	N

<sup>6</sup> Finished reports could be managed with a document management system.

<sup>7</sup> Cherry Point's compliance period in its Title V permit is 6 months.

<sup>8</sup> R-EDMS utility largely serves by maintaining source lists and characteristics.