

Tier 2 Reporting Frequently Asked Questions (FAQs)

For more information on **whether you need to report, what Tier 2 reporting is, and the difference between section 311 and 312**, visit the Environmental Protection Agency ([EPA](#)) [Tier 2 website](#) to find that and more.

Q: I no longer have access to the email associated with my E-Plan account to recover a password or access ID, how can I recover my account?

A: Click the “Contact Us” button anywhere on the E-Plan website (erplan.net) and fill out the form, letting E-Plan know about your situation so they can assist.

Once logged in you can change the login email and submitter name in the Account Information tab in the top right.

Q: My facility closed, sold or didn’t meet reporting thresholds of the previous year, what do I do?

A: Closed Facility: Ensure that your facility had no hazardous chemicals over the reporting threshold at any time during the reporting year. Even closed, a facility needs to report if they were over the threshold during the year. Notify the State Emergency Response Commission (SERC), Local Emergency Planning Committee (LEPC), and local fire department of closure and when your final reporting year will be. The SERC for Iowa is the Iowa Department of Natural Resources (Iowa DNR)

Sold Facility: If sold during the middle of the year and it had hazardous chemicals over the reporting threshold at any point during your ownership that year it must still be reported. There is a chance both parties of the sale will have to report the same facility that year. Notify the SERC, LEPC, and local fire department of the sale.

Notification of Facility Change: While not required, it is encouraged to notify the State Emergency Response Commission (SERC), Local Emergency Planning Committee (LEPC), and local fire department of facility changes such as closing, selling, or no longer needing to submit a Tier 2 report. This will help avoid unnecessary follow-up from these entities in the future who may be checking on the status of your facility.

Q: How do I notify the State Emergency Response Commission (SERC), Local Emergency Planning Committee (LEPC), and my local fire departments about changes to my facility or a 311 submittal? (Does not including a 312 Tier 2 inventory report)

A: SERC (Iowa DNR): Notify by email to iowa.epcra@dnr.iowa.gov

LEPC: Refer to the county coordinator list on our [Iowa Department of Natural Resources \(DNR\) tier 2 page](#) for preferred delivery method.

Local Fire Department: If not specified on the county coordinator list, email or mail a hard copy letter of the update

Q: How do I complete an EPCRA Section 311 submission?

A: Facilities subject to 311 reporting can send Safety Data Sheets (SDSs) of hazardous chemicals or a list of the hazardous chemicals present on-site at or above the reporting threshold (reporting threshold information found here: [EPA Tier 2 site](#)) to the SERC, LEPC and local fire department. This is a one-time submission that should be done within 90 days of acquiring the hazardous chemicals. If you come into possession of a new hazardous chemicals or learn of a major update to the SDS of an existing hazardous chemical, you must submit the update.

Completing a Tier 2 annual report fulfills the 311 submission IF the report is within the 90-day timeframe (for example: getting hazardous chemicals in December and submitting a tier 2 report in January). If you need to report a 311 outside of the Tier 2 submittal window it must be separate from Tier 2.

Q: How do I complete a Tier 2 annual report submission in Iowa?

A: You must submit the Tier 2 annual report to the SERC, LEPC, and local fire department. The state of Iowa SERC (Iowa DNR) only accepts submission through the E-Plan software. By completing the report on E-Plan it automatically fulfills the SERC requirement. Refer to the county coordinator list on our [Iowa Department of Natural Resources \(DNR\) Tier 2 webpage](#) for preferred delivery method to the LEPC. If preferred delivery method to your local fire department is not specified on the county coordinator list, email or mail a hard copy letter of the Tier 2 report to them.

Important note: After completing the Tier 2 report on E-Plan you may download it as a pdf.

Q: How do I access Tier 2 chemical inventory data as a public citizen?

A: Send an email request to iowa.epcra@dnr.iowa.gov

Q: What are the exemptions to Tier 2 reporting?

A: You do not have to report substances for which you are not required to have an MSDS (or SDS) under the OSHA regulations, or that are excluded from the definition of hazardous chemical under EPCRA section 311(e). Each of the following substances are excluded under EPCRA section 311(e):

1. Any food, food additive, color additive, drug, or cosmetic regulated by the Food and Drug Administration.
2. Any substance present as a solid in any manufactured item to the extent exposure to the substance does not occur under normal conditions of use.
3. Any substance to the extent it is used:
 - a. For personal, family, or household purposes, or is present in the same form and concentration as a product packaged for distribution and use by the general public. Present in the same form and concentration as a product packaged for distribution and use by the general public means a substance packaged in a similar manner and present in the same concentration as the substance when packaged for use by the general public, whether or not it is intended for distribution to the general public or used for the same purpose as when it is packaged for use by the general public;
 - b. In a research laboratory or hospital or other medical facility under the direct supervision of a technically qualified individual; or
 - c. In routine agricultural operations or is a fertilizer held for sale by a retailer to the ultimate customer.

Q: Should I report a chemical with an SDS that says it is non-hazardous?

A: The State of Iowa prefers to err on the side of caution. If a substance has an SDS, is over the reporting threshold, and isn't exempt under one of the previously mentioned exemptions, then it should be reported for Tier 2. We want to assist our first responders as much as possible in case of emergency.

Q: How do I report lead acid batteries?

A: Refer to the [Lead Acid Battery Tier 2 Guide](#) for a full explanation.

Q: I am having issues with the E-Plan software, what do I do?

A: Utilize the "Contact Us" button anywhere on the E-Plan website.

Q: Do I need send a certified copy to the SERC (Iowa DNR)?

A: No, the E-Plan submission is all the Iowa DNR needs to fulfill the SERC submittal requirement.

Q: Who do I contact if I have questions not answered here?

A: Simon Stecker, Tier 2 Coordinator
(515) 783-7346
simon.stecker@dnr.iowa.gov