

What to include on your Annual Hazardous Materials Inventory Report

Category	What is included?	Threshold Quantity	What do I enter in the CAS Number field?
Hazardous Substances	All chemical compounds and chemical groups listed on the EPA List of Lists .	50 Gallons or 400 lbs at $\geq 10\%$ Concentration by weight	CAS Number
Halogenated Solvents	All Halogenated Solvents, a list of which can be found in the appendix of the Groundwater Protection Program Reference Manual	10 Gallons or 100 lbs at $\geq 10\%$ Concentration by weight	CAS Number
Hazardous Wastes	Defined by OAR Chapter 340, Division 101. These are defined by the EPA and Oregon Department of Environmental Quality.	30 gallons or 220 lbs, any concentration.	Waste Code (EPA Hazardous Waste Number)
Non-Fuel Petroleum Products	Petroleum-based liquids in any form, besides those used for fuel (See details below).	50 gallons of 400 lbs at $\geq 10\%$ Concentration by weight, stored in any single container with capacity >50 gallons.	400 or CAS Number if known
Petroleum Fuels	Petroleum-based liquid products specifically for fuel purposes (See details below).	50 gallons or 400 lbs, stored in any single container with capacity >50 gallons.	450 or CAS Number if known

Details: Petroleum or Petroleum Products - Means petroleum-based products in any form, including but not limited to crude oil, fuel oils including gasoline and diesel, mineral oil, sludge, oil refuse, and refined products. The term *Petroleum or Petroleum Products* includes **Non-Fuel Petroleum** and **Petroleum Fuel**, defined below. Excluded from this definition are petroleum- and fossil-fuel derived gases such as propane, natural gas, liquefied natural gas, and methane that will be present in a gaseous state at ambient temperature and pressure.

- 1.) **Non-Fuel Petroleum** – Means petroleum products that are relatively low in volatile components, and therefore pose a lower risk to groundwater than *Fuels* (defined below). Typical uses of *Non-Fuel Petroleum Products* include, but are not limited to lubricants, non-PCB electrical insulating fluids, heat transfer fluids, brake fluid, hydraulic fluids, refrigeration fluids, cutting/machining fluids and coolants, and grease.
- 2.) **Petroleum Fuel or Fuel** – Means petroleum-based liquid products that are refined from crude oil specifically for fuel purposes, and therefore contain volatile components that pose a greater risk to groundwater. Fuel includes, but is not limited to, all grades of automotive gasoline, aviation gasoline, diesel, heating oils, and kerosene.

Columbia South Shore Wellhead Protection Area

Frequently Asked Questions

What does “Regulated Threshold” mean?

You are required to include a substance on your Report if your facility uses that material in the Regulated Threshold quantity listed. “Uses” means the material is present at the facility at any one time. For example, if at any point in the year you have up to 50 gallons of a material which contains a hazardous substance (at a concentration of 10% or greater by weight), then you need to report 50 gallons.

The threshold quantity determination for petroleum products and fuels is slightly different. For petroleum fuels, you are only required to report if you have 50 gallons at any given time, AND your facility stores any of that quantity in a container with a capacity greater than 50 gallons. For details, see the [Reference Manual](#).

Where do I find the CAS number?

CAS (stands for Chemical Abstract Service) numbers are like barcodes or social security numbers for chemicals that contain up to 10 digits, divided by hyphens into three parts. For example, the CAS number for Sodium Hydroxide, commonly known as Lye, is 1310-73-2. Every chemical has a unique CAS number to identify it. They are typically listed along with percent concentrations on the Safety Data Sheet for a material. If you are not sure how to locate the CAS number for a product, please get in touch and we will assist you.

I entered the CAS number in the CAS Number box and nothing came up in the dropdown list

Our reporting website only contains listings for chemicals which are regulated in the Groundwater Protection Program. If you enter a CAS number and no matches appear on the dropdown list, that chemical is not on the EPA List of Lists or our list of Halogenated Solvents, and therefore it is not regulated as a Hazardous Substance in our Groundwater Protection Program. You do not need to report it unless it fits into one of the other chemical reporting categories.

If you are still uncertain about what to report, please contact the Wellhead Protection Program staff at groundwaterprotection@portlandoregon.gov and we can look into specific materials and chemicals.

What if I have a material containing more than one hazardous substance?

If you have a single product that contains multiple regulated substances (each at concentrations of 10% or greater), you should add a separate entry in your report for each regulated chemical. Enter each entry with the same product name and product details. For example, if your facility has 50 gallons of a product called Mixture X, which contains both Boric Acid as well as Chromium (both Hazardous Substances), you should have two entries for the same product. Your report would look like this (shown on the next page):

Columbia South Shore Wellhead Protection Area

Company Name	Report Year	Product Name	CAS Number	Chemical Name	Regulated Category & Threshold	Physical State	Unit of Measure	Range	Container Type	Functional Area
Example Company	2019	Mixture X	10043353	Boric acid	Hazardous Substance (>50 gal or >400 lbs)	LIQUID	GALLONS	50-199	TANK INSIDE BUILDING	Indoor Storage
Example Company	2019	Mixture X	7440473	Chromium	Hazardous Substance (>50 gal or >400 lbs)	LIQUID	GALLONS	50-199	TANK INSIDE BUILDING	Indoor Storage

As you can see, all of the details about the substance are the same besides the CAS Numbers and Chemical Names. When reading your report, we would interpret this as 50-199 gallons of one product (Mixture X) which contains two different chemicals.

How do I report Used Motor Oil or Used Antifreeze?

Used motor oil and other petroleum-based automotive fluids are regulated as Non-Fuel Petroleum products, not Hazardous Waste, unless you know that the used fluid contains 10% or more of a listed hazardous substance or waste by volume. If you do not have an SDS with a CAS number from the used oil (for example, you are an auto mechanic and collect used oil from cars receiving oil changes in your shop), you should report it as a general Non-Fuel Petroleum by entering the code 400. Many automotive fluids fall into this category. If you have an unknown mix of Petroleum Fuels, use the code 450.

Used antifreeze should be entered as either Propylene Glycol (CAS#57-55-6), a hazardous substance, or Ethylene Glycol (CAS#107-21-1), also a hazardous substance. These are the most common active ingredients in antifreeze. If you do not know the source of your used antifreeze, it is best to report both ingredients because the waste antifreeze might be a mix of the two substances (see above for “what if I have a material containing more than one hazardous substance?” for details).

How do I know if my waste product is a Hazardous Substance or a Hazardous Waste?

Many common waste products, such as used antifreeze, are not actually considered Hazardous Waste under our regulations. That is because we use a listing of particular hazardous wastes defined by the EPA which refer primarily to particular chemical mixtures from specific industrial processes. Waste Codes are a letter followed by a three-digit number. For example, “K035” is a Waste Code used to report wastewater treatment sludge from the production of creosote.

If you have a material which you intend to discard but which contains a listed Hazardous Substance at a concentration of at least 10% by volume, it still needs to be reported. It will be categorized and regulated as a Hazardous Substance. You can note that it is a waste product by including “waste” in the product name field, or if it is stored in the same area and type of container as the unused version at your facility, you can add up the total amount you have (unused and waste) and report it in one entry.

Do I need to report Hazardous Waste that I already report to OR DEQ as a Hazardous Waste Generator?

Yes. If you submit an annual report on Hazardous Waste to OR DEQ as a Hazardous Waste Generator, you will also need to report that waste to us. If you have hazardous waste on site and would like

Columbia South Shore Wellhead Protection Area

guidance on how to report it under the local wellhead protection program, please contact us at groundwaterprotection@portlandoregon.gov.

What if the composition of a product is a Trade Secret?

Some manufacturers do not disclose the chemical makeup of their products and instead state “trade secret” on the SDS. Please provide the name of the product in the Product Name field, and use the code “300” to list it as a Trade Secret. The Regulated Threshold for products listed only as Trade Secret is the same as that for Hazardous Substances.

Additional Resource

Free Technical Assistance for the Groundwater Protection Program

Columbia Corridor Association

corky@columbiacorridor.org

Groundwater Protection Program Reference Manual:

<https://www.portlandoregon.gov/water/article/618502>

EPA List of Lists

<https://www.epa.gov/epcra/consolidated-list-lists-under-epcracerclacaa-ss112r-march-2015-version>

More Questions? Contact the Wellhead Protection Program

City of Portland:

Doug Wise

groundwaterprotection@portlandoregon.gov

Phone: 503-823-7473

<https://www.portlandoregon.gov/water/29890>

City of Gresham:

Clay Walker

Clay.Walker@greshamoregon.gov

Phone: 503-618-2487

<https://greshamoregon.gov/Well-Field-Protection-Program/>

City of Fairview:

Jeremey Hanson

hansonj@ci.fairview.or.us

Phone: 503-674-6222

<http://fairvieworegon.gov>