



# CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY



*MATTHEW RODRIQUEZ*  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • P.O. BOX 2815, SACRAMENTO, CALIFORNIA 95812-2815  
(916) 323-2514 • (916) 324-0908 FAX • [WWW.CALEPA.CA.GOV](http://WWW.CALEPA.CA.GOV)

*EDMUND G. BROWN JR.*  
GOVERNOR

February 12, 2014

## Unified Program Guidance Letter 14-05

### PRIORITIZING REGULATED BUSINESSES' ELECTRONIC SUBMISSION OF UNIFIED PROGRAM INFORMATION

To: Unified Program Agencies

All businesses regulated under the Unified Program are required to electronically submit Unified Program information into the statewide information management system, which is defined as either the California Environmental Reporting System (CERS) or a local information management system that passes data to CERS. This guidance letter provides a tool for Unified Program Agencies (UPAs) to help guide the use of resources in systematically obtaining the required chemical inventory information from regulated businesses.

Pursuant to section 25404 (e)(4) of the California Health and Safety Code, UPAs and regulated business must report required Unified Program information electronically to the statewide information management system beginning January 1, 2013. To help guide the implementation of the electronic reporting requirement, the California Health and Safety Code also required CalEPA to give higher priority to information relating to chemicals of greatest concern.

In identifying the chemicals of greatest concern, CalEPA gathered existing information from the Department of Homeland Security's "Chemicals of Interest Table" and the California Accidental Release Prevention Program's list of "Regulated Substances." To assist UPAs with prioritizing the use of resources to help in getting businesses to report into the statewide information management system, CalEPA compiled the attached Chemicals of Concern Prioritization Table (Prioritization Table) to identify the hazardous materials that pose the highest risk.

It is important to ensure all regulated businesses have submitted the required information electronically. However, CalEPA realizes that this is a large task that requires substantial resources and time to accomplish. Therefore, CalEPA recommends that each UPA institute a process to apply local resources to systematically ensure that all regulated businesses have submitted the required information into statewide information management system.

The Prioritization Table is intended to be used by UPAs as a guide to systematically ensure regulated businesses handling the chemical of greatest concern submit Unified Program information electronically. It is not a mandate. CalEPA encourages the use of the Prioritization Table to ensure facilities with higher risk chemicals are assigned a higher priority for submission of information.

Please direct questions regarding this guidance letter to John Paine, CalEPA Unified Program Manager, at (916) 327-5092 or email [john.paine@calepa.ca.gov](mailto:john.paine@calepa.ca.gov).

A handwritten signature in black ink, appearing to read "Jim Bohon". The signature is fluid and cursive, with a large initial "J" and "B".

Jim Bohon, Assistant Secretary  
California Environmental Protection Agency

Attachment (1)

Attachment 1  
 CHEMICALS OF CONCERN – PRIORITIZATION TABLE

Chemicals of Concern	Synonym	Chemical Abstract Service (CAS) #	Threshold Quantity (TQ)	Theft Min. TQ <sup>1</sup>	Security Issue <sup>3</sup>
Nickel Carbonyl		13463-39-3	1 <sup>2</sup>	-	☆
Phosgene	[Carbonic dichloride] or [carbonyl dichloride]	75-44-5	10	15	☆ ☆
Hydrogen selenide		7783-07-5	10 <sup>2</sup>	15	☆ ☆
Sarin	[o-Isopropyl methylphosphonofluoridate]	107-44-8	10	CUM <sup>4</sup> 100g	☆
Tabun	[o-Ethyl-N,N-dimethylphosphoramido-cyanidate]	77-81-6	10	CUM <sup>4</sup> 100g	☆
Lewisite 1	[2-Chlorovinyl dichloroarsine]	541-25-3	10 <sup>2</sup>	CUM <sup>4</sup> 100g	☆
Fluoroacetyl chloride		359-06-8	10	-	-
Propargyl Bromide		10696-7	10	-	-
Ethylene fluorohydrin		371-62-0	10	-	-
Mechlorethamine		51-75-2	10	-	-
Methyl vinyl ketone		78-94-4	10	-	-
Phorate		298-02-2	10	-	-
Titanium Tetrachloride	[Titanium chloride (TiCl <sub>4</sub> ) (T4)-]	7550-45-0	100	45	☆ ☆ ☆
Sulfur tetrafluoride	[Sulfur fluoride (SF <sub>4</sub> ), (T-4)-]	7783-60-0	100	15	☆ ☆
Arsine		7784-42-1	100 <sup>2</sup>	15	☆ ☆
Diborane		19287-45-7	100 <sup>2</sup>	15	☆ ☆
Nitric oxide	[Nitrogen oxide(NO)]	10102-43-9	100 <sup>2</sup>	15	☆ ☆
Hydrofluoric acid	[Hydrogen fluoride (anhydrous)] - Federal	7664-39-3	100 <sup>2</sup>	45	☆ ☆
Phosphorus		7723-14-0	100	400	☆ ☆
Chlorine		7782-50-5	100 <sup>2</sup>	500	☆ ☆
Sodium cyanide (Na(CN))		143-33-9	100	APA <sup>5</sup>	☆
Tellurium hexafluoride		7783-80-4	100	15	☆

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Iron, Pentacarbonyl-		13463-40-6	100	-	☆
Hydrocyanic acid		74-90-8	100 <sup>2</sup>	-	☆
Potassium cyanide		151-50-8	100	-	☆
Chloromethyl ether	[Methane, oxybis(chloro-)]	542-88-1	100 <sup>2</sup>	-	☆
Chloromethyl methyl ether	[Methane, chloromethoxy-]	107-30-2	100 <sup>2</sup>	-	☆
Tetramethyllead	[Plumbane, tetramethyl-]	75-76-3	100	-	☆
Isophorone Diisocyanate		4098-71-9	100	-	-
Lithium hydride		7580-67-8	100	-	-
Manganese, tricarbonyl methylcyclopentadienyl		12108-13-3	100	-	-
Methacryloyl chloride		920-46-7	100	-	-
Methacryloyloxyethyl isocyanate		30674-80-7	100	-	-
Methyl phosphonic dichloride		676-97-1	100	-	-
Nitrogen Dioxide		10102-44-0	100	-	-
Ozone		10028-15-6	100	-	-
Phosphonothioic acid, Methyl-, S-(2-(Bis(1-Methylethyl)amino)ethyl) O-ethyl ester		50782-69-9	100	-	-
Acrylyl chloride	[2-Propenoyl chloride]	814-68-6	100	-	-
Benzotrichloride		98-07-7	100	-	-
Cyanuric fluoride		675-14-9	100	-	-
Sulfur trioxide		7446-11-9	100	-	-
Toluene-2,6-Diisocyanate		91-08-7	100	-	-
Trichloro(Chloromethyl)silane		1558-25-4	100	-	-
Tris(2-chloroethyl)amine		555-77-1	100	-	-
Phosphorus oxychloride	[Phosphoryl chloride]	10025-87-3	500	220	☆☆☆

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Methyltrichlorosilane		75-79-6	500 <sup>2</sup>	APA <sup>5</sup>	☆☆
Phosphine		7803-51-2	500	15	☆☆
Fluorine		7780-41-4	500 <sup>2</sup>	15	☆☆
Boron trichloride	[Borane, trichloro]	10294-34-5	500 <sup>2</sup>	45	☆☆
Boron trifluoride	[Borane, trifluoro]	7637-07-2	500 <sup>2</sup>	45	☆☆
Hydrogen sulfide		7783-06-04	500 <sup>2</sup>	45	☆☆
Sulfur dioxide (anhydrous)		7446-09-5	500	500	☆☆
Hydrogen chloride (anhydrous)	[Hydrogen chloride (gas only)] - State	7647-01-0	500 <sup>2</sup>	500	☆☆
Methyl mercaptan	[Methanethiol]	74-93-1	500 <sup>2</sup>	500	☆☆
Sulfur mustard (Mustard gas (H))	[Bis(2-chloroethyl)sulfide]	505-60-2	500 <sup>2</sup>	CUM <sup>4</sup> 100g	☆
Methacrylonitrile		12698-7	500	-	☆
Phosphorus trichloride		7719-12-2	1000	45	☆☆☆
Nitric acid		7697-37-2	1000 <sup>2</sup>	400	☆☆
Chlorine dioxide	[Chlorine oxide, (ClO <sub>2</sub> )]	10049-04-4	1000	-	☆☆
Ammonium nitrate		6484-52-2	5000	400	☆☆
Ammonium perchlorate		7790-98-9	5000	400	☆☆
Ammonium picrate		131-74-8	5000	400	☆☆
Barium azide		18810-58-7	5000	400	☆☆
Diazodinitrophenol		87-31-0	5000	400	☆☆
Diethyleneglycol dinitrate		693-21-0	5000	400	☆☆
Dingu	[Dinitroglycoluril]	55510-04-8	5000	400	☆☆
Dinitrophenol		25550-58-7	5000	400	☆☆
Dinitroresorcinol		519-44-8	5000	400	☆☆
Dipicryl sulfide		2217-06-3	5000	400	☆☆
Dipicrylamine [or] Hexyl	[Hexanitrodiphenylamine]	131-73-7	5000	400	☆☆

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Guanyl nitrosaminoguanylidene hydrazine		-	5000	400	☆☆
Hexanitrostilbene		20062-22-0	5000	400	☆☆
Hexolite	[Hexotol]	121-82-4	5000	400	☆☆
HMX	[Cyclotetramethylene-tetranitramine]	2691-41-0	5000	400	☆☆
Lead azide		13424-46-9	5000	400	☆☆
Lead styphnate	[Lead trinitroresorcinate]	15245-44-0	5000	400	☆☆
Mercury fulminate		628-86-4	5000	400	☆☆
5-Nitrobenzotriazol		2338-12-7	5000	400	☆☆
Nitrocellulose		9004-70-0	5000	400	☆☆
Nitroglycerine		55-63-0	5000	400	☆☆
Nitromannite	[Mannitol hexanitrate, wetted]	15825-70-4	5000	400	☆☆
Nitrostarch		9056-38-6	5000	400	☆☆
Nitrotriazolone		932-64-9	5000	400	☆☆
Octolite		57607-37-1	5000	400	☆☆
Octonal		78413-87-3	5000	400	☆☆
Pentolite		8066-33-9	5000	400	☆☆
PETN	[Penterythritol tetranitrate]	78-11-5	5000	400	☆☆
Picrite	[Nitroguanidine]	556-88-7	5000	400	☆☆
RDX or (RDX and HMX mixtures)	[Cyclotrimethylenetrinitramine]	121-82-4	5000	400	☆☆
Tetranitroaniline		53014-37-2	5000	400	☆☆
Tetrazene	[Guanyl nitrosaminoguanyltetrazene]	109-27-3	5000	400	☆☆
TNT	[Trinitrotoluene]	118-96-7	5000	400	☆☆
Torpex	[Hexotonal]	67713-16-0	5000	400	☆☆
Trinitroaniline		26952-42-1	5000	400	☆☆

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Trinitroanisole		606-35-9	5000	400	☆☆
Trinitrobenzene		99-35-4	5000	400	☆☆
Trinitrobenzenesulfonic acid		2508-19-2	5000	400	☆☆
Trinitrobenzoic acid		129-66-8	5000	400	☆☆
Trinitrochlorobenzene		88-88-0	5000	400	☆☆
Trinitrofluorenone		129-79-3	5000	400	☆☆
Trinitro-meta-cresol		602-99-3	5000	400	☆☆
Trinitromaphthalene		55810-17-8	5000	400	☆☆
Trinitrophenetole		4732-14-3	5000	400	☆☆
Trinitrophenol		88-89-1	5000	400	☆☆
Trinitroresorcinol		82-71-3	5000	400	☆☆
Tritonal		54413-15-9	5000	400	☆☆
1H-Tetrazole		288-94-8	5000	400	☆☆
1,4-Bis(2-chloroethylthio)-n-butane		142868-93-7	5000	CUM <sup>4</sup> 100g	☆
Cyanogen chloride		560-77-4	10000	15	☆☆
Cyanogen	[Ethanedinitrile]	460-19-5	10000	45	☆☆
Dichlorosilane	[Silane, dichloro-]	4109-96-0	10000	45	☆☆
Trifluorocholorethylene	[Ethene, chlorotrifluoro]	79-38-9	10000	500	☆☆
Dimethyldichlorosilane	[Silane, dichlorodimethyl-]	75-78-5	10000	-	☆☆
Trichlorosilane	[Silane, trichloro-]	10025-78-2	10000	-	☆☆
Trimethylchlorosilane	[Silane, chlorotrimethyl-]	75-77-4	10000	-	☆☆
Arsenic trichloride	[Arsenous trichloride]	7784-34-1	15000	2.2	☆☆
Boron tribromide		10294-334	-	45	☆☆
Bromine trifluoride		7787-71-5	-	45	☆☆
Perchloryl fluoride		7616-94-6	-	45	☆☆

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2-Chloroethylchloro-methylsulfide		2625-76-5	-	CUM <sup>4</sup> 100g	☆
Chlorosarin	[o-Isopropyl methylphosphonochloridate]	1445-76-7	-	CUM <sup>4</sup> 100g	☆
Chlorosoman	[o-Pinacolyl methylphosphonochloridate]	7040-57-5	-	CUM <sup>4</sup> 100g	☆
DF	[Methyl phosphonyl difluoride]	676-99-3	-	CUM <sup>4</sup> 100g	☆
Bis(2-chloroethylthio)methane		63869-13-6	-	CUM <sup>4</sup> 100g	☆
Bis(2-chloroethylthiomethyl)ether		63918-90-1	-	CUM <sup>4</sup> 100g	☆
1,5-Bis(2-chloroethylthio)-n-pentane		142868-94-8	-	CUM <sup>4</sup> 100g	☆
1,3-Bis(2-chloroethylthio)-n-propane		63905-10-2	-	CUM <sup>4</sup> 100g	☆
Ethyl phosphonyl difluoride		753-98-0	-	CUM <sup>4</sup> 100g	☆
Isopropylphosphonyl difluoride		677-42-9	-	CUM <sup>4</sup> 100g	☆
O-Mustard (T)	[Bis(2-Chloroethylthioethyl)ether]	63918-89-8	-	CUM <sup>4</sup> 100g	☆
Propylphosphonyl difluoride		690-14-2	-	CUM <sup>4</sup> 100g	☆
QL	[o-Ethyl-o-2-diisopropylaminoethyl methylphosphonite]	57856-11-8	-	CUM <sup>4</sup> 100g	☆
Sesquimustard	[1,2-Bis(2-chloroethylthio)ethane]	3563-36-8	-	CUM <sup>4</sup> 100g	☆
Soman	[o-Pinacolyl	96-64-0	-	CUM <sup>4</sup>	☆



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	methylphosphonofluoridate]			100g	
VX	[o-Ethyl-S-2-diisopropylaminoethyl methyl phosphonothiolate]	50782-69-9	-	CUM <sup>4</sup> 100g	☆
HN3 (nitrogen mustard-3)	[Tris(2-chloroethyl)amine]	555-77-1	-	CUM <sup>4</sup> 100g	☆
HN2 (nitrogen mustard-2)	[Bis(2-chloroethyl)methylamine]	51-75-2	-	CUM <sup>4</sup> 100g	☆
HN1 (nitrogen mustard-1)	[Bis(2-chloroethyl)ethylamine]	538-07-8	-	CUM <sup>4</sup> 100g	☆
Lewisite 2	[Bis(2-chlorovinyl)chloroarsine]	40334-69-8	-	CUM <sup>4</sup> 100g	☆
Lewisite 3	[Tris(2-chlorovinyl)arsine]	40334-70-1	-	CUM <sup>4</sup> 100g	☆
N,N-(2-diethylamino)ethanethiol		100-38-9	-	2.2	☆
o,o-Diethyl S-[2-(diethylamino)ethyl] phosphorothiolate		78-53-5	-	2.2	☆
Diethyl methylphosphonite		15715-41-0	-	2.2	☆
N,N-Diethyl phosphoramidic dichloride		1498-54-0	-	2.2	☆
N,N-(2-diisopropylamino)ethanethiol	N,N-diisopropyl-(beta)-aminoethane thiol	5842-07-9	-	2.2	☆
N,N-Diisopropyl phosphoramidic dichloride		23306-80-1	-	2.2	☆
N,N-(2-dimethylamino)ethanethiol		108-02-1	-	2.2	☆
N,N-Dimethyl phosphoramidic dichloride	[Dimethylphosphoramido-dichloridate]	677-43-0	-	2.2	☆
N,N-(2-		5842-06-8	-	2.2	☆

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dipropylamino)ethanethiol					
N,N-Dipropyl phosphoramidic dichloride		40881-98-9	-	2.2	☆
Ethylphosphonothioic dichloride		993-43-1	-	2.2	☆
Isopropylphosphonothioic dichloride		1498-60-8	-	2.2	☆
Methylphosphonothioic dichloride		676-98-2	-	2.2	☆
Nitrogen mustard hydrochloride	[Bis(2-chloroethyl)methylamine]	55-86-7	-	2.2	☆
Propylphosphonothioic dichloride		2524-01-8	-	2.2	☆
Thiodiglycol	[Bis(2-hydroxyethyl)sulfide]	111-48-8	-	2.2	☆
Nitrogen Trioxide		10544-73-7	-	15	☆
Nitrosyl chloride		2696-92-6	-	15	☆
Oxygen difluoride		7783-41-7	-	15	☆
Hydrogen cyanide	[Hydrocyanic acid]	74-90-8	-	15	☆
Chlorine pentafluoride		13637-63-3	-	15	☆
Dinitrogen tetroxide		10544-72-6	-	15	☆
Germanium tetrafluoride		7783-58-6	-	15	☆
Selenium hexafluoride		7783-79-1	-	15	☆
Stibine		7803-52-3	-	15	☆
Germane		7782-65-2	-	45	☆
Bromine chloride		13863-41-7	-	45	☆
Carbonyl fluoride		353-50-4	-	45	☆
Chlorine trifluoride		7790-91-2	-	45	☆
Hexafluoroacetone		684-16-2	-	45	☆
Methylchlorosilane		993-00-0	-	45	☆

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Silicon tetrafluoride		7783-61-1	-	45	☆
Trifluoroacetyl chloride		354-32-5	-	45	☆
Tungsten hexafluoride		7783-82-6	-	45	☆

<sup>1</sup>Threshold Quantity (TQ) is denoted in pounds unless otherwise indicated.

<sup>2</sup>The least minimum TQ is reported when both state and federal governments regulate the same chemical.

<sup>3</sup>Different types of potential security issues as determined by the Department of Homeland Security. Each (☆) denotes one type of issue.

<sup>4</sup>All amounts of the chemical at the facility are counted cumulatively to a total of 100-grams, "CUM 100g."

<sup>5</sup>A Placarded Amount (APA)

\*Highlighted cells show the determinate criteria for that chemical to be added to this table.

