

## ENVIRONMENTAL REPORTING SCHEDULE FOR 2017

### Pennsylvania Version

Environmental reporting season is just around the corner. Use the table below to determine if you have a reporting obligation. The table summarizes the most common types of environmental reports due in Pennsylvania, along with the due date.

Report	PA Department of Environmental Protection	Reporting Information
Air Emissions Reporting	<u>Annual Inventory and Emission Statement</u> <b>March 1</b>  <u>Annual Title V Emission Fee Worksheet</u> <b>September 1</b>	<b>Emissions Inventory:</b> Applicable regulated sources must submit their emissions inventories to PADEP by March 1.  <b>Annual Emission Fees:</b> Applicable regulated sources must submit their Emission Fee Worksheet to PADEP by September 1. Those facilities subject to emissions fees must also submit the required payment to PADEP by September 1.
Air Quality Compliance Certifications and Semi-Annual Monitoring Reports <sup>1</sup>	<u>Annual Compliance Certification</u> Permit Type: Part 70/Title V <b>Typically due January 30 unless specified otherwise in permit</b>  <u>Semi-Annual Monitoring Reports</u> Permit Type: Part 70/Title V <b>Typically due January 30 and July 30 unless specified otherwise in permit</b>	<b>Compliance Certification and Monitoring Reports:</b> All facilities with a Title V Operating Permit must submit an Annual Compliance Certification and Semi-Annual Monitoring Reports each year. Typically the annual certification report is due by January 30 although PADEP may specify an alternate due date in your permit. Typically the semi-annual monitoring reports are due by January 30 and July 30, although again PADEP may specify alternate due dates in your permit.
Residual Waste Reporting	<u>Biennial Residual Waste Generator Report</u> <b>March 1 (odd years only)</b>  <u>Annual Chemical Analysis of Residual Waste</u> <b>By anniversary date of PADEP's approval of the disposal facility (otherwise, March 1).</b>	<b>Biennial Reports:</b> Generators of an average of 2,200 pounds per month are required to report. The regulatory language of an average of 2,200 pounds per month is being interpreted as 13 tons per year. Therefore, you must prepare this report only if you generate 13 or more total tons of residual waste during the reporting year.  <b>Annual Chemical Analysis:</b> Residual waste generators must complete Form 26R which is a chemical analysis of residual waste every year. One Form is filed for each waste stream. Generators are able to prepare a certification that the waste stream has not changed from the prior year.
Report	PA Tier II System (PATTS) Local Emergency Planning Committee Local Fire Department	Reporting Information
EPCRA Sections 311/312	<u>Tier II Report</u> <b>March 1</b>	<b>Tier II Reporting (EPCRA 311/312):</b> Tier II reports are required to be filed by a facility that stores 10,000 pounds or more of a hazardous substance; or any extremely hazardous substance (EHS) of more than 500 pounds or the Threshold Planning Quantity (TPQ), whichever is less at any one time.
Report	U.S. Environmental Protection Agency PA Department of Labor and Industry	Reporting Information
EPCRA Section 313	<u>Toxic Release Inventory</u> Form A or Form R <b>July 1</b>	<b>TRI Form A and Form R (EPCRA 313):</b> Facilities with 10 or more full-time equivalent employees who are included in a TRI-covered North American Industry Classification System (NAICS) code must prepare and submit a Form A or Form R for every toxic chemical or chemical category as defined, that is manufactured or processed at a rate of 25,000 pounds/year or "otherwise used" at a rate of 10,000 pounds/year, or any extremely hazardous substance that exceeds the 313 reporting threshold.

Note 1: Facilities that are subject to National Emission Standards for Hazardous Air Pollutants (NESHAP), also known as "MACT" standards, and/or New Source Performance Standards (NSPS), may also be required to submit additional regular monitoring reports on an annual or semi-annual basis. These reports are typically due on January 30 and July 30 however PADEP can specify alternate due dates in your operating permit.

For more information or help navigating the reporting obligations that apply to you, contact Denise Wessels, PE, at [dwessels@scsengineers.com](mailto:dwessels@scsengineers.com) or John Tabella at [jtabella@scsengineers.com](mailto:jtabella@scsengineers.com). Denise and John are project managers at SCS Engineers with more than 40 combined years of experience in the industrial arena. Visit us online at [scsengineers.com](http://scsengineers.com).