

Answer These Questions to Get Ahead of Environmental Reporting Season



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The end of 2017 is quickly approaching, and environmental reporting season will follow closely behind. Answer these questions now to help get ahead of your reporting requirements.

Air Emissions Reporting

Do you have a spreadsheet or other tracking tool in place to populate with 2017 raw material usage rates? Is the spreadsheet set up to automatically calculate annual raw material usage rates, criteria air pollutant emission rates, hazardous air pollutant emission rates? Will the software automatically signal when a respective pollutant has to be reported?

Hazardous Waste Reporting

Hazardous waste reports are required to be filed every year for Large Quantity Generators (LQGs) located in Illinois. In Wisconsin, these same reports are required every year for both Small Quantity Generators (SQGs) and LQGs. SQGs located in Indiana must file a manifest report every year and LQGs must file a biennial hazardous waste report during even-numbered years for the prior odd-numbered year. This is the year!

Do you have records of the amount of hazardous waste generated during 2017? Are all hazardous waste manifests available and do they contain information necessary to complete the annual or biennial reporting (for example, the EPA ID number of the waste transporter and the broker or TSDF, how the waste was managed and the method of treatment or disposal of the waste, and other data such as waste identifiers)?

Next up: Look for a calendar of major environmental reporting events in the December issue.

Tier II Reporting

Do you store or otherwise have on-site at any one time 10,000 pounds or more of a hazardous chemical? For purposes of Tier II reporting required by Section 312 of the Emergency Planning and Community Right-to-Know Act (EPCRA), a hazardous chemical is any single material or mixture of materials in a liquid, solid or gaseous state for which a Safety Data Sheet (SDS) is required by OSHA, unless otherwise excluded.

Are any of these chemicals Extremely Hazardous Substances (EHSs)? If so, the reporting threshold for EHSs is lower than 10,000 pounds and varies by chemical. For example, if sulfuric acid, a common chemical found in lead acid batteries, is present at the facility at any one time in quantities of 500 pounds or more, it is subject to Tier II reporting.

Do you know the physical and health hazards associated with each reportable chemical? Where are these chemicals stored in the plant and how much is stored in each location? Do you have updated facility drawings that show the storage locations? What type of containers do you use to store each respective chemical?

Toxic Release Inventory (TRI) Reporting

How many full-time equivalent staff do you employ? What is your NAICS number? Did you manufacture or process 25,000 pounds or more of a listed chemical or chemical category? Did you otherwise use 10,000 pounds or more of a listed chemical or chemical category?

Depending on how you answered these questions, you may be required to complete and submit a Form A or Form R report to the U.S. Environmental Protection Agency with a copy to your respective state.

Do you have records of all chemicals and chemical categories manufactured, processed and otherwise used during 2017? Glycol ethers and water soluble nitrates are commonly "otherwise used" chemical categories in the printing industry. These compounds are found in several products including fountain solutions and cleaning solutions. Have you checked these SDSs to determine if a reportable glycol ether is present, and if so, how much?

Other

Does your air operating permit or air registration permit require you to complete and submit an annual or semiannual monitoring report? Annual or semiannual compliance certification? Are you subject to any air quality rules or regulations under the general category of the New Source Performance Standards or National Emission Standards for Hazardous Air Pollutants? If so, are there any annual monitoring reports or notifications due?

Do you hold an industrial wastewater discharge permit for process wastewater discharges to the sanitary sewer? Are you covered by an individual or general storm water permit? Is water testing required on an annual or semiannual basis? Are there any reports due to the local municipality or state regarding these wastewater discharges and activities?

Address these questions now to prepare for the upcoming environmental reporting season. Collecting the necessary data ahead of time will help you avoid a last minute rush and minimize the chance of reporting errors and late reporting.

Ann O'Brien is a Project Manager with SCS Engineers with more than 30 years of experience in the printing industry. Ann has worked in the environmental field for much of her career, and her background includes air and water quality permitting, environmental recordkeeping, reporting and monitoring programs, hazardous waste management, employee EHS training, environmental compliance audits, and environmental site assessments and due diligence associated with real estate transactions and corporate acquisitions. For more information or help navigating reporting requirements, contact Ann O'Brien at aobrien@scsengineers.com or Cheryl Moran at cmoran@scsengineers.com.



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