

ENVIRONMENTAL REPORTING SCHEDULE FOR 2018

Illinois 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 to each respective federal and state environmental agency in Illinois, along with each respective due date.

| Report | Illinois Environmental Protection Agency | Reporting Information |
|---|--|--|
| Air Emissions Reporting | <u>Annual Emissions Report</u> May 1 | If you have, or are required to have, a State of Illinois air pollution operating permit, you are required to file an Annual Emissions Report . Air emissions reporting is required by 35 Ill. Adm. Code Part 254. |
| | <u>Emission Reduction Market System (ERMS) Report</u> October 31 for facilities with <10 emission units November 30 for facilities with ≥10 emission units | ERMS is a "cap and trade" market system in which participating sources must hold "trading units" for their actual volatile organic material (VOM) emissions. ERMS is directed at only major stationary sources in the Chicago area. These sources are located in the Chicago ozone nonattainment area (Cook, DuPage, Kane, Lake, McHenry, and Will Counties, Aux Sable Township and Goose Lake Township in Grundy County, and Oswego Township in Kendall County). They are required to obtain a Clean Air Act Permit Program (CAAPP) permit, and these sources have baseline VOM emissions of 10 tons/season (ozone season). Sources that do not meet these criteria do not have to participate in the ERMS. |
| Air Quality Monitoring and Compliance Certifications ¹ | <u>Annual Compliance Certification</u> Permit Type: CAAPP May 1 | The CAAPP requires that each CAAPP holder submit an annual compliance certification for all emission units at the source as required by 40 CFR 70.6(c)(5), 39.5(7)(p)(v) of the Illinois Environmental Protection Act, and CAAPP permit condition 9.8. The compliance certification reporting period is January 1 to December 31. |
| Hazardous Waste Reporting | <u>Hazardous Waste Report</u> Large Quantity Generators (in any one month) March 1 | Section 20.1 of the Illinois Environmental Protection Act instructs the Illinois EPA to identify sites that generate, treat, store, or dispose of hazardous wastes and to report the types and quantities of hazardous waste involved. Hazardous waste is defined by the Resource Conservation and Recovery Act (RCRA), which gave the EPA authority to control hazardous wastes from "cradle to grave." Generators submit data annually to the Illinois EPA, which is then compiled and published. |
| Report | Illinois Emergency Management Agency Local Emergency Planning Committee Local Fire Department | Reporting Information |
| EPCRA Sections 311/312 | <u>Tier II Report</u> March 1 | Tier II Reporting (EPCRA 311/312): 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 Illinois Environmental Protection Agency | Reporting Information |
| EPCRA Section 313 | <u>Toxic Release Inventory</u> (Form A or Form R) July 1 | TRI Form A and Form R (EPCRA 313): 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, or New Source Performance Standards (NSPS), may be required to submit periodic monitoring reports and compliance certifications typically due on an annual basis or semi-annual basis and often due within 30 to 90 days of December 31 or 30 to 90 days of June 30, respectively.

For more information or help navigating the reporting obligations that apply to you, contact Ann O'Brien at aobrien@scsengineers.com or Cheryl Moran at cmoran@scsengineers.com. Ann and Cheryl are project managers at SCS Engineers with more than 50 combined years of experience in the industrial arena. Visit us online at scsengineers.com.