

# ENVIRONMENTAL REPORTING SCHEDULE FOR 2019

## Iowa Version

Environmental reporting season is just around the corner. Use the below table 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 Iowa, along with each respective due date.

Report	Iowa Department of Natural Resources	Reporting Information
Air Emissions Reporting	<p><u>Minor Source Emissions Inventory</u> <b>May 15 (East)</b></p> <p><u>Emissions Inventory</u> <b>March 31 (Title V Sources)</b></p>	<p><b>Minor Source Emissions Inventory:</b> Facilities not subject to the Title V Operating Permit Program are required to submit minor source emissions inventories every three years. The State of Iowa is split into thirds (eastern, central, and western) to stagger the number of inventories reviewed and quality-assured in a given year. In addition, emissions inventories from all portable plants in Iowa are collected at the same time as the facilities that are located in the central third of Iowa.</p> <p><b>Emissions Inventory:</b> Title V sources must submit their emissions inventories to the Iowa Department of Natural Resources (IDNR) by March 31. Effective with the 2018 reporting year, emission inventories must be submitted electronically.</p>
Air Quality Monitoring and Compliance Certifications <sup>1</sup>	<p><u>Annual Compliance Certification and Semi-Annual Monitoring Report</u> Permit Type: Part 70/Title V <b>March 31</b></p> <p><u>Semi-Annual Monitoring Report</u> Permit Type: Part 70/Title V <b>September 30</b></p>	<p><b>Compliance Certification and Monitoring Reports:</b> All facilities with a final Title V Operating Permit must submit a Semi-Annual Monitoring Report by September 30 and March 31, and an Annual Compliance Certification by March 31, of each year. According to the IDNR, "these reports are the basic, minimum reporting requirements under Iowa's Title V Operating Permit program."</p>
Hazardous Waste Reporting	<p><u>Hazardous Waste Fee</u> Large and Small Quantity Generators <b>April 15</b></p> <p><i>Hazardous waste reporting is done biannually (even-numbered years for the prior odd-numbered year).</i></p>	<p><b>Hazardous Waste Report:</b> Section 455B.424 of the Iowa Code requires small and large quantity generators and anyone who treats, stores, disposes of, or transports hazardous waste in Iowa to prepare and submit the Hazardous Waste Fee Form and pay the appropriate fee.</p>
Report	Iowa Department of Natural Resources Local Emergency Planning Committee Local Fire Department	Reporting Information
EPCRA Section 312	<p><u>Tier II Report</u> <b>March 1</b></p>	<p><b>Tier II Reporting (EPCRA 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.</p>
Report	U.S. Environmental Protection Agency Iowa Department of Natural Resources	Reporting Information
EPCRA Section 313	<p><u>Toxic Release Inventory</u> (Form A or Form R) <b>July 1</b></p>	<p><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.</p>

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. These are typically required on an annual or semi-annual basis and often due within 30 to 90 days of the end of the reporting period.

For more information or help navigating the reporting obligations that apply to you, contact Ann O'Brien at [aobrien@scsengineers.com](mailto:aobrien@scsengineers.com) or Cheryl Moran at [cmoran@scsengineers.com](mailto: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](http://scsengineers.com).