

ENVIRONMENTAL REPORTING SCHEDULE FOR 2019

Wisconsin 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 Wisconsin, along with each respective due date.

Report	Wisconsin Department of Natural Resources	Reporting Information
Air Emissions Reporting	<u>Annual Emissions Report</u> March 1	Facilities located in Wisconsin that emit air pollutants may be required to report their emissions to the Wisconsin Department of Natural Resources (WDNR). Reporting is required for all air pollutants that exceed their respective reporting threshold listed in NR 438.
Air Quality Monitoring and Compliance Certifications ¹	<u>Annual Summary of Monitoring and Compliance Certification</u> Permit Type: ROP Type A or B March 1 <u>Certification of Annual Emissions, an Annual Summary of Monitoring, and a Compliance Certification</u> Permit Type: ROP Type C (Printing Facilities) June 30 <u>Annual Monitoring Report and Compliance Certification</u> Permit Type: State Operating Permit, FESOP, and Part 70/Title V Varies by permit holder	All Air Pollution Operation Permits issued by the WDNR require that the source submit annual certification indicating the facility was in compliance all of the time (continuous) or most of the time (intermittent) during the previous reporting year. If not in compliance with a particular requirement for any period of time, a Deviation Summary Report must be filed along with the certification. The permit certifications in source-specific Air Pollution Operation Permits are often due at intervals of 30 or 60 days after the end of the reporting period; each facility should review their permit for the term of the reporting period and the specified certification deadline. In addition to certifying its compliance status, each permit requires the facility to submit an annual or semi-annual report summarizing the results of all monitoring requirements listed in the permit.
Hazardous Waste Reporting	<u>Hazardous Waste Report</u> Large Quantity and Small Quantity Generators March 1	Hazardous Waste Report: Large Quantity Generators (LQGs) and Small Quantity Generators (SQGs) of hazardous waste must report their regulated waste activities to the WDNR annually. The report, which covers activity during the previous calendar year, must be submitted to the WDNR by March 1 each year.
Report	Wisconsin Emergency Management Local Emergency Planning Committee Local Fire Department	Reporting Information
EPCRA Section 312	<u>Tier II Report</u> March 1	Tier II Reporting (EPCRA 312): Tier II reports must 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 Wisconsin Department of Natural Resources	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. These are typically required on an annual or semi-annual basis and often due within 30 to 90 days of the end of the compliance period.

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.