



## **Wholistic Approach to Reporting Season**

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## What is Reporting Season?

Most submissions in the first quarter to report for the previous annual calendar year (January to December)



### Do Not Forget Other Compliance Tasks Due During This Period

If it is a task that you can move to another quarter it might be worth moving it, even if you must do it twice in that period (such as stack testing)



# Reporting Season Programs

Stormwater Pollution Prevention Plan (SWPPP) Annual Report (January 10)

Superfund Amendments and Reauthorization Act (SARA) Title III, Tier II Reports (March 1)

National Pollution Discharge Elimination System (NPDES)

- Pollutant Minimization Program Annual Status Report (March 31 or permitted date)
- Fee (January 15 or 45 days after invoice for non-stormwater fees and March for stormwater fees)

Michigan Air Emissions Reporting System (MAERS) (March 15)

Greenhouse Gas (GHG) Reporting (EGGRT) (March 31)

Renewable Operating Permit Annual/Semiannual Certifications (March 15, September 15)

Water Use Reports (April 1)

Acid Rain Program (ARP)/Cross State Air Pollution Rule (CSAPR)

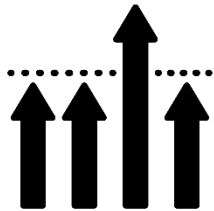
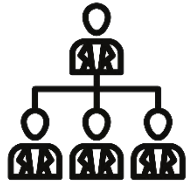
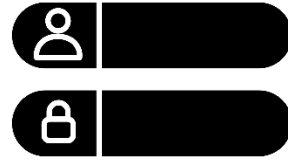
- March 1 ARP allowance transfer deadline
- Early May ARP final report will be run
- June 1 CSAPR allowance transfer deadline
- June 9 CSAPR final report will be run

Waste Generator Reports/Fees (April 30)

- Biennial Haz Waste Report for large quantity generators only even years

Toxic Release Inventory (TRI) (July 1)

Mercury Inventory Report (July 1) and PCB Report (July 15)



## While You are Waiting on Data?

- Staffing changes or vacations
- Who are your preparers and submitters
- Username/passwords
- Browser requirements
- Updated forms
- Thresholds/status change
- Data format
- Data quality
- Updated addresses

## Plan Out the Season

- What is the submittal?
- Online, postmark date, arrival date, if a PO Box USPS only
- Prioritize
- First deadline
- Critical tasks
- Do not wait to last minute – slow downs / crashes and mail problems common



# Updates and Best Practices



## MiEnviro

- EGLE is switching to MiEnviro Portal in 2024. CJ will be covering this update and how to prepare! MiEnviro is an expansion and rebranding of MiWaters for those who were already using it for their water resources reporting.

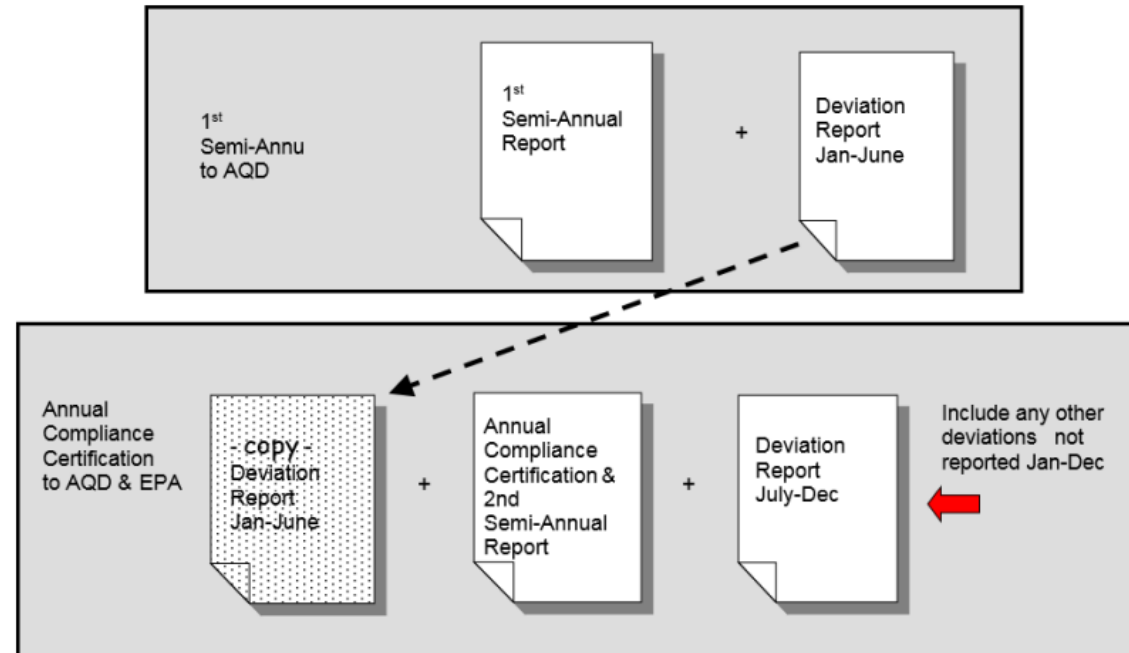
## Tier II Reports

- Physical and chemical hazards are required to be included in the report. Make sure you have the latest version of the SDS for the chemical stored at your facility and update hazards accordingly.
- Tier II reporting is based on thresholds, you need to plan if you are making chemical changes or adding storage. Updates are required within 90 days.
- If you update your Tier II report mid-year to remove a chemical, it is no longer required in your annual report.

# ROP Semiannual Reporting

- Review each permit condition for compliance status
- “Life After ROP” is a great practical guide available online from EGLE

## Life After ROP Renewable Operating Permit Reporting & Revisions





## SWPPP

- Permits after 4/1/2021 do not need to submit an Annual Review Report in MiEnviro. However, they must still complete a report and keep a copy for 3 years. Permittees are responsible to review their permit to ensure compliance.

## TRI

- USEPA is proposing to add PFAS substances to the chemicals of special concern list which would not allow the use of the “easier” Form A and not allow the de minimis exemption for purposes of the Supplier Notification Requirements. This will require more information from chemical suppliers and make having up to date SDS even more important.

# GHGRP

- Don't forget easy to miss sources such as space heaters
- [USEPA is proposing a rule to add sources and change data requirements for the Greenhouse Gas Program.](#) USEPA is proposing to:
  - Expand required sources and potential confidentiality procedures
  - Improve the quality of the data collected by addressing:
    - Changes in industry practices
    - Adopt improved calculation and monitoring methods
    - Collect new data to understand new source categories or new emissions sources for specific sectors

## CSAPR/ARP Updates

- [USEPA has proposed a Good Neighbor Plan for 2015 NAAQS](#) It will not affect 2022 reporting but is expected to drive significant changes beyond just electric generating units and might require planning to start soon for controls changes etc.
- Around the same time the USEPA proposed Good Neighbor Plan for the 2015 Ozone National Ambient Air Quality Standards (NAAQS), they also [revised deadlines under seven allowance trading programs for emissions of sulfur dioxide \(SO<sub>2</sub>\) and nitrogen oxides \(NO<sub>x</sub>\) in 2022.](#) The revised advanced allocation deadline does not affect your transfer deadline for this year but will affect when you are allocated your advanced allowance allocations from the EPA and the State for years 2023 and 2024 and could affect your allowance purchasing strategy.



## Compliance Overlap

- It is easy to just skim through data to make sure it is all done correctly, but is there more you can do with your data if you have with a bit of a closer look?
  - Plan updates? SWPPP/PIPP/SPCC, Monitoring Plans, Startup Shutdown Plans etc.
  - Do you need a chemical additive approval?
  - Have you crossed, or on-trend to cross, thresholds ?
- Did you miss anything?

## Add Value to Reporting Season

- In the environmental sector we are used to being an overhead factor. But can you add more value.
  - Problem Solving: Risk management, training, storage, data, sustainability
  - Is how you are operating changing: Can others use the data, do permits need reviewed?
  - The public will soon have this data, make sure you are telling your own story - look for the good things you have already done
- Did you miss anything?



**Thank you!**

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