

# Maintaining Compliance in the Labor Crisis

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# Introduction

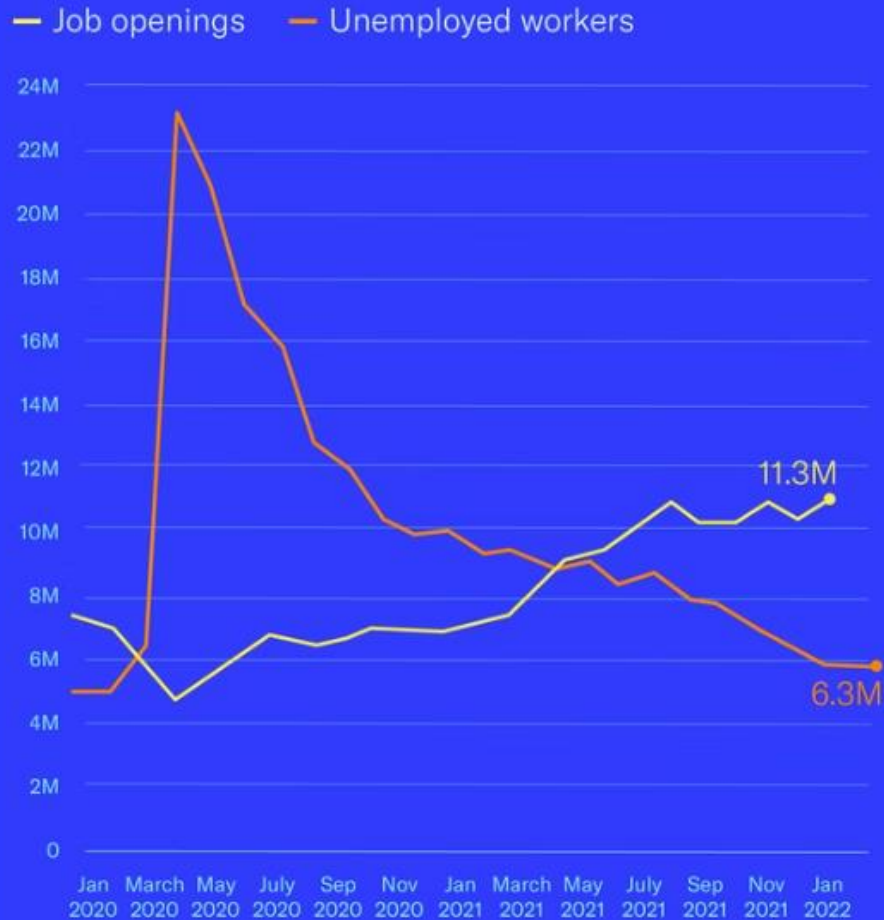
Employers everywhere have been challenged by:

- labor shortage
- frequent staff turnover
- succession planning



*The revolving door of staff*

## National Job Openings vs Number of Unemployed Workers



Source: U.S. Chamber of Commerce Analysis, BLS Data

## AVERAGE LENGTH OF TIME SPENT IN A ROLE, BY GENERATION.



### BABY BOOMERS

57-75 years old

8 YEARS, 3 MONTHS

### GEN X

41-56 years old

5 YEARS, 2 MONTHS

### MILLENNIALS

25-40 years old

2 YEARS, 9 MONTHS

### GEN Z

6-24 years old

2 YEARS, 3 MONTHS

<https://www.careerbuilder.com/advice/how-long-should-you-stay-in-a-job>

Source Link: [US Chamber of Commerce](https://www.uschamber.com/economy/2022/01/11/national-job-openings-vs-number-of-unemployed-workers/)

# Change of Staff

New staff or current staff taking on additional roles.

It is especially important to stay up to date on facility contacts/emergency coordinators, and to ensure they are properly trained for their roles. This presentation will review potential reports, plans, etc. that require notification with a change of staff.

# Agenda



- Permits/Programs
- Environmental Reporting
- Plans (PIPP, SPCC, HWCP, etc.)
- Facility Inspections
- Other

# Permits & Programs

- NPDES Permits
  - Notify EGLE within 10 days after replacement (MiWaters)
    - Facility Contact
    - Certified Operator
- Renewable Operating Permit
  - Responsible official
    - Rule 216 amendment/modification
- Potential recordkeeping requirements
  - Daily/weekly/monthly/etc.





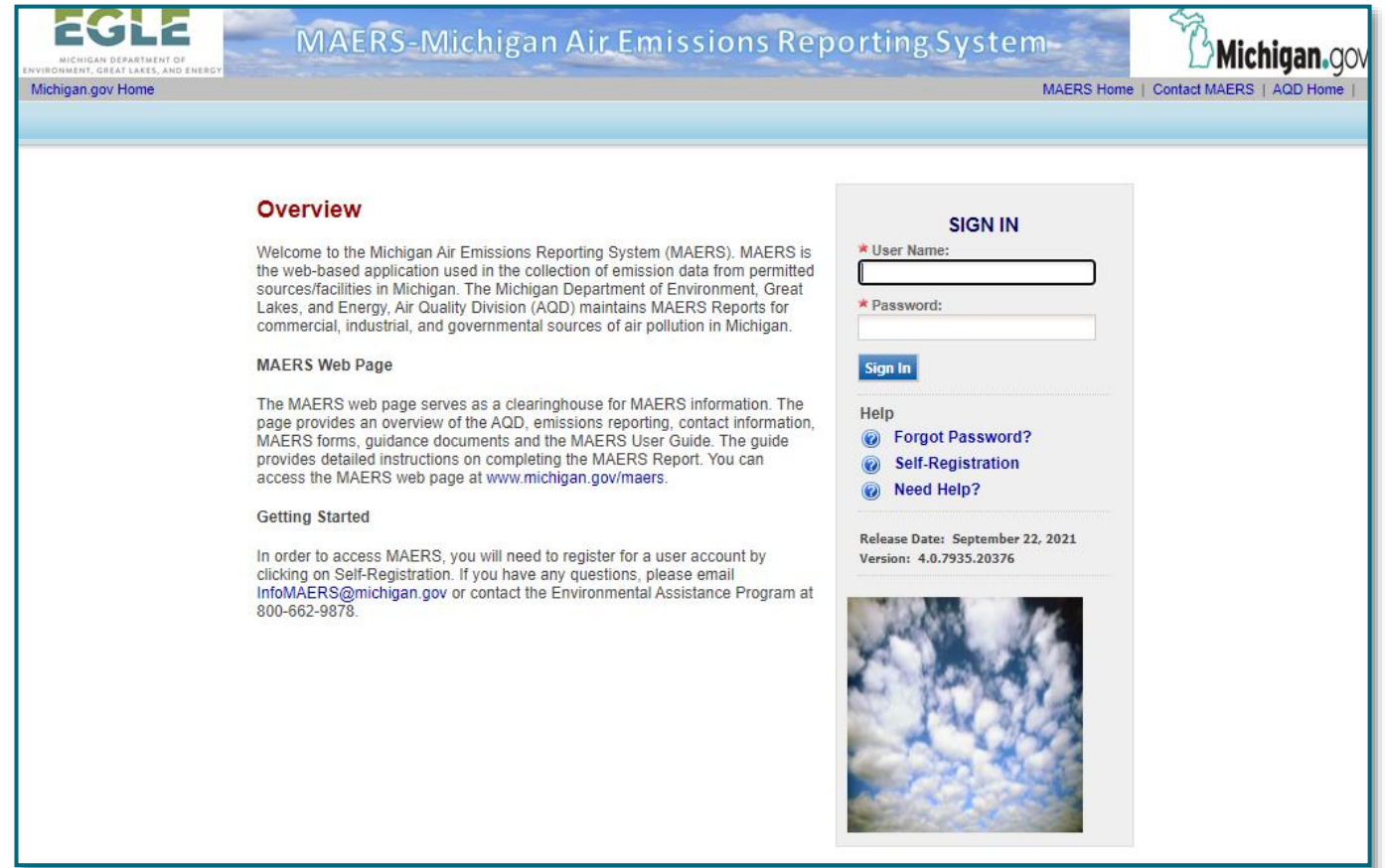
# Environmental Reporting

- Gain access to reporting portals
  - Central Data Exchange - CDX.epa.gov
    - TRIMEweb – SARA Title III Section 313 (Toxics Release Inventory)
    - CEDRI – NESHAP Certifications
    - RCRAInfo – Biennial Hazardous Waste Reporting
  - Tier II Manager <https://www.egle.state.mi.us/tier2manager/Account/Login.aspx>
    - SARA Title III Section 302/303 (Emergency Planning)
    - SARA Title III Section 304 (Emergency Release Notification)
    - SARA Title III Section 311/312 (Hazardous Chemical Inventory)



# Environmental Reporting Cont.

- Gain access to reporting portals
  - Michigan Air Emissions Reporting System  
<https://www.egle.state.mi.us/maersfacility>
    - Emissions reporting for Title 5 and certain permitted sources
  - Greenhouse Gas Emissions Reporting
    - [E-GGRT](#)



**EGLE**  
MICHIGAN DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
Michigan.gov Home

MAERS-Michigan Air Emissions Reporting System

Michigan.gov

MAERS Home | Contact MAERS | AOD Home

### Overview

Welcome to the Michigan Air Emissions Reporting System (MAERS). MAERS is the web-based application used in the collection of emission data from permitted sources/facilities in Michigan. The Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division (AQD) maintains MAERS Reports for commercial, industrial, and governmental sources of air pollution in Michigan.

#### MAERS Web Page

The MAERS web page serves as a clearinghouse for MAERS information. The page provides an overview of the AQD, emissions reporting, contact information, MAERS forms, guidance documents and the MAERS User Guide. The guide provides detailed instructions on completing the MAERS Report. You can access the MAERS web page at [www.michigan.gov/maers](http://www.michigan.gov/maers).

#### Getting Started

In order to access MAERS, you will need to register for a user account by clicking on Self-Registration. If you have any questions, please email [InfoMAERS@michigan.gov](mailto:InfoMAERS@michigan.gov) or contact the Environmental Assistance Program at 800-662-9878.

### SIGN IN

\* User Name:


\* Password:

[Sign In](#)

#### Help

- [Forgot Password?](#)
- [Self-Registration](#)
- [Need Help?](#)

Release Date: September 22, 2021  
Version: 4.0.7935.20376



# Plans



- Signatory requirements
  - Plant Manager
  - Professional Engineer
- Emergency contacts identified
- Certified operator
- Deadline for making updates
- Deadline for notification of updated plans

# Plans Continued

- **Pollution Incident Prevention Plan (PIPP)**
  - The facility owner/operator shall update the plan when facility personnel identified in the plan change
  - Renotify the appropriate agencies (LEPC/local health department/EGLE)
    - Within 30 days after plan completion
- **Spill Prevention, Control and Countermeasure Plans (SPCC)**
  - Response coordinator or other personnel identified in the plan
    - Non-technical amendments
    - May be addressed during 5-year review or next technical amendment

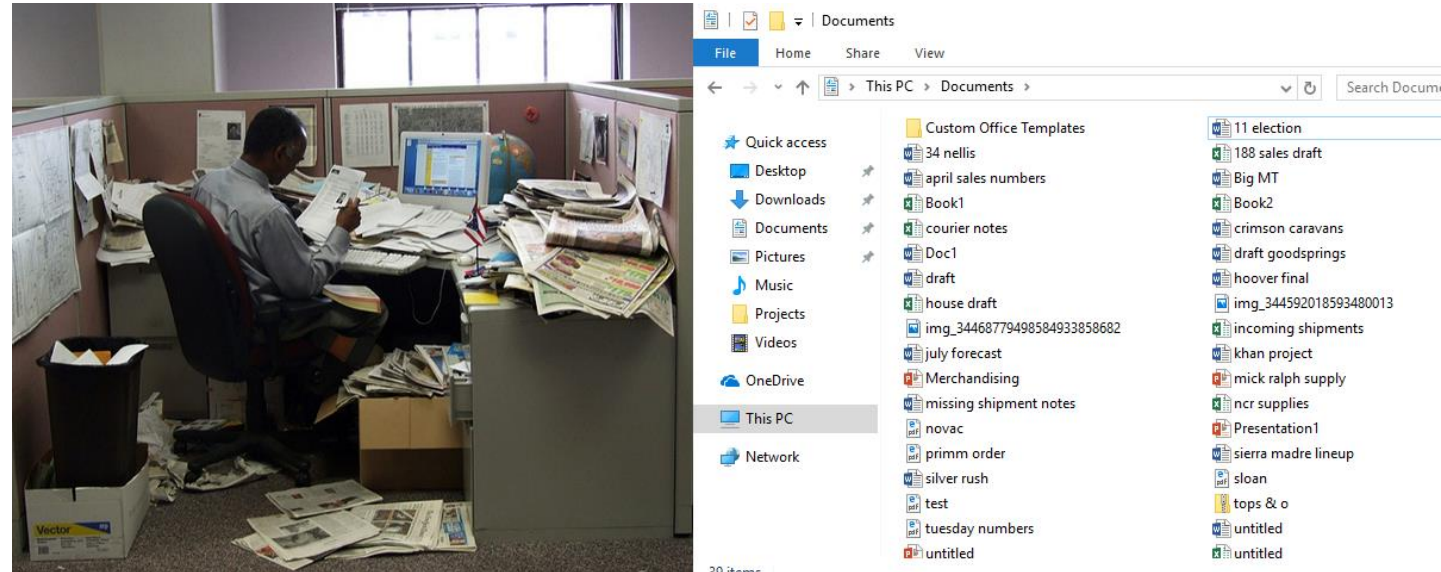
# Plans Continued

- Storm Water Pollution Prevention Plan (SWPPP)
  - Facility contact
  - Industrial Storm Water Certified Operator
- Hazardous Waste Contingency Plan (HWCP)
  - LQGs
    - Emergency coordinator
    - EQP5150 Site Information



# Plans Continued

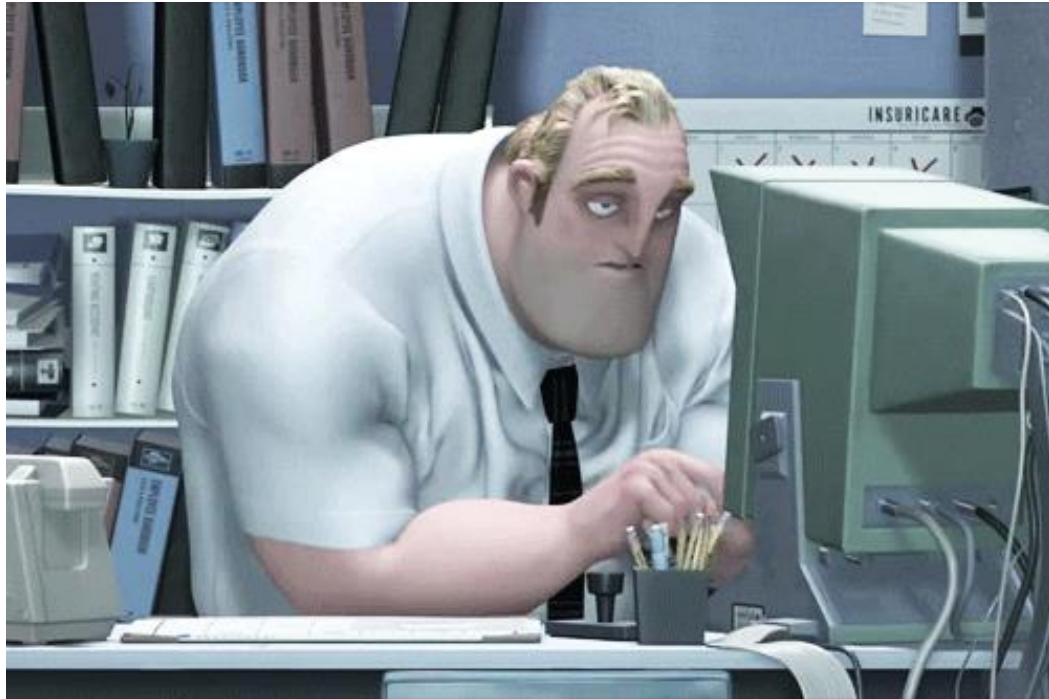
- Electronic file management
  - Clear file naming
  - File directory
  - Do not save critical files to desktop
- Update all hard copies onsite
- Follow company document procedures



# Inspections

- **SPCC**
  - Monthly inspections of oil storage locations including oil containing equipment
- **PIPP**
  - Monthly inspections of storage areas, pumps, equipment, etc.
- **Storm Water**
  - Quarterly storm water comprehensive inspections and visual assessments
  - Preventative maintenance and housekeeping inspections and documentation
- **Hazardous Waste**
  - Weekly inspection of central accumulation area
- **Air Permits**
  - Visible Emissions

# Inspections Continued



- Have backup staff trained
- Develop Standard Operating Procedures (SOPs)
- Add calendar reminders
- Manageable file system

# Additional Considerations

- Signatures
  - DOT training for signing manifests
- Operators
  - EGLE operator testing schedule
    - Municipal Wastewater Exams: May and November
    - Industrial Wastewater Exams: February and August
    - Industrial and Construction Storm Water & SESC : Year-round
  - Certified operator change notification requirements
    - Notify EGLE within 30 days of change in place of employment





# Conclusions

- Many components/ considerations which could involve staff at all levels
- Maintain thorough and accessible compliance documentation
- Communicate applicable changes to all affected employees





Questions?

# Thank You

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