

2014 Michigan Environmental Compliance Calendar



Regulation	First Quarter	Second Quarter	Third Quarter	Fourth Quarter
SARA ₁ Title III, Tier II ₂	March 1 st			
RCRA ₃ Biennial Hazardous Waste Report	March 1 st <i>electronic reporting only</i>			
ROP ₄ Annual Compliance Certification	March 15 th			
MAERS ₅	March 15 th			
Water Use Report (Michigan Specific Requirement)		April 1 st <i>electronic reporting only</i>		
SARA Title III, TRI ₆			July 1 st	
GHG Emissions Reporting ₇		April 1 st		
NPDES ₈ Stormwater Permit and SWPPP ₉ review form	January 10 th			

Notes

1. SARA: Superfund Amendments and Reauthorization Act
2. Tier II: SARA Section 311/312
3. RCRA: Resource Conservation and Recovery Act
4. ROP: Renewable Operating Permit (Title V of the Clean Air Act)

5. MAERS: Michigan Air Emissions Reporting System
6. TRI: Toxic Release Inventory (SARA Section 313)
7. GHG: Greenhouse Gas
8. NPDES: National Pollutant Discharge Elimination System
9. SWPPP: Stormwater Pollution Prevention Plan

Additional Compliance News and Notes

ASTM 1527-13: The United States Environmental Protection Agency issued a final rule on December 30, 2013, regarding the use of ASTM Phase I environmental site assessment standard E1527-13 for "all appropriate inquiries," which replaces ASTM 1527-05. Currently, both standards are recognized by the EPA for liability protection under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). However, it is likely that EPA will issue a rulemaking to remove the 1527-05 reference with respect to AAI. If you have any questions regarding environmental site assessments, contact Jeffrey Bolin, M.S., CHMM (jbolin@dragun.com) at 248-932-0228.

Spill Prevention Control and Countermeasure Plans (SPCC):

SPCC plans must be reviewed every five years. Also, make sure your plan is signed **and** implemented.

NPDES Permitting:

There have been changes to the National Pollutant Discharge Elimination System permitting by the United States Environmental Protection Agency (EPA) that affect construction activity.

GHG Emission Reporting:

Greenhouse Gases (GHG) are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFC), perfluorocarbons (PFC), sulfur hexafluoride (SF₆), and other fluorinated gases, including nitrogen trifluoride (NF₃) and hydrofluorinated ethers (HFE).

ROP Excess Emission Reporting:

Some permits may require more frequent reporting. Certain deviations have immediate reporting obligations.

Biennial Hazardous Waste Report:

Reporting is in even years only.

This is not intended to be an exhaustive list. Environmental regulations are dynamic, and the chemical handling practices at your facility are likely not static. You should, therefore, consider local, state, and federal environmental reporting requirements in light of a changing regulatory environment.

Finally, you might want to consider an environmental compliance assessment to evaluate your compliance status.

If you have any questions regarding environmental permitting or planning, please contact Matthew Schroeder, P.E. (mschroeder@dragun.com) at 248.932.0228.