

2019 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				
ROP ⁴ Annual Compliance Certification	March 15 th			
MAERS ⁵ (Michigan Specific Requirement)	March 15 th			
Water Use Report (Michigan Specific Requirement)		April 1 st (electronic reporting only)		
SARA Title III, TRI ⁶			July 1 st	
GHG Emissions Reporting ⁷	March 31 st			
NPDES ⁸ Stormwater Permit and SWPPP ⁹ Review Form (Michigan Specific Requirement)	January 10 th (electronic reporting only)			

Notes

1. SARA: Superfund Amendments and Reauthorization Act
2. Tier II: SARA Section 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

SARA Title III, Tier II Reporting:

[Changes in SARA Tier I and Tier II Chemical Reporting Regulations](#) became effective on January 1, 2018.

Spill Prevention Control and Countermeasure Plans (SPCC):

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

Biennial Hazardous Waste Report:

Reporting in even years only; no reporting required in 2019.

RCRA Note:

There have been recent revisions to RCRA by the USEPA, including changing Conditionally Exempt Small Quantity Generators (CESQG) to Very Small Quantity Generators (VSQG) and allowing the VSQG to ship their hazardous waste to Large Quantity Generators. Note that not all designated states have adopted these revisions.

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.

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.](#), or [Jeffrey Bolin, CHMM](#), at 248.932.0228.