

# Recordkeeping & Reporting

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Massachusetts Chemistry & Technology Alliance

# Recordkeeping (1 of 5)

- Air emissions
  - Permitted: Monthly and 12-month rolling total emissions and other records (hours of operation, fuel usage, throughput, number of batches)
  - Permit exempt: Usage records and conditions for maintaining exemption eligibility (de minimis or permit by rule, for example)
  - Start-up, shut-down, malfunctions (SSM)
  - Excess emissions
- Emergency engine records (RICE MACT)
  - Hours of operation, including purpose of operation – emergency, routine maintenance or non-emergency
  - Maintenance (oil change, filters, etc.)
  - Engine emissions certification for new engines

## Recordkeeping (2 of 5)

- Major and Area Source NESHAP compliance records
  - 40 CFR Parts 61 and 63
  - Examples – boilers, dry cleaners, halogenated solvent degreasing, pulp and paper, tanks, surface coating, other industry-specific
- New Source Performance Standard (NSPS) compliance records
  - 40 CFR Part 60
  - Examples – boilers, tanks, other industry-specific
- Ozone Depleting Substances – equipment charge capacities, leak repairs, leak rates, technician certifications
- Operation and maintenance records
- CPMS/CEMS records (data and calibration)

# Recordkeeping (3 of 5)

- Leak Detection and Repair (LDAR) programs
  - Equipment inventory and diagram, unsafe-to-monitor, delay-of-repair, leaks, repair attempts, confirmation of repair
- Hazardous waste
  - LQG training records
  - SQG/LQG weekly/daily inspection records
  - Waste determinations and supporting documentation
  - Biennial waste reports (LQG only)
  - Exception reports (SQG and LQG)
  - Documentation of submittal of contingency plan to local emergency response agencies (LQG only)
  - SQG Re-notification (beginning September 2021)
- Wastewater
  - Monitoring records (location, name, date, time, container, preservative, analytical, etc.)
  - Calibration records (flowmeter, pH, etc.)

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## Recordkeeping (4 of 5)

- Stormwater
  - Visual monitoring, benchmark monitoring, effluent guidelines monitoring
  - Routine facility inspections, corrective actions
  - Annual report
- Toxics Release Inventory/ TUR Report – supporting records and calculations
- Keep plans up-to-date:
  - Risk Management Plans – Update every 5 years, check for new chemicals applicability
  - TUR Plans – Update every 2 years (PFAS this year)
  - Spill Prevention, Control, and Countermeasure (SPCC)
  - Facility Response Plan
  - Stormwater Pollution Prevention Plan (SWPPP)

## Recordkeeping (5 of 5)

- Inspectors often focus on records
  - Provide only requested information (if they ask for 2019 records, don't include 2018)
- Records document compliance (or lack thereof)
- Records should be in an organized system
- Records (and how they are organized) should be understood and accessible by more than one person
- Extraneous information should not be included, this goes in a separate file
- If records are retroactively corrected, date and initial changes
- No whiteout changes as it obliterates the old record
- Records should be in permanent format (e.g., ink rather than pencil)

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## Reporting (1 of 4)

- TSCA CDR – October 1, 2020
- TUR Reports and Plans – November 1, 2020 (usually July 1)
- Federal Greenhouse Gas Report – March 31
- Massachusetts Source Registration/ Greenhouse Gas Reports
  - Triennial SR filers report by April 1
  - Operating Permit SR filers report May 1
  - Other annual SR filers report by June 1
  - Annual GHG filers report by April 15
  - Combined SR/GHG – later deadline

## Reporting (2 of 4)

- EPCRA (Right-to-Know) Reporting
  - Section 302 Emergency Planning Notification – one-time notification
  - Section 311 SDS Reporting
  - Section 312 Inventory (Tier I/II) Reporting – March 1
  - Section 313 Toxic Release Inventory Reporting – July 1
- Title V Operating permit Compliance Certifications
  - Semi-annual – Jan 31 and Jul 31
- NESHAP Reporting
  - Initial notification
  - Notification of Compliance Status
  - Semi-annual Compliance Certification – Jan 31 and Jul 31
- NSPS – Initial notifications



## Reporting (3 of 4)

- NPDES Wastewater Reporting
  - Discharge Monitoring Reports – monthly, quarterly, semiannually or annually
  - Planned changes
  - Anticipated noncompliance
  - 24-hour Reporting – noncompliance which may endanger health or the environment
  - Other noncompliance
  - Bypass/Upset
- Indirect Discharge to POTW - Wastewater Reporting
  - Upset Reports
  - Periodic Compliance Report (categorical industrial users - typically due June and December)
  - Bypass
  - Notification of Potential Problems
  - 24-hour Noncompliance Notification
  - Notification of Changed Discharge
  - Notification of Discharge of Hazardous Wastes (15 kg/100kg per month discharge)

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## Reporting (4 of 4)

- Hazardous Waste Reporting
  - Notification of Regulated Waste Activity
  - Hazardous Waste Recycler Annual Report – March 1
  - Biennial Report
  - Exception Report
  - Contingency Plan - (LQG submit to fire/police and hospital)
  - Accumulation Area Closure – (LQG only)
- Renovation/Demolition – MassDEP Asbestos Removal Notification (Asbestos NESHAP – 40 CFR Part 61 Subpart M)



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*Thank you!*

Q & A

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