

ANNUAL DOT HAZMAT REGISTRATION – June 30

If you are a shipper or transporter of hazardous materials subject to DOT registration, it's not too late to submit your registration to the U.S. Department of Transportation. Per 49 CFR Part 107, Subpart G, offerors and transporters of certain quantities and types of hazardous materials, including hazardous wastes, must register with the U.S. Department of Transportation (DOT) on or before June 30. Civil penalties for not registering can be up to \$1200 for small businesses and even higher for large businesses [49 CFR 107.608].

The 2021-2022 Registration Year covers the period from July 1, 2021, through June 30, 2022. Annual fees are \$250 for small businesses and \$2,575 for all other registrants plus a \$25 processing fee for each form filed. Registration applies to the following hazardous material (hazmat) categories:

- Hazmat in quantities that require placarding.
- Non-bulk shipments \geq 5,000 pounds of one hazard class (including hazardous waste) requiring placarding.
- Hazmat (or hazardous waste) in bulk packaging \geq 3,500 gallons (liquids) or 465 cubic feet (solids).
- Class 7 (radioactive) materials.
- Explosives (Division 1.1, 1.2 or 1.3) greater than 55 pounds (25 kg).
- Poisonous by inhalation (Zone A) materials exceeding 0.26 gallons (1 L).

For example, if you are a shipper of hazardous materials that require placarding (e.g., over 1000 pounds of hazardous materials), you must complete the annual DOT registration. For more information on applicability and instructions for registering by mail or online can be found at <https://www.phmsa.dot.gov/registration/registration-overview>.

EPA SECTION 313 TOXIC RELEASE INVENTORY (TRI) REPORTING – July 1

Per Section 313 of the Emergency Planning and Community Right-to-know Act (EPCRA), facilities in **specific TRI-Covered Industry Sectors** with **10 or more full-time employees** who **manufacture, process or otherwise use** EPCRA 313 chemicals above threshold limits must submit their **Toxic Release Inventory (TRI) report to EPA by July 1** for the 2020 Reporting Year [40 CFR Part 372].

Threshold levels are 25,000 pounds for TRI chemicals manufactured/imported or processed, or 10,000 pounds for TRI chemicals "otherwise used".

The current TRI chemical list contains 33 chemical categories and 770 individual chemicals including styrene, which is found in resin and gel coat. A select group of chemicals considered persistent, bio accumulative toxic (**PBT**) chemicals have a much lower reporting limit, such as lead with a reporting threshold of 100 pounds. For a complete list of TRI changes that have occurred in the past years, including the recent changes for the 2020 reporting year and the upcoming changes for the 2021 reporting year, see EPA's website https://www.epa.gov/sites/production/files/2020-02/documents/tri_chemical_list_changes_02_24_2020.pdf

Many composites manufacturers with 10 or more employees will need to file a TRI report. For example, if you use more than two or more drums of resin or gel coat per week, it is likely a TRI report needs to be filed for styrene. If you are unsure whether TRI Reporting applies to your operations, see EPA's [TRI Threshold Screening Tool](#) to help you determine applicability. You will need to know your facility's NAICS code to use the tool.


Reporting is done through EPA's Central Data Exchange (CDX) portal. Register or log in to the CDX website, <https://cdx.epa.gov/CDX/Login>. Once you are registered or logged in as Preparer or Certifying Official, add TRI-MEweb to your CDX account and load/enter your facility's TRI data for the 2018 Reporting Year. For further information on electronic reporting, see [Electronic Submission of TRI Reporting Forms](#).

OSHA'S TOP TEN VIOLATIONS


If you were ever wondering what violations are most frequently issued by OSHA inspectors, take a look at the Top 10 List of OSHA Violations for fiscal year 2020. Don't wait until an inspector shows up, use the list to identify and remedy hazards to **keep workers safe** and **ensure your programs are compliant**.

1. [Fall Protection – General Requirements](#) (29 CFR [1926.501](#)) – 5,424


Violations can be issued if the employer does not provide adequate fall protection to employees. OSHA requires fall protection at elevations of four feet in general industry workplaces.


2. [Hazard Communication](#) (29 CFR [1910.1200](#)) – 3,199


No written hazard communication program or training and lack of GHS-compliant SDSs are the most common violations. Workers have the right-to-know the hazards and identities of chemicals they are exposed to, precautions they can take to protect themselves and access to SDSs.


3. [Respiratory Protection](#) (29 CFR [1910.134](#)) – 2,649


In addition to the requirement to have a written respiratory protection program, employers must also ensure employees have the correct respirator for the hazard, get a medical evaluation before being allowed to wear a respirator and conduct an annual "fit" test prior to each use.


4. [Scaffolding](#) (29 CFR [1926.451](#)) – 2,538


80% of fall accidents happen from 30 feet or less. Workers on scaffolds must be protected by a fall arrest system or a guardrail system.


5. [Ladders](#) (29 CFR [1926.1053](#)) – 2,129


The most common violations are ladders not extending at least three feet above a landing, using damaged/bent ladders, misusing or using the wrong type of ladder for the task, and employees using the top step of a ladder.


6. [Lockout-Tagout](#) (29 CFR [1910.147](#)) – 2,065

Lockout-Tagout is required to prevent employees from the unexpected energization, startup or release of energy from equipment and machinery. Not having lockout-tagout instructions, not conducting a periodic evaluation of the program, and failure to train employees and/or utilize locks and tags are frequent violations.


7. [Powered Industrial Trucks](#) (29 CFR [1910.178](#)) – 1,932

Documentation is required to show that operators have been trained on the safe operation of the forklifts and electric pallet jacks they use. Refresher training and recertification is required every three years. Forklifts must be operated in a safe manner and equipment and accessories must be in good condition.



Information Line 800.621.8003

8. [Fall Protection – Training](#) (29 CFR [1926.503](#)) – 1,621

Violations can be given for lack of a fall protection program and training, inadequate or poorly understood training, and lack of training documentation. Be sure to test your employees and keep records as evidence that the training was understood.



9. [Personal Protective Equipment- Eye and Face Protection](#) (29 CFR [1926.102](#)) – 1,369

Typical violations include not having appropriate eye and face protection, side shields and prescription safety eyewear.



10. [Machine Guarding](#) (29 CFR [1910.212](#)) – 1,313

Employers are required to protect employees from the hazards of moving machinery by utilizing machine guarding for “point of operation”, ingoing nip points, rotating parts, flying chips and sparks, as well as anchoring fixed machinery and providing protection from exposed blades.



Source: <https://www.nsc.org/newsroom/osha-reveals-top-10-violations-for-fiscal-year-202>

Ask the Compliance Expert

For questions related to the content in this bulletin, as well as any other regulatory issues, please email us at compliance.expert@compositesone.com. Or visit us at <http://www.compositesone.com/people/health-safety-environment/regulatory-assistance/> for more information or to submit an inquiry. We will make every effort to answer your request within 24 – 48 hours.