

UPCOMING REGULATORY DUE DATES - 2025

February 1

OSHA (Occupational Safety and Health Administration) Injury and Illness Recordkeeping Rule

The annual summary of work-related injuries and illnesses must be **recorded on the OSHA 300A Form and posted in a visibly prominent area of the workplace from February 1 – April 30**, even if there were zero injuries for the year. The rule, found in 29 CFR (Code of Federal Regulation) 1904, applies to covered employers with more than 10 employees. The Injury and Illness Log (Form 300), Annual Summary (Form 300A) and related Injury and Illness Incident Documents (Form 301 or equivalent) must be kept for a period of five years. Forms and instructions are available at <https://www.osha.gov/recordkeeping/RKforms.html>.

March 1

EPA (Environmental Protection Agency) Section 312 Tier II Reporting

Annual submission of EPA’s Chemical Inventory Report (Tier II Report) is due March 1 every year, per the Emergency Planning and Community Right-to-Know Act (EPCRA). Facilities that store 10,000 pounds or more of any hazardous chemical on-site at any one time must file. For Extremely Hazardous Substances (EHSs), the reporting threshold is 500 pounds or the threshold planning quantity (TPQ), whichever is lower (see <http://www.epa.gov/epcra/epcra-sections-311-312>). Note: Some states may have lower reporting thresholds and special requirements for electronic reporting, so check your facility’s state-specific requirements at <https://www.epa.gov/epcra/state-tier-ii-reporting-requirements-and-procedures> to see what applies to you. For more information go to EPA’s EPCRA website - <https://www.epa.gov/epcra> or see [40 CFR 370.42](#).

March 2

OSHA Electronic Injury and Illness Reporting

In addition to posting a hard copy of the 300A Summary annually from February 1 – April 30, **certain facilities must submit electronic reports by March 2 every year** to OSHA. For a list of designated NAICS industry classification types, see [29 CFR 1904 Appendix A to Subpart E](#). OSHA’s portal for this report is found on the Injury Tracking Application (ITA) launch page <https://www.osha.gov/injuryreporting/index.html>.

OSHA Electronic Reporting

No. of employees	Industry Type	Electronic Report
20-249	Designated	Form 300A
100+	Designated	Form 300A and NEW! Forms 300 and 301
250+	All	Form 300A

June 30

DOT (Department of Transportation) Hazmat Registration

Annual US DOT Hazmat Registrations and fee payments are due June 30 every year for shippers and transporters of certain hazardous materials (or wastes) in commerce that require placarding. Copies of

registration must be kept on file for three years. Fees are approximately \$250 for small businesses and \$2,575 for larger businesses, plus \$25 processing fees for each registration form. Failure to register can lead to civil penalties of \$1,200. See the Pipeline and Hazardous Materials Safety Administration (PHMSA) website for details – <https://www.phmsa.dot.gov/registration/registration-overview>.

Categories included that require placarding

Non-bulk shipments \geq 5,000 lbs of one hazard class requiring placarding
Hazardous materials in quantities that require placarding
Class 7 (radioactive) materials
Explosives (Division 1.1, 1.2 or 1.3) greater than 55 lbs
Poisonous by inhalation (Zone A) materials exceeding 0.26 gallons (1 L)

July 1

EPA Section 313 Toxic Release Inventory (Form R) Reporting

The Annual Toxic Release Inventory (TRI) report is due to EPA by July 1 every year. The rule, found in [40 CFR 355](#), applies to specific industry sectors with 10 or more full-time employees who manufacture, process, or otherwise use a TRI-listed chemical above threshold levels (<https://www.epa.gov/toxics-release-inventory-tri-program/what-toxics-release-inventory>). The full list of TRI reportable substances, including [the list of 196 PFAS](#) (Polyfluoroalkyl Substances) reportable chemicals, is found on at <https://www.epa.gov/toxics-release-inventory-tri-program/reporting-tri-facilities>. Facilities must use TRI-MEweb to submit their TRI reports. Visit the [Electronic Submission of TRI Reporting Forms](#) webpage for details.

September 1

EPA SQG Re-Notification – every four years

EPA’s Hazardous Waste Generator Improvements Rule revised the Resource Conservation and Recovery Act (RCRA) regulations on hazardous waste with over 60 changes, including SQG Re-Notification, to improve documentation and make the regulations more flexible and easier to understand (see EPA’s [Fact Sheet - Hazardous Waste Generator Improvements Final Rule](#)). Examples of the changes include:

- **SQG RE-NOTIFICATION.** Small Quantity Generators (SQGs), defined as businesses with hazardous waste generation between 220 pounds and 2,200 pounds (100 kg – 1,000 kg) per month, must re-notify EPA or their state environmental agency of their generator status via EPA’s [RCRAInfo website portal](#) or (for some states) EPA From 8700-12 by September 1, 2025, and every four years afterwards. If you are a SQG, check EPA’s website “[Map of Where Final Rule is in Effect](#)” or your state agency to see if the rule is in effect and how notification can be done.

Note: The RCRAInfo portal requires a user-specific login that can be set-up through CDX [secure.login.gov](#).

- **EPISODIC EVENTS.** Smaller generators are allowed a “*once-per-year exceedance*” for unplanned or planned episodic events that won’t impact or change their generator status. This is referred to as an “episodic event” and requires approval by EPA and a 90-day window to notify and remove wastes from the site.

TOP 10 OSHA VIOLATIONS 2024

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 2024. Don't wait until an inspector shows up, use the list to identify and remedy hazards and risks to keep workers safe and ensure your programs are compliant. See [National Safety Council - Top 10 OSHA Violations 2024](#).



1. [Fall Protection – General Requirements](#) (29 CFR [1926.501](#)) – 6,307
Violations can be issued if the employer does not provide adequate fall protection to employees. Fall protection is required for elevations four feet or higher.



2. [Hazard Communication](#) (29 CFR [1910.1200](#)) – 2,888
No written hazard communication program or training and lack of access to GHS-compliant SDSs are the most common violations. Workers have the right-to-know about the chemicals they are exposed to and the precautions needed to protect themselves from exposure.



3. [Ladders](#) (29 CFR [1926.1053](#)) – 2,573
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.



4. [Respiratory Protection](#) (29 CFR [1910.134](#)) – 2,470
In addition to the requirement to have a written respiratory protection program, employers must also ensure employees have the correct respirator for the hazard, a medical evaluation from a certified medical provider, and an annual “fit” test.



5. [Lockout-Tagout](#) (29 CFR [1910.147](#)) – 2,443
Violations include failure to have the following: lockout-tagout instructions, a periodic evaluation of the program, training, and/or locks and tags to secure equipment under repair.



6. [Powered Industrial Trucks](#) (29 CFR [1910.178](#)) – 2,248
Employee refresher training/re-certification are required every three years. Forklifts and electric pallet jacks must be operated safely and equipment and accessories must be in good condition.



7. [Fall Protection – Training](#) (29 CFR [1926.503](#)) – 2,050
No written fall protection program, lack of training documentation, and inadequate or poorly understood training are frequent violations.



8. [Scaffolding](#) (29 CFR [1926.451](#)) – 1,873
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.



9. [Personal Protective Equipment- Eye and Face Protection](#) (29 CFR [1926.102](#)) – 1,814
Typical violations include not having appropriate eye and face protection, such as safety glasses with side shields and prescription safety glasses.



10. [Machine Guarding](#) (29 CFR [1910.212](#)) – 1,541
Employers must protect employees from moving machinery hazards by using guards for points of operation, nip points, rotating parts, flying debris, and sparks in addition to anchoring fixed machinery and shielding exposed blades.

HSE Bulletin

Department of Health, Safety & Environment Compliance Reminder
First Half – 2025



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.