

February 1 - OSHA 300A Log

The annual summary of work-related injuries and illnesses for 2015 must be reported on OSHA Log 300A and posted in a visible prominent area of the workplace from February 1 – April 30, 2016, even if there were zero injuries for the year. This rule 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 documents (Form 301) or equivalent must be kept for a period of five years. Forms are available at <https://www.osha.gov/recordkeeping/RKforms.html>

March 1 – EPA Tier II & Biennial Hazardous Waste Report

EPA Section 312 Tier II Reports

Annual submission of EPA's chemical inventory report (Tier II) for Reporting Year 2015 is due March 1, 2016. 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>). The report is sent to the State Emergency Response Commission (SERC), Local Emergency Planning Committee (LEPC), and local Fire Department. Refer to your state for specific requirements and links to the Tier2 Submit software. (<http://www.epa.gov/epcra/tier-ii-forms-and-instructions>).

EPA Biennial Hazardous Waste Report for LQGs

The National Biennial RCRA Hazardous Waste Report for Large Quantity Generators (LQGs) of hazardous waste is due to EPA March 1, 2016. Federal biennial reports are due in even-numbered years for the previous calendar year activities. Some states may be more stringent and require reports for Small Quantity Generators. Check out <http://www.epa.gov/hwgenerators/biennial-hazardous-waste-report> for additional information and links to instructions and forms.

June 30 – DOT Hazmat Registration

Annual DOT Hazmat Registrations and fee payments are due June 30, 2016, for those who offer or transport certain hazardous materials (or wastes) in commerce that require placarding. More information is found at <http://phmsa.dot.gov/hazmat/outreach-training/registration-program>.

July 1 – EPA Section 313 Toxic Release Inventory (Form R)

The Annual Toxic Release Inventory (TRI) report is due to EPA by July 1, 2016, for the 2015 Reporting Year. The rule applies to specific industry sectors, with 10 or more full-time employees, and who manufacture, process or otherwise use a TRI-listed chemical above threshold levels (<http://www.epa.gov/toxics-release-inventory-tri-program>). Facilities must use TRI-MEweb to submit their TRI reports. Visit the [Electronic Reporting of TRI Data](#) webpage for details.

Some Annual Training Requirements for Safety Meetings

Now is a good time to plan your calendar for annual required OSHA and EPA training, such as: Hearing Conservation (and annual audiograms), Respiratory Protection (and FIT testing), HAZWOPER Emergency Responder, Lockout-Tag Out and Electrical Safety, Portable Fire Extinguisher, Access to Employee Exposure and Medical Records, Blood Borne Pathogen, and Hazardous Waste Training for LQGs. Other training may be required every three years (e.g., First Aid, Powered Industrial Truck (Forklift), and DOT Hazardous Materials training).

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.