

Successful Reporting Strategies

Start EHS reports early, and submit them before the deadlines.



By Mike P. Rioux, CHMM
Senior Regulatory Specialist
St.Germain Collins | Sentry EHS®

By January 2nd each year, much of the information needed for EHS reports is readily available. It still can take a long time to produce and submit reports though, so we've pulled together some tips to help you through the process.

To avoid any last-minute drama, it's helpful to answer a handful of questions so you can create your plan of attack:

- What reports are required?
- Are there changes at your facility that may trigger new reports this year?
- Who is responsible for providing the required information for each report?
- What are the deadlines?
- What is the required format for submittals?
- Have the instructions changed since last year?
- Are there any associated fees?

EHS reporting occurs repeatedly and routinely, which provides a good opportunity to put a system in place to streamline the process thereby minimizing costly errors and oversight.

Requirements

A good first step – even if you've been reporting for decades – is to review the previous year's reports. It may draw your attention to something new at your facility that needs to be reported this year. Or it may become clear that key employees who were involved in pulling these reports together are no longer at your facility so you may need to find information in other ways.

Who?

Once you've determined which reports are required to submit this year, you can determine who will be involved in: providing the information; reviewing the details; documenting supporting materials; certifying; and actually submitting the reports.

Much of the information will probably come from various sources outside your EHS team. The data may live in Human Resources, Purchasing, Facilities, Operations or other departments who are not directly reporting to you. There may have been staff changes since last year, even within your department. Identifying all the responsible parties and then clearly communicating expectations will save time and avoid confusion. By communicating your expectations clearly

the first year, significant time can be saved each following year. Request the information to be available within the first two weeks of January.

When?

Knowing the exact deadlines and planning accordingly can avoid finding out too late that the deadline is on a weekend or holiday, or when the person who is supposed to certify the report is on their honeymoon in Tahiti!

Most regulatory agencies do **not** allow for extensions. If late, it can trigger an agency inspection or fines. Always check the exact time (and time zone) of the deadline. From time to time rulemaking changes the date a report is due. Assuming that a report can be turned in any time before midnight on the due date might land you in trouble.

How?

The majority of reports are now required to be submitted online. While this can sometimes save time and headaches, in other cases it can create them. Don't be surprised to find complex and less than user-friendly websites with complicated registration requirements. These are more common than you may think. Don't be surprised by unforeseen IT emergencies if you wait until the last minute.

Months before the due date, it's a good idea for the preparer and certifier to register online and become familiar with this electronic process. While you're there, you can review the instructions to be sure that the requirements for submission have not changed. Take a regulatory agency up on training if they offer it.

Bonus tip: You may also be able to review what other companies in your sector have already submitted. Also check your own company-wide reports to be sure that information reported in one report doesn't conflict with information reported in other reports. Some regulatory agencies use these same techniques to audit the accuracy of submitted reports.

Final review

Before submitting reports, review all of them for accuracy. Having a second (or third) set of eyes reviewing the reports is a great way to prevent submission of inaccurate reports. Modifying and re-submitting erroneous reports is time consuming and can raise your potential for an audit from the regulatory agency.

Documentation

Throughout the process, make sure that everything is documented. Both from the perspective of the data you are reporting, the people who provided the data, why you are reporting (or not reporting), and also in terms of any correspondence from any regulatory agencies involved. This documentation can be a life-saver when starting the process the following year, and can also be tremendously helpful if audited by corporate or inspected by regulatory agencies.

Keep copies of the report or application you submit, along with any attachments. It's important to get a copy of exactly what was submitted, so taking screen shots or printing a PDF of each page before going to the next one may be necessary for electronic submittals. Email a copy of electronic submittals to yourself so that you have a date stamp of when it was submitted.

In the rare case that a report or application must be mailed, be sure to get a full copy of exactly what you're submitting beforehand, and send the original by certified mail so you have a record of it getting there by the deadline.

Be sure to provide copies to others who may need them, or have a central repository such as a compliance tracking database (such as [Sentry EHS](#)), where you can keep these files.

Recap

EHS reporting occurs repeatedly and routinely so use this to your advantage by planning an effective reporting strategy:

- Identify and provide clear expectations to information sources;
- Review reporting requirements and electronic registration formats on reporting websites;
- Review previous reports and identify new reporting requirements;
- Ensure reporting content doesn't conflict with other submitted reports and compare reporting information with reports from other companies in the same sector; and
- Last but not least: document, document, and document.

For a listing of the typical EHS reports and when they are due, see next page.

REPORT	LOCATION(S)	FREQUENCY	DUE DATE(S)	NOTES
Multi-Sector General Permit Report (EPA)	National	Annually	1/31	
Septage Storage Annual Report	Maine	Annually	1/31	
Septage Hauler Report	New Hampshire	Annually	1/31	
Title V Clean Air Act (Major Sources) – Operating Permit Compliance Certification	National	Annually	1/31	
Title V Clean Air Act (Major Sources) – Reporting of Deviations and Periodic Monitoring Report	National	Semiannually	Varies	(due 1/31 and 7/31 in Maine and New Hampshire)
Annual Solid Waste Report	Massachusetts	Annually	2/15	
Annual Solid Waste Report - Processing Facilities	Maine	Annually	2/28	
Beneficial Use of Solid Waste Annual Report	Maine	Annually	2/28	
Composting Facility Annual Report	Maine	Annually	2/28	
Tier II Report	National	Annually	3/1	
Greenhouse Gas Reporting	National	Annually	3/31	
Emergency Demand Response for Generators Report	National	Annually	3/31	
Annual Solid Waste Report	New Hampshire	Annually	3/31	
Solid Waste Hauler Report	New Hampshire	Annually	3/31	
Solid Waste Incinerator Annual Report	Maine	Annually	4/30	
Annual Solid Waste Report for Transfer Stations and Landfills	Maine	Annually	4/30	
MAIRIS (Maine Air Inventory Reporting System) Report	Maine	Annually	5/15	
Toxic Chemical Release Inventory Report (Form R Report)	National	Annually	7/1	
UST Self-Certification Checklist	Vermont	Annually	12/31	
UST Facility Third Party Inspections	Massachusetts	Annually	Varies	
Underground Oil Storage Tanks Annual Inspection Report	Maine	Annually	Varies	
Industrial Discharge Permit - Wastewater Compliance Monitoring Report	National	Varies	Varies	
NPDES (and Authorized State Programs) Permit - Wastewater Compliance Monitoring Report	National	Varies	Varies	

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For more information

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Call a Regulatory Specialist at St.Germain Collins | Sentry EHS®
(207) 591-7000