

## UPCOMING REGULATORY DUE DATES - 2024

### 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 visible 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](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-262/subpart-A/section-262.41).

#### EPA RCRA (Resource Conservation and Recovery Act) Biennial Report

Per EPA's RRCRA regulations in [40 CFR 262.41](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-262/subpart-A/section-262.41), large quantity generators (LQGs) of hazardous waste are required to submit a biennial report in even-numbered years on the quantity and nature of hazardous waste generated and whether the waste was sent for treatment, storage, disposal, or recycling. State-specific contacts, forms, instructions, and electronic reporting information is found at <https://rcrainfo.epa.gov/rcrainfoprod/action/public/public-site/state-contacts> and details on the LQG Biennial Hazardous Waste Report are found at <https://www.epa.gov/hwgenerators/biennial-hazardous-waste-report>.

### 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](https://www.ecfr.gov/current/title-29/chapter-I/subchapter-B/part-1904/subpart-E/section-1904.41). 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 <b>NEW!</b> 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.

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)      |

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 \$1200. Check the Pipeline and Hazardous Materials Safety Administration (PHMSA) website for details – <https://www.phmsa.dot.gov/registration/registration-overview>.

## July 1

### EPA Section 313 Toxic Release Inventory (Form R)

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>). Facilities must use TRI-MEweb to submit their TRI reports. Visit the [Electronic Reporting of TRI Data](#) webpage for details. For a full list of TRI reportable substances, including the list of 189 PFAS (Polyfluoroalkyl Substances) reportable chemicals, see EPA's TRI website - <https://www.epa.gov/toxics-release-inventory-tri-program/reporting-tri-facilities>.

## September 30

### EPA CDR (Chemical Data Reporting) REPORTING (Form U) - *every 4 years*

[40 CFR Part 711](#) describes US EPA's CDR requirement for information to be submitted on the manufacturing, processing, and use of chemical substances on the TSCA (Toxic Substance Control Act) list that were manufactured (and/or imported) over a 25,000-pound threshold at a single site. A reduced threshold of 2,500 pounds applies to a small number of chemicals subject to specific TSCA actions. The reporting period covers substances manufactured in the United States (or imported into the United States) from 2020 – 2023 and is due **every four years**. Reporting must be done electronically through EPA's Central Data Exchange (CDX) portal. For further information on the CDR rule, see EPA's website <https://www.epa.gov/chemical-data-reporting>.

## 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](mailto: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.