

REPORTING, RECORDKEEPING, AND KEEPING ON TRACK

ARE YOU PREPARED?



OUR TEAM FOR TODAY'S PRESENTATION



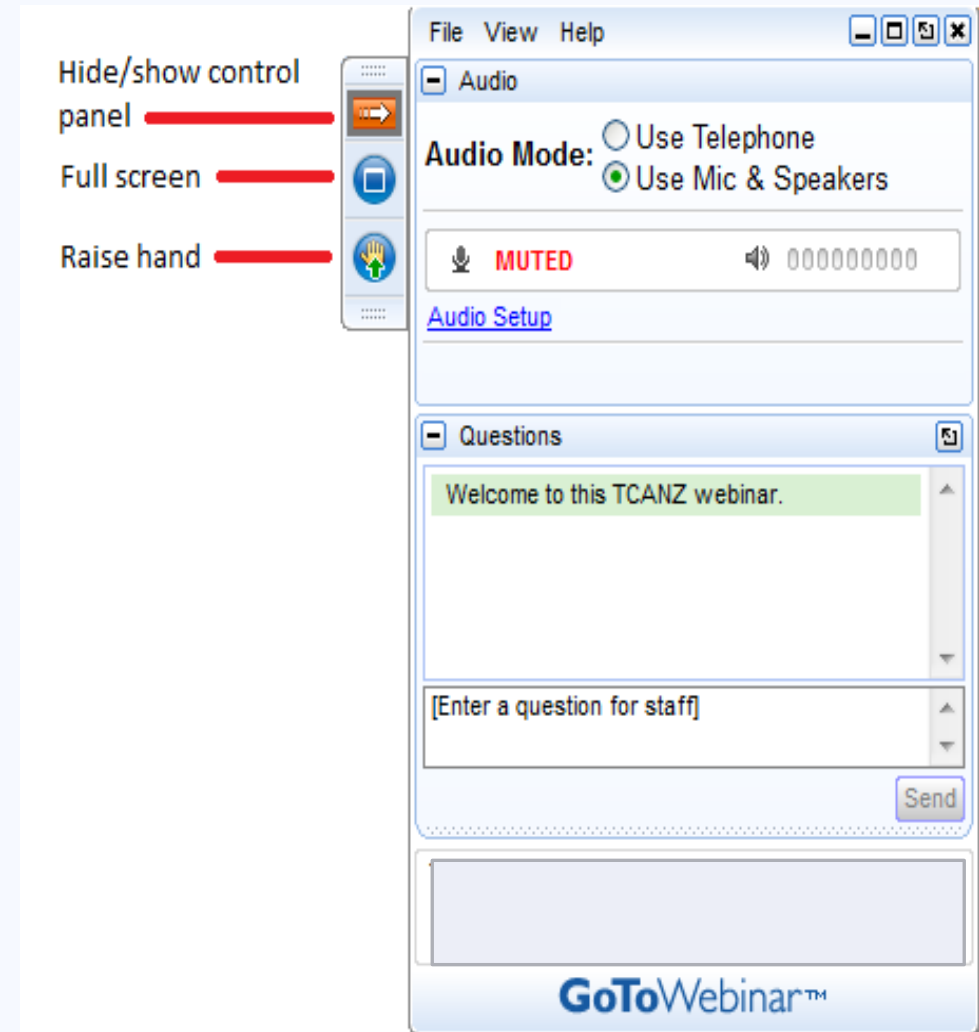
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HOUSEKEEPING

- This presentation is being recorded and will be shared.
- Everyone will be muted to prevent background noise.
- Use the question button to log your question.



TODAY'S TOPICS

1. OSHA Recordkeeping Requirements
2. Annual Environmental Reports
3. Training Documentation
4. Keeping on Track
5. New Tools



LET'S START WITH OSHA

- Injury Records
- Training Records
- Written Programs & Policies
- Inspections
- Medical Surveillance Records



EMPLOYEE RIGHTS

A safe workplace

Access to records:

- OSHA citations
- Annual workplace injury logs
- Medical records, tests that measure hazards



Job Safety and Health IT'S THE LAW!

All workers have the right to:

- A safe workplace.
- Raise a safety or health concern with your employer or OSHA, or report a work-related injury or illness, without being retaliated against.
- Receive information and training on job hazards, including all hazardous substances in your workplace.
- Request an OSHA inspection of your workplace if you believe there are unsafe or unhealthy conditions. OSHA will keep your name confidential. You have the right to have a representative contact OSHA on your behalf.
- Participate (or have your representative participate) in an OSHA inspection and speak in private to the inspector.
- File a complaint with OSHA within 30 days (by phone, online or by mail) if you have been retaliated against for using your rights.
- See any OSHA citations issued to your employer.
- Request copies of your medical records, tests that measure hazards in the workplace, and the workplace injury and illness log.

Employers must:

- Provide employees a workplace free from recognized hazards. It is illegal to retaliate against an employee for using any of their rights under the law, including raising a health and safety concern with you or with OSHA, or reporting a work-related injury or illness.
- Comply with all applicable OSHA standards.
- Report to OSHA all work-related fatalities within 8 hours, and all inpatient hospitalizations, amputations and losses of an eye within 24 hours.
- Provide required training to all workers in a language and vocabulary they can understand.
- Prominently display this poster in the workplace.
- Post OSHA citations at or near the place of the alleged violations.

FREE ASSISTANCE to identify and correct hazards is available to small and medium-sized employers, without citation or penalty, through OSHA-supported consultation programs in every state.

This poster is available free from OSHA.

Contact OSHA. We can help.



RECORDKEEPING FORMS

OSHA's Form 301
Injury and Illness Incident Report

OSHA's Form 300A (Rev. 01/2004)
Summary of Work-Related Injuries and Illnesses

OSHA's Form 300 (Rev. 01/2004)
Log of Work-Related Injuries and Illnesses

Identify the person		Describe the case			
(A) Case	(B) Employee's name	(C) Job title (e.g., Welder)	(D) Date of injury or onset of illness	(E) Where the event occurred (e.g., Loading dock north wall)	(F) Describe injury or illness, parts of body affected and object/condition that directly injured or made person ill (e.g., Second degree burns on right forearm from oxyacetylene torch)

OSHA 301 Injury and Illness Incident Report

OSHA 300A Summary of Work-Related Injuries and Illnesses

OSHA 300 Log of Work-Related Injuries and Illnesses

REPORTING TO OSHA

- Report death within 8 hours
- Provide recordkeeping documents within 4 hours
- BLS injury and illness survey
- In-patient hospitalization, amputation, or loss of an eye within 24 hours
- Several reporting options



ONLINE SUBMISSION

Establishments with 250 or more employees electronically submit OSHA 300 log, 300A, and 301

Establishments with 20 to 249 employees in certain industries electronically submit 300A

Employers must submit required data by March 2 each year



The screenshot shows the OSHA Injury Tracking Application (ITA) website. At the top, it states "An official website of the United States government" and "Here's how you know". Below this, there are logos for "LOGIN.GOV" and "OSHA Injury Tracking Application". The main content area features a diagram with three icons: a person, a keyhole, and a computer screen, connected by lines. Below the diagram, a text box reads: "OSHA Injury Tracking Application (ITA) is using Login.gov to allow you to sign in to your account safely and securely."

OSHA Recordkeeping Rules



Rule 01

ALL EMPLOYERS must follow the serious injury rule...

Rule 02

EMPLOYERS WITH 11 OR MORE EMPLOYEES within the **COMPANY** as a whole must maintain OSHA recordkeeping forms

Rule 03

EMPLOYERS WITH 20 TO 249 EMPLOYEES per **ESTABLISHMENT** in certain industries must electronically file the OSHA 300a annually through OSHA.gov

Rule 04

EMPLOYERS WITH 250 OR MORE EMPLOYEES per **ESTABLISHMENT** must electronically file OSHA Forms 300, 300A, and 301 annually through OSHA.gov

NEW REQUIREMENTS

High Risk Industries >100 Employees

- Farming & Food/Beverage Manufacturing
- Leather, Plastics, Rubber, Wood
- Metal Manufacturing
- Cars, Boats, House Supply Manufacturing
- Hospitals, Healthcare
- Waste Collection/Management
- Amusement, Entertainment
- Etc etc etc

OSHA[®] FactSheet

Improve Tracking of Workplace Injuries and Illnesses Electronic Submission of OSHA Form 300 and 301 Data

The New Requirements

- Establishments with 100 or more employees in designated high-hazard industries (listed in Appendix B to Subpart E of 29 CFR Part 1904) must electronically submit to OSHA detailed information about each recordable injury and illness entered on their previous calendar year's OSHA Form 300 Log and Form 301 Incident Report (29 CFR 1904.41). This includes the date, physical location, and severity of the injury or illness; details about the worker who was injured; and details about how the injury or illness occurred.
- All the establishments required to submit information from their OSHA Form 300 Log and OSHA Form 301 Incident Report to OSHA under this rule are already required to collect and retain this information, and are currently required to electronically submit to OSHA information from their OSHA Form 300A Annual Summary.
- OSHA estimates approximately 50,000 establishments will be required to submit their case-specific injury and illness data. OSHA estimates they will submit information on approximately 750,000 injury and illness cases annually. Focusing the requirements on establishments with 100 or more employees in higher hazard industries means that fewer than one percent of establishments in the country will submit additional data, but the injury and illness data submitted by those establishments will comprise nearly 30% of all reportable occupational injuries and illnesses.
- OSHA estimates it will cost affected establishments with 100 or more employees an average of \$136 per year to comply.
- The data must be electronically submitted through OSHA's Injury Tracking Application (ITA). There are 3 ways to submit the data:

RETENTION AND UPDATING OF RECORDS

- Retain records for 5 years
- Record newly discovered injuries or illnesses
- Record changes in the classification of previously recorded incidents



ANNUAL ENVIRONMENTAL REPORTING

GOVERNMENT COMPLIANCE

- Hazardous Materials Inventory (Tier II)
- Waste (Hazardous, Residual...)
- Air Emissions
- Wastewater/Stormwater Discharge



CORPORATE REPORTING

- GHG (Portion of Ecovadis, CDP, etc.)
- Utility Usage (Sustainability/EMS)
- Intensity Calculations
- Customer-specific aspects

ENVIRONMENTAL REPORTING DATA

BUT FIRST: Administrative/Change Management

- On-line reporting, any changes to Certifying personnel? If so...
 - Look to change online accounts, privileges, new account setup, etc.
- Any changes to reporting mechanism (new on-line system, updated submittal addresses, forms, etc.)
- Any changes to process/permitted units, and how this impacts each report/program
- Any changes to site ownership



Tier II/Hazardous Materials *Inventory*

- Quantity – Assumptions/basis sheet update
 - Spot check physical inventory
 - Forktruck/pallet jack inventory
 - Tanks, containers, other storage; confirm assumptions
 - Any new hazardous materials??
- Chemical
 - Current SDS with hazards
 - Comparison to EHS/Reporting Thresholds
 - Changes to reportable thresholds

ENVIRONMENTAL REPORTING DATA

Waste Reporting

- Lookup Manifest Data at RCRAInfo (hazardous only)
- Obtain data from waste vendor & compare to manifest data by wastestream
- Compare to data on site (do you maintain an on-going log?)
- Confirm waste handling codes and disposal codes
- Enter data in online report or electronic form
- Gather data for other elements of reporting, as applicable:
 - Hazardous Secondary Material (HSM)
 - Other special cases
- **BEST PRACTICE:** Confirm waste profiles are current, Form SI data



WASTED WASTE PROCESSING CENTER 500 MAIN STREET - WEST VALLEY CITY LY700000004

Waste Profile

In Progress

Date	Generated (Tons)	Managed (Tons)	Shipped (Tons)	Received (Tons)	Status	Action
No data in subsidiary progress.						

Completed

Date	Generated (Tons)	Managed (Tons)	Shipped (Tons)	Received (Tons)	Initials/Status	Action
2011	100 00000	0	981 00000	0	OK	
2012	281 70000	41 50000	280 00000	0	OK	
2013	31 00000	16 00000	00 00000	5 00000	OK	
2014	11 00000	10 00000	00 00000	0 00000	OK	

ENVIRONMENTAL REPORTING DATA



Air Emissions Reporting

- Address/incorporate equipment changes (new, removed)
- Onsite fuel use (natural gas bills, fuel deliveries)
- Process Material use (raw material purchase, metering, etc.)
- Process Operation (hours, widgets made, etc. by month)
 - Engine Hours - By Type (emergency, exercise, etc.)
 - Processing time(s)
- Emission Calculations
 - Confirm any new materials used in processes
 - Confirm emission factors; update if testing occurred
- BEST PRACTICE – Configure on-going spreadsheet for emission statement summary, and incorporate changes.

ENVIRONMENTAL REPORTING DATA



Wastewater/Stormwater

- Sampling Results
- Metering data or water bills
- Weather data/inspections



Other Corporate Reports

- Electricity Consumption (Scope 2 GHG)
- Data already collected for other reports, reformatted for specific report
- BEST PRACTICE – Develop summary file noting data sources



TRAINING RECORDS

1. Name
2. Date
3. Topics Discussed
4. Signature
5. Name of Trainer
6. *Retain for the time of employee's employment with the company.*



Verification of Health and Safety Training	
Trainer:	Date:
Subject(s):	
Company:	

PRINTED NAME	SIGNATURE	DEPARTMENT



Emergency Action Plan	1910.38
Process Safety Management of Highly Hazardous Chemicals	1910.119
Hazardous Waste Operations and Emergency Response	1910.120
Respiratory Protection	1910.134
Permit-Required Confined Spaces	1910.146
The Control of Hazardous Energy (Lockout/Tagout)	1910.147
Employee Alarm Systems	1910.165
Powered Industrial Trucks	1910.178
Electric Power Generation, Transmission and Distribution	1910.269
Electrical Safety-Related Work Practices	1910.333
Subpart Z: Specific Chemical Substances	1910.1000 to 1910.1018, 1910.1025 to 1910.1029 and 1910.1043 to 1910.1096
Bloodborne Pathogens	1910.1030
Hazard Communication	1910.1200
Occupational Exposure to Hazardous Chemicals in Laboratories	1910.1450

HEALTH & SAFETY PROGRAM RECORDS

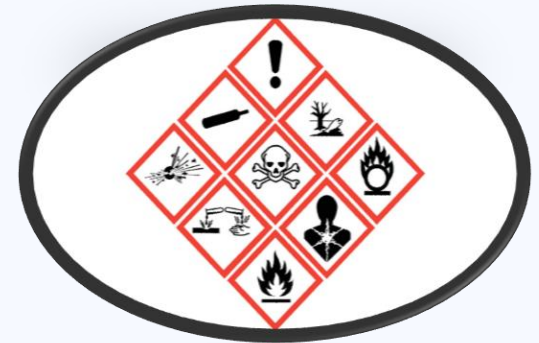
HEALTH & SAFETY PROGRAM RECORDS

Permit-Required Confined Spaces

- Employers are required to retain canceled entry permits for a minimum of one year.
- They should also be reviewed within one year following each entry.

Hazard Communication

- Each safety data sheet (SDS) must be retained for 30 years beyond the duration of employment for all exposed employees.
- Employers must also retain copies of all SDSs for every chemical currently being used.



HEALTH & SAFETY PROGRAM RECORDS

Respiratory Protection

- Retain records pertaining to employee medical evaluations for 30 years past the final date of employment.
- Retain results from the most recent fit-test should also be recorded and maintained until the results of the next test have been collected.



Bloodborne Pathogens

- OSHA employs the “duration of employment plus 30 years” for employee exposure records.



Lockout Tagout

- Maintain logs verifying that periodic inspections by authorized employees are being performed at least once per year.
- Logs should be maintained for a minimum of one year or until a new log is validated and certification is issued.



HEALTH & SAFETY PROGRAM RECORDS

Hearing Conservation

- OSHA recommends that employers retain noise exposure measurement records for a minimum of two years
- Audiometric test records should be retained for the duration of employment



Personal Protective Equipment

- There are several written certifications regarding hazard assessment and employee training that must be retained for the duration of a worker's employment.
- PPE records for individual employees should also be retained until the employee is no longer employed.



PROCESS SAFETY MANAGEMENT (PSM)

OSHA requires process hazard analyses (PHAs), related employee records, and verification records to be retained for the duration of the covered process or the employee's tenure.

Process safety information (PSI) documents used for developing, maintaining, auditing, and managing processes should also be retained for as long as the process is being used.

Save incident investigations covered by the PSM standard for at least five years as well as the two most recent compliance audit reports.

Failure to comply with these retention policies could result in a citation, fine, or penalty.



GENERAL DUTY CLAUSE DOCUMENT RETENTION

The best practice for General Duty Clause document retention is to retain any training records dealing with “recognized hazards” for the duration of employment, including:

1. The written policy
2. Training records
3. Disciplinary documents for policy violations

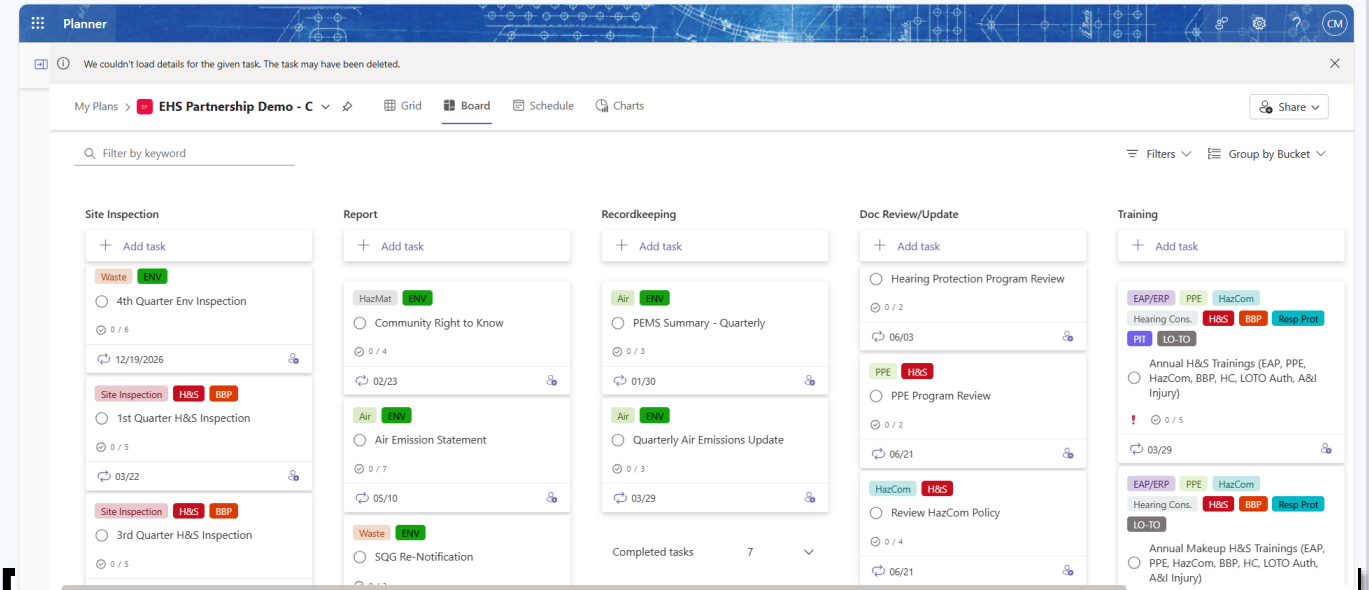
General Duty Clause

Section 5(a)(1) of the OSH Act requires that “Each employer shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees.”

PLANNING AHEAD

- Training to Complete (and records)
- Inspections (and records) to prepare
- Calendar of Action Items to Complete
- On-Going Records to Compile
- Reporting to the government
- BEST PRACTICE – Use a calendar,

and update each year!



Month	Program Area	Task(s)	Date Due	Date Complete	Responsible	Info Needed	Info Needed By	Notes
January	Title V Air Permit	Semi-Annual Deviation Report	1/30/2023			Any NDV's, deviations from permit conditions?	Beginning of January	Identify all deviations from operating permit requirements, the probable cause of such deviations, and any corrective actions or preventive measures taken. Reported through NDEPOnline. If Annual Compliance Certification submitted prior to January 30, 2023, this report is not required to be submitted. Submit report semi-annually stating no shutdowns or catalyst overhaul/functions for previous 6-month period
	Title V Air Permit	Secondary Aluminum MACT PRR Semi-Annual Report	1/30/2023				Beginning of January	
	NPDES Stormwater Permit	Semi-Annual Waste Characterization Report (WCR)	1/29/2023			Classification of Waste	Results from Lab given to CM by the 1st of the month	Identifies the composition of residual waste found in water during sampling period
February	NPDES Stormwater Permit	Semi-Annual Discharge Monitoring Report (DMR)	1/29/2023			Stormwater DMR results	Monitor stormwater discharges and submit Monitoring Report Form to the Department semi-annually	
	EPCRA	Community Right to Know (CRTK) Determination and Reporting	3/1/2023			List of hazardous chemicals stored onsite	Beginning of February	Requires online reporting
	Title V Air Permit	Annual Compliance Certification	2/29/2023			Any NDV's, deviations from permit conditions?	Beginning of February	Submit annually to NDEP and EPA using NDEPOnline System
March	Hazardous Waste	Biennial Report and Fee Payment	3/1/2023				3/1/2023	Submit using on-line system, and complete Manifest Reporting Fee form and submit associated fee/completed form to NDEP
	Title V Air Permit	Annual Combustion Adjustment	within 45 days of adjustment				within 45 days of adjustment	Reports must be submitted electronically
	Sludge Quality Assurance Rule	Quarterly Sample and Analysis of anodizing wastewater treatment sludge	3/31/2023			Contractor Scheduling	Schedule by 31	Under SQAR Rules, quarterly sampling and analysis of sludge required, along with records of sludge generation quantities. No report to NDEP is required
April	Title V Air Permit	Annual EPA Greenhouse Gas Report	4/1/2023			Fuel Consumption	April 1 for previous calendar year	Prepare the Greenhouse Gas Report on EPA's EGGRIT system through CDX
	NPDES Stormwater Permit	Certification Form Certifying Annual Inspection was Conducted	4/1/2023				March	Conduct an annual facility inspection to assess all areas contributing to the stormwater discharge in order to evaluate whether the SPPP is adequate and if additional measures are needed. Submit form to NDEP
	Title V Air Permit	Operating Permit Renewal	9/27/2023				Beginning of September 2018	Must be submitted more than 6 months prior to expiration; preference is one year prior
June	EPCRA	Toxic Release Inventory (TRI) Form R Determination and Reporting	7/1/2023			List of hazardous chemicals stored onsite	Beginning of June	Requires online reporting, payment of regulatory fees
	EPCRA	Release and Pollution Prevention Report (RPPR)	7/1/2023			List of hazardous chemicals stored onsite	Beginning of June	Report data on toxic chemicals online through CDX
	Sludge Quality Assurance Rule	Quarterly Sample and Analysis of anodizing wastewater treatment sludge	6/30/2023			Contractor Scheduling	Schedule by 31	Under SQAR Rules, quarterly sampling and analysis of sludge required, along with records of sludge generation quantities. No report to NDEP is required
July	Title V Air Permit	Annual Emission Statement	6/30/2023			Hours, Throughputs, Emission Sources	End of May	Requires previous calendar year data input to NDEPOnline
	Title V Air Permit	Secondary Aluminum MACT PRR Semi-Annual Report	7/30/2023				Results from test given to CM by the 1st of the month	Submit report semi-annually stating no shutdowns or catalyst overhaul/functions for previous 6-month period
	Title V Air Permit	Semi-Annual Deviation Report	7/30/2023			Any NDV's, deviations from permit conditions?	Beginning of July	Identify all deviations from operating permit requirements, the probable cause of such deviations, and any corrective actions or preventive measures taken
September	NPDES Stormwater Permit	Semi-Annual Waste Characterization Report (WCR)	7/29/2023			Classification of Waste	Beginning of July	Identifies the composition of residual waste found in water during sampling period
	NPDES Stormwater Permit	Semi-Annual Discharge Monitoring Report	7/29/2023			Stormwater DMR results	Results from Lab given to CM by the 1st of the month	Monitor stormwater discharges and submit Monitoring Report Form to the Department semi-annually
	Title V Air Permit	Operating Permit Renewal	9/27/2023				Beginning of September 2018	Must be submitted within 6 months of expiration
November	Sludge Quality Assurance Rule	Quarterly Sample and Analysis of anodizing wastewater treatment sludge	9/30/2023			Contractor Scheduling	Schedule by 31	Under SQAR Rules, quarterly sampling and analysis of sludge required, along with records of sludge generation quantities. No report to NDEP is required
	Hazardous Waste	Annual RCRA and Universal Waste Training	11/30/2023			List of employees attending		Ensure all applicable employees are trained/trained annually if their job responsibility requires the handling or labeling of hazardous waste

CMI's 2025 Compliance Checklist

Annual 2025 Reporting Dates

February 1, 2025

- OSHA Annual Injury and Illness Summary (300A)
- Post from February 1st through April 30th

February 15, 2025

- OSHA VPP Sites Submit Annual Injury and Illness Rates per Annual Submission Document

March 1, 2025

- EPCRA SARA Tier II (311 and 312)

March 1, 2026

- Hazardous Waste - Biennial Reports for Large Quantity Generators

March 2, 2025

- OSHA Electronic Injury and Illness Reporting for 2022

March 31, 2025

- Greenhouse Gas Emissions Report

June 30, 2025

- DOT Registrations

July 1, 2025

- EPCRA SARA Form R Toxic Release Inventory (313)
- Mercury Inventory Report, per TSCA

July 15, 2024

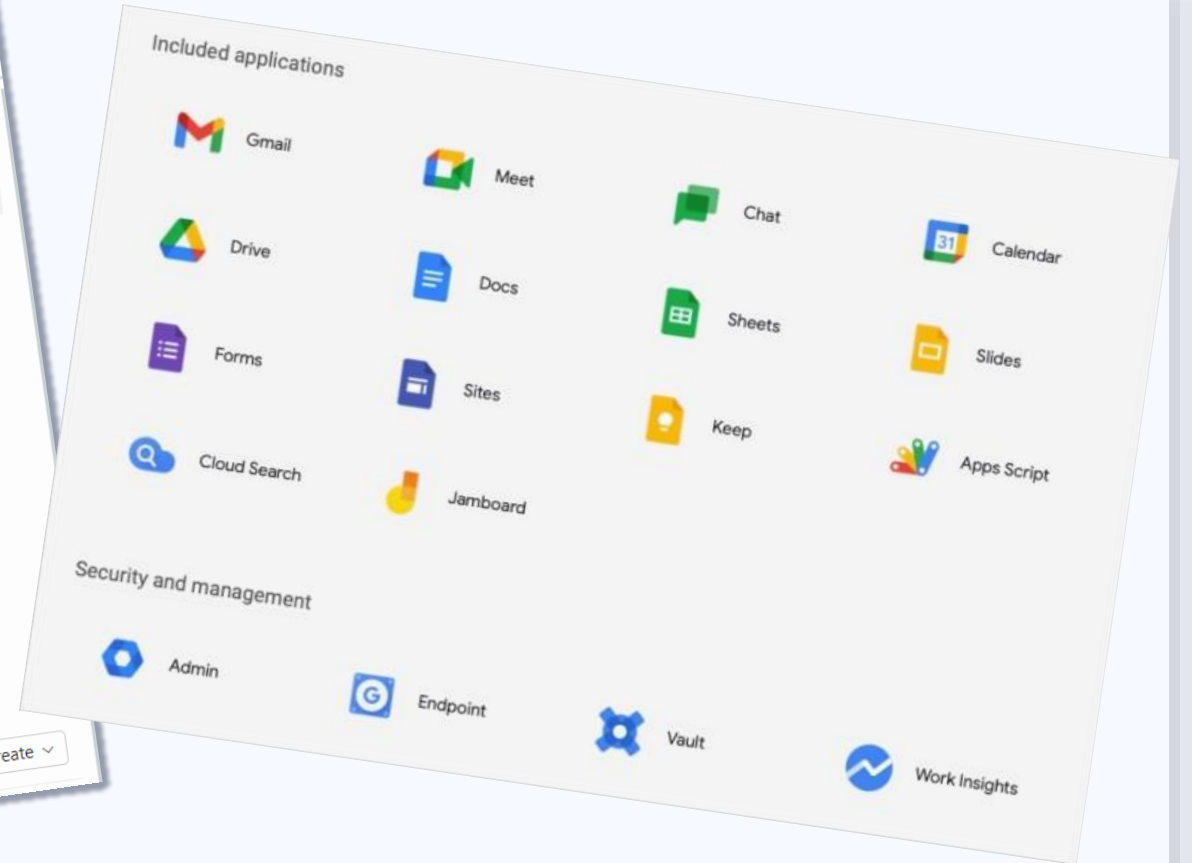
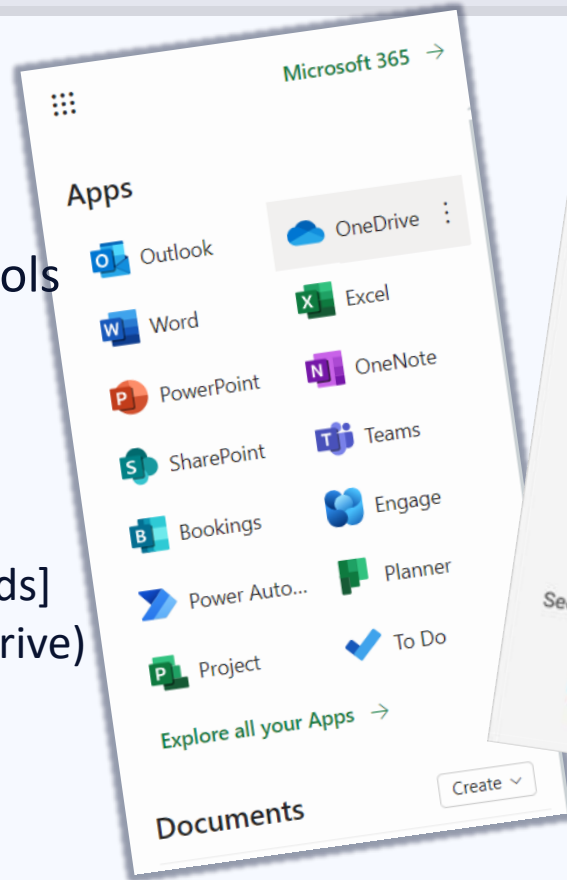
- Annual PCB Report, per TSCA

July 31, 2025

- Voluntary Form R or Form A Revisions to TRI-MEweb

NEW TOOLS

- Consider use of online tools for:
 - Forms (inspections)
 - File Maintenance [Records] (Sharepoint/OneDrive/Drive)
 - Calendar/Schedule [Reports/submissions] (Planner, Jamboard)
 - Collaboration/Delegation (Planner/Teams, Sites/Meet)



QUESTIONS?

THANK YOU FOR JOINING US.



Connect with us for a complementary
15 minute consultation.

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