2024 Kentucky Compliance and Reporting Due Dates

	•	
Air	Title V Air Permit Annual Certification of Compliance	January 30
Air	Greenhouse Gas Reporting (submit at cdx.epa.gov)	March 31
Air	Title V Air Permit Annual Emission Inventory Report ²	April 15
Air	Title V Air Permit - Semi-Annual Monitoring Report	Jan. 30, Jul. 30
EPCRA	EPCRA - Tier II Reports (submit on HazConnect)	March 1
EPCRA	EPCRA - TRI Form R/A (submit at cdx.epa.gov) ³	July 1
RCRA	Annual RCRA Hazardous Waste Reports (LQG and SQG) ⁴	January 1

Reporting Requirements⁽¹⁾

(1) Facility requirements should be verified to confirm due dates.

(2) Federally Enforceable District Origin Operating Permits (FEDOOPs) and Minor Sources are not required to submit Annual Emissions Inventory Reports. Reporting deadline for Title V permit holders may vary with permit conditions.

(3) EPA eliminated the de minimis exemption for Supplier Notification Requirements for chemicals of special concern (e.g., lead, mercury, dioxins, etc.).
(4) VSQGs that for any one calendar month generate more than 220 pounds or accumulate on-site at any time more than 2,200 pounds of hazardous waste, must also submit an annual report.

Additional Environmental Requirements

Stormwater: Complete annual comprehensive inspection and routine facility inspections as needed. Conduct benchmark monitoring and visual monitoring quarterly at each outfall. Conduct training at least annually. Those required to submit Discharge Monitoring Report (DMR) forms must do so within 30 days of sampling.

Hazardous Waste: Kentucky gives a grace period up to March 1st before charging late fees. Verify hazardous waste generator status, review and update contingency plan annually.

Universal Waste: Conduct training annually. Confirm that storage times do not exceed one year.

Wastewater (NPDES/SDS): Discharge reports are required to be submitted at regular intervals, per permit requirements.

SPCC Plan: SPCC Plans must be updated every five years or whenever there is a change in oil storage or spill potential. Conduct and document routine inspections and annual training.

Air Permits/Emission Inventories: Permits issued by the Department of Air Quality (DAQ) often require annual or semi-annual reports. In addition to semi-annual reporting, the DAQ Web Survey (kind of like an emissions inventory but they only ask for production/fuel usages and do the calculations for you) is due in March, however, there is no set due date and it changes each year. The facility's reporting, recordkeeping, and monitoring requirements are explicitly stated in the issued permit.

EPCRA TRI: Begin collecting data for RY2024 for reporting over 100 pounds of 189 specific PFAS chemicals (there is no de minimis exemption). See attached link for additional information: <u>https://www.epa.gov/toxics-release-inventory-tri-program/basics-tri-reporting</u>