



2018 ENVIRONMENTAL COMPLIANCE CALENDAR

Compliance Tips!

Knowledge is Power. Research which environmental regulations apply to your operations. Make sure to consider all relevant media — air, water, and land.

Some permitting authorities may have a backlog. Submit environmental permit applications well before expiration to avoid delay.

Prepare a SWPPP before submitting an NOI or permit application for coverage. A qualified environmental consultant, like ESS, can assist you in preparing one.

Stormwater sampling should be done as early in the month or monitoring period as possible. This allows time to collect more samples if the originals are lost or exceed a holding time. ESS can monitor ideal windows of opportunity for stormwater sampling, allowing you to focus on your facility's daily operations.

Air permits typically require monthly recordkeeping and/or emissions calculations. Stay up to date on monthly recordkeeping and facilities must report emission exceedances in a timely manner.

Maintain GHS labels and use them for all secondary containers. New stringent GHS standards require labels to be reliably affixed without fading or becoming unreadable, despite harsh conditions. Secondary containers, such as spray bottles, must also be properly labeled following the new GHS requirements.

JANUARY							FEBRUARY							MARCH							APRIL							MAY							JUNE									
S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S			
	1	2	3	4	5	6					1	2	3			1	2	3	4	5	6	7			1	2	3	4	5			1	2	3	4	5							1	2
7	8	9	10	11	12	13	4	5	6	7	8	9	10	4	5	6	7	8	9	10	8	9	10	11	12	13	14	6	7	8	9	10	11	12	3	4	5	6	7	8	9			
14	15	16	17	18	19	20	11	12	13	14	15	16	17	11	12	13	14	15	16	17	15	16	17	18	19	20	21	13	14	15	16	17	18	19	10	11	12	13	14	15	16			
21	22	23	24	25	26	27	18	19	20	21	22	23	24	18	19	20	21	22	23	24	22	23	24	25	26	27	28	20	21	22	23	24	25	26	17	18	19	20	21	22	23			
28	29	30	31				25	26	27	28				25	26	27	28	29	30	31	29	30						27	28	29	30	31			24	25	26	27	28	29	30			

Month	Day	Event
January	30	EPA MSGP Annual Report MA, NH epa.gov/npdes
January	Q1	EPA MSGP Benchmark & Visual Monitoring MA, NH epa.gov/npdes
January	Q1	RIPDES MSGP Visual Monitoring RI dem.ri.gov/programs/benviron/water/permits/ripdes
January	Q1	Semi-annual MSGP Benchmark Monitoring RI dem.ri.gov/programs/benviron/water/permits/ripdes
January	Q1	EPA MSGP Inspection MA, NH (Facility-specific, monthly or quarterly) epa.gov/npdes
January	Q1	RIPDES MSGP Inspection RI (Facility-specific, monthly or quarterly) dem.ri.gov/programs/benviron/water/permits/ripdes/pdfs/
January	Q1	SPCC Plan Oil Storage Inspection (monthly or quarterly) epa.gov/oil-spills-prevention-and-preparedness-regulations/overview-spill-prevention-control
February	Q1	EPA MSGP Inspection MA, NH (Facility-specific, monthly or quarterly) epa.gov/npdes
February	Q1	RIPDES MSGP Inspection RI (Facility-specific, monthly or quarterly) dem.ri.gov/programs/benviron/water/permits/ripdes/pdfs/
February	Q1	SPCC Plan Oil Storage (monthly or quarterly inspections) epa.gov/oil-spills-prevention-and-preparedness-regulations/overview-spill-prevention-control
March	1	Air Emissions Statement CT ct.gov/deep
March	1	EPCRA Tier II Report epa.gov/epcra/tier-ii-forms-and-instructions
March	1	MassDEP Hazardous Waste Recycling Annual Report MA mass.gov/eea/agencies/massdep/recycle/hazardous
March	1	Hazardous Waste Biennial Report https://www.epa.gov/hwgenerators/biennial-hazardous-waste-report
March	1	Title V Annual Certification* epa.gov/title-v-operating-permits
March	31	EPA Greenhouse Gas Reporting epa.gov/ghgreporting
March	Q1	EPA MSGP MA, NH (Facility-specific, monthly or quarterly) epa.gov/npdes
March	Q1	RIPDES MSGP RI (Facility-specific, monthly or quarterly) dem.ri.gov/programs/benviron/water/permits/ripdes/pdfs/
March	Q1	SPCC Plan Oil Storage (monthly or quarterly inspections) epa.gov/oil-spills-prevention-and-preparedness-regulations/overview-spill-prevention-control
April	16	Annual Source Registration, Operating Permit Facilities** MA mass.gov/eea/agencies/massdep/service/online/
April	16	Greenhouse Gas Reporting** MA mass.gov/eea/agencies/massdep
April	16	Annual Emissions Statements & Reports NH des.nh.gov/organization/divisions/air
April	16	Title V Compliance Cert. NH des.nh.gov/organization/divisions/air
April	16	Air Inventory RI dem.ri.gov/pubs/regs/regs/air
April	Q2	EPA MSGP Benchmark & Visual Monitoring MA, NH epa.gov/npdes
April	Q2	RIPDES MSGP Visual Monitoring dem.ri.gov/programs/benviron/water/permits/ripdes/pdfs/
April	Q2	EPA MSGP MA, NH (Facility-specific, monthly or quarterly) epa.gov/npdes/stormwater-discharges-industrial-activities#msgp
April	Q2	SPCC Plan Oil Storage (monthly or quarterly inspections) epa.gov/oil-spills-prevention-and-preparedness-regulations/overview-spill-prevention-control
May	15	RES, NESHAP Source Registration** MA mass.gov/eea/agencies/massdep
May	Q2	EPA MSGP MA, NH (Facility-specific, monthly or quarterly) epa.gov/npdes/stormwater-discharges-industrial-activities#msgp
May	Q2	RIPDES MSGP RI (Facility-specific, monthly or quarterly) dem.ri.gov/programs/benviron/water/permits/ripdes/pdfs/
May	Q2	SPCC Plan Oil Storage (monthly or quarterly inspections) epa.gov/oil-spills-prevention-and-preparedness-regulations/overview-spill-prevention-control
June	2	Triennial Source Registration MA mass.gov/eea/agencies/massdep
June	Q2	EPA MSGP Inspection MA, NH (Facility-specific, monthly or quarterly) epa.gov/npdes
June	Q2	RIPDES MSGP Inspection RI (Facility-specific, monthly or quarterly) dem.ri.gov/programs/benviron/water/permits/ripdes/pdfs/
June	Q2	SPCC Plan Oil Storage Inspection (monthly or quarterly) epa.gov/oil-spills-prevention-and-preparedness-regulations/overview-spill-prevention-control

Annual Compliance – Check It Off Your List!

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|---|--|---|
| <input type="checkbox"/> MSGP Comprehensive Facility Inspection / RI dem.ri.gov/programs/benviron/water/permits/ripdes | <input type="checkbox"/> OSHA Training www.osha.gov/publications | <input type="checkbox"/> AST Inspection MA mass.gov/eopss/agencies/dfs/dfs2/osfm/fire-prev |
| <input type="checkbox"/> RIDLT Hazardous Substance Inventory dem.ri.gov/programs/emergencyresponse | <input type="checkbox"/> SPCC Plan Training epa.gov/oil-spills-prevention-and-preparedness-regulations | <input type="checkbox"/> SWPPP/SWMP Training epa.gov/npdes/pubs/empltrng.pdf |
| <input type="checkbox"/> Hazardous Waste Awareness Training epa.gov/hwgenerators | <input type="checkbox"/> DOT Hazardous Material Shipping Certification phmsa.dot.gov/hazmat/outreach-training | <input type="checkbox"/> ELUR Inspection and Report RI dem.ri.gov/programs/wastemanagement/site-remediation |

ESS can help!

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(We won't share your info & you can unsubscribe any time!)

*Some facilities may have an earlier deadline.

** These are the normal MassDEP due dates for RY2017 filings. MassDEP is still revising the eDEP forms and has deferred RY2016 filings to CY2018. The agency will inform facilities of deadlines for both RY2016 and RY2017 filings.



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Compliance Tips!

Planning a facility expansion or construction near a shoreline or wetland? Refer to local environmental agencies to determine the impacts. A reputable consulting firm can assist.

Before leasing or buying, uncover a property's history. A facility where hazardous substances are located may be responsible for cleaning up. Manage the risk by conducting due diligence before leasing or buying a commercial or industrial property. A subsurface investigation may be needed.

Stormwater pollution prevention teams, inspectors, and monitors should be "qualified personnel." EPA defines qualified personnel as "those who possess the knowledge and skills to assess conditions and activities that could impact stormwater quality at your facility, and who can also evaluate the effectiveness of control measures."

Label facility storm drains with "No Dumping – Drains to Stream." If select drains at your facility discharge to the sanitary sewer system or to a sump (for example, at a wash rack), you should label those with a "Drains to Sanitary Sewer" or similar message.

USEPA MSGP Signatory Requirements. Be sure that all MSGP reports, including visual monitoring and facility-specific inspection forms, are signed by an authorized representative of the company.

Be wary of using outdated form templates. As permits are updated, so are their forms. Be sure to check your state or EPA website to ensure that you're using the most up-to-date forms.

JULY							AUGUST							SEPTEMBER							OCTOBER							NOVEMBER							DECEMBER						
S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S
1		3	4	5	6	7				1	2	3	4							1	1	2	3	4	5	6					1	2	3							1	
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29	30	31	26	27	28	29	30	31	23	24	25	26	27	28	29	28	29	30	31	25	26	27	28	29	30	23	24	25	26	27	28	29	30	31							

Month	Day	Compliance Requirement	
JULY	1	EPCRA TRI Forms R & A epa.gov/toxics-release-inventory-tri-program	
	1	MassDEP TUR Form S MA mass.gov/eea/agencies/massdep	
	15	Triennial Source Registration MA mass.gov/eea/agencies/massdep	
	Q3	EPA MSGP Benchmark & Visual Monitoring MA, NH epa.gov/npdes	
	Q3	RIPDES MSGP Visual Monitoring dem.ri.gov/programs/benviron/water/permits/ripdes	
	Q3	Semi-annual MSGP Benchmark Monitoring RI dem.ri.gov/programs/benviron/water/permits/ripdes	
	Q3	EPA MSGP Inspection MA, NH (facility-specific, monthly or quarterly) epa.gov/npdes	
AUGUST	31	Title V Semi-annual Certification* epa.gov/title-v-operating-permits	
	Q3	EPA MSGP Inspection MA, NH (facility-specific, monthly or quarterly) epa.gov/npdes	
	Q3	RIPDES MSGP Inspection RI (Facility-specific, monthly or quarterly) dem.ri.gov/programs	
	Q3	SPCC Plan Oil Storage Inspection (monthly or quarterly) epa.gov/oil-spills-prevention-and-preparedness-regulations/overview-spill-prevention-control-and	
	Q3	RIPDES MSGP Inspection RI (facility-specific, monthly or quarterly) dem.ri.gov/programs	
	Q3	SPCC Plan Oil Storage Inspection (monthly or quarterly) epa.gov/oil-spills-prevention-and-preparedness-regulations/overview-spill-prevention-control	
	Q3	SPCC Plan Oil Storage Inspection (monthly or quarterly) epa.gov/oil-spills-prevention-and-preparedness-regulations/overview-spill-prevention-control	
SEPTEMBER	Q3	EPA MSGP Inspection MA, NH (facility-specific monthly or quarterly) epa.gov/npdes	
	Q3	RIPDES MSGP Inspection RI (facility-specific monthly or quarterly) dem.ri.gov/programs	
	Q3	SPCC Plan Oil Storage Inspection (monthly or quarterly) epa.gov/oil-spills-prevention-and-preparedness-regulations/overview-spill-prevention-control	
	OCTOBER	Q4	EPA MSGP Benchmark & Visual Monitoring MA, NH epa.gov/npdes
		Q4	RIPDES MSGP Visual Monitoring RI dem.ri.gov/programs/benviron/water/permits/ripdes
		Q4	EPA MSGP Inspection MA, NH (facility-specific, monthly or quarterly) epa.gov/npdes
		Q4	RIPDES MSGP Inspection RI (facility-specific, monthly or quarterly) dem.ri.gov/programs
Q4	SPCC Plan Oil Storage Inspection (monthly or quarterly) epa.gov/oil-spills-prevention-and-preparedness-regulations/overview-spill-prevention-control		
NOVEMBER	Q4	EPA MSGP Inspection MA, NH (facility-specific, monthly or quarterly) epa.gov/npdes	
	Q4	RIPDES MSGP Inspection RI (facility-specific, monthly or quarterly) dem.ri.gov/programs	
	Q4	SPCC Plan Oil Storage Inspection (monthly or quarterly) epa.gov/oil-spills-prevention-and-preparedness-regulations/overview-spill-prevention-control	
	DECEMBER	Q4	EPA MSGP Inspection MA, NH (facility-specific, monthly or quarterly) epa.gov/npdes
Q4		RIPDES MSGP Inspection RI (facility-specific, monthly or quarterly) dem.ri.gov/programs	
Q4		SPCC Plan Oil Storage Inspection (monthly or quarterly) epa.gov/oil-spills-prevention-and-preparedness-regulations/overview-spill-prevention-control	

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|---|--|---|
| <input type="checkbox"/> MSGP Comprehensive Facility Inspection / RI dem.ri.gov/programs/benviron/water/permits/ripdes | <input type="checkbox"/> OSHA Training www.osha.gov/publications | <input type="checkbox"/> AST Inspection MA mass.gov/eopss/agencies/dfs/dfs2/osfm/fire-prev |
| <input type="checkbox"/> RIDLT Hazardous Substance Inventory dem.ri.gov/programs/emergencyresponse | <input type="checkbox"/> SPCC Plan Training epa.gov/oil-spills-prevention-and-preparedness-regulations | <input type="checkbox"/> SWPPP/SWMP Training epa.gov/npdes/pubs/empltrng.pdf |
| <input type="checkbox"/> Hazardous Waste Awareness Training epa.gov/hwgenerators | <input type="checkbox"/> DOT Hazardous Material Shipping Certification phmsa.dot.gov/hazmat/outreach-training | <input type="checkbox"/> ELUR Inspection and Report RI dem.ri.gov/programs/wastemanagement/site-remediation |

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