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Regulatory Reminders

- ✓ OSHA 300 Summary Log Posting (Start Date).....Feb. 1
- ✓ Practice Greenhealth Award Applications Due.....Feb. 27
- ✓ Federal EPCRA 312 Tier II Report.....March 1
- ✓ Mass Recycling Permit Annual Report.....March 1
- ✓ Mass Restricted Emissions Status Report.....March 15
- ✓ EPA Mandatory Greenhouse Gas Reporting.....March 31



As I write this article, New England is in the midst of a major snowstorm. Fortunately, we were given plenty of notice to adequately prepare. Effective leadership, communication, coordination

and expertise from government officials, residents and businesses helped our communities minimize and address safety concerns. With businesses and institutions, this same type of effective leadership and communication across varying functional areas can also help organizations to successfully implement programs and effect positive changes with regard to Environmental, Health and Safety (EH&S).

In addition to having strong technical knowledge and experience, successful EH&S professionals are effective managers and leaders. Many find ISO/OHSAS and other EH&S management systems help facilitate managing an organization's EH&S aspects and strongly influencing its EH&S culture. Pending updates to these standards will further improve the ability of organizations to systematically reduce environmental impacts and minimize occupational safety and health risks.

EH&S organizational leadership is also important for achieving strong results. EH&S professionals are often challenged with working together across functional areas. Success is often contingent upon ensuring proper communication and alignment with stakeholders, as well as core business objectives, and ensuring effective integration and alignment with the core business of the organization.

Understanding the overall organizational vision, and taking a bigger picture view of EH&S within the context of this larger vision, provides a framework around which EH&S leaders can think and plan strategically to ensure the success of their organizations achieve a competitive advantage.

Article continues on page 6

2015 Air Reporting Season

As the first quarter of 2015 begins, it is a good time to start thinking about this year's reporting season. Have you been diligent about tracking your chemical usage for all sources, including processes that do not require permits? Have you been tracking the emissions from these "de minimis" sources or units that were installed under an Environmental Results Program (ERP) or permit by construction? When reporting emissions on air source registration, all emission sources need to be reported unless they meet 310 CMR 7.0 Appendix C exemptions. If you have not been tracking the usage or emissions from these units, now is a good time to start gathering that information in preparation for this year. Some things you can start gathering are:

1. A listing of any new equipment added since last reporting season along with installation date
2. Fuel Usage records from supplier
3. Chemical Usage records
4. Hours of Operation
5. Updated Emissions tracking spreadsheets

If your facility also reports Greenhouse Gas (GHG) emissions to the MassDEP or the USEPA, it is a good time to start reviewing any changes to your existing emissions inventory. This inventory may include:

1. Stationary Combustion Units (Boilers, Generators, Space Heaters etc.)
2. Fugitive Emissions from Refrigeration Units (Chillers, HVAC, Water coolers etc.)
3. Mobile Emissions (Cars, Trucks, Forklifts etc.)
4. Process Gas Emissions (PFCs, HFCs, CO₂, N₂O, CH₄, SF₆)

Any units or sources that may have been added, removed or changed in 2014 must be documented and updated on your reports. In addition to the information you may already be gathering for your Source Registration, you can also start gathering:

1. Maintenance record for refrigeration units
2. Mileage, and Fuel Use Records for any mobile sources
3. Process Gas Usage amounts

For more information or for assistance with your Air Source Registration, please contact Lynn Sheridan at 508.970.0033 ext. 122 or lsheridan@capaccio.com.

Sustainability Tracking and Reporting

Industry faces numerous regulatory and voluntary reporting requirements associated with corporate responsibility and sustainability. A successful sustainability program is directly related to a company's ability to track and report a wide range of metrics accurately and consistently. Whether sustainability reporting is driven by ever-changing product content regulation, stakeholders, or customers, the common phrase, "What's measureable is manageable" is becoming increasingly important. Developing and managing a comprehensive and streamlined sustainability program that can effectively consolidate the relevant metrics can be a challenge without the proper utilization of data management practices and tools.

The following questions are critical to establishing a strong sustainability program:

- What does a successful sustainability program include,
- How do measurable metrics contribute to a sustainability program and,
- How can a unified data management system or application simplify data collection, management and reporting?

A successful sustainability program has its roots in data management. Many companies utilize e-mail, Microsoft Excel, and Microsoft Access for data acquisition and reporting. While these are powerful tools, they can cause many risks if not properly controlled and documented. Due to the increasing availability of web-based database solutions in the form of custom applications or software suites, many of these risks can be reduced if not abated all together.

When managing a program across multiple facilities, the ability to have each site enter their data into a single repository reduces the level of effort required collecting it at the corporate level. Also, by having all of the information stored in a single location, normalization, standardization and validation can all be performed simultaneously as data is entered. The result is the capability for real-time data reporting or dashboarding. By utilizing readily available technology, all of your sustainability metrics can be available in a dashboard that can be utilized for internal and external metrics reporting. While developing or deploying a sustainability dashboard system can seem challenging, the benefits in the long run will simplify the overall management of your sustainability program.

CAPACCIO continually seeks opportunities to use technology to assist our clients in addressing data management obstacles. We have developed several customized solutions in a variety of formats and are looking ahead to cloud-based offerings that will provide clients with greater accessibility to critical data.

To speak to someone about your data management needs or to hear about CAPACCIO's solution offerings, please contact John Baycroft at 508.970.0033 ext. 144 or jbaycroft@capaccio.com.



OSHA COMPLIANCE SPOTLIGHT



2015 Occupational Safety and Health Administration News

OSHA 300 Summary Log Posting Requirements

OSHA's Injury and Illness recordkeeping requirements require posting of the OSHA 300 Summary Log for calendar year (CY) 2014 from February 1, 2015 through April 30, 2015. Companies must maintain OSHA 300 records for a minimum of five years.

New OSHA Injury/Illness Reporting Requirements

Previously, employers had to report the following work-related incidents to OSHA within 8 hours:

- o All work-related fatalities
- o Work-related hospitalizations of three or more employees

Starting on January 1, 2015, employers will have to report additional injuries to OSHA:

- o All work-related fatalities
- o All work-related inpatient hospitalizations of one or more employees
- o All work-related amputations
- o All work-related losses of an eye

Fatalities must be reported to OSHA within 8 hours and the other injuries listed must be reported within 24 hours.

How to report an incident:

- o Call 1-800-321-OSHA (6742) or
- o Call your nearest OSHA area office, during normal business hours (www.osha.gov/html/RAmap.html) or
- o Report online (www.osha.gov/report_online)

Major Change to Mass. DPS Hoisting Regulations

As of November 14, 2014, companies operating industrial lift trucks and forklifts on private property are now exempt from complying with the requirements to obtain Massachusetts Hoisting Licenses for forklift operators (520 CMR 6.06) and for implementing an "In-Service Training Program" (520 CMR 6.07), as long as the general public does not have access to the company property. The DPS

made this ruling in light of the fact that the current OSHA standard governing the use powered industrial trucks (29 CFR 1910.178) already requires the training of forklift operators and therefore preempts any state requirements.

- The exemption only applies to the operation of industrial lift trucks and forklifts on private property. Companies operating other types of hoisting equipment on their property, such as cranes and hoists, are still required to comply with the licensing and training requirements of the regulation.

- 520 CMR 6.00 requires that all operators of hoisting machinery in Massachusetts complete an application and pass a test to obtain a license from the Massachusetts Department of Public Safety (DPS). 520 CMR 6.00 is applicable to all hoisting machinery, excluding forklifts, used on private or public property where the height of the lift exceeds 10 feet or the weight of the load exceeds 500 pounds. The regulation includes an exemption from the requirement to license all operators if the company has a training program approved by the DPS and complies with the following requirements:

- o A supervisory employee(s) who holds a hoisting license for the equipment being used must be on-site at all times during operation
- o The company training program must be approved by the DPS biennially
- o Authorized operators must be issued a company license that includes a picture of the employee, a list of hoisting machinery the employee is qualified to operate, and the name and signature of the supervisor who holds a license to operate that equipment. Employees can only be trained and certified to operate the specific equipment for which the supervisory employee holds a license issued by the DPS.

The application form for approval of an in-service training program can be found at: <http://www.mass.gov/eopss/docs/dps/engineering/appl-eng/form-approval-in-service-training-program-.pdf>.

For more information, please contact Bob King at 508.970.0033 ext. 113 or bking@capaccio.com.

Changes to MassDEP Sewer Regulations

In April of 2014, the MassDEP amended its regulations for sewer system permitting (314 CMR 7) and the operation and maintenance regulations for wastewater treatment plants (314 CMR 12). Following are several changes to these two regulatory programs that industrial dischargers should be aware of.

Sewer System Permit Program (314 CMR 7)

Activities Requiring a Permit. The revised regulations have exempted almost all industrial discharges from requiring a permit. The one exception is that discharges from an industrial user with a Standard Industrial Classification (SIC) Code listed in 314 CMR 7.17 of greater than 25,000 gallons per day (gpd) to a publically owned treatment works (POTW) that does not have an approved industrial pretreatment program (Non-IPP) from the EPA, must receive a sewer use permit from the MassDEP (hereinafter referred to as a Non-IPP-POTW). Please note that the list of SIC Codes remains unchanged with these revisions and covers most manufacturing activities.

Activities Not Requiring a Permit. The revised sewer system regulations defines who is NOT required to obtain a permit and lists eight situations that do not require a permit (see 314 CMR 7.05(1)(a) through (h)).

There are three circumstances specific to industrial discharges that are not required to obtain a permit which include;

1. any industrial discharger with a permit to discharge issued by the IPP-POTW (i.e., has an EPA-approved industrial pretreatment program)
2. any industrial discharges less than 25,000 gallons per day to a Non-IPP POTW (i.e., does NOT have an EPA-approved industrial pretreatment program)
3. any industrial discharger with a permit issued prior to April 25, 2014 that discharges greater than 25,000 gpd to a Non-IPP-POTW does not have to renew its permit

While section 314 CMR 7.05 of the revised sewer system regulations continues to address “Activities Not Requiring A Permit”, the revisions significantly reduce the confusion the former regulations posed by completely removing section 314 CMR 7.05(2)(g) and the language related to fully automated industrial pretreatment systems (FAIWPS), elementary neutralization exemptions, grading requirements, batch systems, operator coverage, operation and maintenance requirements, and other requirements focused on industrial systems. Of particular note, the requirements for industrial wastewater pretreatment

system design, reporting, O&M, and decommissioning, formerly found in 314 CMR 7.05(2)g, have been relocated to the revised Operations, Maintenance and Pretreatment Standards, under section 314 CMR 12.11, entitled Requirements for Industrial Wastewater Pretreatment Systems (see article below).

Operations, Maintenance and Pretreatment Standards (314 CMR 12)

Wastewater Bypasses and/or Overflows. The MassDEP has modified the notification requirements for anticipated and unanticipated bypasses and overflows under section 314 CMR 12.03, entitled the Operations of Treatment Works. In particular, permission must be requested at least 10 days prior to any anticipated bypass or overflow (314 CMR 12.03(a)) and the MassDEP must be notified by the sewer system owner within 24-hours of becoming aware of an overflow or bypass (314 CMR 12.03(b)). Within five days of either event, the owner must submit information to the MassDEP regarding the event, its impact, and steps taken to prevent the event from occurring in the future (314 CMR 12.03(c)). A requirement remains in the revised regulation that the MassDEP may require bypass pipes to contain a seal that will be broken when the valve is opened.

Inflow and Infiltration. The revised regulations include a new section requiring sewer system authorities to develop a plan to control inflow and infiltration (I/I) in accordance with the MassDEP’s guidance by December 31, 2017 (314 CMR 12.04(2)). While this may not be directly related to industrial dischargers, it does mean that sewer authorities are going to be conducting more flow and camera studies in the future which may identify unpermitted connections or discharges from industrial activities that could be causing premature pipeline deterioration.

Requirements for Industrial Wastewater Pretreatment Systems (IWPS). Requirements for IWPSs formerly found in the sewer connection regulations (314 CMR 7.05(2)g) such as IWPS design, reporting, O&M, and decommissioning, , have been relocated to the Operations, Maintenance and Pretreatment Standards under section 314 CMR 12.11, entitled Requirements for Industrial Wastewater Pretreatment Systems. The major aspects of these requirements for IWPSs remain unchanged, however the revised regulations can be somewhat confusing regarding the requirements for the preparation of an O&M manuals because now there are two sections that discuss the requirements for O&M manuals (314 CMR 12.04(1) and 12.11(2)).

The first section, Maintenance of Treatment Works and Sewer Systems (314 CMR 12.04(1)), requires operators of

Sewer Permitting Article Continued...

sewer systems and treatment works to prepare an O&M manual containing 14 prescribed sections. While this section appears to be intended for POTWs, the definitions for “sewer system” and “treatment works” provided in the regulation do not specifically identify POTWs or systems for sanitary sewage collection.

The second section, Operation and Maintenance Manual Requirements for IWPS (314 CMR12.11(2)), which, as mentioned above, has been relocated from the sewer connection regulation removes the confusion because it specifically states that the requirements are directed toward industrial wastewater pretreatment systems (IWPS).

For more information, please contact Wayne Bates at 508.970.0033 ext. 121 or wbates@capaccio.com.

Graded Industrial Wastewater Treatment Systems and Staffing Plans

When operating an industrial wastewater pretreatment system (IWPS) there are many administrative regulatory requirements that are often overlooked. Ensuring that your facility documentation is up-to-date now will save you time and stress should MassDEP make a surprise visit.

Below is a link to the MassDEP’s list of graded industrial wastewater systems:

<http://www.mass.gov/eea/agencies/massdep/water/approvals/graded-wastewater-treatment-plants-by-town.html>.

If your facility is not on this list, the MassDEP has not received a grading report for your system. It is also a good idea to check to see if older facilities, like those that are no longer in operation, are still on this list. That indicates that MassDEP never received notification that the plant was closing or had moved.

Once your system is graded, MassDEP will request that a staffing plan be submitted to verify that your system is properly and adequately staffed. These staffing plans should be updated as personnel changes or, at a minimum, every two years.

In addition, facilities operating an IWPS are required to have an accurate and up-to-date Operation and Maintenance(O&M) Manual in accordance with 314 CMR 12.04(1) and 12.11(2). Treatment system vendors often provide an O&M manual containing operational procedures and equipment cut sheets but these documents rarely meet the requirements set forth by MassDEP. Also, in April 2014 there were changes to the O&M regulations and additional requirements were added. If your O&M manual was created prior to April 2014 it should be reviewed and updated to ensure these new requirements are met.

Furthermore, an often overlooked MassDEP requirement is that the IWPS plans must be reviewed and stamped by a Massachusetts Registered Professional Engineer (PE). Off-the-shelf treatment systems often come with schematics or process and instrumentation diagrams that are generic in nature and are not typically reviewed and stamped by a PE.

These are some of the important administrative tasks that should be kept up-to-date and are commonly cited when MassDEP conducts an inspection. Should you need any clarification on these regulations, recent changes, or proper documentation, please contact Wayne Bates at 508.970.0033 ext. 121 or wbates@capaccio.com

2015 Mass. Comprehensive Fire Code Changes

The new Massachusetts Comprehensive Fire Safety Code (527 CMR 1.00) took effect on January 1, 2015. The new code adopts, in large part, the National Fire Prevention Association’s (NFPA) Model Fire Code (NFPA-1- 2012 Edition), with Massachusetts amendments.

The Massachusetts Department of Fire Services (DFS) website is where you can get a copy of the amendments and a crosswalk document to help you with the transition. The DFS website is: <http://www.mass.gov/eopss/agencies/dfs/dfs2/osfm/fire-prev/comprehensive-model-fire-code.html>.

This link also provides contact information for the DFS regarding this matter.

You can get a copy of NFPA 1 2012 edition from NFPA at: <http://www.nfpa.org/codes-and-standards/document-information-pages?mode=code&code=1&tab=editions>.

New Underground Storage Tank Regulations

On January 2, 2015, MassDEP adopted a new Underground Storage Tank Regulation (“UST”, 310 CMR 80.00) that addresses design/construction/installation, registration, operation, maintenance, and inspection of UST systems used to store petroleum fuels and hazardous substances.

See <http://www.mass.gov/eea/docs/dep/toxics/ust/ustf-reg.pdf>.

A fact sheet can found at <http://www.mass.gov/eea/docs/dep/toxics/ust/ust-fs15.pdf>.

All USTs must be inspected every three years by a Third Party Inspector and the reports submitted to MassDEP.

For more information on the Mass. Fire Code or the new UST regulations, please contact Chris Walton, PE, BCEE, at 508.970.0022 ext. 139 or cwalton@capaccio.com.

2014 MCP Regulatory Reform Program

Beginning in April 2014, the MassDEP completed and published revisions to the Massachusetts Contingency Plan (MCP) under its MCP Regulatory Reform Program. These revisions were made to reflect advances in toxicology data and challenges that the business world has faced with regards to assessment and remediation of sites with historic fill material, non-aqueous-phase liquid (NAPL) and vapor intrusion issues.

Several of these revisions are critical in the identification of conditions that are reportable to the MassDEP under the MCP. These include the following:

1. More clarification for locations with historic fill
2. Releases of propane are exempt if managed according to Mass DFS gas leak Emergency and Reporting procedure
3. Revisions in Reportable Concentrations – although there are many more, the following is a list of those compounds that commonly cause a reportable condition where the reportable concentrations have been reduced:
 - Groundwater (GW-2) Reportable Concentrations decreased based on the potential for indoor air impact
 - Benzene decreased from 2 ppm to 1 ppm
 - Naphthalene decreased from 1 ppm to 0.7 ppm
 - C₉-C₁₀ aromatic hydrocarbons decreased from 7 ppm to 4 ppm
 - TCE decreased from 0.03 ppm to 0.005 ppm
 - Xylenes decreased from 9 ppm to 3 ppm
 - RCS-1 Soil for residential properties or properties within 500 feet of a residential property, day care, etc.
 - Lead decreased from 300 ppm to 200 ppm
 - PCBs decreased from 2 ppm to 1 ppm
 - Xylenes decreased from 300 ppm to 100 ppm

- Zinc decreased from 2,500 ppm to 1,000 ppm
 - RCS-2 Soil (all other sites not RCS-1)
 - Naphthalene decreased from 40 ppm to 20 ppm
 - TCE decreased from 2 ppm to 0.3 ppm
 - Xylenes decreased from 300 ppm to 100 ppm
4. NAPL Thickness
 - 1/8 inch = 72-hr reportable condition when within 30 feet of a school, daycare, child care center or residence
 - 0.5 inch = 72-hr reportable condition when greater than 30 feet from a school, daycare, child care center or residence
 - 1/8 inch = 120-day reportable condition

If a site is already being assessed and remediated under the MCP, the primary revisions that may affect the project include:

- The inclusion of greener cleanup Response Action Performance Standards
- Class A, B, C Response Action Outcomes (RAO) are now just called Permanent or Temporary Solution with or without Conditions
- MCP Reporting Timelines have been adjusted as follows:
 - Phase II – Is now due 3 years after Tier Classification, rather than 2 years
 - Phase III – Is now due 4 years after Tier Classification, rather than 2 years
 - Tier Permit Extensions (required if a Permanent Solution is not completed within 5 years) are now valid for 2 years rather than 1 year

To recap, the information above is a snapshot of revisions to the MCP that may impact a site.

To discuss how the 2014 MCP Regulatory Reform Program may apply to a site-specific issue in 2015, please contact Dawn Horter, PG, LSP, at 508.970.0033 ext. 118 or dhorter@capaccio.com.

President's message from page 1 -

In addition to facilitating development and implementation of EHS management systems, at CAPACCIO, we take pride in helping EH&S professionals identify and implement opportunities to transform their organizations to achieve exceptional results. This newsletter has several articles to keep you up-to-date on the latest regulatory developments, as well as information on opportunities

to facilitate achieving EH&S objectives. We would love to talk to you about some exciting developments that can truly transform your EH&S organization to reach new heights of performance, including new technology applications for gathering, managing, and analyzing data in real-time to quickly and accurately address stakeholders and allow greater focus on achieving goals.

As the snow continues to fall, I am grateful for the effective leaders that

are working to keep my lights on, my computer running, and my home warm. As I reflect on how to be the most effective leader I can, my thoughts turn to the famous business writer Peter Drucker who said, "The best way to predict the future is to create it". Why wait? Now's the time to create...

Happy New Year!

Lisa Wilk, P.E., President

CAPACCIO's 2015 Compliance Calendar

Visit <http://www.capaccio.com> for accompanying information on these regulatory deadline dates as well as valuable facts, links to required forms, an outlook version, and much more.

January 2015						
Su	Mo	Tu	We	Th	Fr	Sa
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

- 1 - New Year's Day
- 19 - Martin Luther King Day

February 2015						
Su	Mo	Tu	We	Th	Fr	Sa
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28

- 1 - OSHA 300 Summary Log Posting (Start Date)
- 16 - President's Day
- 27 - Practice Greenhealth Award Applications Due

March 2015						
Su	Mo	Tu	We	Th	Fr	Sa
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

- 1 - Federal EPCRA 312 Tier II Report
- 1 - Mass. Recycling Permit Annual Report
- 15 - Mass. Restricted Emissions Status Report
- 31 - EPA Mandatory Greenhouse Gas (GHG) Reporting

April 2015						
Su	Mo	Tu	We	Th	Fr	Sa
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30		

- 4 - Passover
- 5 - Easter
- 15 - Mass. Mandatory GHG Reporting
- 15 - Mass. Air Source Registrations and Emissions Statements (annual filers, operating permit facilities)
- 30 - Flammable Storage License Registrations

May 2015						
Su	Mo	Tu	We	Th	Fr	Sa
					1	2
3	4	5	6	7	8	9
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17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

- 10 - Mother's Day
- 15 - Mass. Air Source Registrations and Emissions Statements (annual filers, non-operating permit facilities)
- 25 - Memorial Day
- 29 - CDP - Climate Change Reporting
- 31 - Conflict Minerals Reporting

June 2015						
Su	Mo	Tu	We	Th	Fr	Sa
	1	2	3	4	5	6
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14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30				

- 1 - Mass. Air Source Registrations and Emissions Statements (triennial filers)
- 21 - EPA Risk Management Plans
- 21 - Father's Day
- 30 - CDP - Water Reporting

July 2015						
Su	Mo	Tu	We	Th	Fr	Sa
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

- 1 - Mass. TURA Form S Report
- 1 - Federal EPCRA Form R Report
- 4 - 4th of July
- 1 - US DOT Hazardous Materials Registrations
- 15 - Mass. Air Source Registrations (triennial filer)
- 31 - CDP - Supply Chain Reporting

August 2015						
Su	Mo	Tu	We	Th	Fr	Sa
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9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31					

- 3 - ISO 14001:2015 Registration (expected August to late 2015)

September 2015						
Su	Mo	Tu	We	Th	Fr	Sa
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30			

- 1 - TURA Reporting Fee and Worksheet
- 7 - Labor Day
- 15 - Mass. Environmental Results Program Certification
- 29 - Federal NPDES Stormwater Multi-Sector General Permit Site Inspection

October 2015						
Su	Mo	Tu	We	Th	Fr	Sa
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
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November 2015						
Su	Mo	Tu	We	Th	Fr	Sa
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29	30					

- 26 - Thanksgiving

December 2015						
Su	Mo	Tu	We	Th	Fr	Sa
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13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

- 6 - Hanukkah Begins
- 25 - Christmas
- 31 - Mass. Annual Rideshare Report
- 31 - Mass. Mandatory GHG Verifications
- 31 - NEIWPCC WWT Operator TCH Requirement

-  = 2015 Compliance Date
-  = 2015 Holiday



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The information in this calendar is based on the most current information available from regulatory agencies at press time and is subject to change.