



SAVOGRAN

Innovation, Integrity, Quality Since 1875

The Savogran Company

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December 9, 2015

Ms. Kathleen Kerigan
Regulatory Ombudsman
MassDEP
One Winter Street
Boston, MA 02108

Re: TURA Regulatory Review

Dear Ms. Kerigan:

I am writing in support of the administration's willingness to conduct a review of the TURA regulations.

Savogran is an employee owned company located in Norwood that manufactures paint removers, cleaning and patching compounds for the hardware, paint and home center retail trade.

Our company has been manufacturing in the Commonwealth since 1875. Our products allow us to offer good paying manufacturing jobs with excellent benefits. The type of semi-skilled jobs long lost in the Massachusetts economy. Our costs are increasing on a multitude of fronts. The Affordable Care Act alone has increased our health care costs by \$65,000.

We are in a very competitive market place. We face stiff price ceilings imposed by global cut-rate retailers in addition to competitors from low cost states such as Texas and Tennessee.

Companies such as ours which are left on the TURA list use the reportable chemicals in a way for which there is no substitute. We essentially pay a fee for merely operating and employing workers here in Massachusetts. A fee that none of our out of state competitors pay.

Since the TURA program's inception our company has contributed \$116,450 in TURA fees and over \$10,000 in associated continuing education fees and planner fees into the program. As I'm sure you would agree this is a considerable sum for a small business.

At its core, the reporting requirements under TURA are a duplication of the Federal EPA TRI reporting requirements. Furthermore, the TURA reports are significantly more time consuming to complete than the TRI reports. Section 3(F) of the 21I TURA statute states "regulations pertaining to reporting pursuant to section ten shall comport with and complement regulations adopted pursuant to section 313 of EPCRA."



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In regards to fees, Section 4(D) of the statute specifically requires the Administrative Council to include a detailed report of expenditures made from the Toxic Use Reduction Fund. The most recent FY14 annual report produced in June 2015 did not include a detailed accounting report.

In closing, we strongly support efforts to streamline the TURA regulations. We urge the administration to push back on any proposed fee increases until the requirements of the statute regarding transparency of expenditures from the fund are fully met.

Sincerely,

THE SAVOGRAN COMPANY



Mark A. Monique

President