Toxics Use Reduction Act / TURA Online Filing Reports due on or before July 1







MassDEP Contacts

- Email questions to Walter.Hope@mass.gov
- eDEP System Help (& username)
 - Help Desk 617-626-1111
 - Passwords & Usernames?
 - ONLY YOU have access to Passwords.
- **TURA Online Filing:**
 - Walter Hope 857-972-5623
 - TURA policy related questions
 - Lynn Cain





Contacts

- Office of Technical Assistance and Technology (OTA)
 - Confidential On-Site Technical Assistance
 - 617-626-1080 or http://www.mass.gov/envir/ota/



- Toxics Use Reduction Institute (TURI)
 - Research and Training
 - 978-934-3275 or http://www.turi.org/



- U.S. Environmental Protection Agency (EPA)
 - http://www.epa.gov/tri/
 - EPA Hotline has been discontinued, email queries only
 - CDX Helpdesk 888-890-1995 [mechanics, authorizations]
 - TRI Data Processing Center 703-227-4199 <u>tridpc@epacdx.nex</u>
 - Questions [reporting questions, thresholds, chemicals, etc] https://ofmpub.epa.gov/apex/guideme_ext/f?p=104:1





Basic Orientation

- What information to have available.
- Overview of the Form Structure
- Overview of the System Navigation
- Forms for TUR Planning Years (even # years only)
- TUR/EMS/RC Planner Certification



Have the following materials on hand before you begin your online filing:

- Online Filing Tips
- Previous year's filing with changes noted
- Form S Instructions and Appendices
- Form R instructions
- Payment Info





Steps in the Online **TURA** Reporting **Process** Each step is a separate screen

- 1) Log In and Access TURA Reporting Forms
 - a) Access DEP web page click on eDEP Online Filing
 - b) Login Get User Name & Password
 - c) Click on <Forms> then <Toxics and Hazards> then Toxics Use Reduction Act (TURA) Reporting
- 2) Pre-form START
- 3) Form S Cover Sheet (Sections 1-2: General Information and FTEs)
- 4) Form S Cover Sheet (Section 3: Chemicals no longer reported)
- 5) Form S Cover Sheet (Section 4/Production Unit Information)





Steps in the Online **TURA** Reporting **Process Each step** is a separate screen

- 6) Form S (Facility-wide use of chemicals, Sections 1-3: chemical use amounts, materials accounting and waste treatment chemicals)
- 7) Form S (Production Unit Use of Chemicals, Section 4 :production unit chemical use
- 8) Form S Section 4:(notes)
- 9) State ONLY Form R/A (Sections 1,4,5,6,7,8)
- 10)Plan Summary Submittal Selection 11)EMS/RC/TUR, TUR/RC Update







Steps in the Online **TURA** Reporting **Process** Each step is a separate screen



- 12)TUR/RC/EMS Plan Certification by Facility Manager
- 13)Fee Worksheet
- 14)Screen Signatures by Facility Manager
- 15) Payment Screens
 - 1) DEP will mail an Invoice, payment is due in 30 days.
- 16)Receipt
- 17)Submittal
- 18)Printing
- 19) Certification by DEP Certified Planner







Steps in the Online **TURA** Reporting **Process** Each step is a separate screen



19) Certification by DEP Certified **Planner**



20) Toxics Use Reduction Act (TURA) **Planner Certification**



21) For DEP Certified Planners ONLY enter in appropriate facility identifiers



22) Select Plan (TURA, EMS, or RC) that you are certifying & enter name, email, **TUR Planner ID#**



23) Sign, email notification to the facility manager for verification. Plan is NOT certified until this step is completed.



24)SUBMIT the certification





Document your calculations & source material





The system is
FORWARD Built,
or NOT built for
going
'backwards'



If a you input information that was not required (enters in 4 chemicals, but only intended to enter 3, deleting chemicals will create "orphans" in the coding behind the scenes.) This will cause issues and may corrupt the file/submission. There is no easy way to correct this on the database 'end'.

Solution: be sure to enter in ONLY chemicals that MUST be entered.



... Deleting, or changing a form that is connected to another can affect the entire submittal.

Warning: JavaScript Window -



You have asked to validate data that was validated previously. If this form contains any related forms (i.e., any child forms), those forms will be invalidated or marked for deletion.

- * If a form is invalidated, you must go back and re-validate it, making any necessary changes to the data.
- * If a form is marked for deletion, you no longer need the form to complete your submittal. eDEP retains it, however, until such time as you do complete the submittal. If you later change your data in such a way that you again need a form that has been marked for deletion, the form will be re-activated with your previous data.

This process ensures the integrity of the data that you are submitting to DEP.

Do you want to validate this form?

Yes

No



Navigating the TURA/eDEP

- 1. The eDEP/TURA system works on any browser
- 2. The eDEP/TURA system uses a Combination of screens and "blocks" to build your submittal



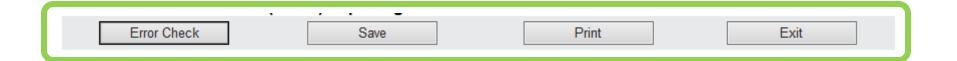


Screens and Blocks

- The TURA report is divided into **screens**: each of the steps listed previously is its own screen
- Screens have required data elements. Some data elements will be arranged in blocks. This is to accommodate companies that need to provide the data on more than one chemical, production unit, treatment process, etc.
 - The first block is always provided. Select "edit" to enter the information, and "update" to save it
 - To add an additional block click the <add> button
 - Blocks may have sub blocks
- When all of the required data for the screen (and all blocks) has been entered, click on "error check and next" to save the data and move to the next screen.
- The next form/screen will be offered once you have corrected all errors



Navigation Buttons Used in eDEP



Error Check: Checks for missing data entry for the entire screen / family of forms

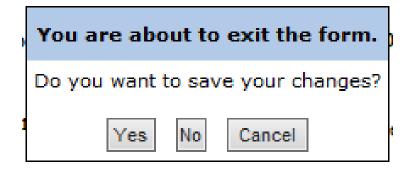
Save: Saves entries to the page you are viewing.

Print: Prints only the page that you are viewing.

Exit: Exits the screen you are on without affecting any prior input – does NOT save any data that has been added/changed.



Navigation Buttons Used in eDEP



Yes will save changes and will affect the relationships to all other screens that follow

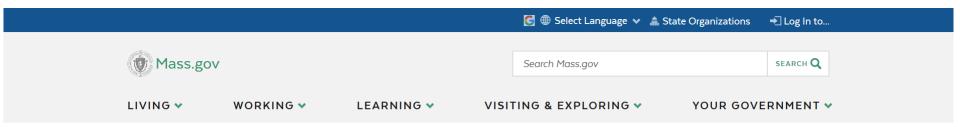
No will NOT save any changes

Cancel will Exit the form and NOT save any changes





https://www.mass.gov/edep-online-filing



Toxics Use Reduction (TUR) Online Reporting

Any company that exceeds specific listed chemical thresholds, has at least ten full-time employees, and has a specific industrial code needs to file a TUR Report annually.

Must be submitted by the July 1 following the calendar year covered by the report.

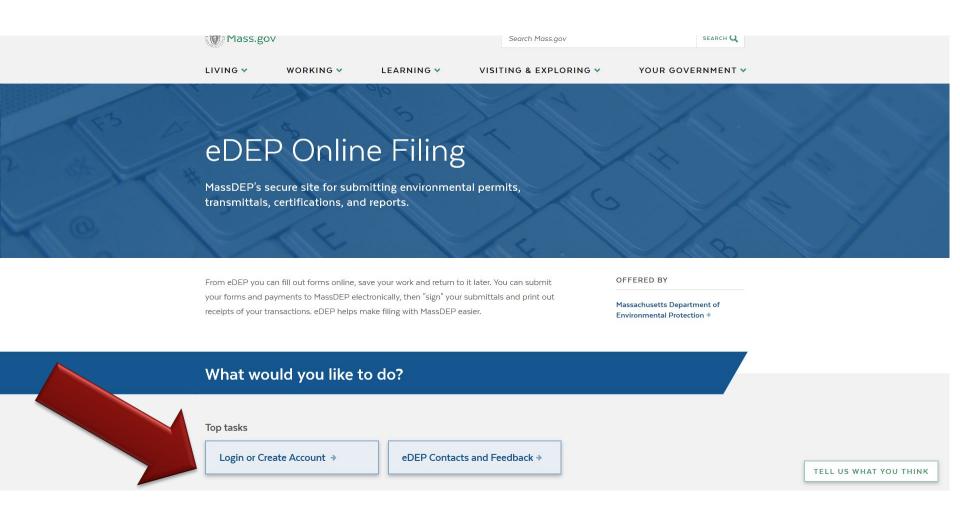
eDEP Online Filing →

TELL US WHAT YOU THINK





https://www.mass.gov/edep-online-filing











MassDEP's Online Filing System

Login or Get Username & Password

Note: eDEP payment feature is unavailable on Internet Explorer browser until further notice. If filing an eDEP Form that requires payment of a fee, please enter the notification using the Google Chrome or Firefox browser. We apologize for the inconvenience and appreciate your patience.

Note: eDEP AQ Source Registration Package is unavailable while we convert to webforms. Facilities that are required to submit a 2016 SR package (due in 2017) will be mailed a SR Reminder Letter when the forms are available for use.

Note: eDEP is unavailable from 8:55 PM Friday through 5:00 AM Saturday for backup purposes and from 8:00 PM Sunday to 8:00 AM Monday for server maintenance.

Welcome to eDEP, a secure site for submitting environmental permits, transmittals, certifications, and reports electronically to the Massachusetts Department of Environmental Protection (DEP). With eDEP, you can fill out your forms online; save your work and return to it later; submit your forms and payments to DEP electronically; "sign" your submittals; and print out receipts of your transactions.

- eDEP Help & Instructions
- What forms can I file in eDEP?
- eDEP Contacts & Feedback

Log into eDEP				
Username: tura13				
Password:				
Login				
Reset Password				
Get Login Help				
New User				
Register and get Username and Password				
Read the eDEP Requirement				
For PC's:				
- Microsoft Windows XP, Vista, Windows 7				
- Browsers: IE 8.0, 9.0, 10.0, 11.0; Firefox 20 and up; Google Chrome 30 and up				

For Mac:

- Adobe Reader 11.0.0



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Log in screen – New user



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Login or Get Username & Password

Note: eDEP is unavailable from 9:00PM Friday through 3:00AM Saturday for backup purposes.

New eDEP Features: Preview

Welcome to eDEP, a secure site for submitting environmental permits, transmittals, certifications, and reports electronically to the Massachusetts Department of Environmental Protection (DEP). With eDEP, you can fill out your forms online; save your work and return to it later; submit your forms and payments to DEP electronically; "sign" your submittals; and print out receipts of vour transactions.

- What is eDEP & other FAQ's?
- What forms can I file in eDEP?
- Instructions for eDEP Forms
- eDEP Contacts & Feedback

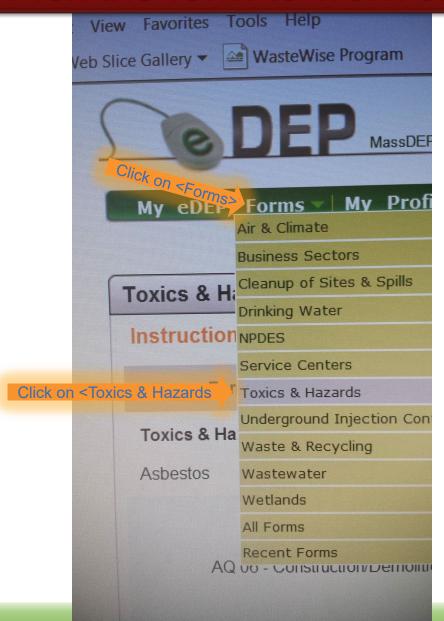
New Facility/User (never filed with eDEP before?)

Log into eDEP Username: Password: Login Forgot your Password? New User egister and get Username and Password Read the eDEP Requirement For PC's:





Pick the form to work on: ...







After picking the forms link...



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Username:ARAZZAK Nickname: AMIR

LOG O

My eDEP Forms ▼ My Profile ▼ Help

Toxics & Hazards

Instructions: Find the form you want to complete below. Then click the button to the far right of the form name in the same row.

Form Name

Description

Instructions

Toxics & Hazards

Asbestos

AQ 04 - Ashestos Removal Notification Form ANF-001

This form is for providing notification 10 working days prior to the removal of any amount of asbestos.

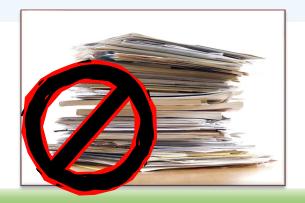
Start Transaction



At the bottom of the list pick the Reporting form



Toxics Use Reduction Act (TURA) Reporting



This form is for facilities that must file a Toxics Use Report.



Start Transaction

filers are often looking for **FORMS**, there is <u>not</u> a list of 'forms', but the Start transaction button begins the process of creating what must be completed.





Do you represent a business? ...(no)



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Username: ARAZZAK Nickname: AMIR

LOG OF

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Do you want to represent a Business for this transaction? Yes No If yes, select the Business you want to represent: Select Business

Instruction:

You have come to this page either because you are an administrator or you are "affiliated" with business(es) which allow you to file in eDEP on their behalf.

Instructions:

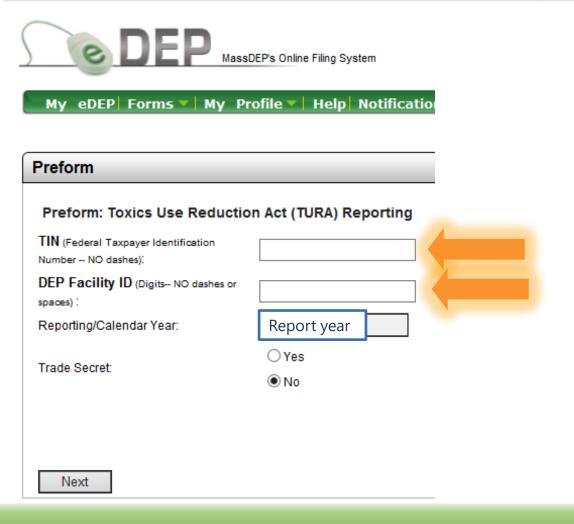
- Indicate if you are representing a business in this transaction.
- If yes, select the business you are representing and then click continue.
- · If no, select no and then click continue.





The PRE FORM Begins:

Enter your facilities TIN (tax ID#) and DEP Facility ID#



-If the **TIN** (or **FIEN**, same #) # is entered incorrectly, OR in DEP's database incorrectly, you will get a error code. The user needs to contact DEP and have the TIN# corrected -If you enter in the wrong **DEP Facility ID**, you will get an error message as well. The **DEP Facility ID# is your DEPF#**, a unique number that has been assigned to your facility. It is NOT your phone, manifest, TRI (form R id), or transporter ID#). -If you enter in the #'in reverse order, you will get an error message.





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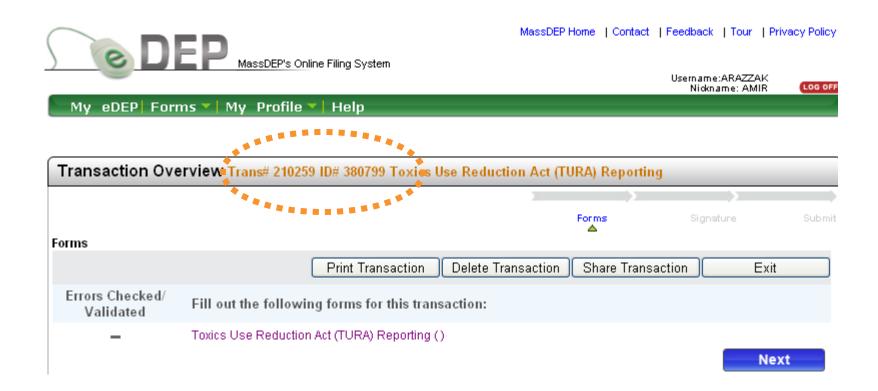
Preform	
Preform: Toxics Use Reduction	on Act (TURA) Reporting
TIN (Federal Taxpayer Identification Number NO dashes):	
DEP Facility ID (Digits NO dashes or spaces):	
Reporting/Calendar Year:	Report year
Trade Secret:	○ Yes • No
Next	

-The TIN# is entered without any 'dashes'

(very few) will still check off the NO box, as you will submit **ONLY Sanitized** information.



The process is linear... ...the process begins





Error Check	Save		Print	Exit
Bureau	chusetts Department of of Air & Waste - Toxion S Cover Sheet	s Use Reduction		Report year Reporting Tear ABNAKI ROCK Facility Name 380799 DEP Facility ID Number
Facility Name and Addres	s:			
a. Name				
1 WINTER ST b. Street Address				
BOSTON	MA			084747
c. City	d. S	tate	e. 2	ZIP Code
f. Are you making a trade secret claim for any information submitted in this COVER SHEET and/or Form S(s)? Yes No If YES, attach a statement substantiating the claim. This copy is: Sanitized Unsanitized h. Are all chemicals included in this Annual Toxics Use report used only to treat waste or control pollution? (if yes, then there are no production units associated with this facility).				
380799799		02125BNKR	CK1WIN	
i. Taxpayer Identification (Federal Employer Identif		j. Toxics I	Release Inventory	(TRI) Identification Number
Section 2: FTE Informa	tion			
	ne employee equivalents" (F ear = 1 FTE) that work at y			

This is calculated as the sum of the total number of paid

If you have fewer than 10 FTEs you do not have to submit

hours(including paid leave) for regular and parttime employees (including drivers, sales, and support staff), the hours spent onsite by contract employees and trades people, and employees from other sites under the same

ownership divided by 2000.

an Annual Toxic Use Report.

Form S Cover Sheet

Error Check & Next







 $\bigcirc 100-499$

OGreater than 500

Document your calculations & source material





Solution: contact DEP





Section 1: General Information				
Facility Name and Address:				
ABNAKI ROCK				
a. Name				
1 WINTER ST				
b. Street Address				
BOSTON	MA	021084747		
c. City	d. State	e. ZIP Code		
 f. Are you making a trade secret claim for any information submitted in this COVER SHEET and/or Form S(s)? ○ Yes No 				
g. If YES, attach a statement substantiating	the claim. This copy is:	○ Sanitized ○ Unsanitized		





Are ALL of your reportable chemicals used ONLY to treat waste or control pollution?





How do we determine what an "FTE" is? - USE EPA's Q&A Document as a guide FTE questions & answers # 21-48

https://ofmpub.epa.gov/apex/guideme ext/f?p=guideme:qa-search

Section 2: FTE Information

a. The number of "full time employee equivalents" (FTEs) (2,000 work hours per year = 1 FTE) that work at your facility.

This is calculated as the sum of the total number of paid hours(including paid leave) for regular and parttime employees (including drivers, sales, and support staff), the hours spent onsite by contract employees and trades people, and employees from other sites under the same ownership divided by 2000.

If you have fewer than 10 FTEs you do not have to submit an Annual Toxic Use Report. 010-49

050-99

0100-499

Greater than 500

Each screen must be Error Checked

Error Check & Next

You *CAN* correct the FTE number if needed (but ALL screens will need to be re-Error Checked that follow).



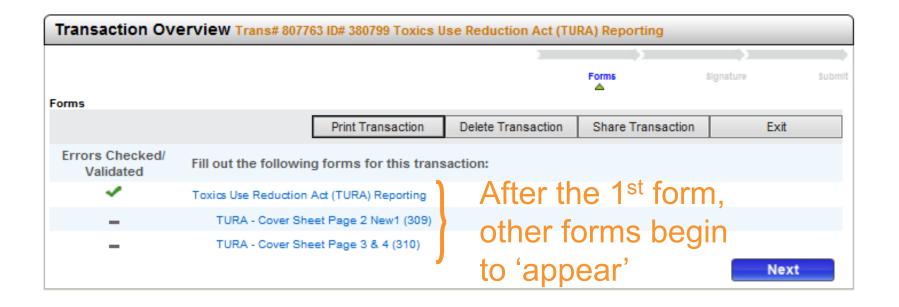




Username: ARAZZAK

LOG OFF

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Error Check Save Print Exit

Section 3 (blank for most)



Massachusetts Department of Environmental Protection Bureau of Air & Waste - Toxics Use Reduction Report

Form S Cover Sheet

Report year		
Reporting Year		
ABNAKI ROCK		
Facility Name		
380799		
DEP Facility ID N	umber	

Section 3: Chemicals Reported in Your Last Report That Are Not Reportable This Year

	TURA chemical, you may identify the substitution. Click Edit to enter info Edit Delete a.2 Oplicable) Chemical Name
a.3 Explanation of why the chemical is not reportable (check codes):	 □ Chemical Below Threshold But > 0 □ No Chemical Use in Reporting Year □ Chemical Substitution □ Chemical Eliminated (No Substitution) □ Decline in Business □ Other (Explain below in the additional comments section) □ Chemical no longer reportable under TURA
CAS # of chemical substituted for TUR Add Chemicals	a.5 Chemical Name

Each screen must be Error Checked

Error Check & Next







Section 3 (blank for most)

- please ONLY enter in chemicals that HAD TO BE REPORTED the prior year, that do NOT have to be reported for this reporting year).
- The chemical name will fill in after Update.

Section 3: Chemicals Reported in Your Last Report That Are Not Reportable This Year	\			
In this section, you may provide information on any chemical reported last year that is not subject to reporting this year. If you substituted a non-listed chemical for a TURA chemical, you may identify the substitution. Check all the codes on to four that apply that apply that apply that apply that apply that apply the codes of the codes				
a.3 Explanation of why the chemical is not reportable (check codes): \[\subseteq \text{Chemical Below Threshold But} > 0 \\ \text{No Chemical Use in Reporting Year} \\ \text{Chemical Substitution} \\ \text{Chemical Eliminated (No Substitution)} \\ \text{Decline in Business} \\ \text{Other (Explain below in the additional comments section)} \\ \text{Chemical no longer reportable under TURA} \]				
CAS # of chemical substituted for TURA chemical Chemical Name Click to Add Chemicals and another unique block	J			

Unique Block

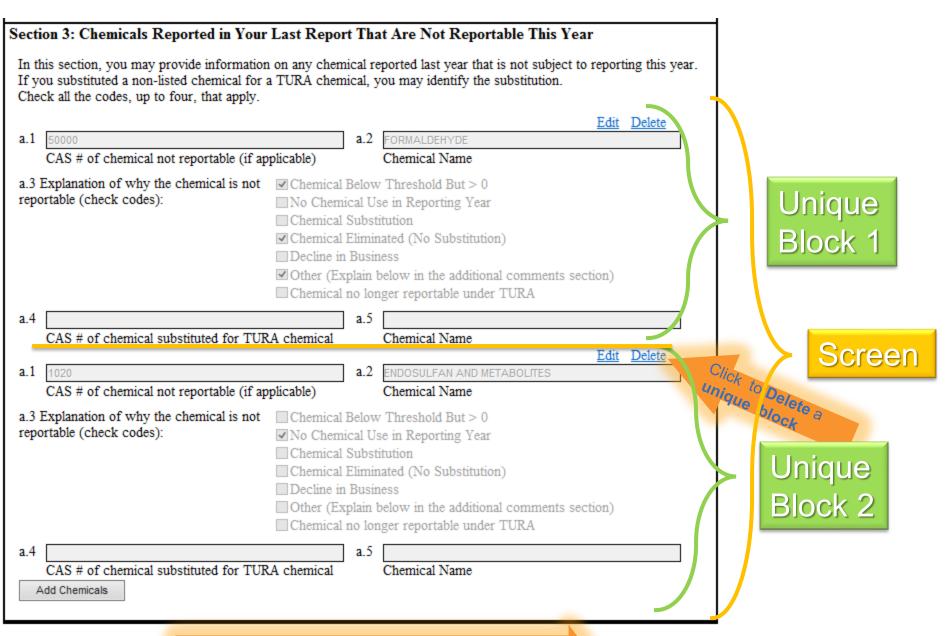
Each screen must be Error Checked

Error Check & Next









Each screen must be Error Checked

Error Check & Next







Document your calculations & source material





Error Check



Massachusetts Department of Environmental Protection Bureau of Air & Waste - Toxics Use Reduction Report

Form S Cover Sheet

_[_					
	Report year						
Į	rooperune rem						
	A DALLA LE DO CITE						
	ABNAKÎ ROCK						
	Facility Name						
	380799						
	DEP Facility ID Number						
- '	Dan Lucini, in Number						

Edit Delete

Section 4: Facility-Wide Description of Production Units

A PRODUCTION UNIT is the combination of the process used to produce a product or service and the product or service being produced. In this section, first time reporters list each of the PRODUCTION UNITS at the facility in which a reported toxic chemical is used. Repeat reporters review and if necessary, update the existing descriptions, indicate whether the production unit was in use during the reporting year, add new production units for new product lines, and if an existing production unit has been substantially changed since the last report, add new production unit with a new unique number.

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TURA Chemical:

Process Code

Process Code

Process Code

Process Code

a. Production Unit #	•			Edit
1				
Is this production un	it IN USE for the reporti	ng year of this submitta	1?	
b. Describe the Proc	ess:			
SPRAYING ADHESIV	E ON CLOTH			
c. Describe the Prod	uet:			
CLOTH PREPARED F	FOR BACKER APPLICATION	N		
Enter up to 4 six-dig first:	it NAICs code that best d	lescribe the Product from	n this Production Unit. Put the p	rimary NAICs code
213113	221330	221121		
d. NAICS Code	e. NAICS Code	f. NAICS Code	g. NAICS Code	
h. Check the approp	riate description for the t	unit of product:		

Enter the CAS # of each reported chemical used in the production unit. List the production process code(s) for each

Process Codes:

Oarea Odollar Ohours Okilowatt Olength ON/A Onumber Ovolume Oweight

Process Code Description

Process Code Description

Process Code Description

Process Code Description

process step that involves a reported chemical as an input, output or throughput. List the TURA-reportable chemicals associated with this production unit

IF the descriptions are incorrect, OR if you have a **NEW** production unit, you will need to create a new production unit.

Screen – can include more than 1 Production Unit – Scroll DOWN to access other already created PU's.







A PRODUCTION UNIT is the combination of the process used to produce a product or service and the product or service being produced. In this section, first time reporters list each of the PRODUCTION UNITS at the facility in which a reported toxic chemical is used. Repeat reporters review and if necessary, update the existing descriptions, indicate whether the production unit was in use during the reporting year, add new production units for new product lines, and if an existing production unit has been substantially changed since the last report, add new production unit with a new unique number. PRODUCTION UNIT DETAILS Edit a. Production Unit# Is this production unit IN USE with chemical(s) over the reporting threshold(s) for the reporting year of this submittal? Yes No b. Describe the Process: SOLDERING OF PRINTED CUSTOM CIRCUIT BOARDS c. Describe the Product: COMPLETED PRINTED CIRCUIT BOARDS Enter up to 4 six-digit NAICs code that best describe the Product from this Production Unit. Put the primary NAICs code 334418 d. NAICS Code f NAICS Code g. NAICS Code h. Check the appropriate description for the unit of product: area Odollar Ohours Okilowatt Olength ON/A Onumber Ovolume Oweight Enter the CAS # of each reported chemical used in the production unit. List the production process code(s) for each process step that involves a reported chemical as an input, output or throughput. List the TURA-reportable chemicals associated with this production unit. TURA Chemical: Edit Delete 7439921 LEAD CAS# Chemical Name Process Codes: HEAT TREATING NOS CC-04 Process Code Description Process Code BB-02 Process Code Description Process Code CASTING/MOLDING CC-01 Process Code Process Code Description AA-01 DIP, FLOW & CURTAIN COATING Process Code Process Code Description ✓ CC-08 SOLDERING/BRAZING Process Code Description Process Code Add Process Codes

Section 4: Facility-Wide Description of Production Units

Production Units will appear on this Screen, each in an individual separately edited & saved unique

All

Click on Edit to enter

data in this unique block

Unique

Block 1





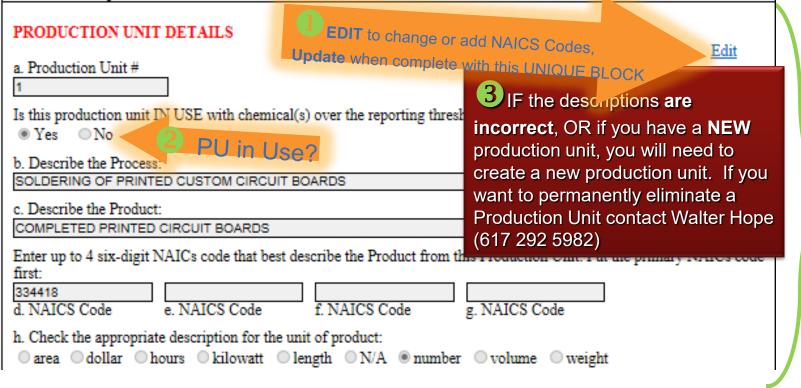
block.

Form S – Section 4 (ALL PU's listed on this SCREEN)

Production Unit in use THIS reporting year with reportable chemical(s) over threshold

Section 4: Facility-Wide Description of Production Units

A PRODUCTION UNIT is the combination of the process used to produce a product or service and the product or service being produced. In this section, first time reporters list each of the PRODUCTION UNITS at the facility in which a reported toxic chemical is used. Repeat reporters review and if necessary, update the existing descriptions, indicate whether the production unit was in use during the reporting year, add new production units for new product lines, and if an existing production unit has been substantially changed since the last report, add new production unit with a new unique number.





Section 4: Toxics Use by Production Unit – ALL Production Units will be listed on this SCREEN (scroll down) Each is a separate BLOCK.

Edit
a. Production Unit #
Is this production unit IN USE with chemical(s) over the reporting threshold(s) for the reporting year of this submittal? • Yes • No
b. Describe the Process:
SOLDERING OF PRINTED CUSTOM CIRCUIT BOARDS
c. Describe the Product:
COMPLETED PRINTED CIRCUIT BOARDS
Enter up to 4 six-digit NAICs code that best describe the Product from this Production Unit. Put the primary NAICs code first:
d. NAICS Code f. NAICS Code g. NAICS Code
h. Check the appropriate de lation for the unit of product:
○ area ○ dollar ○ hours ─ xilowatt ○ length ○ N/A ● number ○ volume ○ weight
i. Enter the CAS # of each reported chemical used in the production unit. List the production process code(s) for each process step that involves a reported chemical as an input, output or throughput.
List the TURA-reportable chemicals associated with this production unit.

PRODUCTION UNIT DETAILS

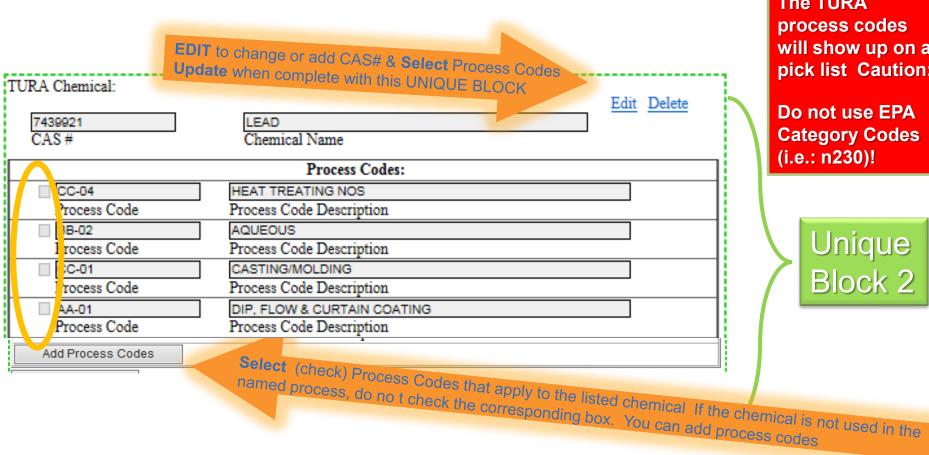
ALL codes can be picked by clicking on "Select"



i. Enter the CAS # of each reported chemical used in the production unit. List the production process code(s) for each process step that involves a reported chemical as an unput.

List the TURA-reportable companies to change or add CAS# & Process Codes Update when complete with this UNIQUE BLOCK Edit Delete Chemical Name CAS# Process Codes: CC-04 HEAT TREATING NOS Process Code Process Code Description BB-02 AQUEOUS Process Code Description Process Code CC-01 CASTING/MOLDING Process Code Process Code Description AA-01 DIP. FLOW & CURTAIN COATING Process Code Process Code Description Add Process Codes Add Chemicals





The TURA process codes will show up on a pick list Caution:

Category Codes





Section 4: Toxics Use by Production Unit – ALL Production Units will be listed on this SCREEN (scroll down) Each is a separate BLOCK.

i. Enter the CAS # of each reported chemical used in the production unit. List the production process code(s) for each process step that involves a reported chemical as an input, output or throughput.

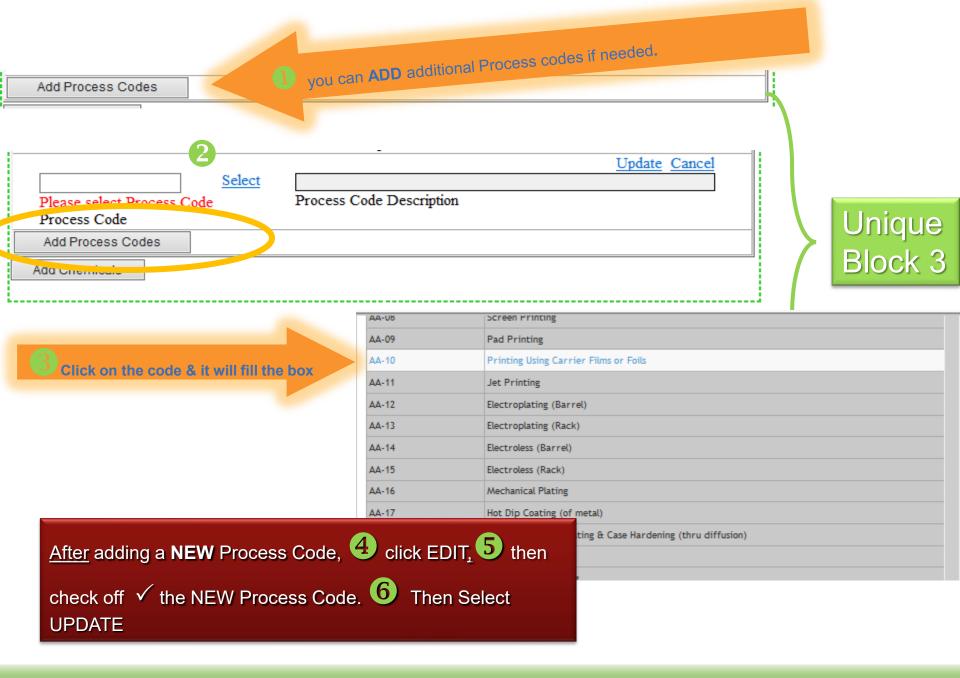
List the TURA-reportable chemicals associated with this production unit.

RA Chemical: 7439921 CAS #	LEAD Chemical Name
	Process Codes:
CC-04	HEAT TREATING NOS
Process Code	Process Code Description
BB-02	AQUEOUS
Process Code	Process Code Description
CC-01	CASTING/MOLDING
Process Code	Process Code Description
AA-01	DIP, FLOW & CURTAIN COATING
Process Code	Process Code Description
✓ CC-08	SOLDERING/BRAZING
Process Code	Process Code Description

ALL codes can be picked by clicking on "Select"









i. Enter the CAS # of each reported chemical used in the production unit. List the production process code(s) for each process step that involves a reported chemical as an input, output or throughput.

List the TURA-reportable chemicals associated with this production unit.

	Edit Dele
CAS#	Chemical Name
	Process Codes:
CC-04	HEAT TREATING NOS
Process Code	Process Code Description
■ BB-02	AQUEOUS
Process Code	Process Code Description
CC-01	CASTING/MOLDING
Process Code	Process Code Description
AA-01	DIP, FLOW & CURTAIN COATING
Process Code	Process Code Description
Add Process Codes	
Add Chemicals	
Clie	
- Incl	k to add another chemical for this production Unit
	another chem:
	offical for this
	ans product





Add Production Unit

Adding a Production Unit - CLICK

PRODUCTION UNIT DETAILS								
PRODUCTION UNIT DETAILS		Update Cancel						
a. Production Unit #		opdate Cancer						
Is this production unit IN USE for	the reporting year of this submittal?							
O Yes O No	the reporting year of this submittan:							
O les O No								
b. Describe the Process:								
c. Describe the Product:								
Enter up to 4 six-digit NATCs code	that best describe the Product from this Production Unit. Put th	e primary NAICs code						
first.	that best describe the freedoct from this freedoction offic. I de th	ic primary ratios code						
d. NAICS Code e. NAICS	Code f. NAICS Code g. NAICS Code							
h. Check the appropriate description	on for the unit of product:							
area Odollar Ohours Okilowatt Olength ON/A Onumber Ovolume Oweight								
i. Enter the CAS # of each reported chemical used in the production unit. List the production process code(s) for each								
process step that involves a reported chemical as an input, output or throughput.								
List the TURA-reportable chemicals associated with this production unit.								
TURA Chemical:								
CAS # Chemical Name								
Process Codes:								
CC-04	HEAT TREATING NOS							
Process Code	Process Code Description							
□ BB-02	AQUEOUS							
Process Code	Process Code Description							
CC-01								
Process Code Process Code Description								
AA-01	DIP, FLOW & CURTAIN COATING							
Process Code	_							
Process Code Process Code Description								
						AA-16	MECHANICAL PLATING	
Process Code	Process Code Description							
When	all complete	į						
	all complete, CLICK							
Add Production Unit	Er Er	ror Check & Next						

Complete ALL fields in the BLOCK, when complete click on UPDATE.

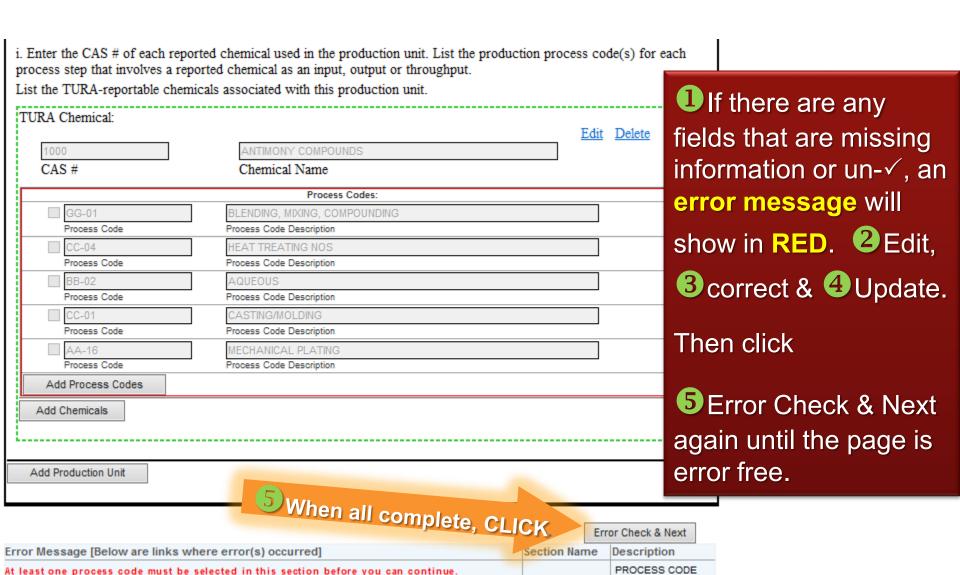
When ALL blocks are completed (all Production Units are entered, all Process Codes checked, all CAS#'s entered for EACH Production Unit, then click on top LEFT or bottom RIGHT:

4 Error Check & Next



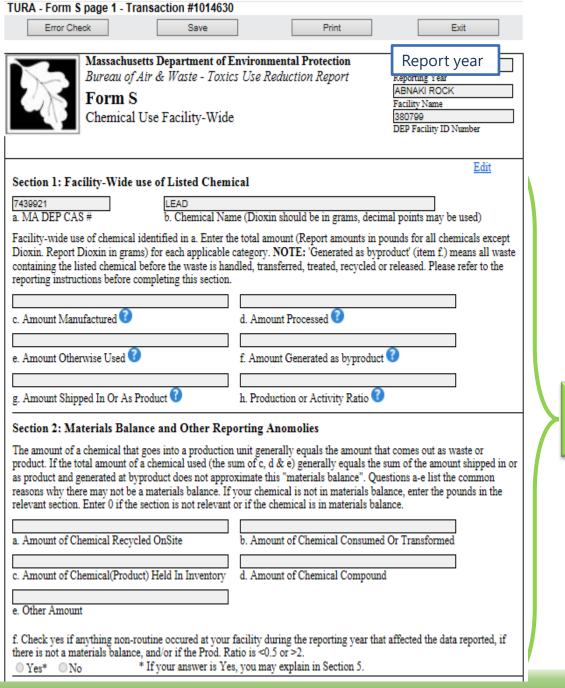












Form S

Screen – can include more than 1 Chemical Scroll access other chemical S.

Unique

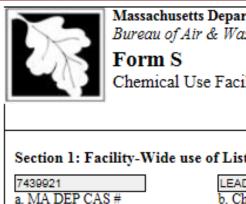
Block 1

ΑII CAS#'s/ Chemicals will appear on this Screen, each in an individual & separately edited & saved unique block.





Enter the pounds of chemicals, enter zero / 0 if applicable. Less than a pound may be reported if PBTs or Dioxin (grams).



Massachusetts Department of Environmental Protection Bureau of Air & Waste - Toxics Use Reduction Report

Chemical Use Facility-Wide

Report year reporting real ABNAKI ROCK Facility Name 380799 DEP Facility ID Number

Update Cancel

ection 1: Facility-Wide us	e of Listed Chemical	
----------------------------	----------------------	--

LEAD

b. Chemical Name (Dioxin should be in grams, decimal points may be used)

Facility-wide use of chemical identified in a. Enter the total amount (Report amounts in pounds for all chemicals except Dioxin. Report Dioxin in grams) for each applicable category. NOTE: 'Generated as byproduct' (item f.) means all waste containing the listed chemical before the waste is handled, transferred, treated, recycled or released. Please refer to the reporting instructions before completing this section.

c. Amount Manufactured 🕜	d. Amount Processed 🕖			
51760	2588			
e. Amount Otherwise Used	f. Amount Generated as byproduct 🕜			
49172	.05			
g. Amount Shipped In Or As Product 🕡	h. Production or Activity Ratio			

-all entry fields **MUST** have a number entered at least a zero.

-this is a common validation problem...

-we do **NOT** expect you to report to the 4th decimal point, **UNLESS** the chemical is Dioxin &/or Dioxin Compounds

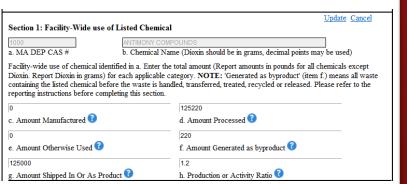
Hover over the to see the definition











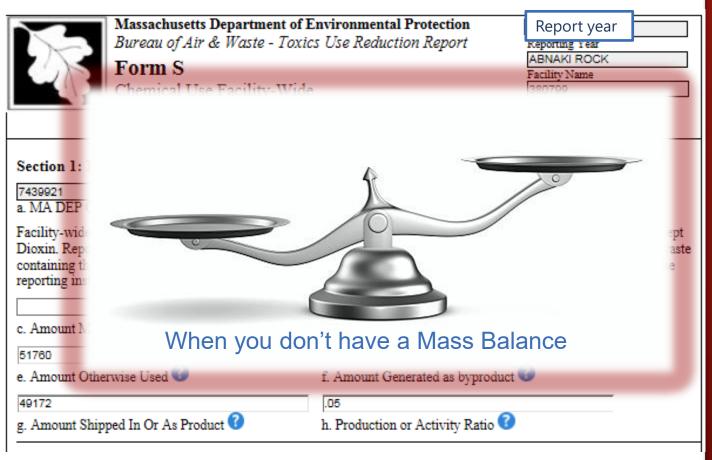
-if you see a Form S for a chemical that you did NOT have to report on, it is because you entered the information into the Form S Cover Sheet Section 3.

-you 'may' be able to exit this form (Form S), and delete the CAS# from the Form S Cover Sheet Section 3, BUT this may corrupt the submittal and you will have to start over

Solution: enter in ONLY the chemicals that MUST be reported and DOUBLE CHECK this information before validating the Form S Cover Sheet, Section 4.







-values such as the word "all", \pm , ∞ , $\sqrt{}$ and others...

Are NOT valid.

Solution: use whole numbers, unless the chemical is a PBT (then you may use .5 of a pound, or if dioxin, you may use grams (system now allows 999.9999 grams to be entered).



Complete additional materials balance information as needed. Enter at least a zero / 0 in each box.

Section 2: Materials Balance and Other Reporting Anomolies

The amount of a chemical that goes into a production unit generally equals the amount that comes out as waste or product. If the total amount of a chemical used (the sum of c, d & e) generally equals the sum of the amount shipped in or as product and generated at byproduct does not approximate this "materials balance". Questions a-e list the common reasons why there may not be a materials balance. If your chemical is not in materials balance, enter the pounds in the relevant section. Enter 0 if the section is not relevant or if the chemical is in materials balance.

a. Amount of Chemical Recycled OnSite

b. Amount of Chemical Consumed Or Transformed

c. Amount of Chemical Held In Inventory

d. Amount of Chemical Compound

c. Other Amount

f. Check yes if anything non-routine occured at your facility during the reporting year that affected the data reported, if there is not a materials balance, and/or if the Prod. Ratio is <0.5 or >2.

○ Yes* No * If your answer is Yes, you may explain in Section 5.

-all entry fields

MUST have a

number entered –

at least a zero.

-this is a common validation problem...





Often mass balance occurs input = outputs but...

If ≠ then please explain checking box 'f' and noting in box 'm'.

Section 2: Materials Balance and Other Reporting Anomolies

The amount of a chemical that goes into a production unit generally equals the amount that comes out as waste or product. If the total amount of a chemical used (the sum of c, d & e) generally equals the sum of the amount shipped in or as product and generated at byproduct does not approximate this "materials balance". Questions a-e list the common reasons why there may not be a materials balance. If your chemical is not in materials balance, enter the pounds in the relevant section. Enter 0 if the section is not relevant or if the chemical is in materials balance.

- a. Amount of Chemical Recycled OnSite

 b. Amount of Chemical Consumed Or Transformed

 c. Amount of Chemical Held In Inventory

 d. Amount of Chemical Compound
- f. Check yes if anything non-routine occured at your facility during the reporting year that affected the data reported, if
- there is not a materials balance, and/or if the Prod. Ratio is <0.5 or >2.

 Yes*

 No

 * If your answer is Yes, you may explain in Section 5.

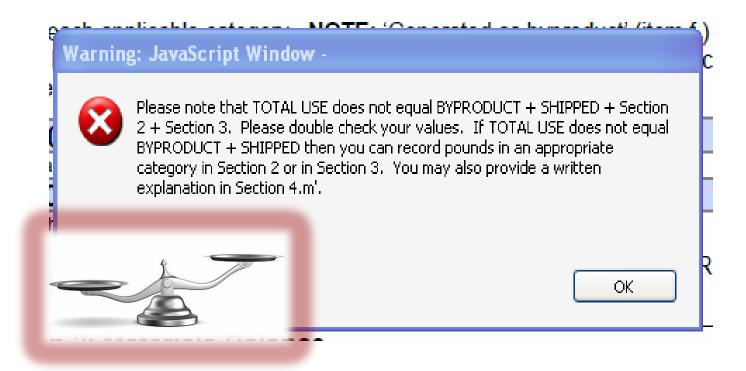






e. Other Amount

If you don't have a mass balance and/or if you have not explained why this message 'may' be presented...



Please check "ok" and explain the lack of a mass balance in box 'm' (separate page).



Was any of the chemical used to treat waste or control pollution?*

Section 3: Chemicals Used in Waste Treatment Units

	a.	Is	this	chemical	used:	to treat	waste (or control	pollution?
--	----	----	------	----------	-------	----------	---------	------------	------------

Yes ONo*

* If your answer is No. skip ahead to Section 4 Toxics Use By Production Unit.

b. Enter the amount of the chemical (in pounds) used to treat waste or control pollution 5000

Pounds

c. Did the use of this chemical for waste treatment or pollution control increase or decrease by 10 percent or more compared with the previous reporting year?

○Yes*

No

* If your answer is Yes, you may explain in Section 5.

* If you indicated (on the first screen) that ALL of the chemicals are used **ONLY** to treat waste, then Section 3.a is fixed at "Yes". In addition, there will be no production units to report.



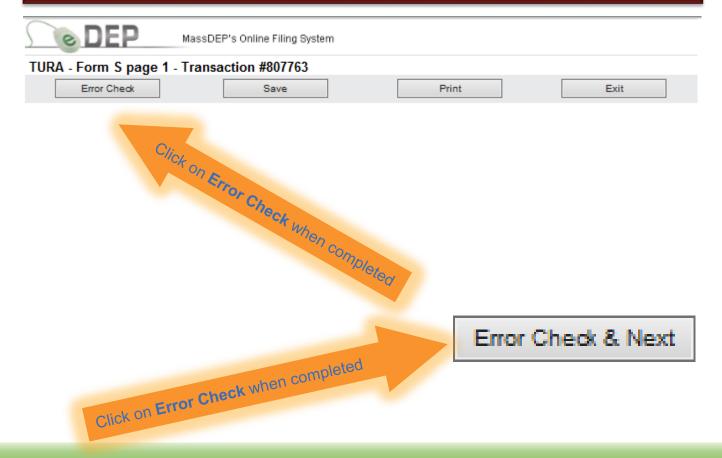


Document your calculations & source material





When ALL Unique Blocks are input and updated, then click on Error Check to check the Screen/Page & Save all data on the page. (located at the top left or bottom right of the screen)







Block								
7439921 LEAD LINIQUE								
a. MA DEP CAS #	b. Chemical N	Vame (District this Unit and points may be used)						
Facility-wide use of chemical	identified in a. F	eport amounts in pounds for all chemicals except						
Dioxin. Report Dioxin in gran	ns) for o	OTE: 'Generated as byproduct' (item f.) means all waste						
containing the listed chemical	Modale	ared, transferred, treated, recycled or released. Please refer to the						
reporting instruction	K Oll Caction	on.						
7439921 a. MA DEP CAS # b. Chemical Name (Discount and points may be used) Facility-wide use of chemical identified in a Foundation of the containing the listed chemical containing the listed chemical containing the listed chemical containing instructions of the containing the listed chemical containing th								
c. Amount Manufactured		d. Amount Processed 🕝						
51760		2588						
e. Amount Otherwise Used 🤇		f. Amount Generated as byproduct 🕡						
49172		.05						
g. Amount Shipped In Or As	Product 🕜	h. Production or Activity Ratio 🔞						
Section 2: Materials Bala	nce and Other R	eporting Anomolies						
		• •						
	-	ion unit generally equals the amount that comes out as waste or						
		e sum of c, d & e) generally equals the sum of the amount shipped in or proximate this "materials balance". Questions a-e list the common						
reasons why there may not be a materials balance. If your chemical is not in materials balance, enter the pounds in the relevant section. Enter 0 if the section is not relevant or if the chemical is in materials balance.								
0								
a. Amount of Chemical Recycled OnSite b. Amount of Chemical Consumed Or Transformed								
00								
0								
e. Other Amount								
f Chack was if anything non-routine occurred at your facility during the reporting year that offerted the data reported, if								
f. Check yes if anything non-routine occured at your facility during the reporting year that affected the data reported, if there is not a materials balance, and/or if the Prod. Ratio is <0.5 or >2.								
there is not a materials balance, and/or if the Prod. Ratio is <0.5 or >2. O Yes* No *If your answer is Yes, you may explain in Section 5.								
O Yes* ● No * If your answer is Yes, you may explain in Section 5.								
Section 3: Chemicals Used in Waste Treatment Units								
a. Is this chemical used to treat waste or control pollution?								
a. Is this chemical used to treat waste or control pollution? O Yes No* * If your answer is No, skip ahead to Section 4 Toxics Use By Production Unit.								
b. Enter the amount of the chemical (in pounds) used to treat waste or control pollution								
o. Enter the amount of the chemical (in pounds) used to deat waste of control politicon								
Pounds								
c. Did the use of this chemical for waste treatment or pollution control increase or decrease by 10 percent or more compared with the previous reporting year?								
○ Yes* ®No	* If your answer is ?	Yes, you may explain in Section 5.						

When this unique Block (CAS#) is complete, click on Update.

Unique Block 1

Error Check & Next

Update Cancel







Massachusetts Department of Environments Bureau of Air & Waste - Toxics Use Reduc Toxics Use Report - Form S Chemical Use By Production Units								
Section 4: Toxics Use by Production Unit I								
Process code(s) where most Type of Change Technic	Note Note Note							
h. Was byproduct generated for this chemical less than 1 percent of OYes* ONo * If your answer is Yes, skip ahead to i. Did the byproduct generated for this chemical in this production u compared with the previous reporting year and/or did you implement OYes ONo* * If your answer is No. skip ahead to	Section 5. Init increase or decrease by 10 percent or more intoxics use reduction? Section 5.							
	Select S							

You may add any comments or explanations regarding chemical use and/or byproduct generated in this production unit, chemical use in waste treatment (from Section 3), and non-routine occurrences at your facility (from Section 2).

Section 5: Description

Maximum 250 characters allowed. Please do not copy and paste.

SECTION 4 FORM S







Section 4: Toxics Use by Pro	duction Unit			Update Cancel
a. Production Unit #	LEAD b. Chemical Name			
c. Quantity of Chemical Use Cod O 1. <= 5,000 lbs. O 2. > 5,000 <= 10,000 lbs. © 3. <= 10,000 <= 100,000 lbs. O 4. > 100,000 <= 500,000 lbs. O 5. >500,000 lbs.	e:			
d. Did the use of this chemical in previous reporting year and/or did	-	_	0 percent or more c	ompared with the
○Yes ®No* *I	f your answer is No, skip	ahead to h. below.		
Process code(s) where most significant changes occured (up to three in descending order)	Type of Change (Enter "I" for Increase, "D" for Decrease)	Technique Code(s) (up to 3 pre proces	s code, enter in orde	er of importance)
AA-12 Select e.1.	D 2.	11 Select 3a.	Select 3b.	Select 3c.
f.1.	2.	Select 3a.	Select 3b.	Select 3c.
g.1.	2.	Select 3a.	Select 3b.	Select 3c.

SECTION 4
FORM S
1st part –
Chemical
Use

Scroll down to find all related Production Units







h. Was byproduct generated for	this chemical less than 1 p	ercent of us	e in this j	production t	init?		
® Yes* ○No *	If your answer is Yes, skip	ahead to S	ection 5.				
i. Did the byproduct generated f compared with the previous rep O Yes •No•	-	implement t	oxics use			ercent or n	iore
Process code(s) where most	Type of Change	Technique	e Code(s))			
significant changes occured	(Enter "I" for Increase,	(up to 3 pr	re proces	s code, ente	r in orde	r of import	ance)
(up to three in descending order) "D" for Decrease)		-				
Select			Select		Select		Select
j.1.	2.	3a.	_	3b.	,	3c.	
Select			Select		Select		Select
k.1.	2.	3a.	-	3b.		3c.	-
Select			Select		Select		Select
1.1.	2.	3a.		3b.	, —	3c.	. —
Section 5: Description							
You may add any comments or chemical use in waste treatment				_		•	
Maximum 250 characters allow	ed. Please do not copy and	paste.					
see TUR Plan for progress							^

SECTION 4 FORM S 2nd part – **Byproduct**

Scroll down to find all related **Production Units**







Document your calculations & source material





A State R/A form will appear only if the chemical is "state only" (or unique to the state), and/or if the NAICS code is "state only" code.

	Forms				
		Print Transaction Delete Tr			
	Errors Checked/ Validated	Fill out the following forms for this transaction:			
	✓	Toxics Use Reduction Act (TURA) Reporting ()			
	TURA - Cover Sheet Page 2 New1 (3)				
	✓	TURA - Cover Sheet Page 3 & 4 (1) TURA - Cover Sheet Page 3 & 4 (8)			
	✓				
	✓	TURA - Form S Page 1 (107153)			
	TURA - Form S Page 2 (107153)				
Sta	ate only chem/n	aics TURA - FORMR/FORMA Page 1 & 2 (107153)			
	-	TURA - Form S Page 1 (1310732)			
	-	TURA - Form S Fee Worksheet (2008)			





When eDEP provides a State Only Form R/A, complete the data entry.

Please note that DEP does not accept the US EPA chemical category identifiers ('N###'); please refer to Appendix B of DEP's Toxics Use Reporting Forms and Instructions for the appropriate Massachusetts reporting number for chemical categories).

There are two filing forms: Form R and an abbreviated Form A. Companies must use the Form R if

- 1. Their Total chemical use is greater than 1 million pounds. OR
- 2. They generate more than 500 pounds of TURA Byproduct: (Sum of the amount released on site, treated on-site, recycled on-site, used for energy recovery on-site, or transferred offsite for treatment, recycling, recovery, disposal or release.) OR
- 3. The chemical is a PBT.

The Form A may ONLY be used if the company uses less than a million pounds of the chemical AND generates less than 500 pounds of TURA byproduct, and the chemical is not a PBT.









Massachusetts Department of Environmental Protection Bureau of Air & Waste - Toxics Use Reduction Report

State Only Form R/Form A

Report year Reporting Year ABNAKI ROCK Facility Name 380799 DEP Facility ID Number

State Form

A State Form

R/A will appear

automatically IF

your facility is a

State ONLY filer

(per NAICS

code, or if you

are reporting

State ONLY

State ONLY

Chemicals).

The NAICS

Codes have

been updated.

variants of

Federal

chemicals (or

This form is for chemicals or facilities that are not reportable under the US EPA Toxics Release Inventory program wh

- Companies in NAICs codes covered by TURA but not covered by TRI. See the TURA Reporting Appendix at http://www.mass.gov/eea/agencies/massdep/toxics/approvals/tura-online-reporting.html
- Chemicals listed under TURA but on the Federal TRI list including CERCLA chemicals, TRI chemicals with a different definition on the CERCLA list than on the TRI list and all TURA High Hazard Chemicals because they have a lower reporting threshold. See the TURA Chemical List at http://www.mass.gov/eea/agencies/massdep/toxics/approvals/turaonline-reporting.html.

This form contains a portion of the fields used in the US EPA Form R and Form A. Please refer to US EPA's Toxic Chemical Release Inventory Reporting Form and Instructions at http://www.epa.gov/toxics-release-inventory-tri-program/trireporting-forms-and-instructions

Chemical-Specific Information

Section 1 Toxic Chemical Identity

1310732

ODIUM HYDROXIDE

1.1 CAS Number

1.2 Toxic Chemical or Chemical Category Name

Please note that DEP does not accept the US EPA chemical category identifiers ('N###'); please refer to Appendix B of DEP's Toxics Use Reporting Forms and Instructions for the appropriate Massachusetts reporting number for chemical categories).

There are two filing forms: Form R and an abbreviated Form A. Companies must use the Form R if

- Their Total chemical use is greater than 1 million pounds. OR
- 2. They generate more than 500 pounds of TURA Byproduct: (Sum of the amount released on site, treated on-site, recycled on-site, used for energy recovery on-site, or transferred offsite for treatment, recycling, recovery, disposal or release.) OR
- The chemical is a PBT.

The Form A may ONLY be used if the company uses less than a million pounds of the chemical AND generates less than 500 pounds of TURA byproduct, and the chemical is not a PBT.

Are you filing a Form R?

(if yes, continue to Section 4 (note: Section 2 and 3 are not required for State Only reporting) if no, fill out only the State Only Form A).

Section 4

Enter the maximum amount of the toxic chemical on-site at any time during the calerdar year

Select

4.1 Two-Digit Code From TRI Instruction Package







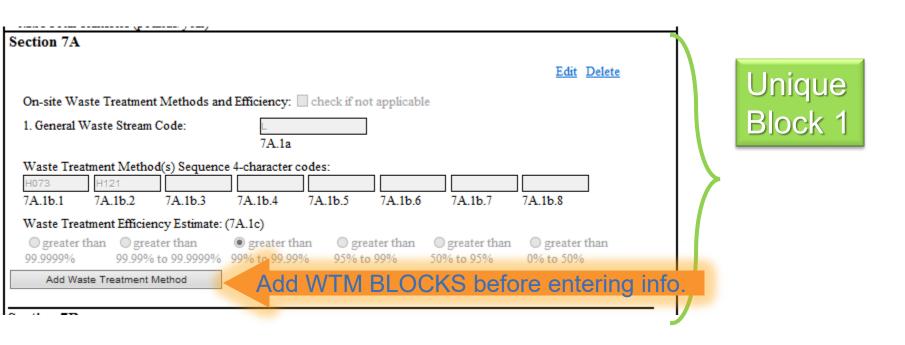
1	2
5.1 Fugitive or non-point air emissions (pounds/year)	
5.3 Discharges to Receiving Streams or Water Bodies	check if not applicable
4	··
Total Discharges (pounds/year)	
rotar 2 isolanges (pounds your)	
5.4 Underground Injection On-site to Class I or Class I	II-V wells □ check if not applicable
5	6
5.4.1 Underground Injection On-site to Class I Wells (pounds/year)	5.4.2 Underground Injection On-site to Class II-V Wells (pounds/year)
5.5 Disposal to Land On-site check if not applicable	e
7	8
5.5.1A RCRA Subtitle C landfills (pounds/year)	5.5.1B Other landfills (pounds/year)
9	10
5.5.2 Land treatment/application farming (pounds/year	5.5.3 Surface Impoundment (pounds/year)
11	
5.5.4 Other disposal (pounds/year)	
Section 6	
Transfers of the toxic chemical in wastes to off-site locations	
6.1.A Total Quantity Transferred to all POTWs \qed che	eck if not applicable
12	
6.1.A.1 Total Transfers to all POTWs (pounds/year)	
6.2 Total Quantity Transferred to all other Off-site local excluding amounts sent to POTWs) ☐ check if not ap	ations (for treatment, disposal, recycling, energy recovery etc., oplicable
13	
6.2.A Total Transfers (pounds/year)	

Section 5

Complete Sections 5 & 6 as you have before, using the EPA TRI instructions for guidance.



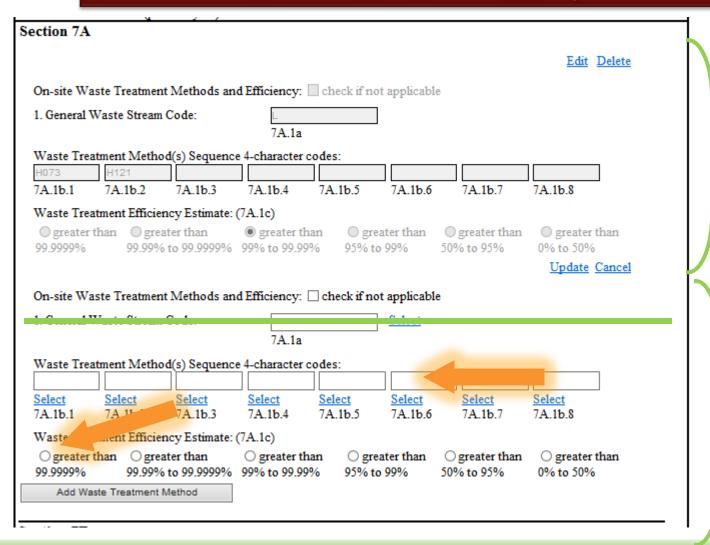
BEFORE you start entering information in Section 7A, add additional Unique Blocks if needed. THEN enter the information for each block & Update one at a time.







BEFORE you start entering information in Section 7A, add additional Unique Blocks if needed. THEN enter the information for each block & Update one at a time.



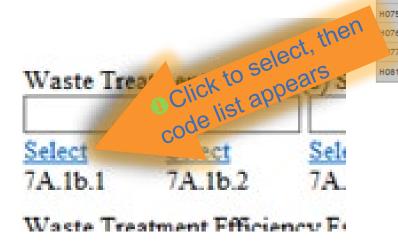
Unique Block 1











WMETHOD	
Code	Description
A01	FLARE
A02	CONDENSER
A03	SCRUBBER
A04	ABSORBER
A05	ELECTROSTATIC PRECIPITATOR
A06	MECHANICAL SEPARATION
A07	OTHER AIR EMISSION TREATMENT
H040	INCINERATION - THERMAL DESTRUCTION OTHER THAN USE AS A FUEL
H071	CHEMICAL REDUCTION WITH OR WITHOUT PRECIPITATION
H073	CYANDE DESTRUTION WITH OR WITHOUT PRECIPITATION
H075	CHEMICAL OXIDATION
1076	WET AR OXIDATION
77	OTHER CHEMICAL PRECIPITATION WITH OR WITHOUT PRE-TREATMENT
H081	BIOLOGICAL TREATMENT WITH OR WITHOUT PRECIPITATION





seci	ion 7B							
On-	Site Energy Recovery Processes	: Check if no	ot applio	cable				
Ene	rgy Recovery Methods 3-charac	ter code(s):	U03	<u>Select</u>		Select	<u>Select</u>	
Sect	ion 7C							
On-	Site Recycling Processes, Rec	.5 Methods	3-charac	cter code(s):	check if no	t applicat	ole	
H39	Select Select	<u>S</u>	<u>elect</u>		Select			
Sect	ion 8							
total: Sour			d in pro Co			n produc		
•	ids per year) Total on-site disposal underground injection & landfills	1	2		3		4]
8.16	Total on-site disposal or other releases	5	6		7		8]
8.1c	Total off-site disposal underground injection & landfills	9	10)	11		12	j
8.1d	Total off-site disposal or other releases	13	14	1	15		16]
8.2	Quantity used for energy recovery on-site	17	18	3	19		20	ĺ
8.3	Quantity used for energy recovery off-site	21	22	2	23		24	ĺ
8.4	Quantity recycled on-site	25	26	3	27		28	1
8.5	Quantity recycled off-site	29	30)	31		32	1
8.6	Quantity treated on-site	33	34	4	35		36	1
8.7	Quantity treated off-site	37	38	3	39		40	Ī
8.8	Quantity released to the environment as a production processes:	result of remedial a	actions, ca	tastrophic even	ne-time event	s not associa	ated with 41	
	Did your facility engage in any source reductions during the reproting year?	action activities for	⊚ Ye	s - continue below	01	No	pounds/year	
8.10	Source Reduction Activities [enter code(s)]		Select	Methods to Id	ity Activity	(enter co	des) Select	
8.10	.2 Select	a a a	Select	b b	Select	С	Select	

Click on **Error Check** when the Form R is completed

Error Check & Next





Document your calculations & source material







A TUR Plan Summary Submittal Selection Form and as applicable a:

TUR Plan Summary

OR

Resource Conservation Plan Summary OR

Environmental Management System Progress Report

and

If a firm did an RC Plan in the last planning cycle a Resource Conservation Plan Progress Report









Massachusetts Department of Environmental Protection Bureau of Air & Waste - Toxics Use Reduction Report

Plan Summary Submittal Selection Form

Report year Reporting Year ABNAKI ROCK Facility Name 380799 DEP Facility ID Number

Complete Section 1, 2, 3, 4 or 5 to identify the type of plan your facility completed in this planning cycle.

- 1 This facility completed an Environmental Management System Plan during this planning cycle. (NOTE: To select this option your facility must have completed a traditional Toxics Use Reduction Plan for at least three prior planning cycles.)
- 2 This facility completed a Resource Conservation Plan during this planning cycle for the following assets. (Note: To select this option, your facility must have completed a traditional TUR Plan for at least three planning cycles, AND not have completed a Resource Conservation Plan in the last planning cycle.) Assets (check all that apply)
 - 2a Energy
 - 2b Water
 - 2c Materials that contribute to solid waste
 - 2d Chemicals on the TURA Toxics or Hazardous Substance List used below reporting thresholds
 - 2e Chemical substances that are not on TURA Toxics or Hazardous Substance List
- This facility either completed a traditional TUR Plan during this planning cycle OR is not submitting any type of plan because the use of all reportable toxics for which a plan is required will have been eliminated or reduced below the reporting threshold by the end of THIS calendar year.

The traditional TUR Plan is required for all chemicals for which a Form S is being submitted in this Annual Toxics Use Reduction Report and was submitted in at least one prior Annual Toxics Use Reduction Report, unless the use of that chemical will have been eliminated or reduced below the reporting threshold by the end of the current calendar year.

- O 3a. This facility has completed a Traditional TUR Plan that includes all chemicals for which a Form S is being submitted in this Annual Toxics Use Reduction Report and was submitted in at least one prior vear.
- 3b. This facility use of the following chemicals for which a plan would otherwise is required will have been eliminated or reduced below the reporting threshold by the end of THIS calendar year. Note, if this list includes ALL chemicals for which a TUR Plan is otherwise due, this facility is not required to complete any type of plan or submit any plan summary in this planning cycle.

	CAS#	Chemical Name	Method*	By taking the following steps
				Edit Delete
ı			□E □R	
ı	3b.a.1 3b.a.2	2	3b.a.4	
	Add Chemical			

- 4 This facility is not required to complete any type of plan or submit a plan summary because it has closed or is scheduled to close in this calendar year.
 - ☐ This facility completed a Resource Conservation Plan in the prior planning cycle. If Yes, you must also submit a Resource Conservation Progress Report describing progress in the implementation of the Resource

Date (mm/dd/vvvv)

Conservation Plan and complete TUR Plan summary as needed.

t 3015.aspx

Error Check & Next



Only during even # years 💸 Select the correct Planning Form:

- -EMS
- -RC
- -TUR









Massachusetts Department of Environmental Protection Bureau of Air & Waste - Toxics Use Reduction Report

Environmental Management System Progress Report

Report year

Planning Year ABNAKI ROCK Facility Name 380799 DEP Facility ID Number

The TURA Environmental Management System (EMS) must be certified by a TUR Planner approved to certify TURA

Provide a brief des dress the covered t	cription of the objectives and targets established by your facility for this planning cy exics listed above:	ycle to
	cription of progress made toward meeting objectives and targets established for coverious planning cycle, and, if applicable, why anticipated progress was not achieved:	













B. Integrating TUR Planning

l.	We have checked if alternatives to our	current	toxics	use have	become	available	and are	technically	and
	economically feasible to implement.								

OYes ONo

We have solicited our employees for ideas about reducing toxics use, the generation of byproduct from toxics use, or releases.

OYes ONo

We have continued to promote a policy of toxics use reduction in our activities and are incorporating it into planning and design as well as day-to-day management.

OYes ONo

 We have continued to monitor our toxics use in order to ensure that all leaks, spills, releases and byproduct generation are minimized to the extent practicable.

OYes ONo

5. We have identified all regulatory requirements triggered by use of toxics chemicals.

OYes ONo

Our EMS has been audited by a qualified independent auditor at least once during the past two year TURA planning cycle.

OYes ONo

We have solicited information from vendors, consultants, government agencies, academic experts, or other resources to better understand our options for implementing TUR activities.

OYes ONo





		^
		~
You may pr	rovide additional information about your EMS activities:	Ť
You may pr	rovide additional information about your EMS activities:	^
You may pr	rovide additional information about your EMS activities:	^
You may pr	rovide additional information about your EMS activities:	^
You may pr	rovide additional information about your EMS activities:	^
You may pr	rovide additional information about your EMS activities:	^
You may pr	rovide additional information about your EMS activities:	^













Massachusetts Department of Environmental Protection Bureau of Air & Waste - Toxics Use Reduction Report

Environmental Management System Progress Report

Report	year
--------	------

Planning 1 ear

ABNAKI ROCK

Facility Name

380799

DEP Facility ID Number



I certify under penalty of law that the following is true:

- (a) I have examined and am familiar with this EMS;
- (b) The EMS meets the requirements of 310 CMR 50.82 and the elements specified therein are being implemented;
- (c) The EMS is actively addressing environmental compliance issues;
- (d) The individual who has certified the EMS pursuant to 310 CMR 50.84(3) has provided me with documentation that he or she meets the requirements of 310 CMR 50.84(2).
- (e) These statements are based upon answers to queries made by me to individuals who have been designated to implement the EMS, and I have made my best effort to ensure that they are being held accountable for implementing the system in good faith. I understand that by choosing to implement an EMS in lieu of a toxics use reduction plan, I am responsible for maintaining documentation to evidence a good faith effort to implement all elements of the EMS.
- (f) I am aware that there are penalties for submitting false information, including possible fines and imprisonment.

1. Signature of Senior Management Official

2. Date (mm/dd/yyyy)

3. Print Name of Senior Management Official

4. Email Address

Error Check & Next

EMS Certification by Senior Management Official







Error Check	- Transaction #101463	Print	Exit
Effor Check	Save	Pfint	EXIL
Massachu	otts Donartment of En	vironmental Protection	Report year
	_	Use Reduction Report	Planning Year
		•	ABNAKI ROCK
-2 ()		ı Plan Summary	Facility Name
		nservation Guidance when	
filling out	this form.		DEP Facility ID Number
argeted Asset			
ATERIALS THAT CONTRI	BUTE TO SOLID WASTE		
elected Operations			_
-	source conservation plan c	overs. If operation is not listed,	choose "other"
Shipping/receiving are ✓	Dock	-	
Operation Code	2. Operation Code	3. Operation Code	4. Operation Code
			4. Operation code
Operation Code	2. Operation Code		4 Operation Code
Other (describe):	2. Operation Code	3. Operation Code	4. Operation Code
Baseline Amount of A	enet Head		
		·	
	iount of the asset used dur port amount per unit of pr	ring the baseline calendar year,	reported as a total amour
· -	14 120000	POUND	ne .
1 ear (e.g., 2007) 20 Υε			se - Unit of Measure
			se - Offit of Measure
I unit of measure is diffe	rent than listed above, ple	ase describe.	
Per Unit of Product Use	Optional)		
Per Unit of Product Use	Optional)		





D. Options Selected to Implement RE CYCLING CARDBOARD AND SHIPPING OLD COMPUTERS FOR RECYCLING E. Other Options Considered List the resource conservation options you considered but decided not to implement. You also may provide an explanation why you chose not to implement a particular option. USING REUSABLE TOTES FOR SHIPPING CIRCUIT BOARDS AND COMPUTERS TO END CUSTOMERS.





F. Goals for Reducing the Asset

List the resource conservation goal(s) as a percentage reduction or a specific amount reduction (e.g., number of kWh or Tons) over a certain time period. The first line is an example.

Amount of Reduction	Unit of Measure	Goal by Date (Year)	Description of Goal
15%	Gallons	2008	Reduction of potable water use and sewer discharge
25	POUNDS	2022	REDUCTION IN CARDBOARD AND SHIPPING MATE
F.1.a	F.1.b	F.1.c	F.1.d
F.2.a	F.2.b	F.2.c	F.2.d
F.3.a	F.3.b	F.3.c	F.3.d
F.4.a	F.4.b	F.4.c	F.4.d

G. Expected Change in the Amount of Asset Used

Indicate the expected change in the amount of the asset(s) to be used (due to the options implemented) between the year on which the plan is based and two years after the plan is due.

The unit of measure in this section POUNDS (as listed previously in Section C).

Note: You will report actual changes in the amount of the asset used on a resource conservation progress report that you must submit with the next toxics use reduction plan summary. However, if there are actual changes to report due to an option already implemented, you may include them below.

Expected Annual change in the amount of asset used by July 1st of the next even-numbered calendar year on an annual basis:

30000

H. Prior Efforts (Optional)

Results of Prior efforts may have resulted in reductions of the asset used. Please indicate the reductions accomplished as a result of projects implemented since July 1st of the previous even-numbered calendar year.

The unit of measure in this section POUNDS (as listed previously in Section C).

I. Additional Information

You may provide additional information about your resource conservation plan.

Click on Error Check when the Form is completed

Error Check & Next









Massachusetts Department of Environmental Protection Bureau of Air & Waste - Toxics Use Reduction Report

Resource Conservation Plan Summary

Please refer to the Resource Conservation Guidance when filling out this form.

Repoi	rt year
-------	---------

Planning Year ABNAKI ROCK

Facility Name 380799

DEP Facility ID Number

I certify under penalty of law that the following is true:

- (a) I have personally examined and am familiar with this Resource Conservation Plan;
- (b) I am satisfied that any supporting documentation used in the development of the Plan exists and is consistent with the Plan;
- (c) based on my inquiry of those individuals immediately responsible for the development of this Plan, I believe that the information in the Plan and any supporting documentation used in the development of the Plan is true, accurate, and complete;
- (d) the Plan, to the best of my knowledge and belief, meets the requirements of 310 CMR 50.90; and
- (e) I am aware that there are penalties for submitting false information, including possible fines and imprisonment.

	or: .	000 :		0.07 1
1	Signofilina	of Semior	Management	(ltticial
1.	SISHMUME	OI SCHIOL	IVIALIA 2 CIII CIII	Omciai

2. Date (mm/dd/yyyy)

- 3. Print Name of Senior Management Official
- 4. Print Title of Senior Management Official
- Email Address

Error Check & Next



RC
Certification by
Senior
Management
Official

Click on Error Check when the Form is completed







TOXICS USE REDUCTION PLAN SUMMARY FORM

ABNAKI ROCK Facility Name 380799 DEP Facility ID Number

Edit

TUR

A. Chemical Data

AMMONIA

A.1 Chemical Name

7664417

A.2 CAS #

Calculated as follows:

Projected pounds of Use in the Calendar Year immediately following the Planning Year - Pounds of Use on the current Form S (the amount used in the calendar year prior to the planning year). The number will be negative use is expected to decrease.

A.5 Is this chemical used only in WASTE treatment?

Two Year Projected Change in Byproduct.

87

A.3 Use

3

A.4 Byproduct

- Yes skip to Section C.
- No go to Section B.

NOTE: If this page is blank, please

contact the program, you may be asked to start a new transaction.

B. Options Considered & Selected for Implementation

B.1 Options Considered

1. SUBSTITUTE A NON-TUR CHEMICAL

Unique Block 1

> TUR Plan Summary

Scroll down to find all Chemicals

B.2 Options Selected for Implementation as a result of this planning process

NONE - TUR CHANGE TO NON-TUR CHEMICAL IS NOT ECONOMICALLY FEASIBLE DUE TO COSTS ASSOCIATED WITH FDA REVALIDATION/APPROVAL PROCESS FOR PU#001, AND TECHNICALLY AND ECONOMICALLY INFEASIBLE FOR PU#003.

TUR









C. Prior Options Implementation

Mandatory: List any options that had been selected for implementation in the prior plan but were not implemented, and explain why they were not adopted.

Optional: List TUR Options implemented in prior years.

1. IMPLEMENTED THE TIGHTNESS TEST OF CATALYTIC SEAL FINDING AND REPAIRING LEAKS.

Unique
Block 1
continuation

TUR Plan Summary

Scroll down to find all Chemicals









Massachusetts Department of Environmental Protection Bureau of Air & Waste - Toxics Use Reduction Report

TURA Plan Summary

Report year
Planning Year
ABNAKI ROCK
Facility Name
380799
DEP Facility ID Number

Management Certification

I certify under penalty of law that the following is true:

- (a) I have personally examined and am familiar with this Toxics Use Reduction Plan;
- (b) I am satisfied that any supporting documentation used in the development of the Plan exists and is consistent with the Plan:
- (c) based on my inquiry of those individuals immediately responsible for the development of this Plan, I believe that the information in the Plan and any supporting documentation used in the development of the Plan is true, accurate, and complete;
- (d) the Plan, to the best of my knowledge and belief, meets the requirements of 310 CMR 50.40; and
- (e) I am aware that there are penalties for submitting false information, including possible fines and imprisonment.

1. Signature of Senior Management Official

2. Date (mm/dd/yyyy)

ASFSAF

3. Print Name of Senior Management Official

WALTER.HOPE@MASS.GOV

4. Email Address

Error Check & Next













RC+ (Resource Conservation) Plan Update (+ TUR Plan Summary)







No.	Bureau of Air &	partment of Environ Waste - Toxics U Conservation	se Reducti	ion Report	Report year Planning Year PRINTERS OIL SUPPLY Facility Name 131260 DEP Facility ID Number
A. Targeted B. Identifics	Asset	n			<u>Edit</u> <u>Delete</u> ✓
1. Year Re	source Conservation	Plan was completed:			
2. Progress	Report Date:	-			
_	Conservation F	rogress			
• •	INFORMATION n C. RC Plan Summ	arv)			<u>Edit</u> <u>Delete</u>
a. Year:	b. Amou	nt used per year:		c. Unit of Measure: MMBTU - Energy Gallons - Water Pounds - Solid waste Toxics	e or
REDUCTION (from Section	N GOAL 18 F AND G, RC P18	an Summary)		_	
d. Year to be Achieved:		e. Expected Annual Reduction:		f. Actual Annua Reduction:	1
g. Descriptio	n:				
Add R	esource Conservation Pr	ogress			
D. Options I	mplementation :	Status			
Provide implem not implemente		ch selected option lis	ted in Section	on D of the RC Plan S	Summary. If any option was
Option			Impl	ementation Status	
Add Option					Edit Delete
7100 Option					
Add Asset					



RC (Resource Conservation) **Progress** Report (must also complete TUR Plan Summary)

Error Check & Next







	Edit Delete
A. Targeted Asset	
	~
B. Identification Information	
Year Resource Conservation Plan was completed:	
2. Progress Report Date:	
C. Resource Conservation Progress	
T4	it Defete
BASELINE INFORMATION	<u>it Delete</u>
(from Section C, RC Plan Summary)	
a. Year: b. Amount used per year: c. Unit of Measure:	~
MMBTU - Energy	
Gallons - Water Pounds - Solid waste or	
Toxics	
REDUCTION GOAL	
(from Sections F AND G. RC Plan Summary)	
d. Year to be e. Expected f. Actual Annual	
Achieved: Annual Reduction:	
Reduction:	
g. Description:	
Add Resource Conservation Progress	



+ TUR



ADD Baseline information for **EACH** "Targeted Asset" as needed as a separate Unique BLOCK, **UPDATE** when complete.





D. Options Implementation Status

Provide implementation status for each selected option listed in Section D of the RC Plan Summary. If any option was not implemented, state why.

Option	Implementation Status			
		Edit	<u>Delete</u>	
Add Option				
dd Asset				•

Error Check & Next

IF you have more than 1 (one) option, click on ADD OPTION before you enter your information, edit & when information is added, then UPDATE.

ADD Asset as needed, and ERROR CHECK & NEXT when complete









Massachusetts Department of Environmental Protection Bureau of Air & Waste - Toxics Use Reduction Report

Toxics Use Fee Worksheet

	report year
	Reporting Year
	ABNAKI ROCK
	Facility Name
11	380799
	DEP Facility ID Number

Report vear

BOSTON		021084747
c. City d. St	ate	e. ZIP Code
The amount of your fee depends on the number of at your facility, and number of toxic substances for submit).		
Use the following schedule to determine your fee	for the 2017 reporti	ng year.
# Full Time Employee Equivalents	Base Fee	Maximum Fee
>= 10 and < 50	\$1,850	\$5,550
>= 50 and < 100	\$2,775	\$7,400
>= 100 and < 500	\$4,625	\$14,800
>= 500	\$9,250	\$31,450
f. Determine your base fee by referring to the 2nd column above.		4825
g. Enter # of Form Ss you are filing that are not h chemicals:	igh hazard or low ha	izard 1
h. Enter # of Form Ss you are filing for high hazard chemicals:		0
i. Enter # of Form Ss you are filing for low hazard chemicals:		0
j. ADD LINES g and h and multiply the result by \$1,100.		1100
k. Add LINE f and LINE i. 5725		

The Fee Worksheet is Created by YOU/your facility.

MassDEP will send an invoice based on this information

Certification Statement

(Maximum Fee) WHICHEVER IS LESS

1. Enter the amount from LINE K or from the 3rd column of the schedule

I hereby certify that I have reviewed this and all attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and information in these documents are accurate based on measurements and/or reasonable estimates using data available to the preparers of these documents.

Your fee is the amount entered in LINE L. MASSDEP WILL MAIL AN INVOICE FOR PAYMENT. Payment due 30 days after invoice notice date - Late payment will result in a \$1000 late fee as mandated by MGL 211.

- I am aware that there are significant penalties for willful or intentional submission of false or incomplete
 information.
- I agree on behalf of the filing facility to remit the required Toxics Use Fee (as determined on the Fee Worksheet) to the Commonwealth of Massachusetts, as required by 301 CMR 40.03.

a. Authorized Signature	b. Date (MM/DD/YYYY)
c. First Name (Print)	d. Last Name (Print)
e. Position/Title	f. Email Address





Fee

Worksheet



1 WINTER ST b. Facility Site Address BOSTON 021084747 d. State e. ZIP Code c. City The amount of your fee depends on the number of "full time employee equivalents" (2,000 work hours per year) at your facility, and number of toxic substances for which reporting is required (i.e., the number of Form Ss you submit). Use the following schedule to determine your fee for the 2017 reporting year. Maximum Fee # Full Time Employee Equivalents Base Fee >= 10 and < 50 \$1.850 \$5.550 >= 50 and < 100 \$2,775 \$7,400 >= 100 and < 500 \$4,625 \$14,800 \$9,250 \$31,450 >= 500 4625 f. Determine your base fee by referring to the 2nd column above. Not high/not low Haz g. Enter # of Form Ss you are filing that are not high hazard or low hazard chemicals: h. Enter # of Form Ss you are filing for high hazard chemicals: High Hazard i. Enter # of Form Ss you are filing for low hazard chemicals: I ow Hazard 1100 j. ADD LINES g and h and multiply the result by \$1,100. 5725 k. Add LINE f and LINE j. 1. Enter the amount from LINE K or from the 3rd column of the schedule (Maximum Fee) WHICHEVER IS LESS Your fee is the amount entered in LINE L. MASSDEP WILL MAIL AN INVOICE FOR PAYMENT. Payment due 30 days after invoice notice date - Late payment will result in a \$1000 late fee as mandated by MGL 211.

ABNAKI ROCK

a. Facility Name

Part 1 of the Fee Worksheet

> IF the fee is incorrect because you indicated an incorrect FTE # on the first screen, you can correct it – **BUT** all screens that follow page 1 will need to be revalidated one-at-a-time





Document your calculations & source material





The late fee is NOT a penalty. The late fee is set by the Legislature (M.G.L. 21I ö 19 (f). The Department shall an additional administrative fee of \$1000 for failure to file a complete and accurate report by July 1st of the year following the use of the chemical. (i.e.: chemicals used in 2023 must be reported by July 1, 2024).

A late fee may also be added for failure to pay any fee pursuant to this section in a timely manner. * late fee applied if the fee is not paid by the due date on the invoice.





Certification Statement

- I hereby certify that I have reviewed this and all attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and information in these documents are accurate based on measurements and/or reasonable estimates using data available to the preparers of these documents.
- I am aware that there are significant penalties for willful or intentional submission of false or incomplete information
- I agree on behalf of the filing facility to remit the required Toxics Use Fee (as determined on the Fee Invoice) to the Commonwealth of Massachusetts, as required by 301 CMR 40.03.

a. Authorized Signature	b. Date (MM/DD/YYYY)
BARRY	BOSS
c. First Name (Print)	d. Last Name (Print)
CHIEF OPERATING OFFICER	BarryBoss@Berry.Com
e. Position/Title	f. Email Address

Click on Error Check when the Invoice is completed

Error Check & Next



When a transaction is signed the information entered in the submittal is "locked" and cannot be changed. Solution: double check all information before signing.



Signature screen for **Senior Management Official**

Please select the box below and then indicate your acceptance.				
TURA - Form \$ Fee Worksheet - 1 Form(s)				
SIGNATURE I hereby certify that I have reviewed this and all attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and information in this and related documents are accurate based upon measurement and/or reasonable				
estimates using data available to the preparers of these documents. I am aware that there are significant penalties for willful or intentional submission of false or incomplete information. I agree on behalf of the filing company, to remit the required Toxics Use Fee (as determined on the				
Fee Invoice) to the Commonwealth of Massachusetts as required by 301 CMR 40.03.				
By entering my name I acknowledge that I have read and agree with the certification statement.				
NAME Sign TURA - Plan Certification Statema: 1 - 1 Form(s)				
MANAGEMENT CERTIFICATION Check				
I certify under penalty of law that the following is true:(a) I have personally examined and am familiar with this Toxics Use Reduction Plan;(b)I am				
satisfied that any supporting documentation used in the development of the Plan exists and is consistent with the Plan;(c)based on my inquiry of those individuals immediately responsible for the development of this Plan, I believe that the information in the Plan and any supporting documentation used in the development of the Plan is true, accurate, and complete;(d)the Plan, to the best of my knowledge and belief, meets the requirements of 310 CMR 50.40; (e)I am aware that there are penalties for submitting false information, including possible fines and imprisonment.				
By entering my name I acknowledge that I have read and agree with the certification statement.				
NAME 02/25/2020				
l accept I do not accept				

Several certification / signature lines appear. Please **PRINT** this screen & certification screens and the paper forms, keep for your facility records.

The signatures on this screen will fill-in at the appropriate places on earlier screens/forms











Only during even # years









For Reporting, The **SUBMIT** Step is next







Electronically Submit your report





Payment Review and Submit your Transaction Exit

Please review your transaction, If you are satisfied, scroll down and click submit,

An email confirmation will be automatically sent to the owner of this account at

If you would like to send this confirmation to others please enter their address below

DEP Transaction ID: 210259 Date and Time Submitted: 04/14/2009 04:28:15 Other Email

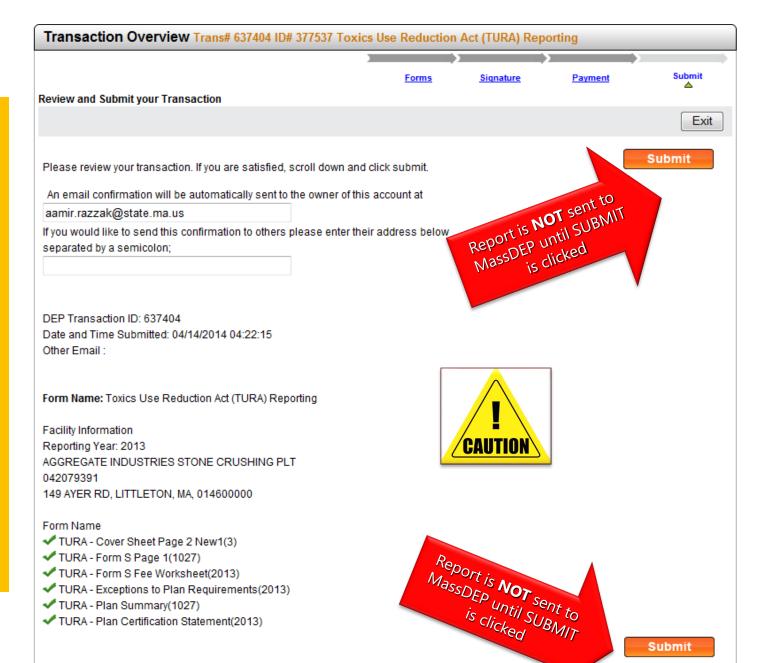
Report is NOT Sent to is clicked submit

















If you do NOT click on the **Submit** button, MassDEP will NOT receive the information.

If MassDEP does not receive the information by the deadline, there is a \$1000 late fee. Additional FINES may apply as well.











TUR/EMS/RC Planner Certification is a separate form & step



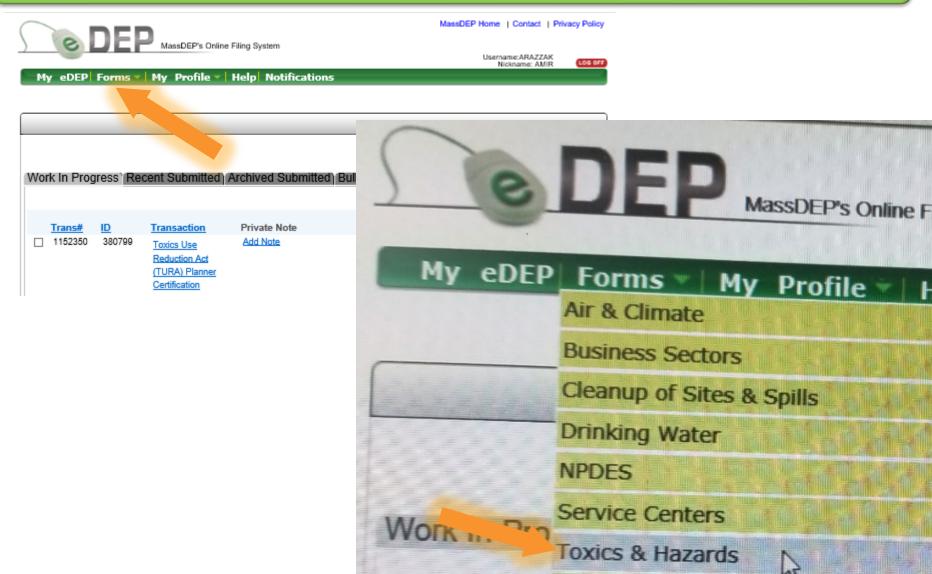






TUR/EMS/RC Planner Certification is now a separate form & step











TUR/EMS/RC Planner Certification is now a separate form & step





Toxics Use Reduction Act (TURA) Planner Certification

This form is for MassDEP Certified Toxics Use Reduction Planners use, to Certify TUR, RC or EMS Plans.

Start Transaction



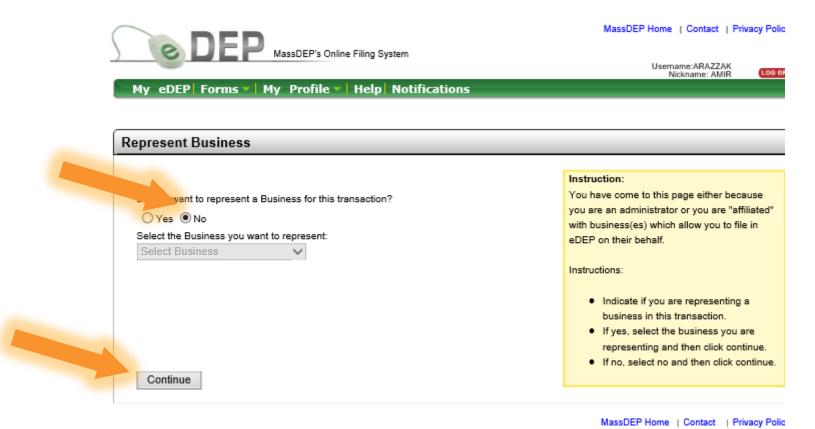






TUR/EMS/RC Planner Certification is now a separate form & step











complete the information for the facility that you are certifying as a MassDEP Certified TUR/RC/EMS Planner





My eDEP Forms ▼ My Profile ▼ Help Notifications

Preform		
Preform: Toxics Use Reduction	on Act (TURA) Planner Certification	
TIN (Federal Taxpayer Identification Number NO dashes):	r	
DEP Facility ID (Digits NO dashes or spaces):		
Planning/Calendar Year:	Report year	









complete the information for the facility that you are certifying as a MassDEP Certified TUR/RC/EMS Planner



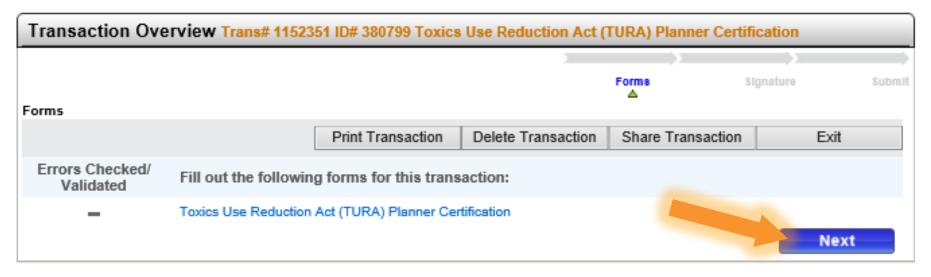


MassDEP Home | Contact | Privacy Policy

Username: ARAZZAK Nickname: AMIR

LOG OFF

My eDEP Forms ▼ My Profile ▼ Help Notifications



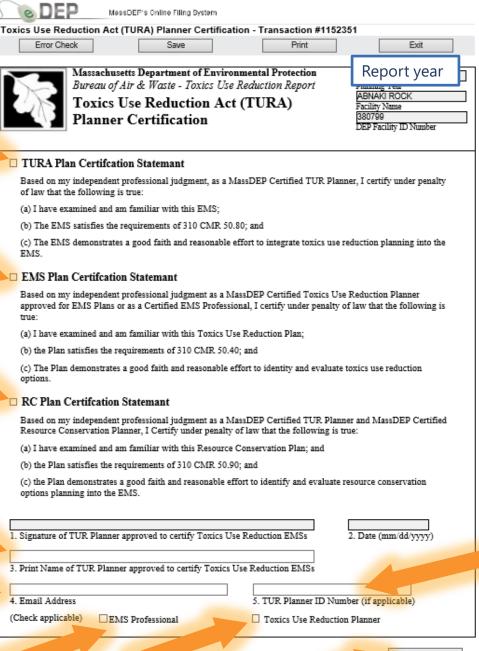
MassDEP Home | Contact | Privacy Policy





complete the information for the facility that you are certifying as a MassDEP Certified TUR/RC/EMS Planner

Check 1 or more statements, as appropriate & then Sign & indicate email &



Error Check & Next









complete the information for the facility that you are certifying as a MassDEP Certified TUR/RC/EMS Planner



ODEP MassDEP's Online Filing System		
	Usemame:ARAZZAK Nickname: AMIR	
My eDEP Forms ▼ My Profile ▼ Help Notific	ations	
Transaction Overview Trans# 1152351 ID# 380799 Toxio	cs Use Reduction Act (TURA) Planner Certification	
	Forms Signature Submit	
Forms	Sign & Accept	
Print Transaction	Delete Transaction Share Transaction Exit	
Errors Checked/ Fill out the following forms for this train	nsaction:	
✓ Toxics Use Reduction Act (TURA) Planner C	Sertification	
	Next	
	Transaction Overview Trans# 1152351 ID# 380799 Toxics Use Reduction Act (TURA) Planner Certification	
		-
	Forms Signature	Submit
	Signature	
	Ex	it
	Please select the box below and then indicate your acceptance.	
	Toxics Use Reduction Act (TURA) Planner Certification - 1 Form(s)	
	☐ TURA PLANNER CERTIFICATION	
	Based on my independent professional judgment as a Toxics Use Reduction Planner, I certify under penalty of law that the following is true: ((a) I
	have examined and am familiar with this Toxics Use Reduction Plan; (b) the Plan satisfies the requirements of 310 CMR 50.40; and (c) the Plan depositors a good faith and spaceable effect to identify and support toxics are reduction and familiar with and spaceable effect to identify and support toxics are reduction and familiar with and spaceable effect to identify and support toxics are reduction.	n
	demonstrates a good faith and reasonable effort to identify and evaluate toxics use reduction options.	
	By entering my name I acknowledge that I have read and agree with the certification statement.	
	NAME Date 02/25/2020	
		_
	I accept I do not accept	







complete the information for the facility that you are certifying as a MassDEP Certified TUR/RC/EMS Planner



MassDEP Home Contact Privacy Policy DEP MassDEP's Online Filing System Username-ARAZZAK Nickname: AMIR	
Forms Print Transaction Print Transaction Print Transaction Delete Transaction Share Transaction Exit Errors Checked/ Validated Toxics Use Reduction Act (TURA) Planner Certification Support Forms Support Forms Support Forms Toxics Use Reduction Act (TURA) Planner Certification	MassDEP Home Contact Privacy Policy MassDEP's Online Filing System Username: ARAZZAK Nickname: AMIR Wy eDEP Forms My Profile Help Notifications
Next	Transaction Overview Trans# 1152351 ID# 380799 Toxics Use Reduction Act (TURA) Planner Certification
The system will email you	Forms Signature Submit Review and Submit your Transaction
(the Planner) a receipt, and	Exit
you can send a copy	Pleas review your transaction. If you are satisfied, scroll down and click submit.
indicating you completed the	An email confirmation will be automatically sent to the owner of this account at samir.rszzsk@state.ms.us
CERTIFICATION to your boss or client.	If you would like to send this confirmation to others please enter their address below separated by a semicolon;
Of Chefft.	DEP Transaction ID: 1152351 Date and Time Submitted: 02/25/2020 02:28:43 Other Email:
The TUR/EMS/RC Plan is NOT	Form Name: Toxics Use Reduction Act (TURA) Planner Certification
CERTIFIED UNTIL YOU have clicked on the SUBMIT	Facility Information Reporting Year: 2019
BUTTON	ABNAKI ROCK 380799799 1 WINTER ST, BOSTON, MA, 021084747
	Form Name





REMEMBER!



- **✓** DOCUMENT
 - •With changes in staffing, know where your records are
 - TUR Plan &/or RC/EMS Plans MUST be at the facility
- ✓ REPORT ONLY WHAT YOU NEED TO REPORT
- ✓ BE AWARE OF CONTAMINANTS IN YOUR RAW MATERIAL
- ✓ LEAD CAN BE IN "NON-LEAD EU CERTIFIED MATERIALS"
- √KEEP ABREAST OF CHANGES IN THE PROGRAM
 - New/Added chemicals (and/or "improved SDS's)
 - Lower reporting thresholds
 - Frequent additions of additional PFAS/PFOA
- SUBMIT the TUR Report, TUR/EMS/RC Plan
- TUR PLANNERS (TUR/EMS/RC) SUBMIT the CERTIFICATION
 - ✓ PAY ON TIME





