

TURA Enforcement

Rebecca Dolan, MASS DEP



TURA Enforcement

- In the past year we have addressed all outstanding enforcement issues from RY2019- RY2021 filing years.
- 30 Notices of Non-Compliance and 4 Warning letters were sent. Enforcement was sent to both facilities and TUR Planners
- Enforcement covered a range of infractions including:

- Failure to File
- Missing Chemical(s)
- Failure to Respond to QA/QC
- Missing Plan Summary
- Missing TUR Planner Certification
- Incomplete Plan Summary

- Failure to Hire an Active TUR Planner
- Hiring a TUR Planner who is not Certified for the Plan Type Completed
- Signing a plan when expired
- Signing for a Plan type that you are not certified to



Avenues of Enforcement

Evaluated during a Non Planning Year



Filing Issue	Explanation
Failure to File (Non-Filer)	Facility filed in prior reporting year but did not file in current reporting year and did not indicate closed or Non-Applicable for the Filing year (Below Reporting Threshold, FTE, etc.)
Missing Chemical(s)	Facility filed for current reporting year but did not include a chemical that was on prior filings and did not list that chemical as being eliminated from processes or Below Reporting Threshold
QA/QC Non-Response	Facility filed for current reporting year but had issue with Form S and Form R data not agreeing mathematically and did not respond to outreach

Reminders for the Upcoming Year

- File on Time
- Remember to respond to outreach about your facility's filing from TURA program staff
- TURA program staff send outreach to the "Authorized Signer" listed on the Toxics Use Fee Worksheet. Make sure that person knows what to do if they receive outreach from the TURA program.
- Notify the TURA Program if your "Authorized Signer" has left the company
- Remember to update phone trees for the facility, if someone cannot be reached by email we do try to call.
- If you find a mistake in your filing, AMEND it.



TURA Facility Audits

- TURA Facility Audit's have resumed. Facilities will be receiving Requests For Information (RFI) for their plan.
- Audits now include an onsite inspection

