



TURA Enforcement

Leoni Desai, MassDEP

May 2025



TURA Program Enforcement

- TURA Enforcement covers a range of infractions.
 - Types of enforcement: Warning Letter, NON, RPAN, ACOP
- Enforcement can be issued to facilities, planners, or both facilities and planners depending on the situation
- Reporting based enforcement is preceded by outreach



Avenues of Enforcement (Facility)

Evaluated during a Non-Planning Year



1. Failure to File

a. Report

2. Incomplete Report

a. Missing Chemical(s)

b. Failure to Respond to QA/QC



QA/QC Issues - 1

BYP and Form R data do not match

- a) $BYP > Trans + Rels + ON-SITE (Tmt + Recyc + Energy Recovery)$
- b) $BYP < Trans + Rels$



Section 8

Production Related Waste Managed. Enter in Pounds per year (grams of dioxins) (Do not double count: 8.1a - 8.7 should total: (Amount used in production - Amount shipped in product + Amount consumed in production))

Source Reduction and Recycling Activities. Column A Note: Do not double count. (Enter data as pounds per year)	Column B Current Rpt. Year	Column C Following Rpt. Year	Column D 2nd Following Rpt. Year
8.1a Total on-site disposal underground injection & landfills	<input type="text"/>	<input type="text"/>	<input type="text"/>
8.1b Total on-site disposal or other releases	<input type="text"/>	<input type="text"/>	<input type="text"/>
8.1c Total off-site disposal underground injection & landfills	<input type="text"/>	<input type="text"/>	<input type="text"/>
8.1d Total off-site disposal or other releases	<input type="text"/>	<input type="text"/>	<input type="text"/>
8.2 Quantity used for energy recovery on-site	<input type="text"/>	<input type="text"/>	<input type="text"/>
8.3 Quantity used for energy recovery off-site	<input type="text"/>	<input type="text"/>	<input type="text"/>
8.4 Quantity recycled on-site	<input type="text"/>	<input type="text"/>	<input type="text"/>
8.5 Quantity recycled off-site	<input type="text"/>	<input type="text"/>	<input type="text"/>
8.6 Quantity treated on-site	<input type="text"/>	<input type="text"/>	<input type="text"/>
8.7 Quantity treated off-site	<input type="text"/>	<input type="text"/>	<input type="text"/>
8.8 Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes:	<input type="text"/> pounds/year		

8.10 Did your facility engage in any source reduction activities for this chemical during the reporting year? ☐ Yes - continue below ☐ No

Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1 <input type="text"/> Select	<input type="text"/> Select	<input type="text"/> Select	<input type="text"/> Select
	a	b	c
8.10.2 <input type="text"/> Select	<input type="text"/> Select	<input type="text"/> Select	<input type="text"/> Select
	a	b	c



QA/QC Issues - 2

Non-Routine Production Ratio or Activity Index

- a) Prod Ratio Act Index <0.5 OR >2.0
- b) Prod Ratio Act Index = 0



Section 5: Description

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).

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



QA/QC Issues - 3

Does not meet eligibility for State Only Form A

To meet eligibility:

- Company must use less than 1,000,000 lbs of the chemical
- Company must generate less than 500 lbs of TURA BYP
- The chemical is not a PBT




Reminders for the Upcoming Year

- Maintain your onsite paperwork to meet regulatory record keeping requirements.
- The TURA program is not able to make changes on reports for filers. All changes must be made electronically via the AMEND feature.
- Facilities should be the ones initiating the online transactions and sharing the access to their TUR Planners. We have, however, updated eDEP to allow any user who has been granted access to a transaction to initiate an AMEND.
- The Authorized Signature name on the fee page should match the first and last name of the person signing that fee page.



Reminders for the Upcoming Year (cont.)

- Be sure to include BELOW THRESHOLD chemicals on form S Section 3 only.*
- Non-Applicability Form:
<https://www.mass.gov/doc/tur-reporting-non-applicability-form-0/download>



Massachusetts Department of Environmental Protection
Bureau of Air & Waste - Toxics Use Reduction Report
Form S Cover Sheet

Reporting Year _____
Facility Name _____
DEP Facility ID Number _____

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, up to four, that apply.

a.1 _____ CAS # of chemical not reportable (if applicable)	a.2 _____ Chemical Name
---	----------------------------

a.3 Explanation of why the chemical is not reportable (check codes):

<input type="checkbox"/> Chemical Below Threshold But > 0
<input type="checkbox"/> No Chemical Use in Reporting Year
<input type="checkbox"/> Chemical Substitution
<input type="checkbox"/> Chemical Eliminated (No Substitution)
<input type="checkbox"/> Decline in Business
<input type="checkbox"/> Other (Explain below in the additional comments section)
<input type="checkbox"/> Chemical no longer reportable under TURA

a.4
Other (Only required if Other was selected in a.3)

a.5 _____ CAS # of chemical substituted for TURA chemical	a.6 _____ Chemical Name
--	----------------------------



Reminders for the Upcoming Year (cont.)

- If your facility is closing, please complete the closure form:
<https://www.mass.gov/doc/tur-reporting-facility-closure-form-0/download>
- If you have a question or issue when completing your filing, contact the TURA Program at tura.program@mass.gov
- If you find a mistake in your filing, AMEND it.



Reminders for TUR Planners

- To update your address or phone number in ePlace, go to Account Management and scroll down to Contact Information > Actions > Edit

Contact Information

To update your Contact Information below please click on Actions and Edit. For First name and last name changes, you will need to contact your agency.

Showing 1-1 of 1 | [Download results](#)

First Name	Middle Name	Last Name	Business Name	Contact Type	Account Owner	Status	Action
LEONI		DESAI		PublicUser	Yes	Approved	Actions ▼ Edit

- To update your name in ePlace, contact ePLACE_helpdesk@mass.gov
- To update your ePlace email, complete this form:
<https://app.smartsheet.com/b/form/d3c0e0e4d7914f57a7c665dd60ba794a>



Reminders for TUR Planners (cont.)

- Make sure your application/renewal matches what you want to apply for.
- If you are a General Practice Planner and your status is 'About to Expire', we will remove you from the list of active General Practice Planners so you should consider renewing at least three months prior to your expiration date.
- CE Credit Pre-Approval Form:
<https://www.mass.gov/doc/tur-planner-continuing-education-credit-pre-approval-form-0/download>



Self Disclosure

- If you need to self disclose a violation or are working with a company that needs to self disclose a violation, contact enforcement program staff so that we can provide the correct information and necessary forms.

Questions?



Leoni Desai

MassDEP

leoni.desai@mass.gov

617-939-6775

<https://www.mass.gov/guides/massdep-toxics-use-reduction-program>