Massachusetts Toxics Use Reduction

TUR Planning and TUR Planners

TURA Program Strengthening Ad Hoc Committee

March 30, 2021

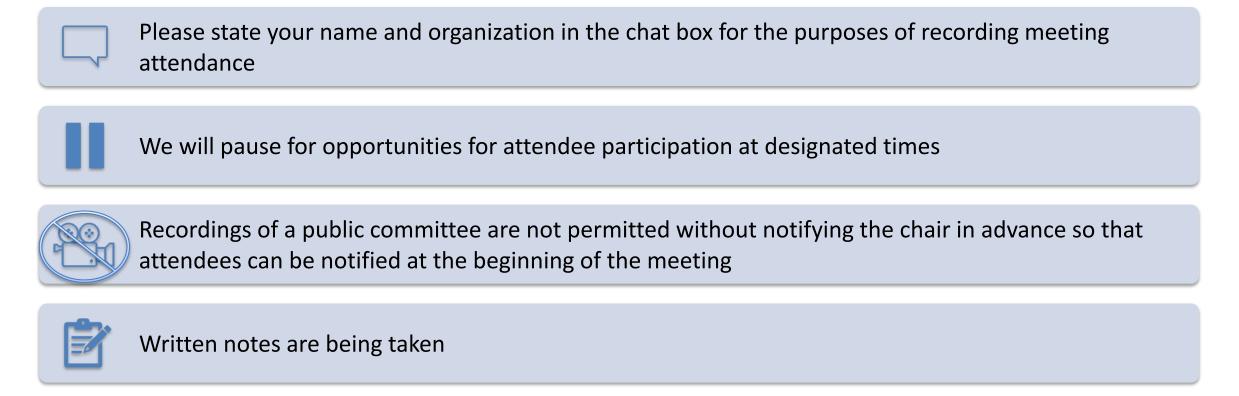










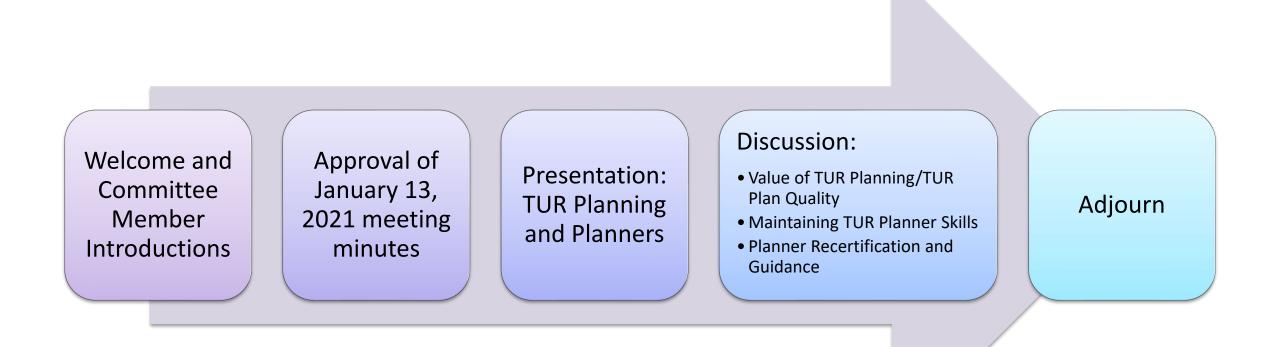




Please contact <u>Caroline.Higley2@mass.gov</u> if you have technical difficulties during the meeting

Today's Agenda





Note: Public comments/questions will be held until opened for general discussion

Vote on Minutes





Approval of Jan 13, 2021 meeting minutes

TUR Planning





Key pillar of TURA program success



Prompts a comprehensive review of production processes



Certified by senior management, and by trained professional that the TUR Plan meets regulatory requirements, and that planning was conducted in good faith

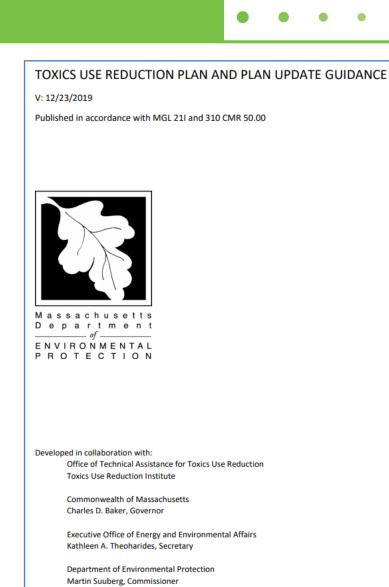


Planning intended to motivate adoption of feasible TUR opportunities

TUR Planning Guidance

- Developed and maintained by MassDEP
- Most recent revision in December 2019
 - Guidance updates informed by feedback from small group of veteran General and Limited Practice Planners
- Guidance describes
 - Required activities of planning
 - Elements required in the TUR Plan
 - Documentation needed to demonstrate a good faith and reasonable effort

https://www.mass.gov/doc/toxics-use-reduction-planningplan-update-guidance/download



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Toxics Use Reduction

TUR Planner Qualification

See page 2 of the background document





Minimum relevant work experience and/or education required



Can be General Practice (i.e., can conduct planning for multiple facilities) or Limited Practice (i.e., can only conduct planning for their employer's facility/facilities)



Certified through exam-track procedure or through experience in TUR activities (Limited Practice Planners only)



Recertify every two years with:

Appropriate fee payment

Sufficient continuing education credits

Continuing Education

See pages 3-4 of the background document

Objectives of TURA Program continuing education conferences

- Help planners maintain planning skills
- Alert planners to emerging issues
- Provide information on safer materials/options
- Provide peer mentoring and case examples relevant to current chemical use issues
- Alert planners to changing or potential future regulations
- Connect planners to tools and resources designed to support their efforts
- Introduce planners to new ideas and global leaders in topics that relate to TUR planning, typically through keynote presentations

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TUR Planner Feedback on Conferences

See page 5 of the background document

Content

- Appreciate hearing from each other and learning about real world solutions and best practices
- Find information on emerging chemical concerns challenging but useful
- Value hearing from MassDEP and learning about future regulatory changes

Venue

- No one right solution for location, method or timing for conferences
- In-person facilitates networking, but requires day off work, missing concurrent sessions being held, and sometimes significant travel
- Virtual provides more flexibility, but eliminates informal networking and can be challenging to break up the workday

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TUR Planners

See page 6 of the background document

- Currently
 - 115 General Practice Planners
 - 63 Limited Practice Planners
- Initially trained through TUR Planner Certification Course:
 - 100% General Practice Planners
 - 51% Limited Practice Planners (two-thirds of whom did so in the last 10 years)

Planner	Years Planning		
Certification	Over 20 years	10 to 20 years	Less than 10 years
General Practice Planners	40%	33%	27%
Limited Practice Planners	42%	10%	48%

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TUR Planner Feedback on Planning

See pages 6-9 of the background document

- Planning leads to:
 - Improved management attention
 - Improved worker health and safety
 - Financial savings
 - Compliance
 - Improvements in production efficiency
- Benefits include
 - Organizational focus on opportunities
 - Technical and economic benefits
- Challenges include
 - Difficulties related to limited options
 - Difficulties with specific planning elements
 - Administrative challenges

Excerpt from 2008-2009 TURA Program Assessment report

Benefits experienced as a result of implementing TUR projects in the period 2000-present			
Benefit	Responses	Percentage (of 196 Respondents)	
Increased management attention to environmental practices	108	55%	
Improved worker health and safety	99	51%	
Financial savings	81	41%	
Compliance with other state or federal regulations	64	33%	
Improvements in production efficiency	57	29%	
Improved product marketing	41	21%	
Improvements in product quality	33	17%	
Improvements in technology and physical infrastructure	30	15%	
Compliance with international standards	22	11%	
Improved worker-management relations	21	11%	
Other	18	9%	
Improved community relations	16	8%	
Retention of a product line	12	6%	

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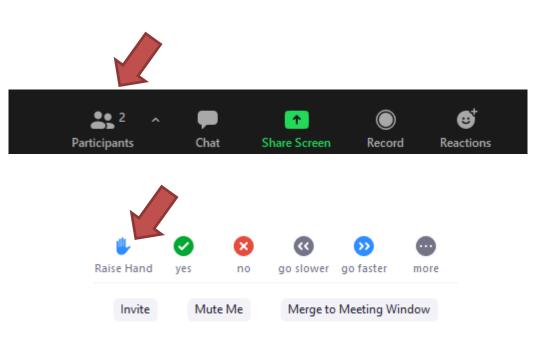
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Discussion Logistics



Use Zoom function to raise your hand for comments or questions

- To access the "Raise Hand" function, click "Participants" at the bottom of your screen, and then click the "Raise Hand" button that appears under the list of participants
- This will notify the host that you have a question
- Participants will be unmuted and invited to ask questions one at a time



Please contact <u>Caroline.Higley2@mass.gov</u> if you have technical difficulties during the discussion

Discussion Ground Rules





Be open to other perspectives



Build on suggestions



Allow space for all to participate

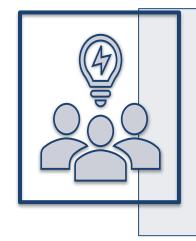
Focus on issues and opportunities



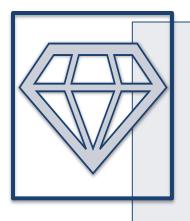
Stay present (both mentally and physically)

Discussion Goals





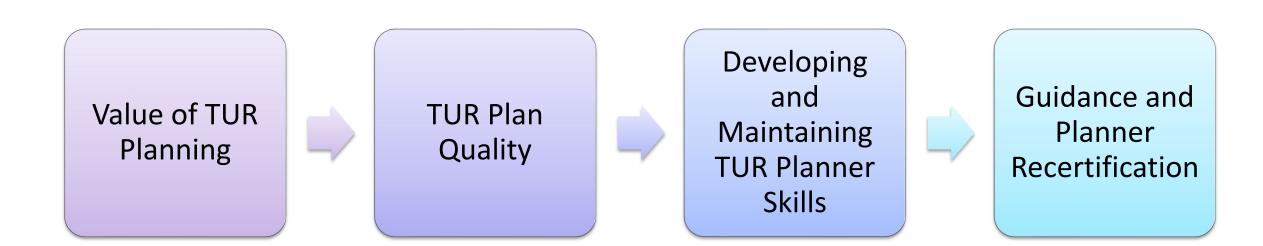
Gather creative, innovative ideas



Focus on opportunities to increase benefits of the TURA Program for both companies and the Commonwealth

Discussion topics

Massachusetts Toxics Use Reduction





- 1. In addition to feedback outlined in the background document, what is the value of TUR planning for newer filers vs companies filing for decades?
- 2. How can TUR planning support broader goals, such as:
 - Worker and/or public health
 - Business competitiveness
 - Overall sustainability objectives
 - Investor and community relations



- 1. What else can the TURA Program do to ensure that planning is high quality?
- 2. Are there innovative ways the TURA Program can engage with filers to improve plan quality and help identify options?
 - Consider opportunities for TUR not addressed (see pg 10) and challenges expressed



- 1. What are the strengths and weaknesses of the training provided by the program for planners?
 - What are your thoughts on the range of topics offered in the past several years (see Table 2)?
 - What specific additional training offerings would be most helpful?
- 2. What are other services the program can offer to help planners develop and maintain TUR planning skills?



- 1. How can the TURA Program improve the value of the planning guidance?
- 2. What are advantages and disadvantages of the two-year planner recertification cycle?
 - What might the impact on planner or plan quality be if the cycle was modified?

TURA Program Strengthening Ad Hoc Committee





Please direct any questions or comments to:

Tiffany Skogstrom, Director MA OTA tiffany.skogstrom@mass.gov

Adjourn





April 29 (11 am – 1 pm):

• Toxic Substances

May 13 (10 am – noon):

• TURA Fees