

# Massachusetts Toxics Use Reduction

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## Alternative Planning Options

TURA Program Strengthening  
Ad Hoc Committee

January 13, 2021



# Logistics



Please state your name and organization in the chat box for the purposes of recording meeting attendance



We will pause for opportunities for attendee participation at designated times



Recordings of a public committee are not permitted without notifying the chair in advance so that attendees can be notified at the beginning of the meeting



Written notes are being taken



Please contact [Caroline.Higley2@mass.gov](mailto:Caroline.Higley2@mass.gov) if you have technical difficulties during the meeting



# Today's Agenda



1. Welcome and Committee Member Introductions
2. Approval of Dec 14, 2020 meeting minutes
3. Presentation: Alternative Planning Options
4. Discussion
  - Experience with Alternative Planning
  - Guidance and Training
  - Other important considerations
5. Adjourn

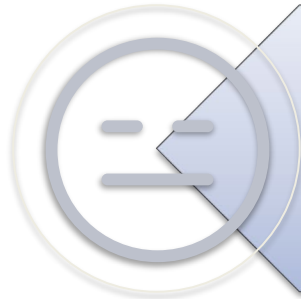
Note: Public comments/questions will be held until opened for general discussion

# Vote on Minutes

- Approval of Dec 14, 2020 meeting minutes



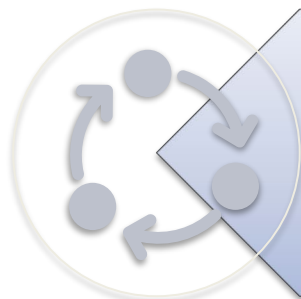
# Toxics Use Reduction Act 2006 Amendments



Developed to provide options for MA companies who have been engaged in TUR planning for multiple cycles and are finding limited options



Designed to provide flexibility and new opportunities for companies to integrate TUR planning techniques into their overall operations



Facilities that have completed one TUR Plan and at least two Plan Updates may choose to:

- Continue with Toxics Use Reduction Plan Updates
- Develop a Resource Conservation Plan
- Implement a TURA EMS



# RC Planning Requirements



## Complete

Complete a Resource Conservation plan per the TURA regulations (310 CMR 50.90)

- Similar elements to TUR planning
- Energy, Water, Materials contributing to solid waste, Chemicals not otherwise reportable

## File

File a certified RC plan summary with MassDEP by July 1 of planning year that is:

- Certified by a TURP that it meets the requirements of 310 CMR 50.63, and,
- Signed by the senior management official

## Complete

For the next plan cycle, complete a TUR Plan Update and a Resource Conservation Progress Report

- Separate Progress Report required for each asset chosen

# TUR/RC Planner Certification



## Initially

Must be a currently certified TUR Planner

Must obtain 12 CE credits in RC

- Six on applying TUR methods to RC Planning
- Six on asset specific topics



## Recertification

Maintain TUR planner certification

Obtain 9 continuing education (CE) credits every 4 years

- 3 each for energy, water, and materials
- RC CE credits count toward total TUR continuing education credit requirement



No additional RC continuing education credit required for exempt chemicals or toxics used below threshold (Asset 4)

TUR Planners do not need additional RC certification



# Companies that have Developed Resource Conservation Plans

Massachusetts  
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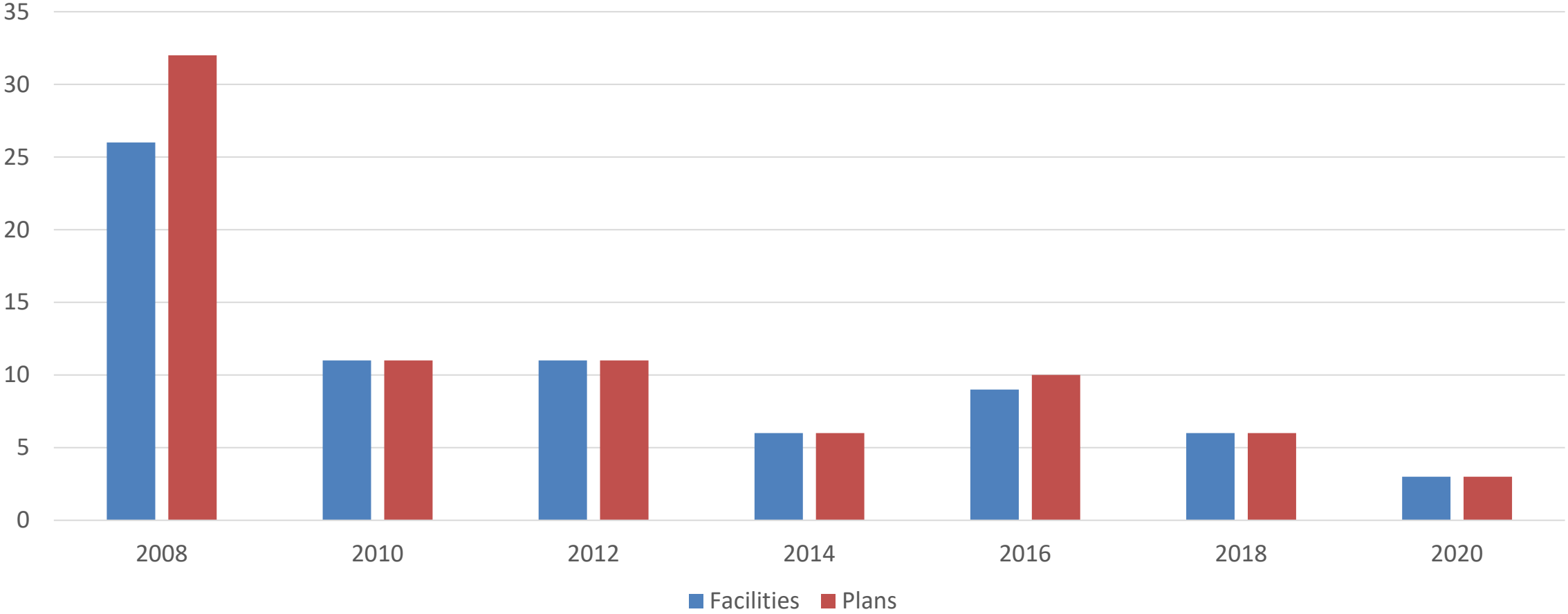




# Trends in RC Planning



Resource Conservation Planning Trends



# Example of RC Planning Outcomes

Planning Years 2010, 2012, 2014 RC Progress Report Summary		
Asset	Number of Plans	Reductions Achieved
Energy	27	70,120 MMBTUs
Water	11	544 Millions of Gallons
Materials Contributing to Solid Waste	5	1,140 Tons
Listed Chemicals Used Below Reporting Threshold and Chemicals Exempt	6	28,231 Pounds

# Integrating TUR into an EMS



**Say what you  
do**

**Do what you  
say**

**Prove it**

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Identify all TURA covered toxics as significant aspects

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Cover all production units identified in your most recent TUR report

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Include all 14 TURA EMS elements

# TURA EMS Requirements



## Determine

### Determine eligibility:

- Plan-Do-Check-Act cycle completed
- Independent audit conducted

## Incorporate

Incorporate TUR into your existing EMS per the TURA regulations (310 CMR 50.90)

## File

File a certified TURA EMS Progress Report with MassDEP by July 1 of each planning year that is:

- Certified by a TUR Planner that it meets the requirements of 310 CMR 50.63, and,
- Signed by the senior management official

# TURA EMS Certification



## General TUR Planner

- 16 CE in EMS (one time)

## Limited TUR Planner

- 2 yrs experience OR 16 CE credits in EMS

## EMS Professional

- 16 hr TUR training AND 16 hr TUR training every 6 yr thereafter
- OR (Limited EMS Professional only)
- 2 yr TUR experience AND 16 hr TUR training every 6 yr thereafter

# Companies that have Integrated TUR into their EMS

Massachusetts  
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EXCELITAS  
TECHNOLOGIES®



umicore  
materials for a better life



Rousselot

PerkinElmer®  
For the Better



tyco

Rapiscan®  
systems

AS&E®



SKYWORKS®

Sika®  
Sarnafil®



CleanHarbors®



ATI Allegheny  
Ludlum  
Allegheny Technologies



Callahan  
Chemical Company

MERSEN

Ferraz Shawmut | Eldre | Idealec | FTCAP

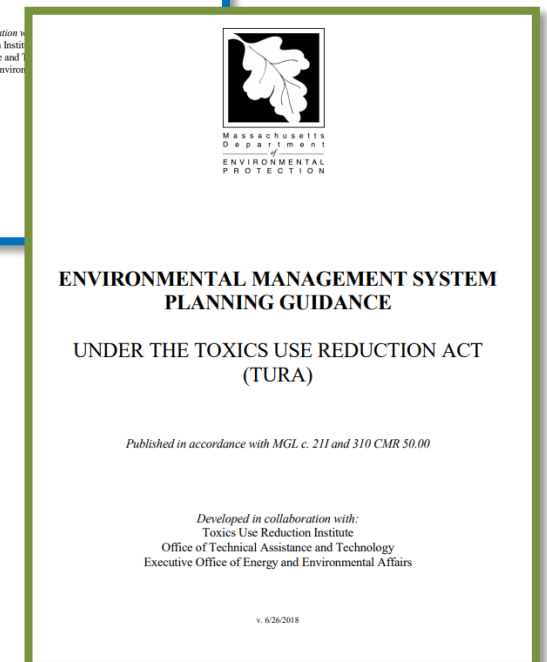
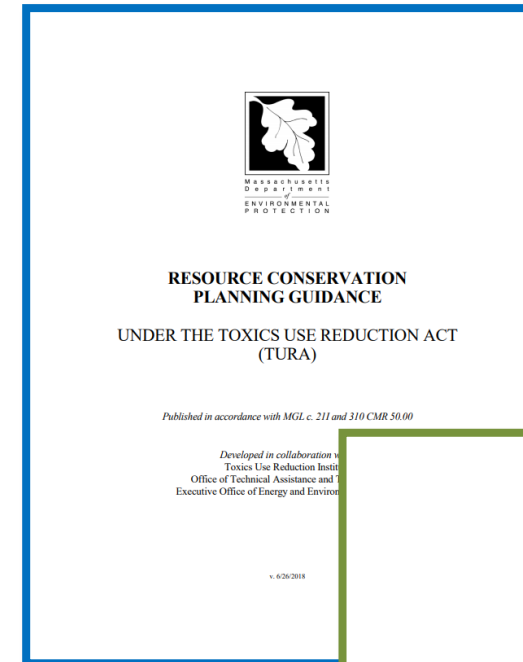
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# MassDEP Resource Conservation Planning and TURA EMS Guidance



2018 updated versions available on DEP's website

- RC Guidance
  - Clarifies requirements in the regulations
  - Gives an idea of what is expected
  - Provides examples of RC opportunities
- TURA EMS Guidance
  - Clarifies requirements
  - Provides insights into integrating TUR with existing EMS
  - Offers examples of TUR in various aspects of the EMS







# Recent Trainings



## Initial 16-hour trainings

- Resource Conservation: February 2020
- TURA EMS: February 2019

## Continuing education opportunities (90 min each):

- RC (3 asset areas): February 2020
- Energy conservation: Spring 2019
- Water conservation: Fall 2018
- Materials contributing to solid waste: Spring 2018

# TURA Program Update



Find a summary of ongoing TURA Program work here:

- [www.turi.org/programupdatejan21](http://www.turi.org/programupdatejan21)

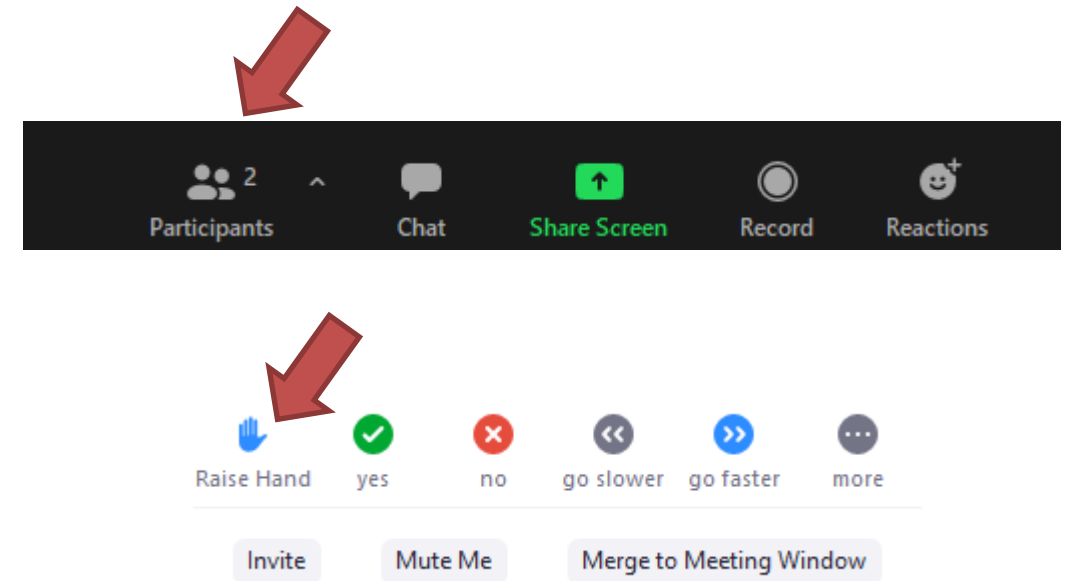
## Program activities

- Hosted numerous virtual training and demonstration events
- Published case examples of TUR implementation
- Developed COVID-19 response resources
- Provided grant funding to promote use of safer solvents and disinfectants
- Changes in reporting requirements
- Assessed and listed reporting and planning requirements for chemical categories
- Updated the TURA data portal
- etc

# 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.



# Discussion Ground Rules



Be open to other perspectives



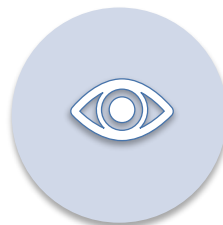
Build on suggestions



Allow space for all to participate

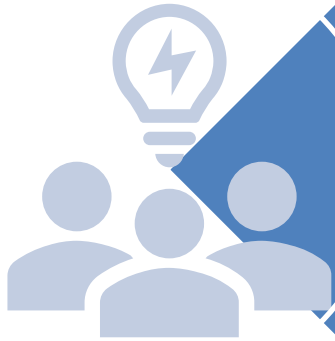


Focus on issues and opportunities

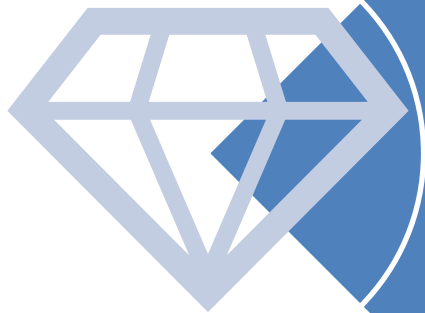


Stay present (both mentally and physically)

# Discussion Goals



Gather creative, innovative ideas



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

# Discussion Questions – Experience with Alternative Planning



- Have you taken advantage of Resource Conservation planning?
  - Why or why not?
- Have you taken advantage of TURA EMS?
  - Why or why not?
- What would encourage your facility/client to take advantage of these options?

# Discussion Questions – Guidance and Training

- What has your experience with the guidance been?
  - What can be done to improve guidance?
  - Is this a priority?
- What additional tools/resources would be helpful?
  - For instance, are there organizations outside of the MA TURA Program that have trainings or resources available that should be highlighted?
- How can we improve on the trainings offered?



# Discussion Questions – General



- Why are more companies not taking advantage of these alternative planning options? How can we encourage better uptake?
- Are there current health and environmental priorities that could be incorporated into RC planning or TURA EMS options? (e.g., climate change resiliency, circular economy, drought preparedness)
- Are there opportunities to keep TUR planning relevant by integrating it with other current planning/assessment programs? (e.g., EPA energy programs, emergency preparedness, climate change resiliency plans, ISO 14001)
  - What would make this more feasible/attractive?
- Are there additional ways to streamline the reporting process?
  - For instance, integrating TUR and RC into one overall plan and plan update

# TURA Program Strengthening Ad Hoc Committee

**Massachusetts**  
Toxics Use Reduction



Resolution: 1280x1024 px  
Free Photoshop PSD file download  
www.psdgraphics.com

Please direct any questions or  
comments to:

Tiffany Skogstrom, Director MA OTA  
[tiffany.skogstrom@mass.gov](mailto:tiffany.skogstrom@mass.gov)

# Adjourn



**March 30 (1 – 3 pm):**

- **TUR Planning and TUR Planners**
- 

**April 29 (11 am – 1 pm):**

- Toxic Substances

**May 13 (10 am – noon):**

- TURA Fees

