



TUR Planning Refresher

Making Pre-Planning Integral to your Operations

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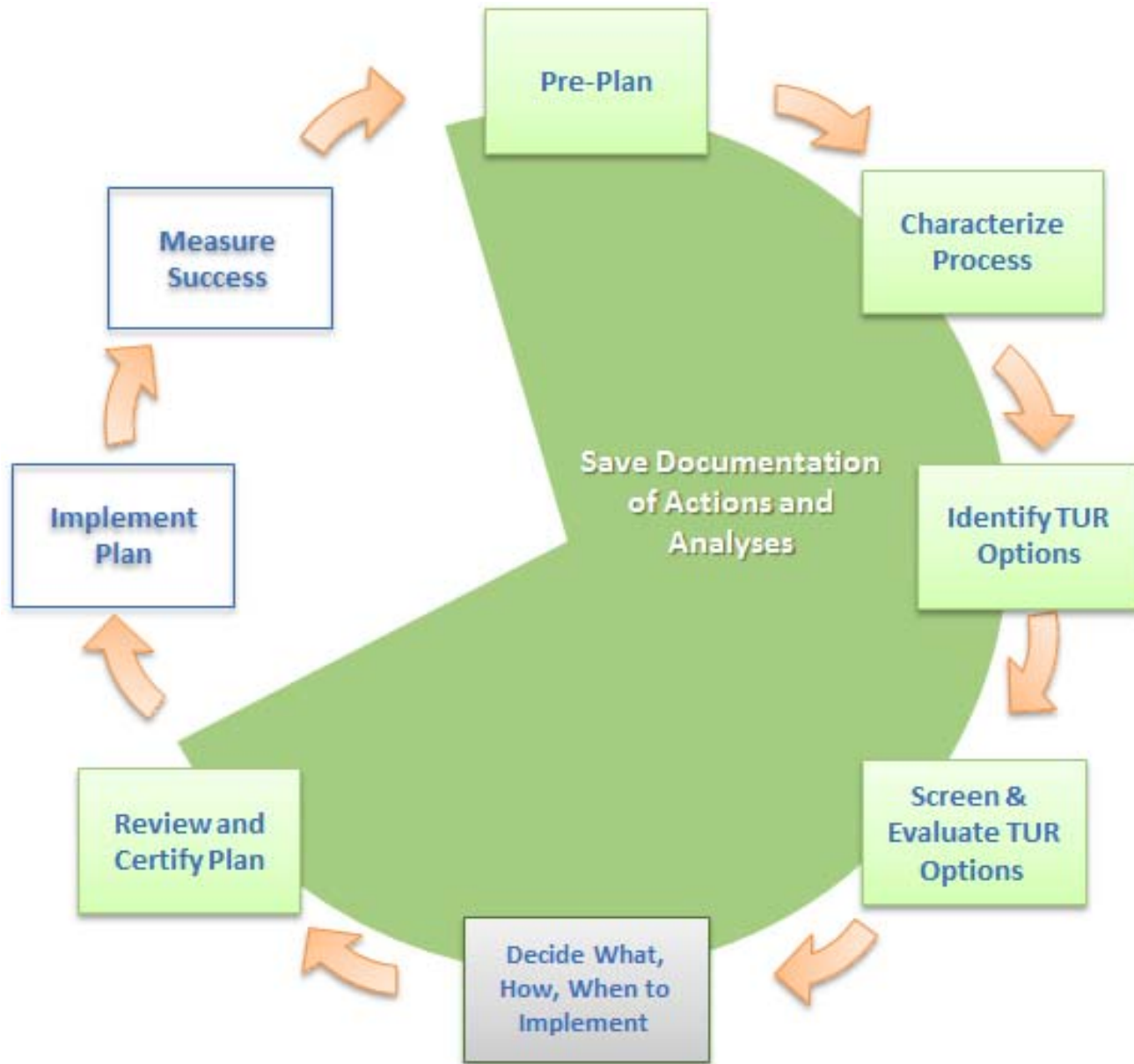
Westborough Doubletree



Agenda

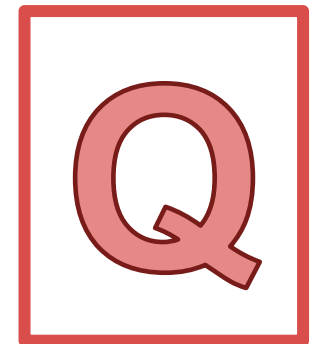


- Let's Refresh our Memories
 - Company Q
- Required Pre-Planning Elements
- Industry Peer Panel - Using Pre-Planning to Maximize TUR Success
 - Setting the Management Tone
 - Engaging with Employees



Large Group Discussion

- Read through the handout about Company Q and consider these pre-planning elements
 - Plan Scope
 - Statement of Management Policy
 - Employee Notification
- As a group we'll discuss:
 - Good enough?
 - What would you do to improve it?



Goals of TURA

50% reduction in the generation of toxic by-products by 1997 through TUR (achieved = 47%; 50% by 1999; now >60%)

Establish TUR as the preferred means of regulatory compliance

Sustain and promote the competitive position of Massachusetts industry

Promote reduction in the production and use of toxic and hazardous substances

Enhance and strengthen enforcement of environmental laws, and coordinate state agencies administering toxics-related programs

As planners, you can do more than simply satisfy regulatory goals

Elevate importance of EH&S

- Go beyond compliance
- Increase operator to senior management buy-in

Identify waste reduction and cost savings

- Increase profitability
- Demonstrate value of EH&S

Promote sustainability

- Create safer work environment
- Stay ahead of customer and global market restrictions

Pre-Planning is the foundation of your efforts

- **Facility-Wide Information Requirements (310 CMR 50.43)**
- TURA requires that a certified TUR plan include:
 - **A statement of facility-wide policy regarding TUR**
 - A statement of the **scope** of the plan
 - **Expected** change in facility-wide use and byproduct generation for each covered toxic

Scope: Facility-Wide Level

Description of each production unit, including:

- Production unit number
- Process description(s)
- Product
- Unit of product
- Chemicals and CAS numbers from each covered toxic associated with the production unit

Description of the process for identifying TUR options

Summary of all TUR techniques that were considered appropriate

Management Policy

Purpose

- Focus attention on encouraging (or discouraging) TUR
- Communicate (internally and externally) firm's commitment to TUR

Must include

- How facility encourages TUR
- Policies that encourage/discourage TUR

Optional policy information

- Role of TUR in hiring, salaries, promotions
- R&D and TUR
- Capital investment decision process

DEP observations

- Policies that encourage or discourage TUR often missing
- Optional information rarely present

Employee Notification

Must happen by January 1 of planning (even-numbered) years

Must:

- Identify and describe production units
- Explain planning criteria/requirements
- Solicit TUR suggestions

Describe how your facility does this within your TUR Plan

DEP observations:

- Not always done in timely fashion
- Often missing planning criteria
- Simply posting on a bulletin board seems to garner few results

Panel Discussion – Strategies that Work



Gary Nedelman, Mexichem Specialty Compounds



Darrin Rioux, Morgan Advanced Technology



Robert Fricke, US Pack



Q&A

Key Take-Aways

Management Policy sets the tone for success



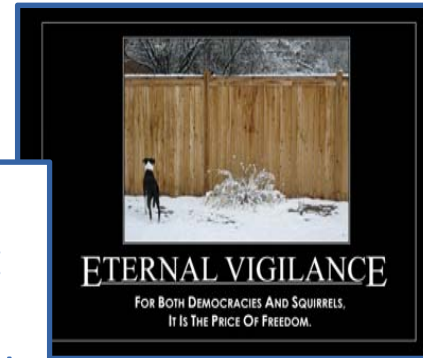
Finding champions in your organization can be a powerful indicator of success



Incentivize employees to share their ideas and creativity



Be vigilant and engaged



Questions??