

Examples of Regulatory Integration of Toxics Use Reduction at MassDEP

Panel: TURA Policy Lessons,
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Integrating TUR in MassDEP's Primary Business Processes

- **Permitting**
 - **Assistance**
 - **Compliance Assurance**
 - Inspections
 - Reporting
 - **Enforcement**
 - **Regulations, Policies, Program Development**
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Permitting: P2 Pilot Project (90-92)

Successes -

- TURA supports DEP's permit review
 - Process redesign
 - Input substitution
- Air Quality analysis of BACT (Best Available Control Technology) dovetails with TUR

Challenges -

- Businesses do not want to reengineer processes during permitting review
 - Timeline certainty = \$
 - Permit fast as possible
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Assistance: Referrals to OTA & TURI

Successes -

- More OTA site visits
 - More TUR implemented
 - Build the “business case”
- Grounds TURI research agenda
- More job satisfaction at DEP

Challenges-

- Program evaluation difficult
 - Confidentiality
- Concerns about “consulting”

Compliance Assurance: Facility-Wide Inspections to Reduce Sources of Toxics

Successes -

- Materials flows & processes vs. programmatic “silos”
- Toxic processes & media transfers evident
- TUR as preferred compliance strategy
 - More data points
 - Full costs of process
 - “Teachable moment”

Challenges -

- Training
- Some folks are specialists not generalists
- Organization – choose your matrix
- Periodic EPA translation/reassurance

Compliance Assistance – Reporting: Consolidated Toxics Reporting

Successes –

- Toxics Reports inventory is a resource
- Cross reference databases to assure compliance and find scofflaws

Challenges –

- Significant investment in current scheme
 - Public & private
- Businesses don't always desire One-Stop

Enforcement: Penalty Mitigation for TUR

Successes -

- TUR implemented
 - Business' \$\$ available for TUR, not otherwise available
 - Profile of environmental raised to highest levels in the company
- Settle enforcement cases

Challenges -

- Not entirely voluntary
- Controversial to forgo deterrent portion of penalty
- Some beneficiaries unaware of value

Regulation, Policy, & Program Development

Successes –

- TUR has become DEP organizational value
- Regulations e.g.
 - Consumer Products
 - CA LEV
 - Coatings
- Natural bridge to sustainability

Challenges –

- Performance standards vs. design standards