

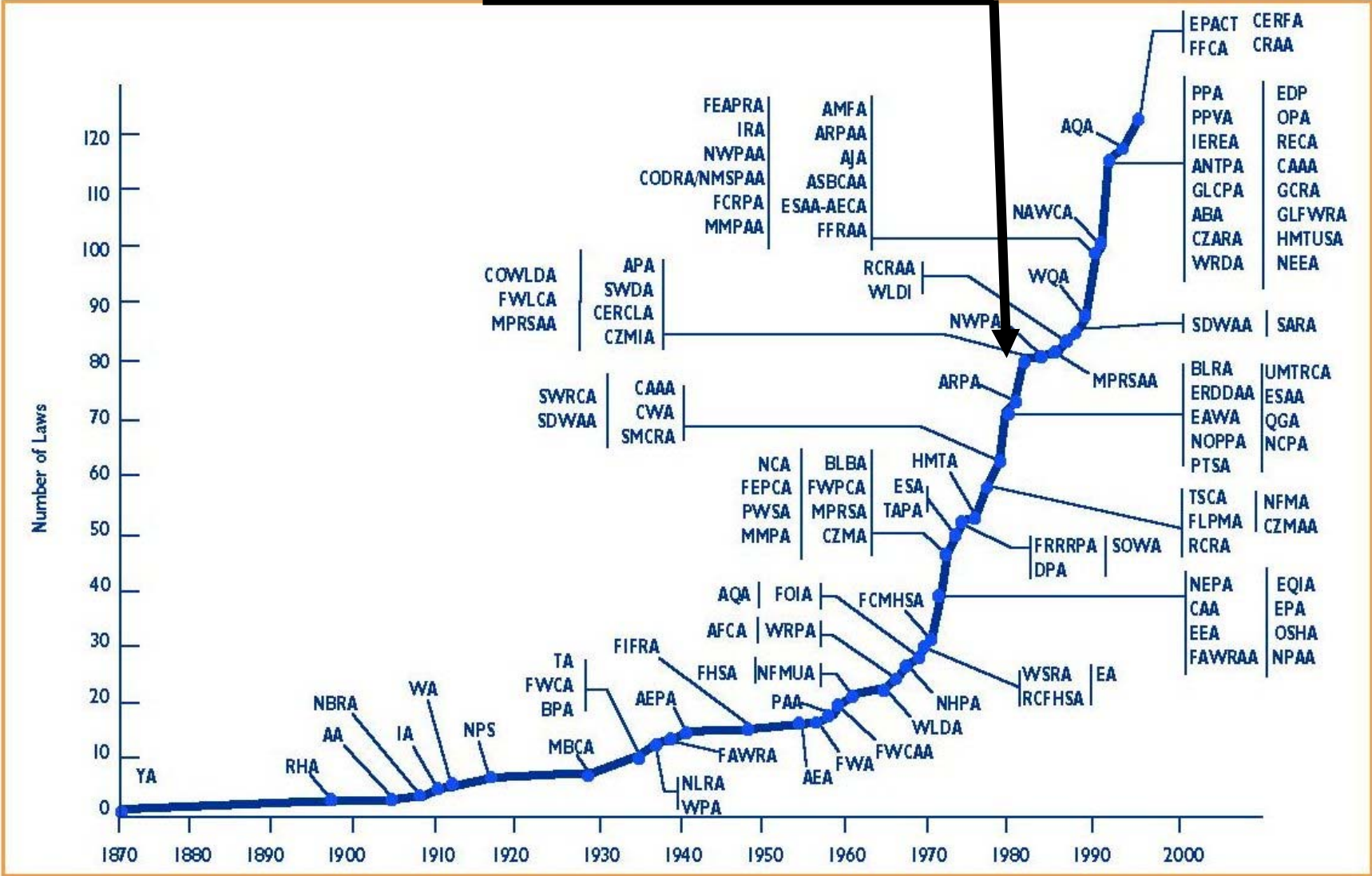
# **A Model for Reducing Toxic Chemical Use**

## **the Amended Massachusetts Toxics Use Reduction Act of 2006**

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# US Federal Environmental Regulations

## Toxics Use Reduction Act - 1989



# The Toxics Use Reduction Act (TURA)

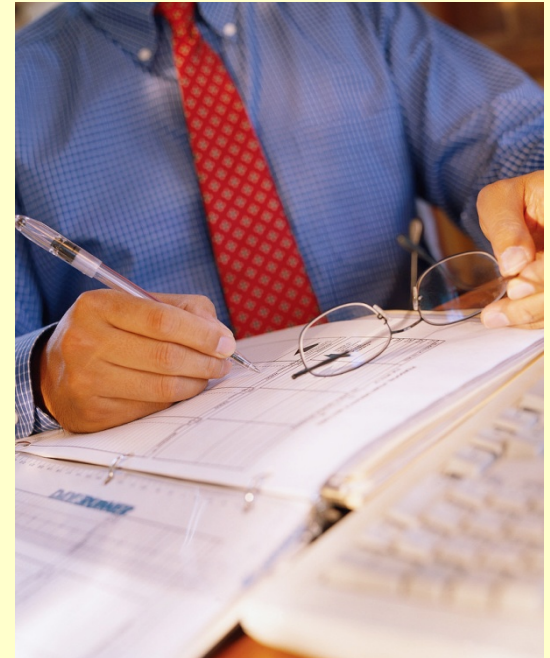
- Passed into Massachusetts law in 1989
- Requires Planning and Reporting by applicable facilities
- Established the three TURA agencies

# TURA Mission

- Reduce the use of toxic chemicals by Massachusetts industry
- Protect workers, the public and the environment
- Sustain, safeguard and promote competitive advantage in MA businesses, large and small
- Establish a goal of 50% reduction by 1997

# What Companies Must Do

- Report annually on amount of toxics **used**
- Pay an annual fee
- Conduct toxics use reduction ***planning*** every two years



# Key TURA (State) and TRI (Federal) Differences

## TURA:

- covers more SIC/NAICS codes
- has more reportable chemicals
- has “higher hazard” threshold
- requires use reporting, not just releases
- has fees

# Reporting Thresholds (facilities with $\geq 10$ employees)

- Manufactured or processed: 25,000 lbs
- Otherwise used: 10,000 lbs
- PBTs:
  - Lead, lead compounds: 100 lbs
  - Mercury, mercury compounds: 10 lbs
  - Dioxin & dioxin-like compounds: 0.1 gram
- Higher Hazard Chemicals: 1,000 lbs

# TURA Fees

- Base Fee

<u># FTEs</u>	<u>Base fee</u>	<u>Max fee</u>
- $\geq 10$ < 50	\$1,850	\$5,550
- $\geq 50$ < 100	\$2,775	\$7,400
- $\geq 100$ < 500	\$4625	\$14,800
- $\geq 500$	\$9,250	\$31,450

- Plus \$1,100 per chemical (but not more than max fee)

# 1<sup>st</sup> 10 Years - General Trends

- Planning
  - 70% of firms identified TUR options in their plans
- Implementation
  - 81 % of the firms that identified TUR options in their plans reported implementing at least some of them
  - 67% of firms reported cost savings
  - 66% of firms reported health and safety benefits
- Materials accounting was rated the most valuable component of TUR planning

# 10 Year - Costs and Benefits of the TURA Program

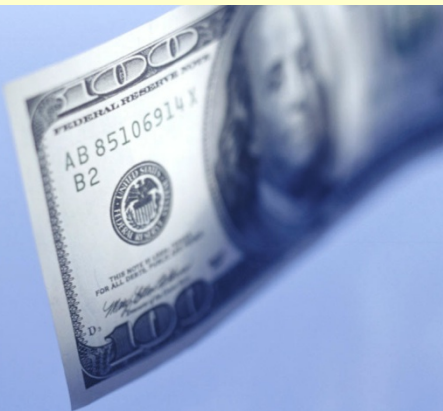
## **Economic benefits exceeded costs**

From 1990 - 1997:

- Reported Costs = \$77 million
- Monetized Benefits = \$91 million

\*\*\*Benefits do not include:

- » Human health and ecological benefits
- » Benefits to non-TURA firms
- » Other non-monetized benefits



# TURA Program Evaluation - The 20 Year View

## Preliminary Indications:

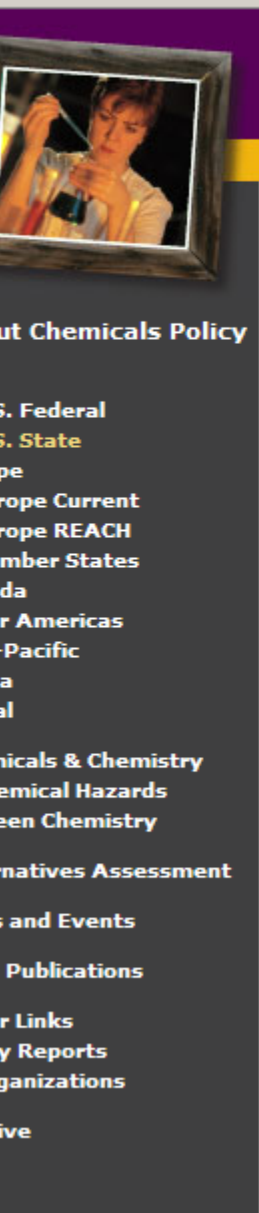
- Companies identified new TUR opportunities even after years within program
- TUR techniques are being disseminated outside of Massachusetts
- Qualitative benefits being realized
  - Increased upper management attention to EH&S
  - Improved worker health and safety

# 2006 Amendments – Major Changes

- Designate high and low hazard chemicals
  - Lower reporting threshold (1000 lb.) for high hazard
  - Lower fees for low hazard
  - Up to 10 may be designated per year
- Reduce and simplify chemical list
- Planning alternatives:
  - Resource Conservation Planning – energy, water, materials
  - Integrate TUR Plan into EMS
- Revise production-unit level reporting

# Other Potential TURAs

- Scotland
- Ontario, Canada



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# Chemicals Policy Initiative

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## US STATE LEVEL CHEMICALS POLICY DATABASE

The database can be searched by state, region, status (e.g., enacted, proposed, and failed), [policy category](#) (e.g., pollution prevention, single chemical restriction, etc.), chemical, and product type (e.g. children's products, cleaning products, etc.).

To search the database, use the six pull-down menus below to make selections in one or more of the pull-down menus. When making selections in multiple pull-down menus, the results will include only entries that contain all of the selections highlighted. The database can also be searched by making multiple selections from one pull-down menu. In order to select more than one item in each menu, hold down the command key (Mac) or control key (PC) while making the selections. When making multiple selections in one pull-down menu, the results will include entries that contain any of the selections highlighted.

Additionally, the entire database can be searched by entering a bill number, word, or phrase into the box located below the pull-down menus. This will search the full database entries of each policy for the entered word or phrase, although it will not return results where the entered word or phrase is found solely in the full-text document (word or pdf) of the policy.

To print the results of the search, click on the print icon located at the top of the returned results. To search again, click on "new search" located below each entry to reset the menus.

To let us know about legislation or policies that are not represented in the database, any mistakes in the entries, or if you have any other comments, please [click here](#).

### Passed and Pending State Level Chemicals Legislation

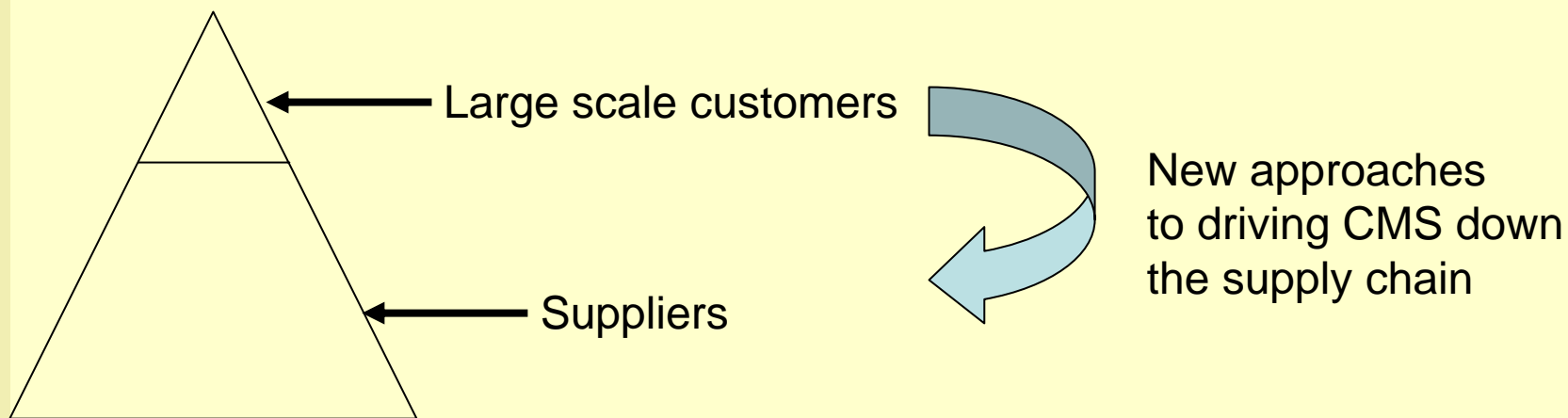
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[RESET FORM](#)

To select more than one item in each list, hold down the command key (Mac) or control key (PC) while making your selections.

STATE	REGION	STATUS	CHEMICAL
All	All	All	All
Alabama	Arctic	Proposed	2-ethyl-1-hexanol
Alaska	Midwest	Enacted	4-phenylcyclohexene
Arizona	Northeast	Failed	Alkylphenol
Arkansas	Pacific		Arsenic
California	Southeast		benzyl butyl phthalate (BBP)

# Non-Regulatory Drivers

- OEMs – Asset Protection
  - Minimizing the risk of supply chain disruptions
- CMS Providers – Bottom of the Pyramid



“It’s not easy being green”



“The times they are a changin’ ”

Bob Dylan 1963

**Thank you for your interest.**

**For more information  
on the Toxics Use Reduction Program:**

**[WWW.TURI.ORG](http://WWW.TURI.ORG)**

**[Jack\\_Luskin@uml.edu](mailto:Jack_Luskin@uml.edu)**