

Overcoming Barriers to Toxics Use Reduction Implementation

TURI Continuing Education Conference
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John Raschko, Ph.D.
Massachusetts Office of Technical Assistance
(617) 626-1093
john.raschko@state.ma.us
www.mass.gov/eea/ota



Overview

- **Introduction**
- **Company case studies –**
 - **Siemens Healthineers**
 - **ThermoFisher Scientific**
 - **Stainless Steel Coatings**
- **Panel discussion**

Introduction

- **OTA Barriers Report (7/2008) –**

- Survey of TURPs at CE Conference
- Barriers to practices identified as worth doing, but company decided not to implement

- **Top 10 Barriers –**

- Quality
- Lack of Reliability
- Customer Requirements or Perception
- Technical Uncertainty
- Capital Cost
- Conformance to a Standard
- Operating Cost
- Technical Difficulty
- Lack of Management Support
- Other Things Considered More Important

Introduction (cont'd)

- **Other Barriers Identified –**

- Not Enough Benefit from Doing It
- Resistance To Change Because of Invested Effort
- Not Enough Help to Do It
- Not Enough Reasons to Do It
- Lack of Staff Support
- Not Enough Time to Do It
- Physical Plant Limitations
- Regulatory Complications

One Less Regulatory Barrier

- January 25, 2018 - EPA issued guidance memorandum withdrawing the “once in, always in” policy for the classification of major sources of HAPs.
- New guidance - sources of HAPs previously classified as “major sources” may be reclassified as “area” sources at any time -
 - Facility must limit its PTE to below major source thresholds.
- <https://www.epa.gov/stationary-sources-air-pollution/reclassification-major-sources-area-sources-under-section-112-clean>