

Greetings!

This issue includes information about OTA services, important regulatory updates, and more.

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## OTA Staff Will Always Be Here For You

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Throughout the COVID-19 pandemic, the Office of Technical Assistance and Technology (OTA) has continued to assist our clients with their environmental safety and compliance needs. Now, we're pleased to add virtual site visits to our roster of services. Contact one of our specialists to set up a virtual site visit to receive free, confidential assistance tailored to your needs.

[Find an OTA Specialist](#)

Additional relevant COVID-19 resources include:

- The Toxics Use Reduction Institute's (TURI) [Safer Cleaning and Disinfecting Fact Sheet](#) for manufacturers and businesses
- The State of Massachusetts [Safety Standard Guidance for Manufacturers](#)

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## Working with Industries to Prevent PFAS Pollution

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OTA is collaborating with Wastewater Treatment Facilities (WWTF) in order to protect drinking water from contamination from per- and polyfluoroalkyl substances (PFAS). Under new regulations, upon renewal of their National Pollution Discharge Elimination System (NPDES) permits, WWTFs will be required to test for certain PFAS compounds discharged by upstream facilities in effluent and sludge, and, in some cases, in wastewater.

OTA has already begun proactively reaching out to facilities upstream from WWTFs whose discharges may be tested. We can assist your company in identifying PFAS-containing products and communicating with your supplier to reduce the risk of inadvertent discharge. OTA has also prepared a [notification letter template](#) to help you reach out to your suppliers so you can identify which products contain reportable PFAS chemicals.

Be on the lookout for future communication from [your OTA specialist](#), or feel free to reach out to us. **As**

always, OTA services are no-cost & absolutely confidential.

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## COVID-19 Response Spotlight: Industrial Polymers & Chemicals and Shawmut Manufacturing

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This year's COVID-19 pandemic has introduced unprecedented challenges, and Massachusetts manufacturers have risen to the occasion in countless ways. A previous OTA newsletter recounted how companies have [gone above and beyond](#) to support the community by donating or manufacturing personal protective equipment or disinfectants. **Thank you for your ongoing work, your devotion to innovation, and your commitment to your communities.**

Industrial Polymers and Chemical (IPAC) was one of 13 Massachusetts companies recently awarded a [Manufacturing Emergency Response Team Grant](#) by the Commonwealth of Massachusetts for an additional CNC cutting machine that will be used to manufacture isolation gowns for the healthcare industry. OTA recently spoke with Tom Kennedy, Chief Technical Officer at IPAC, about the grant and their plans.

When COVID-19 arrived in Massachusetts, IPAC considered what they could do to support their community. IPAC's long expertise with polymer manufacturing and cutting put them in an excellent position to manufacture personal protective equipment (PPE), including gowns and specialty filters.



A CNC cutting machine at the IPAC Shrewsbury facility (T&G Staff File Photo/Ashley Green, Industrial Polymers and Chemical)

Quickly, IPAC dedicated additional shifts and a CNC cutting machine to the production of isolation gowns. "This is going right to Boston, saving lives during this pandemic," Kennedy said. The grant will pay for the installation of a second CNC machine to expand their PPE production capacity.

Pursuing this work wasn't just an asset to Massachusetts healthcare workers and COVID patients—it also boosted morale. Workers on ten-hour shifts are "standing a little bit taller" to know that their work was supporting their community and that their efforts were being recognized—both by the state MERT grant, and by [their recent win](#) in the Mass COVID-19 Health and Safety Challenge, sponsored by theInnovation Institute at the [Massachusetts Technology Collaborative \(MassTech\)](#) and Lever, Inc.

Kennedy also gratefully acknowledged the Dacey family, which owns IPAC, and named the family's support as essential factor in the company's ability to integrate COVID-19 response into its mission.

"You feel so helpless during this pandemic. The fact that we could actually affect it—that's a big deal," Kennedy said.

Another MERT grant recipient is The Shawmut Corporation, the subject of an [OTA case study](#). The Shawmut Corporation and The Fallon Company, LLC will use the \$2.8 million grant to purchase equipment

for an N95 mask manufacturing plant in Massachusetts.

**Congratulations to IPAC, the Shawmut Corporation, and all the other awardees on these grants. We thank you for your hard work to keep Massachusetts healthy and prosperous.**

Now more than ever, OTA is here to assist Massachusetts manufacturers with their environmental safety and compliance needs. In order to provide assistance while still preventing the spread of COVID, we're very pleased to add virtual site visits to our roster of services. [Contact one of our specialists](#) to set up a virtual site visit to receive **free, confidential assistance** tailored to your needs.

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## Tiffany Skogstrom Named OTA Director

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The TURA Program is pleased to announce that Tiffany Skogstrom has been named Director of the Office of Technical Assistance following the retirement of longtime Director Rich Bizzozero in April. Tiffany has been with OTA since 2013, serving as the Acting Director and previously as the Outreach and Chemical Policy Analyst. Tiffany raises the agency's visibility as a free and confidential resource for Massachusetts' toxics users and coordinates OTA's chemical policy development and research.

Throughout her career, Tiffany has worked with various environmental and nonprofit organizations on waste reduction, recycling and pollution prevention campaigns, including the Boston Public Health Commission and Health Care Without Harm. Her toxics use reduction and occupational health experience includes creating a program to improve the work environment for auto shop and nail salon workers through the Boston Public Health Commission's Safe Shops and Safe Nail Salon Projects. Tiffany graduated from the Boston University School of Public Health where she concentrated in Environmental Health and was awarded the William B. Patterson Memorial Award for Excellence in Environmental and Occupational Health. She is also an Environmental Leadership Program Fellow as well as a Fellow of the University of California San Francisco Program on Reproductive Health and the Environment's Reach the Decision Makers Program.

OTA and the entire TURA program are fortunate to have Tiffany's leadership, and we congratulate her on her appointment!

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## Welcome, Krishana Abraham-Petrie!

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We're pleased to welcome Krishana Abraham-Petrie to OTA as our new Environmental Justice Intern. Krishana assists OTA in marketing and delivering their toxics use reduction services and resources to the environmental justice community through identifying potential partners and businesses and developing outreach and educational materials. She also will help to create a

strategic plan to approach and engage with the environmental justice community and minority-owned businesses. Krishana is a graduate student in Environmental Law & Policy at Vermont Law School, with a concentration in Climate Law. Prior to joining the OTA, Krishana has also completed a co-op with the City of Boston's Greenovate Boston, engaging residents with the City's Climate Action Plan and community organizing. She holds a bachelor's degree in Environmental Studies and Political Science from Northeastern University.



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## OTA's Michelle Spitznagel Appointed to National Pollution Prevention Roundtable

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Congratulations to OTA Team Leader Michelle Spitznagel for her recent appointment to the Board of Directors of the [National Pollution Prevention Roundtable](#). The National Pollution Prevention Roundtable (NPPR) is a national forum that promotes the development, implementation, and evaluation of efforts to avoid, eliminate, or reduce waste generated to air, land, and water. In her role at OTA, Michelle provides pollution prevention and compliance assistance to companies in the textile, paper, printing, biotechnology, and polymer industry sectors. She also assists companies interested in implementing renewable energy technologies and has previously assisted companies with coating operations. Michelle's background also includes hazardous materials, underground storage tank regulation, and analytical laboratory work. Michelle has a bachelor's degree from Purdue University in environmental science and a master's degree in civil and environmental engineering from the Massachusetts Institute of Technology.

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## Drought and Water Conservation

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Drought conditions persist in Massachusetts, although recent rainfall has improved conditions in some parts of the state. After experiencing Level 3 – Critical Drought during September and October, the Southeast Region of the Commonwealth has been downgraded to Level 2 – Significant Drought. The Cape Cod region has held steady at Level 2, while the Nashua River basin has worsened to Level 2. Conditions in the Western, Connecticut River Valley, Central, Northeast, Islands, regions and the Millers and Charles River watersheds have improved to Level 1 – Mild Drought.

Despite improvements in many several regions. state officials urge Massachusetts residents and institutions to take the following steps to reduce demand on water supplies.

**In Level 2 areas  
(Significant Drought):**

**In Level 1 areas  
(Mild Drought):**

- Minimize overall water use
- Limit outdoor watering: hand-held hoses/watering cans, no more than one day a week, 9 a.m. to 5 p.m.
- Follow local water use restrictions

- Minimize overall water use, focusing on indoor water use (toilets, faucets and showers are more than 60% of indoor use.)
- Reduce outdoor watering to no more than one day a week, 9 a.m. to 5 p.m.

Companies are encouraged to integrate water conservation into their [TURA Resource Conservation plans](#). If your company needs assistance with water conservation, review [OTA's water conservation case studies](#) to learn about what other TURA filers have done, and [reach out to OTA staff](#) if you want to learn more.

Learn more about [drought status and response in Massachusetts](#).

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## Upcoming EPA Webinars: Ammonia Emissions Prevention, P2U, and Energy Conservation

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### Pollution Prevention Opportunities for Ammonia Emissions in the Food and Beverage Sector

November 18, 2020 at 2pm EST

Register: Ammonia Emissions  
Prevention

The webinar will provide attendees with: 1) an overview of the sources of emissions of ammonia from the industrial refrigeration systems commonly used in food and beverage processing facilities; 2) a summary of refrigerant inventory determination methods for industrial ammonia systems, including an Ammonia Inventory Calculator, which is a new online resource to estimate the operating charge of existing systems; and 3) the use of dynamic charge calculations for flagging refrigerant losses from systems that would otherwise go undetected. Applications of these methods, along with best practices for identifying and eliminating fugitive ammonia leaks identified during field work in Wisconsin food and beverage plants will also be discussed.

### P2U Celebrating Success: Fostering a P2 Culture

November 19, 2020 at 12pm EST

Register: P2 Celebrating  
Success

Join EPA Region 4 and NPPR for the November session of the P2U (Pollution Prevention University) webinar series featuring P2 award program recipients.

- Overview of awards programs represented
- Project highlights from award winners
- Speaker panel Q&A session on the value and benefits of recognition programs, encouraging buy-in and participation in internal environmental sustainability programs, and barriers encountered in pursuing P2 efforts

### Using Data to Guide Your Hunt For Energy Treasure: Now Virtually with VEIC

Join EPA's ENERGY STAR<sup>®</sup> and the New England Energy Management Best Practice Network for a webinar on Using Data to Guide Your Hunt For Energy Treasure: Now Virtually with VEIC. As businesses grapple with capital constraints due to COVID, many traditional energy efficiency projects may be

December 9, 2020 at 1pm EST

Register: Energy Conservation

on hold. How can your energy meters be mined for low- and no-cost opportunities to reduce operating costs? VEIC will share some new approaches to gain insights from site energy data to help virtually guide your organization's hunt for energy treasure. **Companies are encouraged to integrate energy conservation into their [TURA Resource Conservation plans](#).**

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## Regulatory Update: TURA Hazardous Chemical List

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Following the [recent addition of 172 PFAS](#) to the US Environmental Protection Agency (EPA) Toxics Release Inventory (TRI), the TURA Administrative Council voted on September 10, 2020 to add these substances to the Hazardous Chemical List, in compliance with TURA statutory requirements to list any chemicals added to the TRI. Reporting for these substances under TRI is due to US EPA on July 1, 2021. With these revisions to the Hazardous Chemical List, these substances will additionally become reportable under TURA in January 2021 for reports due in July 2022.

A public hearing regarding these additions will be held via videoconference on November 20, 2020 at 1:00pm Eastern Time. [Hearing access information is available here](#). Written testimony may also be submitted until 5pm on November 20, 2020, either via [email](#) or via mail to:

Tiffany Skogstrom, Executive Director, TUR Administrative Council  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, MA 02114

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## Regulatory Update: Solvent Wipes

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At the end of 2019, DEP replaced their long-standing Policy for Industrial Wipers Contaminated with Solvents with regulations 310 CMR 30.104(3)(i) and (j) for reusable and disposable wipes, respectively. These new regulations provide conditional exclusions from hazardous waste regulations for solvent-contaminated wipes and make Massachusetts requirements "at least as stringent" as the EPA Solvent-Contaminated Wipes Rule enacted in 2013.

If you have decided to handle your solvent wipes as hazardous waste, it is not necessary to make any changes because of these new regulations. However, if you prefer not to handle solvent wipes as hazardous waste, you will need to comply with the new conditional exclusions for solvent-contaminated wipes.

Although these conditional exclusions are very similar to the previous policy, here are a few of the key differences. First, disposable wipes that are hazardous due to the presence of trichloroethylene are not eligible for the conditional exclusion and must be handled as hazardous waste. Also, there are now added

requirements for labeling and recordkeeping based on the EPA regulations:

- Wipes must be accumulated, stored, and transported in completely closed containers labeled with the words “Excluded Solvent–contaminated Wipes.”
- All facilities generating solvent–contaminated wipes must maintain records to document:
  - That wipes are not accumulated for longer than 180 days. (Note that fire safety regulations generally require daily removal of solvent wipes from buildings.)
  - A description of the process used at your facility to ensure wipes contain no free liquids before they are either laundered on–site or transported off–site
  - The name and address of the permitted laundry, dry cleaner, landfill, or combustor receiving the solvent–contaminated wipes.

Finally, conditionally–excluded wipes can only be sent to a permitted facility in Massachusetts or in another state which has adopted the federal Solvent–Contaminated Wipes Rule. A chart indicating which states have currently adopted the rule can be found [here](#).

If you would like no–cost, confidential help in complying with these new regulations, feel free to contact Michelle Spitznagel by [email](#) or at (617) 626–1065.

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## About Us

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The [Massachusetts Office of Technical Assistance & Technology \(OTA\)](#) is a non–regulatory agency within the Executive Office of Energy and Environmental Affairs.

OTA is driven by the premise that preventing pollution makes good business sense. We provide **free, confidential** onsite technical assistance to Massachusetts manufacturers, businesses, and institutions.

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