CHANGES TO TURA REPORTING FOR REPORTING YEAR 2023 AS OF APRIL 2024

MassDEP Reporting 2023 Spring Reporting Trainings

MassDEP will be offering 4 TURA Reporting Year 2023 spring reporting trainings, from **8:30 to 1:00** at the following locations:

- May 7 UMass Dartmouth Center for Innovation & Entrepreneurship, room CR4A (151 Martine St, Fall River)
- May 9 **DEP Worcester** SuAsCo conference room (8 New Bond Street, Worcester)
- May 14 **Greenfield Community College** Stinchfield Lecture Hall N335, Main Campus (One College Drive, Greenfield)
- May 16 Parker River National Wildlife Refuge auditorium (6 Plum Island Turnpike, Newburyport)

MassDEP Updated Reporting Year (2023) Guidance Documents

The following MassDEP TURA guidance documents have been updated:

<u>Toxics Use Reduction Reporting Instructions</u> – updated to reflect that MassDEP now accepts TURA reporting only online, through eDEP

<u>Toxics Use Reduction Reporting Instructions Appendices</u> - updated Appendix A to include 2022 NAICS codes; updated PFAS guidance starting on page 63 in Appendix B, to indicate that PFAS added to TRI in 2021 and 2022 are now to be reported under TURA individually, rather than in the TURA PFAS NOL category.

<u>Complete List of TURA Chemicals</u> updated to include recently added TRI PFAS chemicals

<u>Toxics Use Reduction Plan and Plan Update Guidance</u> – was updated to be more user-friendly

Effective Reporting Year (2023) for reports due July 1, 2024

The following eight listed chemicals are PFAS that TRI had listed for reporting years 2021 and 2022. These chemicals were part of the TURA Certain PFAS NOL category for reporting year 2022 and have been adopted by the TURA Administrative Council as <u>individually</u> reportable under TURA with the TRI 100 lb. threshold effective reporting year 2023, for reports due July 1, 2024.

335-93-3	Silver(I) perfluorooctanoate reportable under TRI as of 1/1/21						
507-63-1	Perfluorooctyl iodide (reportable under TRI as of 1/1/21)						
2395-00-8	Potassium perfluorooctanoate (reportable under TRI as of 1/1/21)						
375-73-5	Perfluorobutane sulfonic acid (PFBS) (reportable under TRI as of 1/1/22)						
29420-49-3	Potassium perfluorobutane sulfonate (reportable under TRI as of 1/1/22)						
65104-45-2	2-Propenoic acid, 2-methyl-, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-						
	heneicosafluorododecyl ester, polymer with 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-						
	heptadecafluorodecyl 2-methyl-2-propenoate, methyl 2-methyl-2-propenoate,						
	3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafluorotetradecyl 2-						
	methyl-2-propenoate and 3,3,4,4,5,5,6,6,7,7,8,8,8-tridecafluorooctyl 2-methyl-2-						
	propenoate (reportable under TRI as of 1/1/21)						
203743-03-7	2-Propenoic acid, 2-methyl-, hexadecyl ester, polymers with 2-hydroxyethyl methacrylate,						
	.gammaomegaperfluoro-C10-16-alkyl acrylate and stearyl methacrylate (reportable unde						
	TRI as of 1/1/22)						
45187-15-3	Perfluorobutanesolfonate (reportable under TRI as of 1/1/22)						

Effective Reporting Year (2024) for reports due July 1, 2025

Elimination of the de minimis Exemption for TRI PFAS Chemicals

Effective Reporting Year 2024 for reports due July 1, 2025, TRI PFAS chemicals are **no longer** eligible for the *de minimis* exemption, because EPA has designated them chemicals of special concern.

310 CMR 50.20 (7):

With respect to toxic substances present as a component of a mixture or trade name product, toxics users shall consider the quantity of the toxic substance if the toxics user knows that the toxic substance is present as a component of the mixture or a trade name product. In determining the amount or quantity of a toxic substance manufactured, processed, or otherwise used at a facility, the toxics user shall not consider the amount of the toxic substance if it is present in a mixture in concentrations equal to or below the deminimis concentration for that toxic substance set forth in 40 CFR Part 372.38(a); provided, however, that this deminimis exemption shall not apply for any toxic or hazardous substance specified as a chemical of special concern in 40 CFR 372.28.

For reporting year 2024 (reports due July 1, 2025) 9 PFAS, 14 other chemicals, and 1 Category were added to TURA, following their addition to TRI.

CAS#	Chemical Name				
375-22-4	Perfluorobutanoic acid				
2218-54-4	Sodium perfluorobutanoate				
2966-54-3	Potassium heptafluorobutanoate				
10495-86-0	Ammonium perfluorobutanoate				
45048-62-2	Perfluorobutanoate				
2728655-42-1	Alcohols, C8-16, γ - ω -perfluoro, reaction products with 1,6- diisocyanatohexane, glycidol and stearyl alc.				
2738952-61-7	Acetamide, N-[3-(dimethylamino)propyl]-, 2-[(γ-ω-perfluoro-C4-20- alkyl)thio] derivs.				
2742694-36-4	Acetamide, N-(2-aminoethyl)-, 2-[(γ-ω-perfluoro-C4-20-alkyl)thio] derivs., polymers with				
	N1,N1-dimethyl-1,3-propanediamine, epichlorohydrin and ethylenediamine, oxidized				
2744262-09-5	Acetic acid, 2-[(γ-ω-perfluoro-C4-20-alkyl)thio] derivs., 2- hydroxypropyl esters				
683-18-1	Dibutyltin dichloride				
96-23-1	1,3-Dichloro-2-propanol				
75-12-7	Formamide				
1222-05-5	1,3,4,6,7,8-Hexahydro-4,6,6,7,8,8-hexamethylcyclopenta[g]-2- benzopyran				
111-41-1	n-Hydroxyethylethylenediamine				
5064-31-3	Nitrilotriacetic acid trisodium salt				
140-66-9	p-(1,1,3,3-Tetramethylbutyl)phenol				
87-61-6	1,2,3-Trichlorobenzene				
2451-62-9	Triglycidyl isocyanurate				
115-96-8	Tris(2-chloroethyl) phosphate				
13674-87-8	Tris(1,3-dichloro-2-propyl) phosphate				
25155-23-1	Tris(dimethylphenol) phosphate				
	DINP Category*				

^{*}In July 2023, EPA added the Diisononyl Phthalate (DINP) category to the TRI list for TRI reporting, effective reporting year 2024, for reports due July 1, 2025. The diisononyl phthalate (DINP) category includes all branched alkyl diesters of 1,2 benzenedicarboxylic acid in which alkyl ester moieties contain a total of nine carbons.

PFAS Tracking and Reporting: TRI and TURA:

	Report to TRI	TURA tracking starting	Report to DEP	How Reportable	Threshold
TURA Certain PFAS NOL		January 1, 2022	July 1, 2023	As a category	25,000 lbs. manufactured/ processed; 10,000 lbs. otherwise used
172 TRI/TURA PFAS – 2020	July 1,2021	January 1, 2021	July 1, 2022		
Four TRI PFAS - 2021	July 1, 2022	January 1, 2023	July 1, 2024	Individually	100 lbs. (de minimis exemption no longer applies)
Four TRI PFAS - 2022	July 1, 2023				
Nine TRI PFAS - 2023	July 1, 2024	January 1, 2024	July 1, 2025		