PFAS Tracking and Reporting

Office of Technical Assistance and Technology (OTA) December 21, 2023



Certain Per- and Polyfluoroalkyl Substances Not Otherwise Listed (Certain PFAS NOL) <u>are reportable</u> under the Toxics Use Reduction Act (TURA) (section 41.03(14)).

- Companies covered by TURA have been required to track their use of these PFAS since **January 1**, **2022.** The first reports on this category were due to MassDEP on **July 1**, **2023**.
- Certain PFAS NOL are reportable **as a category**, so companies that are using more than one chemical that fits this category only need to report on the total amount used and pay a single per-chemical fee for this category.
- Certain PFAS NOL are reportable at the **standard TURA thresholds** of 25,000 pounds manufactured/processed or 10,000 pounds otherwise used.

In 2020, 172 per- and polyfluoroalkyl substances (PFAS) were added to the Toxics Release Inventory (TRI) list, and were also added to the TURA List effective January 1, 2021 (section 41.03(13)).

- Companies covered by TURA have been required to track their use of these PFAS since **January 1**, **2021**. The first reports on this category were due to MassDEP on **July 1**, **2022**.
- These TRI PFAS are reportable individually under TURA.
- The TRI PFAS are reportable under TURA at a **100-pound threshold**.

Seventeen additional PFAS have been added to the TRI list between 2021 and 2023, bringing the current total number of TRI PFAS to 189. Eight of these PFAS were added to the TURA List effective January 1, 2023 (section 41.03(15)) for reports due to MassDEP on July 1, 2024, and nine more have been added effective January 1, 2024 (section 41.03(16)), for reports due to MassDEP on July 1, 2025.

- These TRI PFAS are reportable **individually** under TURA.
- The TRI PFAS are reportable under TURA at a **100-pound threshold**.

	TURA tracking starting:	Report to DEP:	Reportable:	Threshold:
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 Four TRI PFAS - 2021 Four TRI PFAS - 2022	January 1, 2021 January 1, 2023	July 1, 2022 July 1, 2024	Individually	100 lbs. (de minimis exemption no longer applies; see <u>MassDEP website</u> for details)
Nine TRI PFAS - 2023	January 1, 2024	July 1, 2025		

If you have any questions about PFAS and TURA reporting, please contact OTA Director Tiffany Skogstrom (<u>tiffany.skogstrom@mass.gov</u>).