

OTA Services



Tiffany Skogstrom, MPH

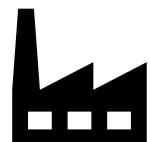
Director, Massachusetts Office of Technical Assistance

5.11.23

TURA and OTA Basics

General program information

Toxics Use Reduction Act (TURA) of 1989



Who reports?

- Massachusetts manufacturers who:
 - Operate under certain Standard Industrial Classification (SIC) codes
 - Have >10 employees
 - Manufacture or process $\geq 25,000$ lbs (or otherwise use $\geq 10,000$ lbs) of listed substances
- This covers a little over 400 Massachusetts facilities



What TURA requires

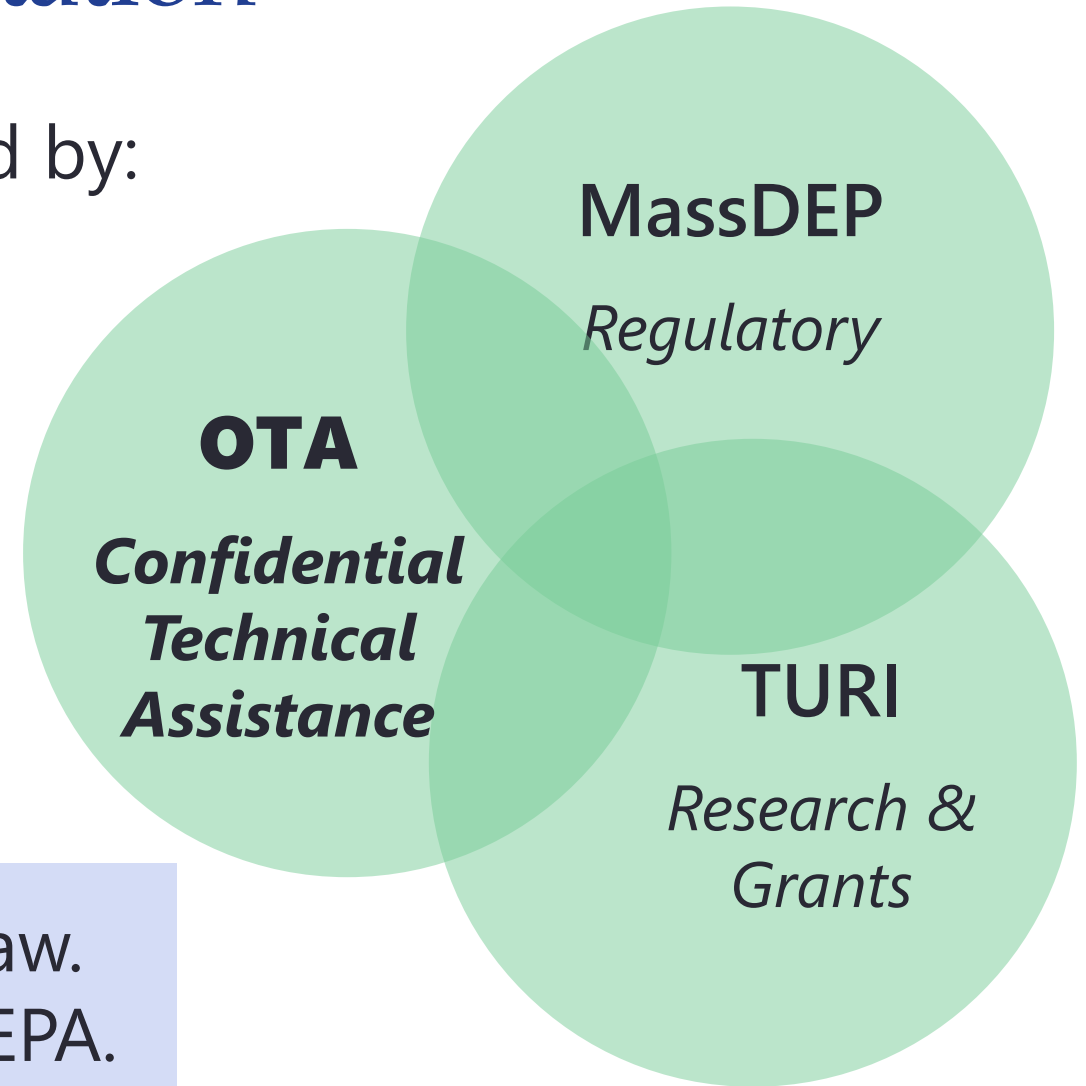
- Report to the state
- Pay a fee
- Create a Toxics Use Reduction Plan every two years

TURA does not prohibit companies from using listed chemicals.

TURA Program Implementation

The TURA Program is co-implemented by:

- The Massachusetts Department of Environmental Protection
- The Massachusetts Office of Technical Assistance
- The Toxics Use Reduction Institute at UMass Lowell



TURA is a state law, not a federal law.
OTA, DEP, and TURI are not part of EPA.

Office of Technical Assistance (OTA)

- **Non-regulatory** agency
- Provides **free, confidential** technical and compliance assistance to MA businesses that use toxic substances
- Gives **concrete recommendations** for toxics reduction and resource conservation

OTA has conducted 3,500 site visits at 1,500 facilities, reducing **millions of pounds** of toxic chemicals and **millions of dollars** in operating costs.

OTA Technical Assistance

- OTA can assist facilities with:
 - Toxics use reduction
 - Environmental compliance
 - Energy efficiency
 - Resource conservation
- Both onsite and remote assistance are available
- After a site visit, OTA delivers a report with tailored recommendations




OTA Staff

- Chemists, engineers, and public health professionals
- Hands-on manufacturing experience



OTA understands:

- Health and safety
 - The bottom line
 - Regulatory requirements
 - How to implement change
- 

Frequently Asked Questions about OTA

Is OTA's work truly confidential?

Yes. OTA will **never** disclose anything about your company—not even that we worked with you—without your written permission.

What if I'm out of compliance with laws or regulations?

Then we'll help you get in compliance. We can't and won't report any violations.

What kinds of work has OTA done before?

Some companies have given us permission to talk about how we've helped them. Visit mass.gov/ota to see our case study library.

Identifying PFAS Use in Your Facility

Look for common uses of PFAS



- Common uses include textile coatings (e.g., water-repellency), surfactants, degreasing (e.g., solvents), metal finishing (e.g., fume suppressants), polymers and resins, and AFFF
- Check your SDSs for products likely to contain PFAS
- Note listings described as Confidential Business Information (CBI) or proprietary as items of concern – contact your supplier or [OTA](#) for help

Check available CAS numbers against reportable definition



- Review [TURA guidance](#) and use reportable definition to check CAS # against [existing databases](#)
- Paper and metal finishing industries, [contact OTA](#) to take survey
- If no CAS numbers are available for fluorinated compounds, contact your supplier or [OTA](#) for technical assistance

Send a notification letter to your chemical or product supplier



- Use [OTA's template](#) to notify your supplier
- Involve your purchasing department in this effort
- Keep records to demonstrate good faith effort

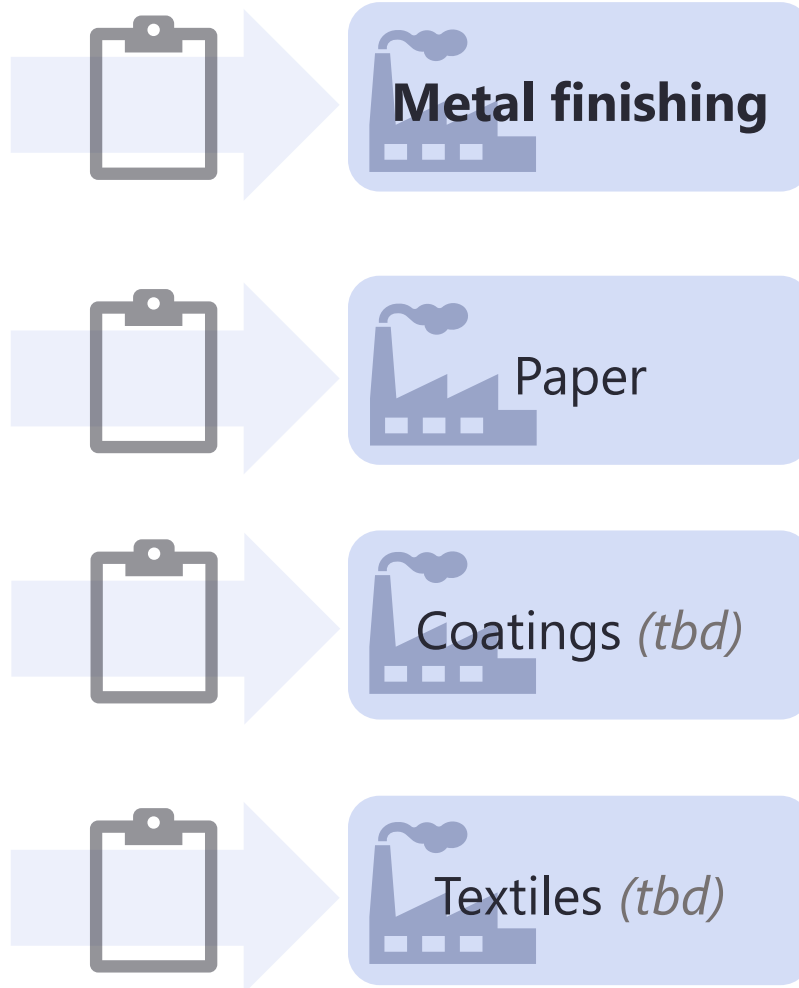
Contribute to developing product list



- The TURA program is developing a list of products confirmed to contain PFAS
- If your supplier notifies you of products containing PFAS, please share this information with OTA/TURI

Resources for Companies: PFAS Identification

Assessments to
identify PFAS
sources



- OTA technical staff flag likely sources of PFAS
 - Companies may share list of CAS numbers with OTA
- OTA pursues research on products of concern
- Companies may opt to share product information with OTA to populate a list of PFAS-containing products

PFAS Tracking and Reporting: TRI and TURA

	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	January 1, 2021	July 1, 2022	Individually	100 lbs. (de minimis exemption applies; see MassDEP website for details)
Four TRI PFAS - 2021	January 1, 2023	July 1, 2024		
Four TRI PFAS - 2022	Anticipated January 1, 2024	Anticipated July 1, 2025		
Nine TRI PFAS - 2023				

Guidance for Reporting PFAS under TURA

Contact Us

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