

Changes to TURA Reporting for Reporting Year 2022

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Changes for TURA Reporting Year 2022 Document (As of April 2023)

Includes:

- Updated TURA guidance documents
- New Certain PFAS NOL Category

TURA Reporting Instructions Appendices (revised March 2023)

- Beginning on page 80, the guidance for reporting Per- and Poly-Fluoroalkyl Substances (PFAS) under the Toxics Use Reduction Act (TURA), including:
 - Individually Listed PFAS
 - the Certain PFAS Not Otherwise Listed (NOL) Category

TURA Chemical List (Revised April 2023)

- Includes a hyphenated CAS # list
- Additional sheet which includes a non-exhaustive list of chemicals included in the PFAS NOL category that are TURA reportable, including the newest 17 TRI PFAS additions.

MassDEP Updated Reporting Year (2022) Guidance Documents

These three updated MassDEP TURA guidance documents can be found at:

<https://www.mass.gov/lists/massdep-toxics-use-reduction-policies-guidance>.

Effective Reporting Year 2022
New Certain PFAS NOL Category
for Reports Due July 1, 2023

- For the 2022 Reporting Year, the Certain PFAS NOL (Not Otherwise Listed) category has been added under TURA.
- Heather Tenney will be discussing how the new PFAS NOL category is defined in the next presentation.

New Certain PFAS NOL Category

- Reporting of this Certain PFAS NOL category is at typical TURA reportable thresholds of 25,000 pounds manufactured or processed and 10,000 pounds otherwise used annually.

Guidance for New Certain PFAS NOL Category

- Pages 2-9 of *Changes for TURA Reporting Year 2022*
- Includes the list of PFAS that are reported as part of the TURA Certain PFAS NOL category (**DEP Category #1300**).

Guidance for New Certain PFAS NOL Category

- Guidance for reporting the Certain PFAS NOL Category begins on page 80 of the TURA Reporting Instructions Appendices
- Also found in additional sheet of TURA Chemical List which includes a non-exhaustive list of chemicals included in the PFAS NOL category that are TURA reportable

New TRI PFAS Chemicals Reportable Under TURA as Part of Certain PFAS NOL Category

- The first **eight** chemicals highlighted in gray toward the end of the Certain PFAS NOL Category list in guidance are PFAS chemicals that TRI has listed for reporting years 2021 and 2022.
- These chemicals have been adopted by the TURA Administrative Council, and will be reportable individually under TURA effective reporting year 2023, for reports due July 1, 2024.
- However, this reporting year 2022, these eight chemicals are to be reported under TURA as part of the Certain PFAS NOL category.

New TRI PFAS Chemicals

First 8 Chemicals

Highlighted in Gray in Guidance

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)
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-heneicosafuorododecyl 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-pentacosafuorotetradecyl 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)
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)
203743-03-7	2-Propenoic acid, 2-methyl-, hexadecyl ester, polymers with 2-hydroxyethyl methacrylate, .gamma.-.omega.-perfluoro-C10-16-alkyl acrylate and stearyl methacrylate (reportable under TRI as of 1/1/22)
45187-15-3	Perfluorobutanesulfonate (reportable under TRI as of 1/1/22)

New Certain PFAS NOL Category

Last 9 Chemicals Highlighted in Gray in Guidance

- The last **nine** chemicals highlighted in gray toward the end of the Certain PFAS NOL Category list in the guidance are PFAS chemicals that TRI has listed for reporting year 2023.
- TURA shall adopt these changes pending an Administrative Council vote, but until they are adopted by the Council, these nine chemicals **are to be reported under TURA as part of the Certain PFAS NOL category.**

New TRI PFAS Chemicals

Last Nine Chemicals

Highlighted in Gray in Guidance

375-22-4	PFBA (reportable under TRI as of 1/1/23)
45048-62-2	Perfluorobutanoate (reportable under TRI as of 1/1/23)
10495-86-0	Ammonium perfluorobutanoate (reportable under TRI as of 1/1/23)
2966-54-3	Potassium perfluorobutanoate (reportable under TRI as of 1/1/23)
2218-54-4	Sodium perfluorobutanoate (reportable under TRI as of 1/1/23)
2728655-42-1	Alcohols, C8-16, γ - ω -perfluoro, reaction products with 1,6-diisocyanatohexane, glycidol and stearyl alc. (reportable under TRI as of 1/1/23)
2738952-61-7	Acetamide, N-[3-(dimethylamino)propyl]-, 2-[(γ - ω -perfluoro-C4-20-alkyl)thio] derivs. (reportable under TRI as of 1/1/23)
2744262-09-5	Acetic acid, 2-[(γ - ω -perfluoro-C4-20-alkyl)thio] derivs., 2-hydroxypropyl esters (reportable under TRI as of 1/1/23)
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 (reportable under TRI as of 1/1/23)

Rules for Reporting Specifically Listed Chemicals vs. Chemical Categories Matrix (Rows 7-12) – Page 101 of Appendices

Row No.	EPCRA or TURA Specific Chemical	EPCRA or TURA Category	CERCLA Specific Chemical	CERCLA Category	TURA NOL Category	Report as:
7		Yes			Yes	EPCRA or TURA Category
8			Yes		Yes	CERCLA Specific Chemical
9			Yes	Yes		CERCLA Specific Chemical
10				Yes		Do Not Report
11				Yes	Yes	TURA NOL category
12					Yes	TURA NOL category

Rules for Reporting Specifically Listed Chemicals vs. Chemical Categories Matrix – Row 12

- For example, **Octafluoropropane** (CAS# 76-19-7)
- This chemical is reportable under **both** the C1-C4 TURA NOL Category (**1047**) and the Certain PFAS NOL Category (**1300**).
- You would report **both chemical categories** and pay **one** fee.

Contact Info

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