

IMPORTANT - TURA REPORTING - TIME SENSITIVE NOTICE

February 2025

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, the 189 TRI reportable PFAS chemicals (adopted between 2020-2023) are no longer eligible for the de minimis exemption, because EPA has designated them chemicals of special concern. <https://www.epa.gov/toxics-release-inventory-tri-program/changes-tri-reporting-requirements-and-polyfluoroalkyl>

PFAS that are not TRI reportable should continue to be reported under the TURA Certain PFAS NOL category. Please refer to the TURA PFAS Guidance on page 63 of the TURA Reporting Instruction Appendices [<https://www.mass.gov/doc/tura-reporting-appendices-0>]

De Minimis for Trivalent Antimony Compounds Has Been Changed

Effective Reporting Year 2024 for reports due July 1, 2025, the TRI *de minimis* level for Trivalent Antimony compounds has been changed from 1.0% to 0.1%, since these chemicals are classified as carcinogens due to assessments by the International Agency for Research on Cancer. They are reportable under the Antimony Compounds category (TURA CAS# 1000).

New TURA Reportable Chemicals for RY2024 (reports due July 1, 2025)

Twenty-one new chemicals and one chemical category have been added to the TURA chemical list, these were effective for TRI reporting forms due in 2023. Nine of these chemicals are PFAS with a 100-pound reporting threshold.

CAS #	Chemical Name	Threshold (Pounds)
375-22-4	Perfluorobutanoic Acid (PFBA)	100
2218-54-4	Sodium perfluorobutanoate	100
2966-54-3	Potassium perfluorobutanoate	100
10495-86-0	Ammonium perfluorobutanoate	100
45048-62-2	Perfluorobutanoate	100
2728655-42-1	Alcohols, C8-16, γ-ω-perfluoro, reaction products with 1,6-diisocyanatohexane, glycidol and stearyl alc.	100
2738952-61-7	Acetamide, N-[3-(dimethylamino)propyl]-, 2-[(γ-ω-perfluoro-C4-20-alkyl)thio] derivs.	100

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	100
2744262-09-5	Acetic acid, 2-[(γ-ω-perfluoro-C4-20-alkyl)thio] derivs., 2-hydroxypropyl esters	100
683-18-1	Dibutyltin dichloride	25,000/10,000
96-23-1	1,3-dichloro-2-propanol	25,000/10,000
75-12-7	Formamide	25,000/10,000
111-41-1	n-hydroxyethylethylenediamine	25,000/10,000
5064-31-3	nitrilotriacetic acid trisodium salt	25,000/10,000
140-66-9	p-(1,1,3,3-Tetramethylbutyl)phenol	25,000/10,000
87-61-6	1,2,3-trichlorobenzene	25,000/10,000
2451-62-9	triglycidyl isocyanurate	25,000/10,000
115-96-8	tris(2-chloroethyl) phosphate	25,000/10,000
13674-87-8	tris(1,3-dichloro-2-propyl) phosphate	25,000/10,000
25155-23-1	tris(dimethylphenol) phosphate	25,000/10,000
1222-05-5	1,3,4,6,7,8-Hexahydro-4,6,6,7,8,8-hexamethylcyclopenta[g]-2-benzopyran	100 (PBT)
	Diisononyl phthalate (DINP) Category *	25,000/10,000

* The **DINP category (TURA CAS # 1048)** includes branched alkyl di-esters of 1,2 benzenedicarboxylic acid in which alkyl ester moieties contain a total of nine carbons. *This category includes but is not limited to the following chemicals:*

DINP Category TURA CAS # 1048	Chemical Name in Diisononyl phthalate (DINP) Category
14103-61-8	Bis(3,5,5-trimethylhexyl) phthalate
20548-62-3	Bis(7-methyloctyl) phthalate
28553-12-0	Diisononyl phthalate
71549-78-5	Branched dinonyl phthalate
68515-48-0	Di(C8-10, C9 rich), branched alkyl phthalates
111983-10-9	Bis(3-ethylheptan-2-yl) benzene-1,2-dicarboxylate

Effective Reporting Year 2025, for Reports Due July 1, 2026:

Seven new PFAS have been added to the Toxics Release Inventory (TRI) list [<https://www.epa.gov/toxics-release-inventory-tri-program/addition-certain-pfas-tri-national-defense-authorization-act>], with a 100-pound reporting threshold, for TRI reporting year 2024 (for TRI reports due July 1, 2025).

The TURA Administrative Council added these new PFAS to the TURA chemical list for reporting year **2025 (for reports due July 1, 2026)**. Until then, most of these PFAS should be reported under the TURA Certain PFAS NOL Category for reporting year 2024. Please reference the TURA PFAS Guidance in the TURA Reporting Instructions Appendices [<https://www.mass.gov/doc/tura-reporting-appendices-01>].

Those seven PFAS are shown below. These PFAS are also visible at the end of Table 4 in the TURA PFAS Guidance in the TURA Reporting Instructions Appendices [<https://www.mass.gov/doc/tura-reporting-appendices-01>].

CAS#	Chemical Name
307-24-4	Perfluorohexanoic acid
422-64-0	Perfluoropropanoic acid
2923-26-4	Sodium perfluorohexanoate
21615-47-4	Ammonium perfluorohexanoate
82113-65-3	1,1,1-Trifluoro-N-[(trifluoromethyl)sulfonyl] methanesulfonamide
90076-65-6	Lithium bis[(trifluoromethyl)sulfonyl] azanide
2816091-53-7	Betaines, dimethyl(.gamma.-.omega.-perfluoro-.gamma.-hydro-C8-18-alkyl)

MassDEP TURA Program News:

- Walter Hope has retired from MassDEP. Please direct all TUR Planner questions and credit approval requests to Leoni Desai (leoni.desai@mass.gov).
- TURA Bills have been mailed out. If you have not received a bill or have questions about your bill, please contact the TURA Program at TURA.Program@mass.gov for assistance.
- For any regulatory questions, please contact the MassDEP TURA program via email at TURA.Program@mass.gov with any questions.
- For guidance on managing PFAS at your facility, please contact the Office of Technical Assistance (OTA) via email at tiffany.skogstrom@mass.gov.
- The MassDEP TURA Program is looking to hire an Environmental Analyst IV (EA IV) for the implementation of the TURA/Toxics Programs. First consideration will be given to those applicants that apply within the **first 14 days** of the posting. Interested applicants please apply at: <https://massanf.taleo.net/careersection/ex/jobdetail.ftl?job=250000FJ>