

**Toxics Use Reduction Institute Science Advisory Board Meeting Minutes**  
**October 20, 2025**  
**Virtual Zoom Meeting**  
**10:30 AM**

**Members Present:** Robin Dodson (Chair), Rich Gurney (Vice Chair), Heather Lynch, Christy Foran, Denise Kmetzo, Alicia Timme-Laragy, Helen Poynton

**Program staff present:** Heather Tenney (TURI), Karen Thomas (TURI), Hayley Hudson (TURI), Colin Hannahan (TURI), David Turcotte (TURI), Sandra Baird (MassDEP), John Raschko (OTA)

**Others present:** Carol Holahan (Foley Hoag LLP), Liz Harriman (LCSP), Raza Ali (ACC), Dannielle Melendez (ACC), Anthony Laber (MA DLS On-Site Consultation Program)

***Welcome & Introductions***

Please note that this meeting is being conducted remotely as the provisions to allow remote meetings under the Open Meeting Law have been extended to June 30, 2027. Board members and program staff were introduced, and visitors were asked to put their name and affiliation in the chat.

***TURA Program Update***

TURI staff introduced the new TURI Interim Director, David Turcotte. The program update noted monthly training webinars including a recent one in early October where TURI staff shared recent SAB work, a new TUR Planner course that is underway, a demonstration event at New Method Plating, and a grant from EPA to establish a vacuum vapor degreasing hub.

TURI has awarded two academic research grants, one for non-halogenated flame retardants for textiles and one for replacing NMP in battery applications. TURI has two on-going community grants as well, one tackling microplastics and the other to implement safer cleaning chemicals.

Regarding quaternary ammonium compounds, the SAB recommended to list the category in 2021, TURI prepared the Policy Analysis that was presented at a TURA Advisory Committee meeting and then presented at the TURA Administrative Council which voted to open a public comment period. That period has now closed, and the program is responding to comments.

***Approve June Meeting Minutes***

There was a motion to discuss the June meeting minutes as written, and there was a second. There was no discussion. There was a motion to approve the minutes, and there was a second. A roll call vote was conducted, and the seven members present at that time voted in favor.

### ***Presentation and Discussion of Ultra Short Chain (USC) PFAS***

TURI reviewed new information on Ultra Short Chain (USC) PFAS and presented a summary of what was found. The original TURA Certain PFAS NOL listing was reviewed along with previous work on USCs from 2020. TURI performed an updated literature review and provided a sample of 8 studies for the Board to review.

Trifluoroacetic acid (TFA) was chosen as the focus to start because it is the most prevalent and has the most information. As the Board had previous concerns for persistence, more studies were provided for the environmental endpoint. TURI summarized the studies and provided a review of the regulatory concerns of TFA. It was then opened for Board discussion. Some key points mentioned were:

- TFA is highly corrosive and irritating, so it can be complicated to test and observe systemic effects. Persistence, mobility, and corrosivity are documented hazards, less convincing evidence on overall toxicity.
- Thyroid effects are worth looking into more. Acute daily intake (ADI) was based on thyroid effects, but other reviews had differing opinions.
- Dekant (2023) was noted as a good review.
- The ECHA document focused on eye malformations and neural tube defects rather than thyroid, and they concluded that there was clear evidence for developmental toxicity, in addition to noting the corrosivity and persistence. A proposal was made by the German states; it is currently in review.
- There was discussion on TFA being a degradation product. It was mentioned that many precursors to TFA are covered in the TUA Certain PFAS NOL category. For example, hydrofluoroethers (HFEs) and hydrofluoroolefins (HFOs) are covered under TURA and have to be reported.
- TFA is a degradation product, but it is also a byproduct of certain PFAS, so it can be generated in the manufacturing of many different PFAS. If something is increasing in the environment, the food we eat, and the water we drink in the way that TFA is, that warrants continued consideration. More peer reviewed studies showing effects are needed.
- The ubiquitous nature is concerning; it's very prevalent and predominant in dust. It is the most commonly identified and in the highest levels of all the PFAS we are looking at. It's a chemical we are definitely exposed to in our everyday lives.
- There was discussion on TFA and the claim that it is formed naturally from oceanic processes. TFA is not getting into our wine and into our household dust from oceanic processes and whatever microbes are breaking down in the ocean is not relevant to this discussion.

- The ECHA document was mentioned as a good place for more ecotoxicity information.
- Given the data that was presented, it seems like there is justification to spend time looking at the propanoic acid.
- TFA is used in peptide synthesizers; any information on use would be helpful.

The plan for the next meeting will include giving the Board more time to review studies (among the 8 TFA studies) that they did not get a chance to and providing information on perfluoropropanoic acid.

There was an opportunity for visitor comments and there were none.

### ***Presentation and Discussion of EPA's Tool ToxCast***

TURI staff presented an overview of EPA's Toxicology Forecaster Tool with a focus on its use for Board purposes.

Board members mentioned the following ways that the ToxCast information could help inform their deliberations:

- Additional information once the Board has looked at relevant scientific literature
- For individual chemicals: interested in active hit call rate, intended target families with many active hit calls
- For multiple chemicals in a category, the Board is interested in common assays with active hit calls and what those assays are intended to test
- If endocrine disruption is suspected, check for ToxCast outcomes for those targeted assays
- Similarly, for other endpoints such as liver toxicity or cardiotoxicity; endpoints for which specific assays are targeted as well as certain mechanisms if specific ones are suspected
- Keeping in mind that some endpoints and some chemicals give better predictions in this type of testing

There was an opportunity for visitor comments and there were none.

### ***Next Meeting***

We will plan for a late November or early December meeting.

### ***Handouts***

- DRAFT June SAB Meeting Minutes for Board Review
- ECHA 2025: Proposal for Harmonised Classification and Labelling for TFA
- Arp 2024: Global Threat of TFA

- Dekant 2023: Mammalian toxicity of TFA and assessment of human health risks due to environmental exposures
- Freeling 2023: Assessing the environmental occurrence of the anthropogenic contaminant TFA
- Joudan 2021: Insufficient Evidence for Natural TFA
- Pickard 2020: Ice Core Record of Persistent Short-Chain Fluorinated Alkyl Acids
- Moscato 2025: TFA Narrative Review on Physico-Chemical Properties, Exposure Pathways, and Toxicological Concerns

### **Zoom Meeting Chat**

2025-10-20 10:33:35 From Liz Harriman to Everyone:  
Liz Harriman, Lowell Center for Sustainable Production, UMass Lowell

2025-10-20 10:33:36 From Raza Ali to Everyone:  
Raza Ali, American Chemistry Council

2025-10-20 10:33:37 From David Turcotte to Everyone:  
David Turcotte, Interim Director, TURI UMass Lowell

2025-10-20 10:33:40 From Anthony.Laber to Everyone:  
Anthony Laber-MA DLS On-Site Consultation Program

2025-10-20 10:33:44 From John Raschko, OTA to Everyone:  
John Raschko, Mass. OTA

2025-10-20 10:34:16 From Dannielle Melendez to Everyone:  
Dannielle Melendez, American Chemistry Council

2025-10-20 10:36:08 From Carol Holahan to Everyone:  
Carol Holahan, Foley Hoag LLP

2025-10-20 11:19:58 From Heather Lynch to Everyone:  
Registration Dossier - ECHA

2025-10-20 11:25:24 From Liz Harriman to Everyone:  
Are there other short chain PFAS in use that aren't in the TURA definition, which would also be breaking down into TFA or have their own issues?

2025-10-20 11:46:25 From Hayley Hudson to Everyone:

LogKow = -0.4-5.6 range  
MW 180-480 LogVP <1

2025-10-20 11:57:53 From David Turcotte to Everyone:  
Sorry, I need to leave for another meeting

2025-10-20 11:59:15 From Robin Dodson to Everyone:  
I need to hop off. @Rich Gurney (Simmons U) handing it over to you. Thanks.

2025-10-20 12:11:15 From Liz Harriman to Everyone:  
very helpful overview and board discussion!

2025-10-20 12:21:33 From Karen to Everyone:

- EPA ToxCast Website
- EPA Presentation 2023: "Using ToxCast/Tox21 Screening Data from the CompTox Chemicals Dashboard" by Katie Paul Friedman, RTP
- ACC 2022: Purposes and Uses of EPA's Toxicity ForeCaster (ToxCast™) Q&A Document for ACC members prepared by the ACC LRI.
- ACC 2017: "A User's Guide for Accessing and Interpreting ToxCast Data," Natalia Ryan, PhD, Bayer Crop Science in consultation with ACC Computational Profiling Work Group.

2025-10-20 12:21:45 From Karen to Everyone:  
Sources for my presentation