

TURA Program Update

Liz Harriman and Tiffany Skogstrom April 12, 2023 Marlborough, MA







TURA Form S Filing/Reporting Changes



- Reporting Year 2022 (reports due July 1, 2023)
 - MassDEPTURA webpage
 - TURA reporting Instructions Appendices Mar 2023
 - Updated TURA Chemical list also with CAS formatted #'s
 - US EPA Additional TRI Chemicals
 - PFAS 4 add'l listed individually with 100 lb reporting threshold
 - Ethylene oxide at contract sterilization facilities
- (Virtual) TURA Form S Reporting Workshop (RY 2022)
 - Scheduled for May 11 to 9:30-12:30

TURA Form S Filing and Reporting Changes

- TURA category: Certain PFAS NOL
 - Reportable for 2022, reports due July 1, 2023
 - Guidance available in <u>TURA Reporting</u> <u>Instructions Appendices</u>
 - Updated TURA Chemical list
 - Includes Certain PFAS NOL guidance list on separate sheet
 - PFAS Webinar



Industrial Sources of PFAS













PFAS Tracking and Reporting: TRI and TURA

	Report to TRI	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	July 1,2020	January 1, 2021	July 1, 2022	Individually	100 lbs. (de minimis exemption applies; see <u>MassDEP</u> <u>website</u> for details)
Four TRI PFAS - 2021	July 1, 2021	January 1, 2023	July 1, 2024		
Four TRI PFAS - 2022	July 1, 2022				
Nine TRI PFAS - 2023	July 1, 2023	Anticipated January 1, 2024	Anticipated July 1, 2025		

Science Advisory Board



- Recommendation to list 24 EPA Registered ADBAC and DDAC quaternary ammonium compounds (QAC's, or "quats")
 - <u>OACs draft policy analysis</u> presented to Advisory Committee and Administrative Council
 - OACs fact sheet
- Deliberations on Carbon Nanotubes and Carbon Nanofibers petition in process.
 - SAB Recommendation to list Single- and Multi-Walled Carbon Nanotubes (MWCNTs) and Carbon Nanofibers
 - Currently deliberating on question of thresholds and HHS designation
- Flame retardants advising MassDEP on new MA flame retardants law
- Next meeting: May 12, 2023 (virtual)
 - Temporary provisions allowing remote participation under Open Meeting Law extended to March 31, 2025



TURA Program Agency Updates







New Leadership





Executive Office of Energy and Environmental Affairs

- Rebecca Tepper, Secretary
- Stephanie Cooper Undersecretary for the Environment



MassDEP Commissioner Bonnie Heiple



UMass Lowell – new Chancellor Julie Chen

Meet the new staff!

Massachusetts **Toxics Use Reduction**

- Elisheva Thoreen,
 Rebecca Dolan, OTA
- Environmental Engineer
- **MassDEP**
- Environmental Analyst

- Gabriel Salierno, TURI
- Green Chemist





- Karen Thomas, TURI
- EHS Specialist









Staff Changes and Opportunities



Brenda is retiring! Thank-you and our best wishes!

New Opportunities:

- TURI Safer Chemicals Lab Technician
- TURI Education & Training Associate





TURI Update – Strategic Priorities

Halogenated Solvents - Drive to Zero **PFAS** Flame Retardants

FY23 TURI Grants Update

Massachusetts
Toxics Use Reduction

INDUSTRY, SMALL BUSINESS, COMMUNITY AND ACADEMIC RESEARCH

Focus on Safer Solvents

- Boyd, Woburn
 - Replacing remaining TCE use
- Vishay Barry, Attleboro
 - Installing aqueous cleaning equipment
- Southbridge Sheet Metal Works, Sturbridge
 - Eliminating methylene chloride vapor degreaser
- Conklin Office Furniture, Holyoke
 - Testing alternatives for safer adhesives and thinners
- Assoc. Prof. Hsi-Wu Wong, UMass Lowell, partnering with Johnson Matthey, Andover and Devens
 - Eliminating methylene chloride in pharmaceutical chromatography



FY23 TURI Grants Update

Massachusetts
Toxics Use Reduction

INDUSTRY, SMALL BUSINESS, COMMUNITY AND ACADEMIC RESEARCH

Focus on PFAS

- Prof. Ram Nagarajan, UMass Lowell, partnering with Transene Co., Danvers
 - Surfactants in electronics manufacturing
- Professional Firefighters of Massachusetts (PFFM),
 Nantucket PFAS Action Group, and Fall River and
 Nantucket Fire Departments
 - Reducing PFAS in fire fighter turnout gear
 - Training for firefighters around PFAS



FY23 TURI Grants Update



INDUSTRY, SMALL BUSINESS, COMMUNITY AND ACADEMIC RESEARCH

Focus on Flame Retardants

- Donoma Gym, Stow
 - Replacing foam pit cube with non-flame retardant foam cubes



TURI Website

TURI Website Redesign

- Enhance usability for learning about other TUR successes
- How do you currently use the website? What are you looking for?





OTA Update

Massachusetts Toxics Use Reduction

- PFAS Surveys for Metal Finishers / Paper Industries
- OTA/MassDEP partnership on outreach to POTWs and Significant Industrial Users upstream from Wastewater Treatment Facilities

Identifying PFAS Use in Your Facility

Common uses of PFAS in metal finishing processes*

Review and Interpret SDSs

Send a notification letter to your chemical or product supplier

Contribute to developing product list

- Cr plating, anodizing, plastic etching wetting agents, fume/mist suppressants
- Non-Cr metal plating products that regulate foam, improve bath stability, aid in metal deposition, and improve the quality of the final plate
- Chromate conversion coating wetting agents, fume suppressants
- Various powder coatings
- Degreasing HFE solvents
- · Check your SDSs for products likely to contain PFAS
- Confidential Business Information (CBI) contact your supplier or <u>OTA</u> for help
- If no CAS numbers are available for fluorinated compounds, contact your supplier or <u>OTA</u> for help.
- · Use OTA's template to notify your supplier
- · Involve your purchasing department in this effort
- Keep records to demonstrate good faith effort
- 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

*PFAS in the metal plating and finishing industry (qp3-05), MN Pollution Control Agency, 12/22

TUR Resources: Per- and Polyfluoroalkyl Substances

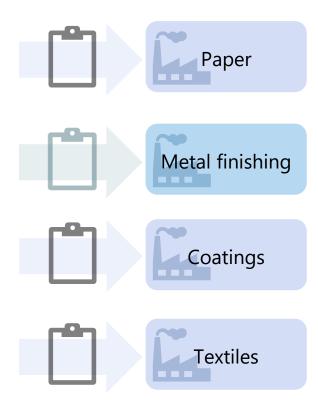
OTA Update



Resources for Companies: PFAS Identification

Assessments to identify PFAS sources

(metal finishing available, others in development)



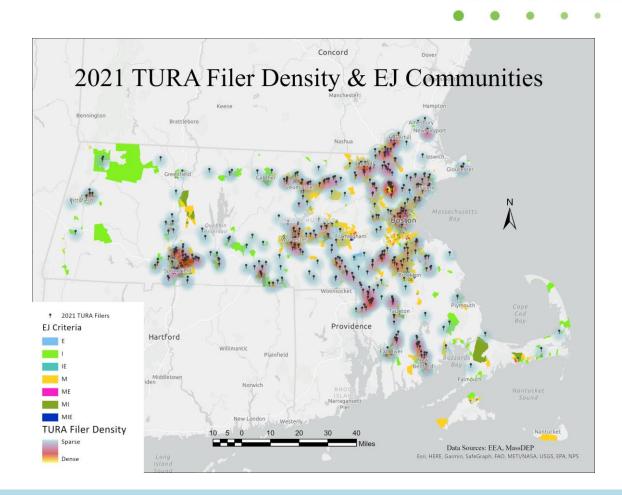
- OTA technical staff flag likely sources of PFAS
 - Companies may share list of CAS numbers with OTA
- OTA and TURI pursue research on products of concern
- Companies may opt to share product information with OTA to populate a list of PFAS-containing products

OTA/TURI

Environmental Justice (EJ)



- OTA is developing an interactive mapping tool to explore EJ and strategize outreach to TURA filers in EJ communities.
- OTA is helping to develop TURA program EJ website for multiple stakeholders
- TURI has conducted a survey regarding the state of EJ in MA to inform strategic planning process





Recent MassDEP Actions

RY2019-2021 outstanding enforcement actions addressed

25 Notices of Noncompliance (NON) and 3 Warning letters issued to facilities

5 NONs issued to TUR Planners



MassDEP Enforcements

Violations seen include:

- Failure to file
- Missing chemicals
- Failure to respond to QA/QC request
- Missing or incomplete Plan Summaries
- Improper certification
 - Missing TUR Planner certifications
 - Failure to hire an active TUR Planner
 - Hiring a TUR Planner not certified to sign for the type of Plan completed
 - Signing a TUR Plan when Planner's certification had already expired
 - Signing for a Plan type that the TUR Planner not certified for

MassDEP has started the TURA audit program again

MassDEP Reminders





Check when your certification expires

It's on your certification letter



Confirm the TUR Plan type you are asked to certify

If you're not certified for that type (e.g., RC or EMS), find another Planner



Be sure to use correct contact information on file in ePlace Portal

MassDEP posts a <u>list of active</u>
<u>licensed General Practice TUR</u>
<u>Planners</u> on the TURA Programs
section of <u>www.mass.gov</u> using this
information

Incorrect information makes it difficult for MassDEP or potential clients to reach you

Contact us any time!





TURI questions

Liz Harriman harriman@turi.org

Or appropriate staff person:

TURI Staff: https://www.turi.org/About/Staff_List







Tiffany Skogstrom <u>Tiffany.skogstrom@mass.gov</u>

OTA Staff: https://www.mass.gov/service-details/otas-

<u>team</u>





MassDEP questions

Planning: Lynn Heisey Cain lynn.cain@mass.gov

Reporting: Walter Hope walter.hope@mass.gov

C&E: Rebecca Dolan Rebecca.G.Dolan@mass.gov

