



Massachusetts Chemistry & Technology Alliance (MCTA)

TURA Update

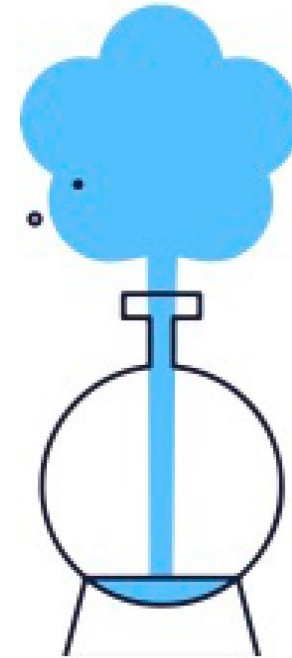
November 7, 2024

Actions

- Flame Retardants;
- MWCNTs, SWCNTs and CNFs;
- Quaternary Ammonium Compounds;
- PFAS.

Flame Retardants

The SAB reviewed 25 analogues to the original 11 chemistries listed in the 2021 Flame Retardant law. This information has been provided to MassDEP, which is charged with determining whether to add them to the ban of certain products produced or sold in Massachusetts.



MWCNTs, SWCNTs and CNFs

The SAB recommended listing Multi-Walled Carbon Nanotubes as a higher hazard substance with a 1000 lb reporting threshold and listing Single-walled Carbon Nanotubes and Carbon Nanofibers at 25,000 pounds manufactured or processed and 10,000 pounds for otherwise used.



Quaternary Ammonium Compounds

The divided Administrative Council voted in 2023 to list certain QACs (DDAC and ADBAC), multiple CAS numbers for each, to the Administration for a hearing.

The next step in the process is for draft regulations to go out for public comment and hearing.

PFAS

Nothing! Really! Honest! Truly!

No new PFAS was added to the TURA list in 2024. However, tracking for nine already added PFAS started on January 1, 2024 and seven are in the process of being added for reporting year 2025.

EPA is currently proposing another 16 individual PFAS and 15 categories.

TURA Program Strengthening Ad Hoc Committee.

In brief, the Ad Hoc Committee was charged with reviewing the experiences of stakeholders since the promulgation of the 2006 Amendments to the Toxics Use Reduction Act of 1989. Its stated goal was to discuss possible improvements to the program that would ensure ongoing progress in toxics use reduction.

The committee looked at five focus areas – Compliance & Enforcement, Alternative Planning, Planners and Planners, the TURA list and Fees. A synthesis document was created to summarize the discussions at these meetings.

MCTA Major Issues with TURA Program

- There is no exit plan for long-term filers;
- The two-year planning cycle is unreasonable and does not reflect the realities of running a manufacturing Facility;
- There is no waiver for companies that must use certain chemistries for compliance with mil-specs, public bidding specifications and FDA Establishment licenses;
- Fee Increases

Actions Taken

- Inspector training and assistance;
- Increased MassDEP Audits & Inspections;
- Encouragement of alternative planning for PFAS in 2024;
- Improved visibility of Chemical List.

Future Actions?

- Sector focused assistance and workshops and resources;
- Evaluate options to streamline TUR plan updates;
- Consider option to skip a planning cycle if no feasible options are available;
- **Consider streamlining or expediting TURA list updates from authoritative chemical lists;**
- Require reporting on already listed CERCLA categories;
- **Revisit fee increase based on 2014 fee recommendations**
- **Explore expansion of the TUR filer universe so it extends beyond the SEC codes identified in the 1989 legislation. *This would require legislative action.***



Questions

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