



# Beyond TRI: Lessons learned from additions to the Toxics Use Reduction Act

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# Toxics Use Reduction Act of 1989 (TURA)

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- Requires certain facilities, using certain chemicals, to report annually on chemical use, byproduct, and shipped amounts
  - Requires Toxics Use Reduction Plan every two years
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# TURA

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- TRI + CERCLA chemicals
  - Similar reporting thresholds to TRI
  - Similar facilities to TRI
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# 2006 TURA Amendments

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- Allows for Higher Hazard Substances and Lower Hazard Substances (up to 10 per year)
  - HHS have 1,000 lb reporting threshold
  - LHS eliminate per-chemical fee
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# Higher Hazard Substances

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- TCE
  - Cadmium and Cadmium Compounds
  - PCE
  - Formaldehyde
  - Hexavalent Chromium Compounds
  - Methylene Chloride
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# Contributions of Smaller Filers (first reporting year)

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- Trichloroethylene 117,380 lbs (22%)
- Cadmium 29,429 lbs (100%)
- Cadmium compounds 14,625 lbs (8%)
- Perchloroethylene 73,770 lbs (39%)

# HHS Filers

High Hazard Chemicals Number of Facilities Reporting 2006-2011

Reporting Year	Cadmium	Cadmium Compounds	Trichloroethylene	Tetrachloroethylene
2006	0	1	11	4
2007	0	1	9	5
2008	<b>5</b>	<b>7</b>	<b>27</b>	5
2009	4	8	23	<b>24</b>
2010	4	8	16	18
2011	4	6	17	17

NOTE: Bolded numbers indicate the first year that these chemicals were designated as an HHS and the reporting threshold lowered

# Trichloroethylene

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- 2011 TURA Data
  - 17 filers
  - 303,000 lbs total use
    - chemical distributors 169,000 lbs
    - shipped in products 50,000 lbs
  - 155,000 lbs byproduct
  - 42,700 lbs released



# Cadmium and Compounds

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- 2011 TURA Data
  - 9 filers
  - 208,000 lbs total use
  - 11,300 lbs byproduct
  - 18 lbs released
  - 1 Trade Secret filer

# Perchloroethylene

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- 2011 TURA Data
  - 17 filers (9 dry cleaners)
  - 146,000 lbs total use
    - Chemical distributors 84,000 lbs
  - 55,000 lbs byproduct
  - 24,300 lbs released

# HHS Progress

(since first reporting year)

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- Trichloroethylene 43% reduction
- Cadmium 9% reduction
- Cadmium Compounds 11% increase
- Perchloroethylene 24% reduction

# Lessons Learned from HHS Designation

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- Small quantity filers combined have significant toxics use
  - HHS Designation encourages filers to reduce
  - Solvents/otherwise used chemicals remain easier to substitute and reduce
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# N-Propyl Bromide (NPB)

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- Staff observed its substitution for TCE/PCE
  - Science Advisory Board reviewed data in 2009
  - Added to TURA list in 2009
  - Recommended as HHS in 2013
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# N-Propyl Bromide (NPB)

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- First filing year 2010
  - 3 filers
  - Total Use = 39,159
  - Total Releases = 25,961
  - (17<sup>th</sup> highest under TURA)
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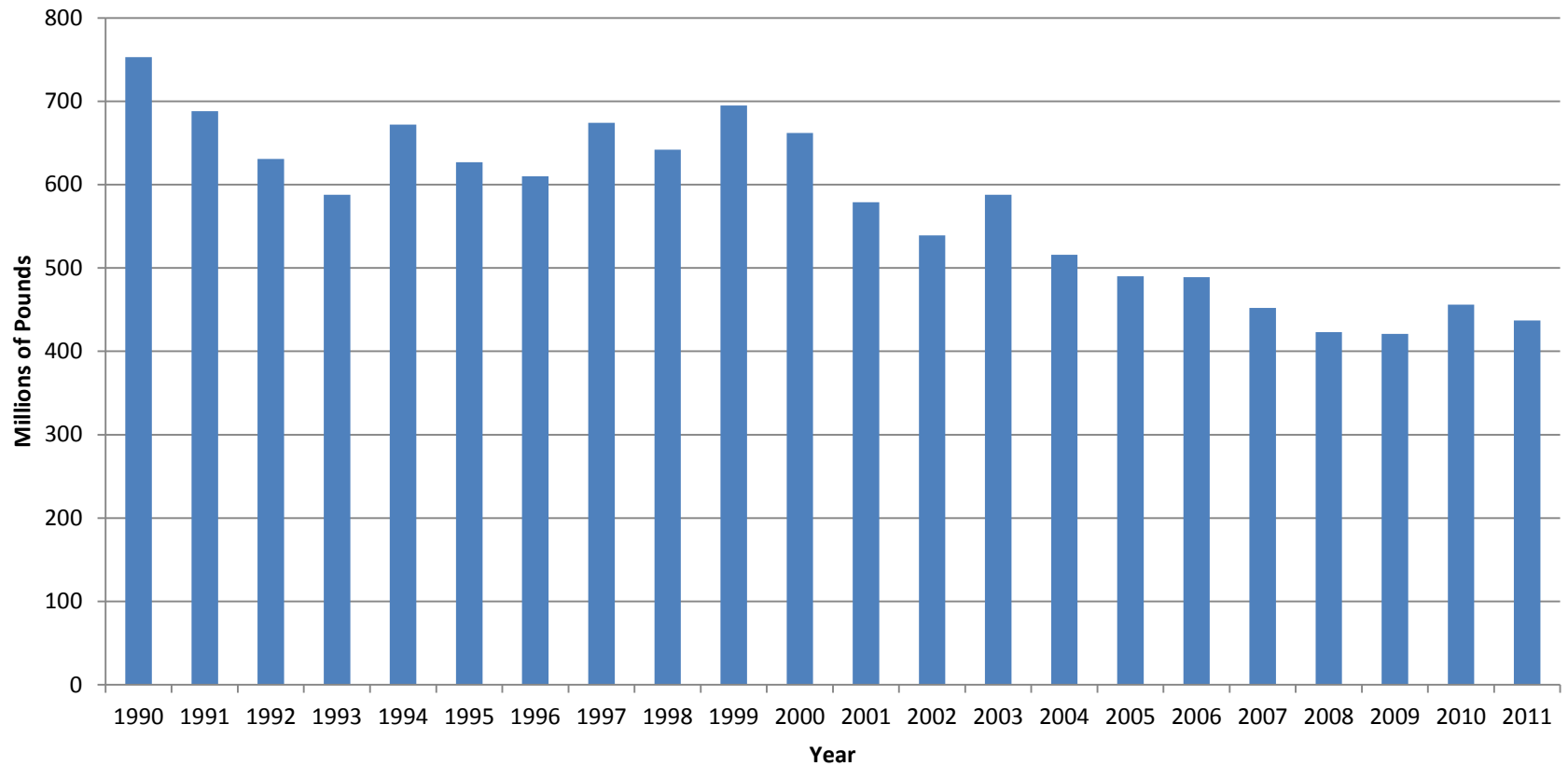
# Lessons Learned from NPB listing

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- Unregulated substances can have surprisingly large releases

# Overall TURA Progress

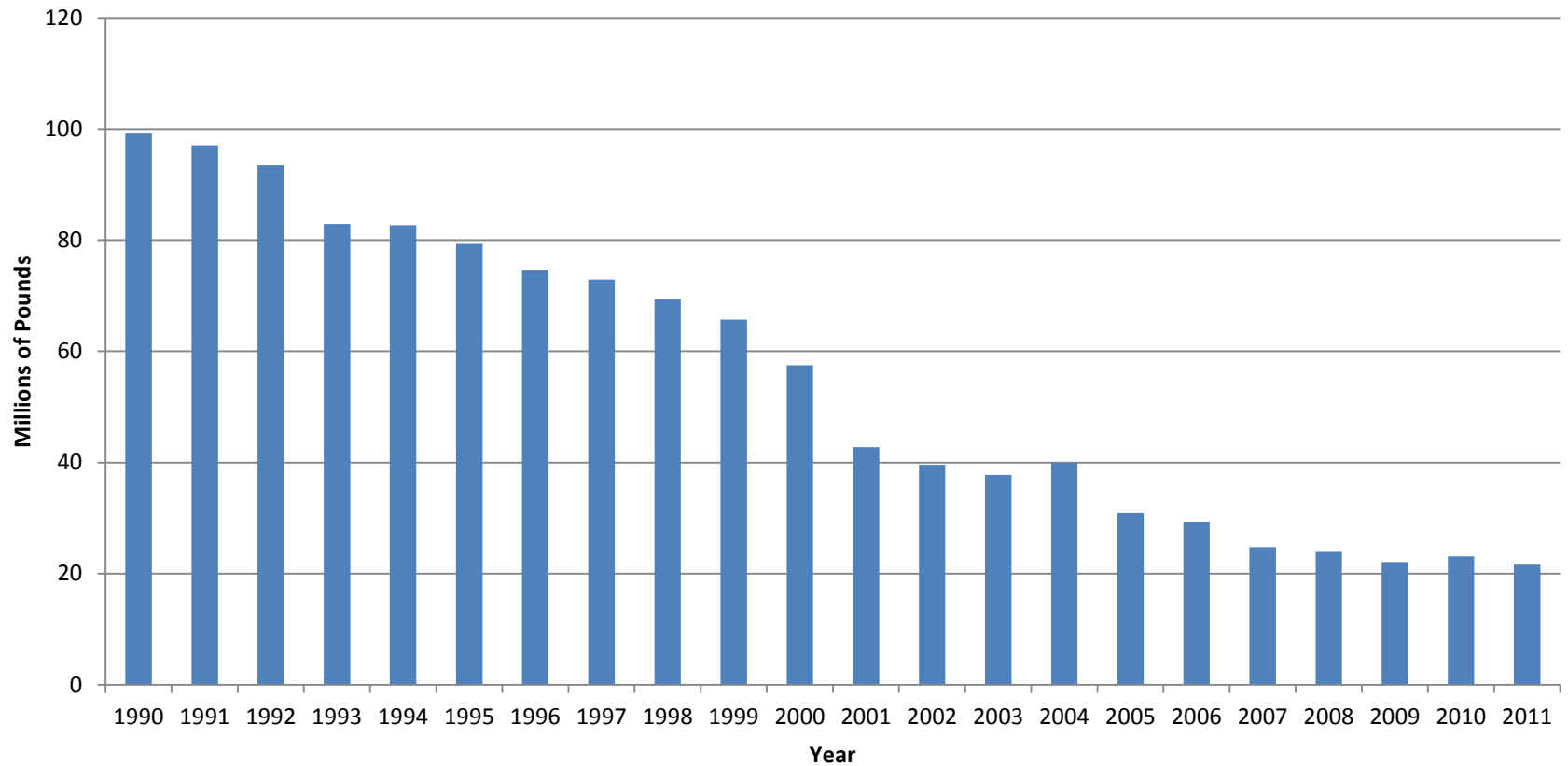
**Total TURA Use**





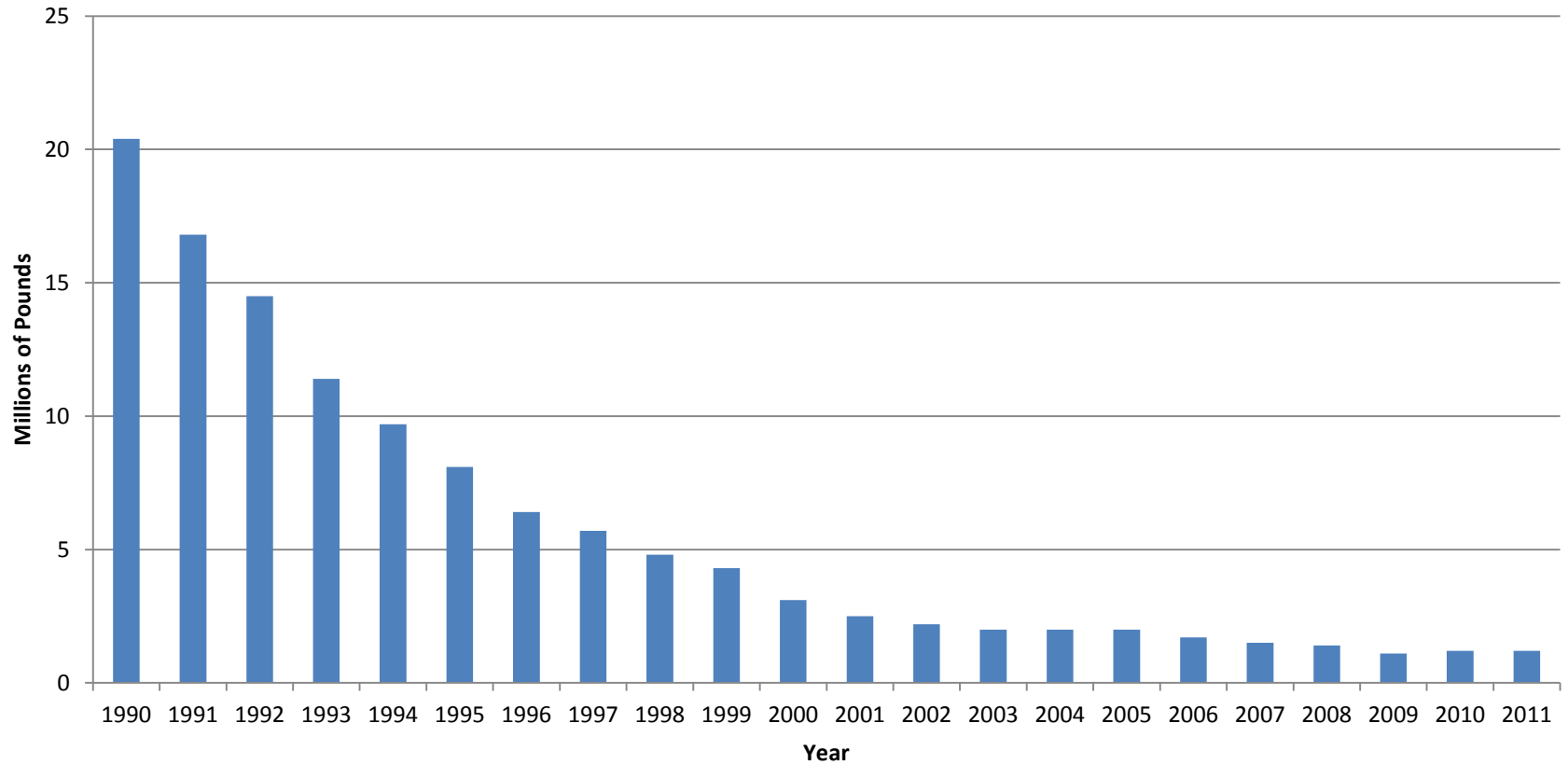
# Overall TURA Progress

## TURA Byproduct



# Overall TURA Progress

TURA Releases



# Conclusions

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- Cumulatively, smaller filers are a significant part of the toxics picture
  - Regulatory attention helps focus toxics users on chemicals to move away from
  - Large releases can occur where there is a lack of regulatory attention
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# Considerations for TRI

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- Consider adding new chemicals
  - Consider threshold changes
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