



PFAS Uses and Avoiding Regrettable Substitutes

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NEWMOA PFAS Webinar Series

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PFAS Uses and Avoiding Regrettable Substitutes

TURA and TUR approach

PFAS and uses

Strategies for avoiding regrettable substitutes

Examples

Massachusetts Toxics Use Reduction Act (TURA)

Helps Massachusetts companies and communities *reduce the use of toxic chemicals* while **promoting competitive advantage** of Massachusetts businesses

Chemical use reporting

Biennial toxics use reduction planning

Annual fee



TURA Program



Massachusetts Department of Environmental Protection (MassDEP): Planner certification, filings, enforcement, data analysis



Massachusetts Office of Technical Assistance and Technology (OTA): Business Assistance, On-site, confidential technical assistance



Massachusetts Toxics Use Reduction Institute (TURI): Training, grants, research, alternatives assessment, Science Advisory Board, policy analysis, technical support, laboratory, library

Science Advisory Board

- Scientific recommendations

Advisory Committee

- Multi-stakeholder policy input

Administrative Council

- Votes on policy initiatives (e.g. listing chemicals)

Hierarchy of Controls

Most effective

Elimination

Physically remove the hazard

Substitution

Replace the hazard

Engineering Controls

Isolate people from the hazard

Administrative Controls

Change the way people work

PPE

Protect the worker with Personal Protective Equipment

Mitigation

TUR

Primary Prevention

Secondary Prevention

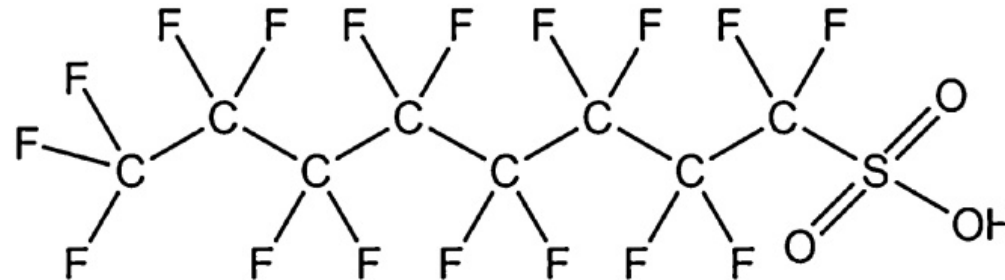
Tertiary Prevention

Least effective

What are PFAS?

- Fluorinated carbon chain
- Large class of chemicals - 4,700 identified by OECD

Example – PFOS:



Raw Materials



Commercial Products



Transient degradation intermediates



Terminal Degradation Products

Some Uses and Sources of PFAS

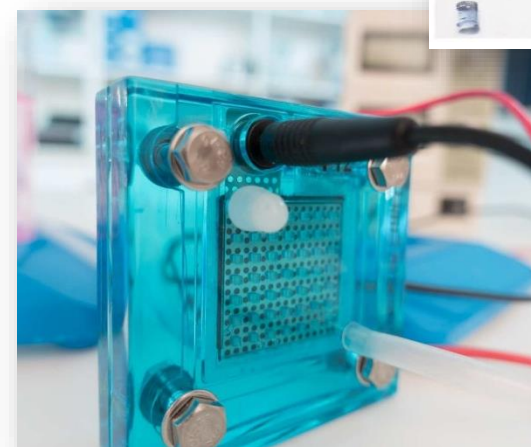
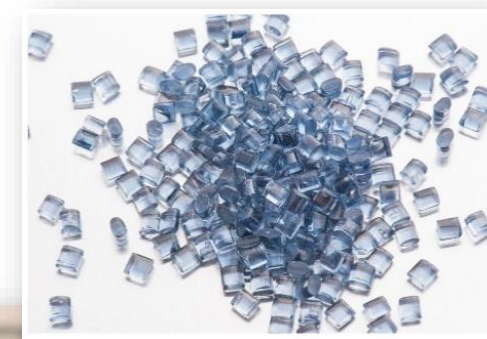


- Oil & water repellency
- Lubricant, emulsifier
- Surfactant, film former
- Non-reactive/low surface tension

Source: Green Science Policy Institute, used with permission. www.greensciencepolicy.org

Industrial Uses

- Polymers and Resins
 - Fluoropolymers, and as feedstock and processing aids in their manufacture (e.g., PTFE, PVDF, FEP)
 - Side-chain fluoropolymers
 - Non-fluorinated resin processing aids
 - Fluorination of HDPE containers
 - Additives in coatings
 - Membranes (e.g., Nafion)



Industrial Uses

- Metal finishing
 - Surfactants - Fume/mist suppressants
 - Bath additive in nickel, copper and tin plating
- Solvents - HFE's (hydrofluoroethers),
- Solvents, blowing agents, refrigerants - HFO's, HFC's
- Surfactants, lubricants, coatings in many industries



Prevention Approach: Avoiding Regrettable Substitutes

Use an Alternatives Assessment framework

Evaluate use and function. Is it necessary?

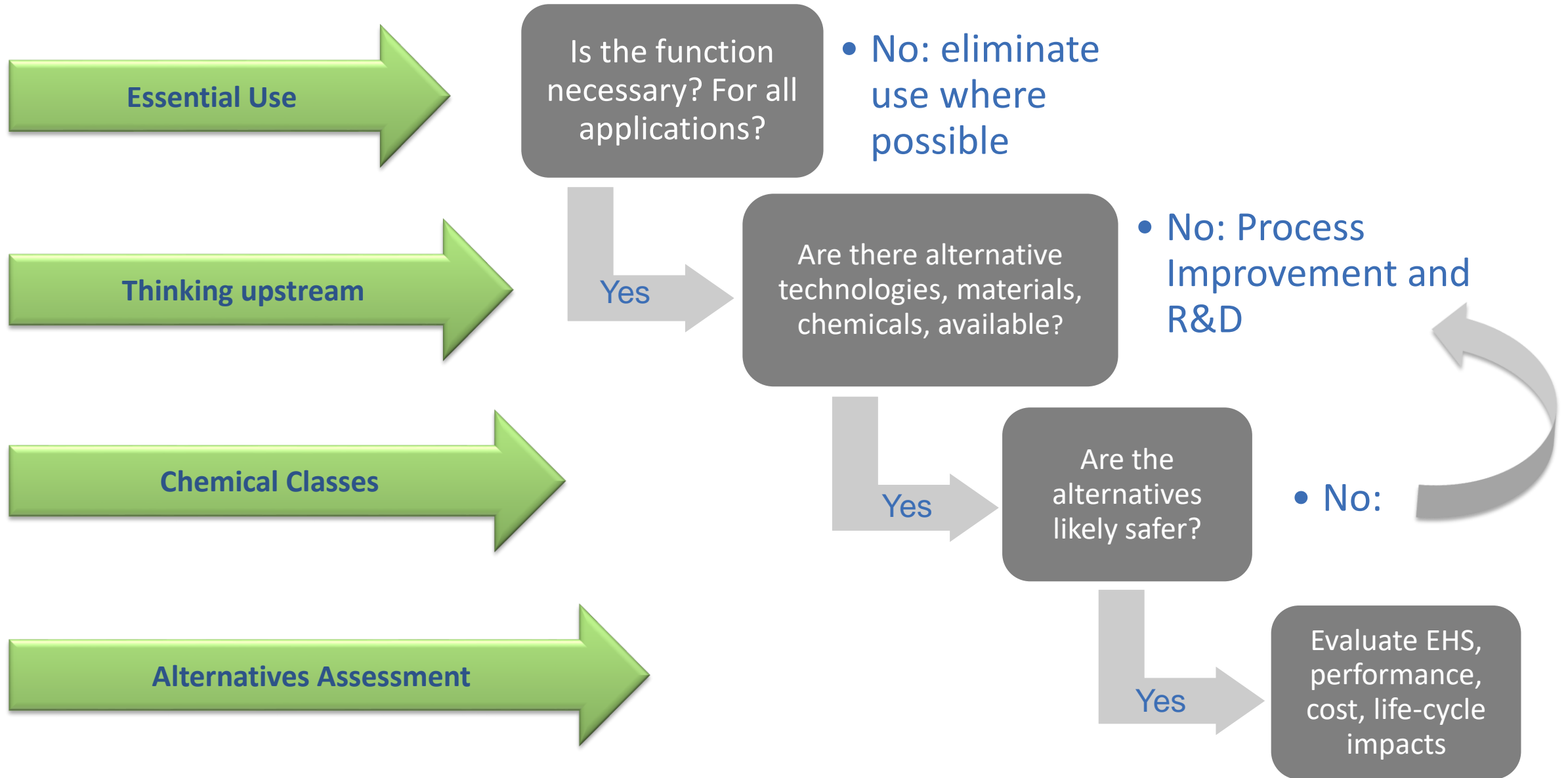
Essential uses concept

Evaluate safer alternatives

Class approach, life-cycle thinking

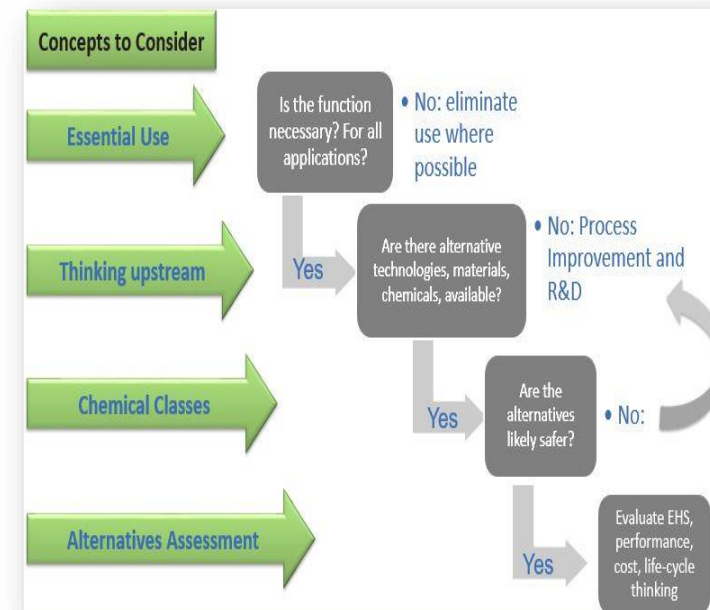
If use is essential and no safer alternatives available, look for process improvements, eliminating emissions and exposure. Move to R&D.

Concepts to Consider



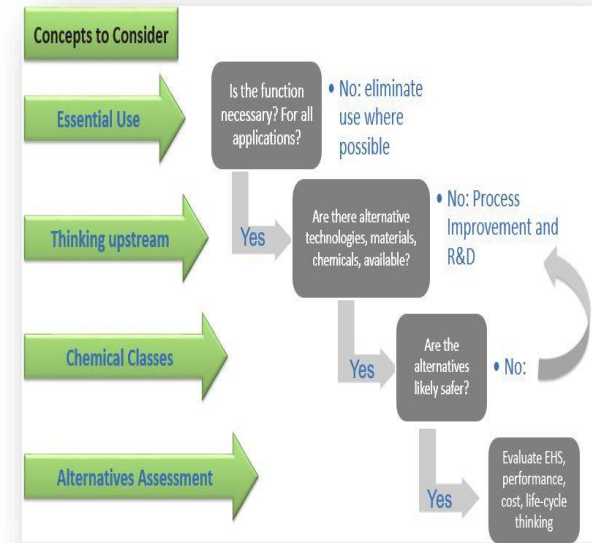
Ski Wax

- Function
 - Low friction, water resistant coating
- Essential? For all or some applications?
 - Performance criteria varies with application
- Alternatives
 - Drop in/alternative coatings
 - Hydrocarbon wax
 - C6 fluorowax (same chemical class)
 - Novel non-fluorowaxes (e.g., SWIX Pro)
 - Alternative ski material or surface topography
- Assess alternatives for hazard, specific performance requirements, cost, life cycle impacts



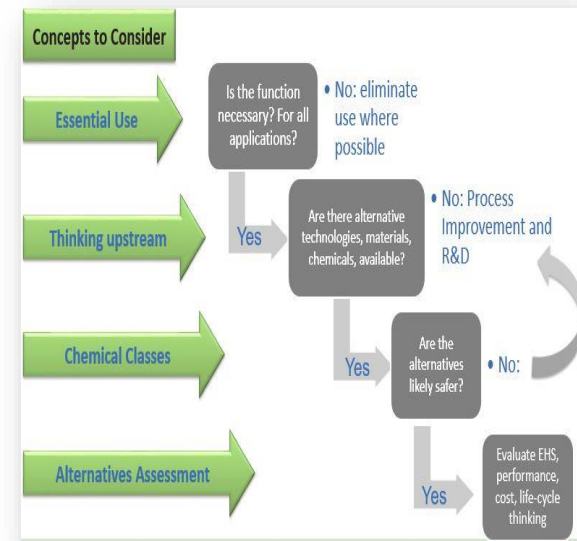
Hex Chrome Fume/Mist Suppressants

- Function – low surface tension
 - Limits release of Cr^{+6} from metal finishing baths
- Essential? For all or some applications?
 - Performance criteria vary somewhat with application
- Alternatives
 - Non-hex chrome metal finishing
 - Closed systems
 - Drop in alternatives
 - C6 fluorinated surfactants (same chemical class)
 - Non-fluorinated surfactants
- Need for continued R&D for Cr^{+6} metal finishing alternatives and non-fluorinated fume suppressants



DWR Textile Coatings

- Function
 - Water and oil repellant
- Essential? For all or some applications?
 - Fit for Purpose – wide range of performance needs
 - Roofing membranes, yurts, tents, sails, upholstery
 - Outdoor wear, children's fleece, footwear, leather
- Alternatives
 - Alternative textile materials, weaving and fiber modification
 - Alternative coatings: fluorinated, siloxanes/silicones, hydrocarbons, polyurethane, nanomaterials, dendrimers,
 - Effective water repellency; challenges with oil repellency
- Assess alternatives for hazard, specific performance requirements, cost, life cycle impacts



Selected Resources

- Glüge, et al, 2020. [An overview of the uses of per- and polyfluoroalkyl substances \(PFAS\)](#) , *Environ. Sci.: Processes Impacts*, 2020, 22, 2345 - With extensive supplementary information
- Buck and Korzeniowski, 2019. [The PFAS Universe Webinar](#)
- Cousins, et al, 2019. [The concept of essential use for determining when uses of PFASs can be phased out](#), *Environ. Sci.: Processes Impacts*, 2019, 21, 1803
- Global PFAS Science Panel www.pfassciencepanel.org/
- Cousins, et al 2021. [The High Persistence of PFAS is Sufficient for their Management as a Chemical Class](#), *Environ Sci Process Impacts*. 2020 Dec 16; 22(12): 2307–2312.
- Bălan, et al, 2021. [Regulating PFAS as a Chemical Class under the California Safer Consumer Products Program](#), EHP Commentary
- [Green Science Policy Institute](#) – upcoming report: *Building a Better World: Eliminating Unnecessary Uses of PFAS in Building Materials*.
- Industry Fluoropolymer Use information: [Performance Fluoropolymer Partnership](#)
- Draft [PFAS Category Policy Analysis](#) for TURA program – Oct 2020
- EU Commission DG Environment, 2019. [The use of PFAS and fluorine-free alternatives in textiles, upholstery, carpets, leather and apparel](#), Doc Ref. 42054-WOOD-XX-XX-RP-OP-0004_S4_P01.3



Thank you

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