

EPA Releases Strategic Roadmap for PFAS

Outlines Federal Direction for the next three years

By **Analise Lindborg**, *Associate Scientist*
and **Judi Durda**, *Executive Vice President*

On October 18, the U.S. Environmental Protection Agency (EPA) released its most comprehensive plan to date to address per- and polyfluoroalkyl substances (PFAS) in the nation's water, soil, and air. The Roadmap outlines EPA actions to manage PFAS, including monitoring and regulation, through 2024. It is part of the Biden Administration's overall plan to develop and implement a coordinated government-wide approach to addressing PFAS.

The Roadmap describes the suite of methods EPA will use to address PFAS, with implications for both the public and private sectors. Of particular note, the Roadmap includes:

- **Expanded Monitoring.** EPA will expand PFAS monitoring and validate the analytical methods needed to be assured of the accuracy of monitoring results. The Fifth Unregulated Contaminant Monitoring Rule released earlier this year includes a suite of 29 PFAS to be monitored in drinking water. This information, along with additional toxicity studies, is expected to inform a national primary drinking water regulation for PFOA and PFOS and drinking water health advisories for GenX and PFBS by 2023. EPA plans to monitor PFAS in effluent through National Pollutant Discharge Elimination

System permits and place restrictions on industrial PFAS discharges through Effluent Limitation Guidelines in 2022. EPA will conduct nationwide fish tissue surveys, finalize monitoring approaches for stack emissions and ambient air concentrations of PFAS, and prepare a finalized risk assessment for PFOA and PFOS in biosolids.

- **Toxic Substances Control Act (TSCA) and Related Programs.** Several measures related to the manufacture and use of new and banned PFAS will extend review periods, as "new PFAS are subject to rigorous reviews," restrictions are placed on previously allowed low-volume exemptions, and new uses for previously approved PFAS are limited, subject to new notices and additional reviews. Enhanced reporting requirements will



require planning and preparation for companies that produce and use PFAS, as EPA plans to request information under TSCA Section 8 on uses, production volumes, disposal, exposures, and hazards of PFAS manufactured since 2011, and categorize the PFAS as “Chemicals of Special Concern” while removing “*de minimis* eligibility from supplier notification requirements” on the Toxics Release Inventory (TRI) in 2022. The latter action under TRI will require expanded reporting of releases for those PFAS currently on the list, although EPA has not yet declared which additional PFAS may be added to the list. EPA also plans to establish a voluntary stewardship program, wherein industries will commit to reducing and reporting all environmental releases of PFAS, but are still subject to regulatory and compliance requirements.

- **Hazardous Substance Designation.** In response to a push to designate PFAS as “hazardous substances,” EPA plans to list PFOS and PFOA as such under the Comprehensive Environmental Response, Compensation and Liability Act. This designation will require facilities to report PFOA

and PFOS releases that meet or exceed a reporting limit that has not yet been determined by EPA. This designation will increase federal, state, local, and tribal oversight and risk of cost recovery claims from agencies. Notably, EPA does not propose regulating any PFAS as “hazardous waste” under the Resource Conservation and Recovery Act.

- **No Grouping.** Although there is expanded monitoring and proposed regulations placed on various PFAS through this new Roadmap and a plan to further define PFAS categories, EPA still intends to monitor and regulate PFAS individually, rather than as a single group of chemicals. This approach will accommodate consideration of the unique properties of each chemical when evaluating risks and determining management needs.

All actions in the Roadmap are listed as “efforts ongoing” or given an expected completion time frame. EPA notes that this work is “subject to the availability of appropriations and other resources” and beyond the time frames, does not provide any prioritization of actions.



Analise Lindborg

Associate Scientist

alindborg@integral-corp.com

[View Bio](#)



Judi Durda

Executive Vice President

jdurda@integral-corp.com

[View Bio](#)

Learn more at integral-corp.com