

THE JOURNAL OF FEDERAL AGENCY ACTION

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PFAS Regulatory Update: Final Rules Recently Issued by the Environmental Protection Agency, and What's to Come

Dianne R. Phillips, Amy L. Edwards, Meaghan A. Colligan,
Jose A. Almanzar, and Molly Broughton*

In this article, the authors review recent steps taken by the U.S. Environmental Protection Agency toward implementing several regulatory commitments regarding per- and polyfluoroalkyl substances (PFAS) made in the agency's 2021 PFAS Strategic Road Map and in its 2023 Second Annual Progress Report.

The first half of 2024 has been busy for those following regulatory developments related to per- and polyfluoroalkyl substances (PFAS). Building on its plans in the 2021 PFAS Strategic Road Map¹ and its 2023 Second Annual Progress Report,² the U.S. Environmental Protection Agency (EPA) continued its fast-paced regulatory activity in anticipation of the Congressional Review Act's³ look-back deadline, after which Congress has the right to review and potentially disapprove final regulations. In addition, rules previously promulgated by EPA require significant action in 2024. Summaries of key developments are below.

Resource Conservation and Recovery Act

EPA advanced efforts to address PFAS under the Resource Conservation and Recovery Act (RCRA) on February 8, 2024, by proposing⁴ to add the following nine PFAS compounds, as well as their associated salts and structural isomers, to a list of hazardous constituents considered in the RCRA Corrective Action Program:⁵

- Perfluorooctanoic acid (PFOA),
- Perfluorooctanesulfonic acid (PFOS),
- Perfluorobutanesulfonic acid (PFBS),

- Hexafluoropropylene oxide-dimer acid (HFPO-DA or GenX),
- Perfluorononanoic acid (PFNA),
- Perfluorohexanesulfonic acid (PFHxS),
- Perfluorodecanoic acid (PFDA),
- Perfluorohexanoic acid (PFHxA), and
- Perfluorobutanoic acid (PFBA).

In addition, EPA proposed⁶ to expand the definition of hazardous waste applicable to regulatory corrective action to include not only listed chemicals but also “any substance” that meets the broad statutory definition of “hazardous waste” under RCRA, which includes wastes that could “pose a substantial present or potential hazard to human health or the environment. . . .” EPA argues that this change will allow the agency to enforce RCRA corrective action requirements as was intended in the law. Additionally, these revisions will grant the agency the authority to address PFAS and other emerging contaminants that have not yet been explicitly defined as hazardous waste at RCRA-permitted treatment, storage, and disposal facilities. According to EPA’s Spring 2024 Agency Rule List,⁷ EPA expects to finalize⁸ these rules in December 2024.

Safe Drinking Water Act

EPA announced the National Primary Drinking Water Regulation (NPDWR)⁹ under the Safe Drinking Water Act (SDWA) on April 10, 2024. The final rule sets legally enforceable thresholds, called maximum contaminant levels (MCLs), for six PFAS in drinking water (PFOA, PFOS, PFHxS, PFNA, and HFPO-DA as contaminants with individual MCLs and PFAS mixtures containing at least two or more of PFHxS, PFNA, HFPO-DA, and PFBS using a Hazard Index MCL to account for the combined and co-occurring levels of these PFAS in drinking water.) EPA also finalized health-based, nonenforceable maximum contaminant level goals for these PFAS.

Public water systems will have three years after the rule’s promulgation to comply with monitoring requirements, that is, by December 2026, at which point they must begin reporting their monitoring results. The initial monitoring requirements will mandate four quarterly samples for larger systems serving populations of more than 10,000 people and biannual samples from smaller systems serving populations of 10,000 or fewer. Beginning five

years after promulgation, if the levels of PFAS detected in these samples exceed the MCLs, public water systems must notify their served communities and take steps to reduce levels of PFAS in their drinking water. States will be permitted to set and enforce their own drinking water criteria, provided the criteria are at least as stringent as the EPA's national criteria.

Over the past few years, multiple states—Maine,¹⁰ Massachusetts,¹¹ Michigan,¹² New Hampshire,¹³ New Jersey,¹⁴ New York,¹⁵ Pennsylvania,¹⁶ Rhode Island,¹⁷ Vermont,¹⁸ Washington,¹⁹ and Wisconsin²⁰—have established enforceable drinking water standards for certain PFAS in drinking water under state law.

Several states, including Delaware²¹ and Virginia,²² are also considering MCLs for certain PFAS.

Other states, such as Connecticut,²³ Maryland,²⁴ and Oregon,²⁵ have established nonenforceable “action levels” or drinking water guidelines.

Some states, such as California²⁶ and Utah,²⁷ have begun monitoring programs in addition to EPA's Unregulated Contaminant Monitoring Rule.²⁸

All of this adds greater complexity to drinking water standards and creates confusion for consumers and regulated entities.

Two organizations filed a petition on June 7, 2024, challenging the NPDWR under the SDWA in the U.S. Court of Appeals for the District of Columbia Circuit in Docket No. 24-1188. On June 10, 2024, more organizations filed similar petitions in the same court as Docket No. 24-1191 and Docket No. 24-1192. All three cases have been consolidated under Docket No. 24-1188. Several additional parties have moved to intervene, which were granted on July 23, 2024. Procedural motions were due in mid-July. According to one party's Nonbinding Statement of Issues, several of the challenges relate to use of the Hazard Index MCL, the regulation of mixtures and the feasibility of achieving the MCLs, among other things. A briefing schedule was set on September 4, 2024, with final briefs due March 25, 2025.

Collectively, the parties argued that the NPDWR is arbitrary and capricious and should be overturned, contending that the agency exceeded its authority under the SDWA and did not follow the mandate by Congress. These challenges have been filed sufficiently recently that the petitioners are likely (and are expected to be able) to use the U.S. Supreme Court's June 28, 2024, decision overruling the *Chevron* doctrine in *Loper Bright Enterprises v. Raimondo*.

In addition, petitioners are expected to rely on the 2022 Supreme Court decision in *West Virginia v. EPA* to bolster their argument that the EPA lacked the authority under the SDWA to promulgate the NPDWR. In *West Virginia*, the Supreme Court set out the “major questions” doctrine—a rule of statutory construction that holds if an agency seeks to decide an issue of major national significance, its action must be supported by clear congressional authorization. Pursuant to that rule of construction, the organizations are anticipated to argue EPA would be precluded from issuing the NPDWR absent clear congressional authorization to EPA to regulate PFAS.

Comprehensive Environmental Response, Compensation, and Liability Act

EPA announced²⁹ on April 19, 2024, its final rule designating two PFAS compounds—PFOA and PFOS, including their salts and structural isomers—as “hazardous substances” under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund). The rule was published³⁰ in the Federal Register on May 8, 2024, with an effective date of July 8, 2024. The following obligations and ramifications are implicated:

- PFOA and PFOS releases of one pound or more in a 24-hour period must be reported to the National Response Center.
- EPA may include an evaluation of PFOA and PFOS in its five-year review of sites included on the National Priority List (Superfund sites).
- EPA may order investigations and cleanups of PFOA and PFOS and recover such costs from responsible parties.
- Private parties that conduct cleanups consistent with the National Contingency Plan may seek to recover cleanup costs associated with PFOA and PFOS from other responsible parties, including contribution for costs paid.
- Federal entities that transfer or sell property must provide notice about the storage, release, or disposal of PFOA or PFOS on the property, as well as guarantee that any PFOA or PFOS contamination has been remediated or, if needed, that additional cleanup will occur in the future.
- Compliance with the “All Appropriate Inquiries” rule, 40 C.F.R. Part 312, will require consideration of PFOA and/

or PFOS to qualify for CERCLA Landowner Liability Protections.

Three organizations filed a petition on June 10, 2024, challenging the CERCLA designation, arguing EPA exceeded its statutory authority under the Administrative Procedure Act in the U.S. Court of Appeals for the District of Columbia Circuit in Docket No. 24-1193. Several additional parties filed petitions docketed as 24-1261, 24-1266, 24-1271 and 24-1272, all consolidated under Docket No. 21-1193. A Joint Proposed Briefing Schedule was filed on September 9, 2024, which indicates final briefs will be filed on April 2, 2025.

Toxic Substances Control Act

EPA published a final rule³¹ in October 2023 to amend Section 8 reporting requirements under the Toxic Substances Control Act (TSCA) that require persons who manufacture (including import) or have manufactured or imported these chemical substances or products containing these substances, in any year between January 1, 2011, and December 31, 2022, to report information electronically regarding PFAS uses, production volumes, disposal, exposures, and hazards. The new regulations, 40 C.F.R. Part 705,³² which became effective on November 13, 2023, have enormous implications.

The rule applies not only to traditional chemical manufacturers, but to all importers of products (Product Importers) that may contain one or more PFAS compounds. PFAS are used in a large number of product categories, such as electronics, wires and cables, pipes, cooking and bakeware, textiles, automotive applications, toys, water- and stain-resistant clothing, cleaning supplies, dental floss, toilet paper, paints, varnishes, carpets, and many other industrial and consumer products, so the potential universe of regulated parties is vast. There are no exemptions for low levels or small amounts of PFAS use. Exemptions are provided for PFAS used in certain types of products regulated by other agencies and programs, such as food additives and medical devices. For many Product Importers, this will be an entirely new process giving rise to many questions, some of which are answered in EPA's recently published Frequently Asked Questions³³ and Instructions for Reporting PFAS Under TSCA Section 8(a)(7).³⁴ EPA extended

the deadline by its filing dated September 5, 2024. Reporting on a compound-by-compound basis is now due January 11, 2026 (or July 11, 2026, for small entities).

Toxics Release Inventory

EPA published a final rule³⁵ changing reporting requirements for PFAS listed in the Toxics Release Inventory (TRI) on October 31, 2023. The final rule includes PFAS currently on the TRI and automatically includes additional PFAS added pursuant to sections 7231(b) and (c) of the 2020 National Defense Authorization Act to the list of chemicals of special concern eliminates the de minimis exemption for “Supplier Notification Requirements” for all chemicals of special concern and limits the use of range reporting. EPA contends that elimination of the de minimis exemption and range reporting options will provide a more complete picture of PFAS releases and waste management quantities. As described by EPA,³⁶ some requirements become effective for reporting year 2023 (forms were due by July 1, 2024, for 189 PFAS compounds), but the most significant changes will be implemented in reporting year 2024 (forms due July 1, 2025, for 196 PFAS compounds).

National Pollutant Discharge Elimination System

Currently, the NPDWR, if upheld, will also impact the development of effluent limits for National Pollutant Discharge Elimination System (NPDES) permits that regulate point source discharges to waterbodies under the Clean Water Act. When developing effluent limits for an NPDES permit, discharge limits must protect the uses of the receiving waterbody. If the receiving waterbody is a drinking water source, the MCLs from the Drinking Water Rule will influence the derivation of human health-based water quality criteria and related permit effluent limits. EPA has not promulgated any binding changes to the NPDES permitting programs as of now, but guidance³⁷ was issued for state environmental agencies and NPDES permit issuers that recommends adopting the full suite of PFAS-monitoring techniques³⁸ being used by EPA. According to EPA’s Spring 2024 Agency Rule List, EPA expects³⁹ to issue a proposed rule in June 2025 to update NPDES application regulations, 40 C.F.R. 122.21.

In a similar vein, EPA has not yet released actionable Effluent Limitation Guidelines (ELGs) to restrict PFAS discharges. In the Strategic Roadmap, EPA predicted that the agency will make “significant” ELG regulatory changes by the end of 2024. According to its Spring 2024 Agency Rule List, EPA expects⁴⁰ to issue a proposed rule (ELG) revising the existing Organic Chemicals, Plastics, and Synthetic Fibers ELG (40 CFR Part 414) by September 2024, although that date will likely slip by based on prior experience.

Currently, EPA is continuing its multi-industry study of PFAS discharges and utilizing the ELG program to conduct industry-specific studies, as described in Effluent Guidelines Program Plan 15 (Plan 15).⁴¹ Specifically, EPA is evaluating the textiles industry (40 CFR part 410),⁴² concentrated animal feeding operations (40 CFR part 412),⁴³ and nationwide data on industrial discharges of PFAS to publicly owned treatment works. To date, through Plan 15, EPA has determined that revisions to the effluent guidelines and standards for landfills (40 CFR part 445)⁴⁴ are warranted and will not be pursuing further action regarding the electrical and electronic components industry (40 CFR part 469).⁴⁵ However, EPA will continue to monitor PFAS discharges from the electrical and electronic components industry, pulp, paper, and paperboard category (40 CFR part 430)⁴⁶ and airports. EPA also intends to propose updates⁴⁷ to its Clean Water Act Part 136 monitoring methods to incorporate multilaboratory-validated methods for analyzing PFAS⁴⁸ in January 2025.

Conclusion

In summary, there is a lot going on in the PFAS regulatory world, and it takes a scorecard to keep track of proposed, finalized, and challenged regulations. EPA does not appear to be letting up, and further developments are expected throughout 2024 and into early 2025.

Notes

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1. <https://www.epa.gov/pfas/pfas-strategic-roadmap-epas-commitments-action-2021-2024>.
2. <https://www.epa.gov/system/files/documents/2023-12/epas-pfas-strategic-roadmap-dec-2023508v2.pdf>.
3. <https://www.gao.gov/legal/congressional-review-act>.
4. <https://www.federalregister.gov/documents/2024/02/08/2024-02328/definition-of-hazardous-waste-applicable-to-corrective-action-for-releases-from-solid-waste>.
5. <https://www.epa.gov/hw/learn-about-corrective-action#whatis>.
6. <https://www.federalregister.gov/documents/2024/02/08/2024-02328/definition-of-hazardous-waste-applicable-to-corrective-action-for-releases-from-solid-waste>.
7. https://www.reginfo.gov/public/do/eAgendaMain?operation=OPERATION_GET_AGENCY_RULE_LIST¤tPub=true&agencyCode=&showStage=active&agencyCd=2000&csrf_token=E16A2D3B67B023108AE83B281A12DAD1D52207628C77A089ED6D7D29A722F9069D5872C6DE02941F9101C8A486E2B8E4B6D0.
8. <https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202404&RIN=2050-AH27>.
9. <https://www.epa.gov/newsreleases/biden-harris-administration-finalizes-first-ever-national-drinking-water-standard>.
10. <https://www.mainelegislature.org/legis/bills/getPDF.asp?paper=SP0064&item=3&snum=130>.
11. <https://www.mass.gov/doc/310-cmr-2200-the-massachusetts-drinking-water-regulations/download>.
12. <https://casetext.com/regulation/michigan-administrative-code/department-environmental-quality/drinking-water-and-municipal-assistance-division/supplying-water-to-the-public/part-6-state-drinking-water-standards-and-analytical/section-r-32510604g-mcls-for-per-and-polyfluoroalkyl-substances>.
13. [https://www.pfas.des.nh.gov/drinking-water#:~:text=Health%20standards&text=In%20July%202020%2C%20New%20Hampshire,acid%20\(PFHxS\)%20%E2%80%93%2018%20ppt](https://www.pfas.des.nh.gov/drinking-water#:~:text=Health%20standards&text=In%20July%202020%2C%20New%20Hampshire,acid%20(PFHxS)%20%E2%80%93%2018%20ppt).
14. <https://dep.nj.gov/pfas/standards/>.
15. https://www.health.ny.gov/environmental/water/drinking/emerging_pfas_publicwater.htm.
16. <https://www.pacodeandbulletin.gov/Display/pabull?file=/secure/pabulletin/data/vol53/53-2/46.html>.
17. <https://webservice.rilegislature.gov/Statutes/TITLE46/46-32/INDEX.htm>.
18. <https://legislature.vermont.gov/Documents/2020/Docs/ACTS/ACT021/ACT021%20As%20Enacted.pdf>.

19. <https://doh.wa.gov/community-and-environment/drinking-water/contaminants/pfas-drinking-water>.
20. <https://dnr.wisconsin.gov/topic/DrinkingWater/2022PFASMCLs.html>.
21. <https://www.dhss.delaware.gov/dhss/dph/hsp/files/MCLimplementationPlanPFAS.pdf>.
22. <https://rga.lis.virginia.gov/Published/2021/RD681>.
23. <https://portal.ct.gov/dph/drinking-water/dws/per--and-polyfluoroalkyl-substances>.
24. https://mde.maryland.gov/programs/Water/water_supply/Documents/PFAS_MDH_PFHxS_Advisory%20Fact_Sheet.pdf.
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27. <https://deq.utah.gov/drinking-water/drinking-water-pfas>.
28. <https://www.epa.gov/dwucmr/fifth-unregulated-contaminant-monitoring-rule>.
29. <https://www.epa.gov/newsreleases/biden-harris-administration-finalizes-critical-rule-clean-pfas-contamination-protect>.
30. <https://www.govinfo.gov/content/pkg/FR-2024-05-08/pdf/2024-08547.pdf>.
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36. <https://www.epa.gov/toxics-release-inventory-tri-program/addition-certain-pfas-tri-national-defense-authorization-act>.
37. <https://www.epa.gov/newsreleases/epa-issues-guidance-states-reduce-harmful-pfas-pollution>.
38. <https://www.epa.gov/cwa-methods/frequent-questions-about-pfas-methods-npdes-permits>.
39. <https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202404&RIN=2040-AG34>.
40. <https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202404&RIN=2040-AG10>.
41. <https://www.epa.gov/eg/current-effluent-guidelines-program-plan>.
42. <https://www.epa.gov/eg/textile-mills-effluent-guidelines>.

43. <https://www.epa.gov/npdes/animal-feeding-operations-regulations-guidance-and-studies>.
44. <https://www.epa.gov/eg/landfills-effluent-guidelines>.
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47. <https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202404&RIN=2040-AG37>.
48. <https://www.epa.gov/water-research/pfas-analytical-methods-development-and-sampling-research>.