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U.S. Environmental Protection Agency Draft Interim Recommendations for Addressing Groundwater Contaminated with PFOA/PFOS: ASTSWMO Comments

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The Association of State and Territorial Solid Waste Management Officials (“ASTSWMO”) submitted June 10th comments to the United States Environmental Protection Agency (“EPA”) addressing the:

Draft Interim Recommendations for Addressing Groundwater Contaminated with PFOA and PFOS

ASTSWMO describes itself as an association representing the waste management and remediation programs of the 50 U.S. States, five Territories, and the District of Columbia.

PFAS consist of a large group of man-made chemicals that include perfluorooctanoic acid, perfluorooctane sulfonate, and GenX chemicals.

PFAS properties include resistance to heat, water, oil. They have been described as persistent in the environment and resist degradation.

The compounds have been used in various industrial applications of consumer products such as:

- Fabrics for furniture
- Paper packaging for food and other materials resistant to water, grease or stains
- Firefighting airfields
- Utilization in several industrial processes

Potential human exposure to PFAS includes pathways through drinking water, air or food.

ASTSWMO’s June 10th comments reiterate a previous belief that:

... there are many more PFAS chemicals potentially impacting human health and the environment, not just PFOA and PFOS. We encourage EPA to include recommendations for investigation and remediation actions for additional PFAS chemicals in either this recommendations document or another guidance document.

The organization also states that the document needs to “provide clear guidance on applicable or relevant and appropriate requirements (ARARs). Including additional guidance on ARARs is critical because EPA’s health advisories for PFOA and PFOS are non-enforceable, non-regulatory values and States have or are in

the process of developing their own regulatory standards for PFOA and PFOS that are more stringent than the federal advisories.”

Specific language recommended that EPA add relevant to ARARs includes:

Where State regulations qualify as ARARs for PFOA and PFOS, the remediation goals established shall be developed considering the State regulations that qualify as ARARs, as well as other factors cited in the NCP (see 40 CFR 300.430(e)(2)(i)(ff)). Final remediation goals and remedy decisions are made in accordance with 40 CFR 300.430 (e) and (f) and associated provisions.

The organization also recommends:

- Citing OLEM Directive 9200.2-187
- Adding a recommendation regarding investigation of CERCLA or RCRA corrective action sites for these contaminants once federal authorities are established

A copy of the June 10th comments can be found [here](#).