PFAS Positioning and Guidance Statement: US Composting Council Announcement

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The United States Composting Council ("USCC") recently issued a document titled:

PFAS Positioning and Guidance Statement ("Statement")

The USCC describes its mission as advancing:

. . . compost manufacturing, compost utilization, and organics recycling to benefit our members, society, and environment.

The USCC *Statement* on PFAS addresses the impacts it believes could occur if the compost industry is negatively impacted by "unsound policies" and contains the USCC's recommendations to mitigate those potential impacts.

The *Statement* addresses PFAS which consists of a large group of man-made chemicals that include perfluorooctanoic acid, perfluorooctane sulfonate, and GenX chemicals. They have been used in various industrial applications and consumer products. PFAS have been described as persistent in the environment and resist degradation.

Other organizations, such as public owned treatment works that generate beneficially reusable sludge but receive discharges that may contain PFAS, have expressed concerns about the impact on these operations. In the case of POTWs the possible impact on their ability to effectively manage municipal biosolids has been cited as a significant concern.

By way of background, the USCC *Statement* notes that the United States generates hundreds of millions of tons of organic residual materials on an annual basis. It argues that such material constitutes a resource having its origin in the soil and is:

. . . most effective means to recycle and return these materials to the soil.

It further states that these benefits:

. . . must not be jeopardized by the adoption of any regulatory limits for soil PFAS unless supported by sound, peer-reviewed research.

Additional benefits of composting are stated to include:

- Diversion of organic residuals from landfills/incinerators
- Reduction of the generation of methane in landfills
- Reuse of a material that contains beneficial nutrients, conserves water, reduces and avoids use of synthetic chemicals

The USCC policy recommendations in regard to PFAS include:

- Reasonable regulation of PFAS and efforts to better understand the impact of these chemicals on the environment and industry, such as:
- Bans on intentionally added PFAS in food service packaging (or other feedstocks) and reasonable regulation of PFAS chemicals at their source. Support innovative packaging (or other feedstocks) that eliminates PFAS inclusion in their production.
- Strongly support that composting must be included in any legislative exclusion from CERCLA liability related to PFAS.
- The EPA must "Ensure Science-Based Decision-Making" to advance scientific understanding of PFAS and follow the science to advance public health and environmental protections. This must be completed prior to setting national and state regulatory standards for safe levels of PFAS in compost. As per EPA's recent PFAS Strategic Roadmap, EPA must go further in developing health risk assessments of PFAS chemicals in compost feedstocks, compost finished product and soil. The USCC recommends that EPA engage in similar to studies done under Rule 40 CFR Part 503. (These standards were developed as a comprehensive risk-based rule to protect the public health and the environment from reasonably anticipated adverse effects of pollutants that may be present in biosolids.)
- USDA and EPA to provide grant research funding to scientifically document the plant uptake properties of PFAS – if any – in compost. It is important that field trials be a component of any research since lab settings may not mimic real world conditions.
- Research should also be funded to demonstrate, again through field trials, the runoff and migration of PFAS – if any - from compost-amended soils. The addition of compost to soil improves its ability to retain moisture and minimize erosion thus reducing the
- potential to migrate to ground or surface water.
- Though in its infancy there is positive indication that certain PFAS compounds can be broken down biologically. This deserves further research support.
- Manufacturers of the GenX chemicals and others designed to substitute for PFOA and PFOS must fund research into the long-term impacts of these new chemicals and actively seek substances that provide similar properties that do not impact human health.

A copy of the USCC *Statement* can be downloaded here.