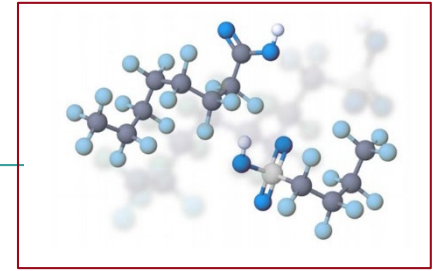
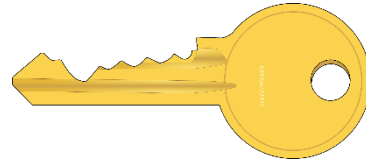


# Key PFAS Issues (1)



## Water

- Revisit 70 ppt LHA for drinking water?
- MCLs: Post 3/21 2021 final “reg det” EPA has 24 months to develop and propose a National Primary Drinking Water Regulation (“NPDWR”) for PFOS & PFOA. Final NPDWR will set federal MCLs for PFOS and PFOA.
- Proposed UCMR 5
- ANPRM data on facilities that manufacture/formulate PFAS substances, move to ELG

## Remediation

- List as a hazardous waste under RCRA, CERCLA?
- Destruction guidance
- Interim remedial groundwater cleanup guidance

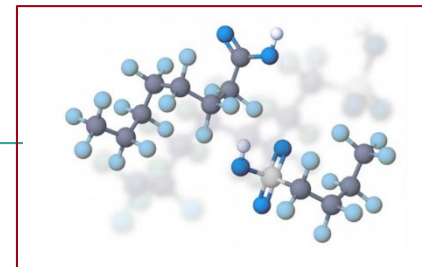
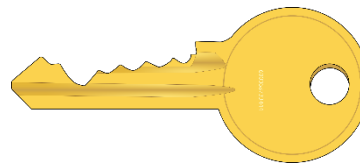
## TSCA

- TRI reporting in July
- New chemical reviews

## Science

- Re-release PFBS assessment?
- Complete Gen-X Assessment
- Class Based v Individual Regulation

# Key PFAS Issues (2)



## Policy/Guidance

- Whole of government approach
- Action Plan Update

## Enforcement

- 16 actions by EPA
- CERCLA administrative orders
- Removal actions
- Information requests under TSCA, CERCLA, RCRA
- SDWA 1431

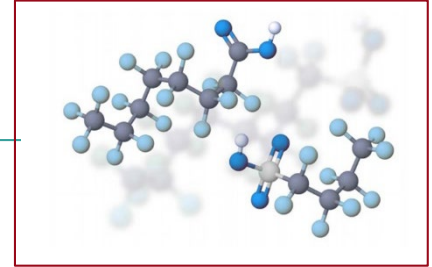
## Litigation

- Nuisance, Trespass
- Suits against manufactures for source water protection
- Class Action
- Toxic Torts

## State Activity

- Many states have MCLs
- WQs? TMDLs?
- Screening levels, advisories
- PFOA Listing under CA Prop 65
- Permit monitoring requirements
- Information requests

# Proactive PFAS Steps



- Track New Legal, Regulatory & Policy Developments
- Internal Due Diligence
- Evaluate Risk Profile
- Evaluate Corporate PFAS Compliance Policies & Procedures
  - ✓ PFAS Program Governance, Structure & Content
  - ✓ Corporate Information Sharing
  - ✓ Monitoring & Reporting
  - ✓ Management of PFAS stockpiles / Disposal of PFAS
  - ✓ Litigation Portfolio Evaluations / Litigation Holds
  - ✓ Policies and Practices Related to External Engagement
  - ✓ Environmental Justice Considerations
  - ✓ Benchmarking Compliance
- Evaluate legal claims
- SEC Disclosures