

PFAS REGULATORY UPDATE: EPA UPDATED INTERIM GUIDANCE ON THE DESTRUCTION & DISPOSAL OF PFAS SUBSTANCES & MATERIALS - VERSION 2

In April 2024, U.S. Environmental Protection Agency issued an update to the Interim Guidance on the Destruction and Disposal (D&D) of Perfluoroalkyl and Polyfluoroalkyl Substances and Materials Containing Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS). The Interim Guidance related to PFAS waste management was first issued in 2020. The science and research of these fundamental technologies continues to advance but uncertainties remain, and research continues toward helping to resolve those uncertainties and gather data to better support decision making for PFAS waste management. As part of this update, EPA has released a new analytical test method, OTM-50, that will help collect more data and answer some of these questions—such as those concerning products of incomplete combustion. The updated interim guidance encourages testing with a range of methods at thermal treatment facilities before accepting large quantities of PFAS-containing materials.

EPA encourages managers of PFAS and PFAS-containing materials to use D&D options that have a lower potential for releasing PFAS to the environment as described in Section 1 of the interim guidance. According to EPA's interim guidance, the following technologies (in no particular order) have a lower potential for environmental release of PFAS compared to other technologies:

- **Interim storage with controls:** May be a short-term option.
 - Containerized or high PFAS-content materials.
 - Less suited for materials continuously generated or with high-volume/low-PFAS content.
 - With proper controls, interim storage can control PFAS migration (Section 1).
- **UIC–Permitted Class I non-hazardous industrial or hazardous waste injection wells:**
 - Isolate liquid wastes deep in subsurface and ensure protection of underground sources of drinking water.
- **Landfills–Permitted hazardous waste landfills:**
 - For concentrated wastes, recommend disposal at hazardous waste landfill.
 - New information shows landfills release more PFAS to the environment than previously thought.
 - Leachate emission controls of typical hazardous waste landfills are important for certain types of PFAS.
- **Thermal treatment–Permitted hazardous waste combustors that operate under certain conditions:**
 - New research since 2020 indicates that thermal treatment units operating under certain conditions are more effective at destroying PFAS.
 - Uncertainties remain and more information is needed.

Other Test Method 50 (OTM-50) Sampling and Analysis has not yet been subject to the Federal rulemaking process but has been peer reviewed and found to be useful to the emission measurement Community. Due to the need for consistency, this OTM method is to promote what is believed to be the current best practices to sample and analyze the PFAS targets emitted from stationary sources. OTM-50 is being used to collect more consistent data and help to resolve uncertainties and will be updated as necessary when more data from stakeholders becomes available.

To discuss this matter and how it may impact your projects, please contact your Langan Project Manager or:



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