



A LOOK INTO THE PFAS CRYSTAL BALL: PLANNING FOR A PFAS IMPACTED FUTURE

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The Regulatory Picture is Becoming Clearer

 EPA's PFAS Strategic Roadmap. Issued on October 18, 2021: sets timelines by which EPA plans to take specific actions and commits to new policies to safeguard public health and protect the environment.

Goals:

- RESTRICT Pursuing a comprehensive approach to proactively prevent PFAS from entering air, land, and water at levels that can adversely impact human health and the environment.
- REMEDIATE Broadening and accelerating the cleanup of PFAS contamination to protect human health and ecological systems.
- RESEARCH Investing in research, development, and innovation to increase understanding of PFAS methods, human health and environmental risks, and technologies.

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- Hazardous Substance Designation: On August 26 2023 EPA issued proposed Hazardous Substance designation or PFOA/PFAS under CERCLA. Anticipating final designation in early 2024.
- Hazardous Constituent Designation under RCRA: makes PFAS subject to investigation and cleanup activities at permitted hazardous waste facilities.
- Maximum Contaminant Limits: March 14, 2023 EPA proposed six PFAS compounds for enforceable MCLs. Anticipated final early 2024

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- PFAS Analytical Methods
 - Method 1633
- Determining the risk
- Other Rulemaking:
 - TSCA Toxic Release Inventory
 - Clean Water Act NPDES
 - UCMR 5

Chaotic to Normal

- Navy Policy Leaned Forward. EPA has caught up.
- Project Planning for PFAS happens pre-award.
- Determining the risk while looking out for our neighbors

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PFAS IMPACTED FUTURE

The Future

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- The cost of the MCL. March 2023, EPA announced a \$2 Billion fund to address PFAS in drinking water.
- Project Planning for PFAS happens pre-award.
- Determining the risk while looking out for our neighbors drinking water.
- Ecological Risk.
- Increasing public Engagement.
- Destructive Technologies/Remediation.
- Toxicity Assessments could evolve.

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PFAS IMPACTED FUTURE

The Future

- Project Planning:
 - Do I have PFAS at my location?
 - Do I need to plan for disposal?
 - Offsite disposal
- Environmental Justice.
- Lifecycle of PFAS. Evolutions of the full lifecycle of PFAS, their unique properties, the ubiquity of their uses, and the multiple pathways for exposure

NAVFAC SE UPDATE

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