TRSA 100+ est. 1912
Strengthening and Promoting the Linen, Uniform and Facility Services Industry
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Addressing PFAS in the Environment

BACKGROUND

Per- and poly-fluoroalkyl substances (PFAS) are a broad class of thousands of different chemicals receiving increased public attention amid federal and state efforts to address emerging issues with varying levels of concern. This diverse family of important chemical substances, recognized as "forever chemicals" that do not biodegrade or break down, is used throughout a wide cross-section of industries, including first responder services, health care, automotive, aerospace, construction, electronics, personal care and textiles. Products enabled by PFAS technologies include healthcare garments as well as flame retardant and waterproof personal protective equipment for first responders—critical to national security, public safety, and emergency response.

Industries across the economy use both reusable and disposable textile products containing certain PFAS compounds to provide barrier protection and water and stain repellant benefits. The linen, uniform and facility services sector provides reusable textiles that are reused multiple times (in healthcare settings barrier gowns can be used up to 75 times) whereas disposable products are discarded after a single use. Once disposed of in a landfill, disposable products can potentially leak and contaminate groundwater.

While the long-term health effects of exposure to PFAS continues to be studied, there is sufficient concern to begin to phase out the production of some of these compounds. In addition, the U.S. Environmental Protection Agency (EPA), the U.S. Department of Defense (DoD), and other federal and state agencies are advancing actions to regulate the discharge of PFAS compounds into the environment and to develop monitoring, treatment and disposal requirements for PFAS waste.

TRSA is committed to partnering with key stakeholders on pragmatic and effective solutions to PFAS challenges. We believe that these approaches need to include risk-based federal regulation based on strong science, as well as collaboration on effective treatment and disposal technologies for wastewater and solids.

INDUSTRY POSITION

Regulation is important to all stakeholders and should be based on the following principles:

The Federal Government Should Implement a Consistent Approach for Assessing and Regulating Specific PFAS With Clear Timelines. The appropriate interagency processes should be used to coordinate regulatory actions among all interested agencies so that government regulations, actions, and communications are consistent and coordinated for maximum effectiveness. Clear timelines will ensure that policy decisions and regulatory outcomes are harmonized and implemented in a timely fashion.

Regulations Should Be Based on the Best Available Science. Any regulatory action addressing different PFAS chemicals should be based on sound, peer-reviewed science and a transparent and well-informed record. Agencies should identify sources of uncertainty and the research needed to reduce those uncertainties. Likewise, regulations should also remain flexible to accommodate emerging science.

Specific PFAS Should Be Regulated Based on Risk to Protect Human Health and the Environment. A quantitative, risk-based approach considers both hazards and levels of exposure. Risk-based approaches are necessary for forming a basis for directing limited societal resources for risk mitigation only to those chemicals and use patterns that pose risks of concern. This rational, quantitative approach is superior to decisions made on the

basis of exposure alone (e.g., the mere presence or persistence of a substance). Chemicals of low concern should be treated accordingly.

Regulatory Outcomes Should Not Be Predetermined. Regulatory decisions should be made using existing regulatory frameworks, which have been developed carefully based on sound science and guided by the notice and comment procedures within the Administrative Procedure Act to ensure that all relevant public policy goals are considered.

PFAS Compounds Should Be Regulated Independently, or as Appropriate Sub-Categories, Not as a Single Group. Risk estimates require consideration of both hazard and exposure. PFAS chemicals have a wide variety of different properties and uses. Due to this variation, it is inappropriate to regulate all PFAS chemicals as a single group, and broadly restrict different PFAS compounds through wide-reaching bans. Rather, each individual chemistry or "well defined" specific small groups of chemicals should be regulated based on the specific risks posed, not simply on structural or physical / chemical similarities. Risks associated with one member of the PFAS class should not be attributed to other members of the PFAS class without clear scientific justification. Any grouping of PFAS for risk assessment should also be scientifically justified. Suitable substitutes for critical-use applications should be identified prior to instituting regulatory restrictions. Additionally, wherever possible, the federal government should strive to minimize patchwork regulations and instead develop nationwide standards that limit regulatory uncertainty, reduce confusion, provide clarity, and improve cleanup outcomes for stakeholders and the public.

Agencies Should Provide Meaningful Risk Communication and Regulatory Transparency. Agencies should ensure that the public can easily understand the magnitude of the risks associated with specific PFAS chemicals and exposures. This includes candid discussions regarding the processes associated with evaluating those chemicals as well as any scientific uncertainties in those analyses.

EPA and Other Federal Agencies Should Establish Regular Consultation with Stakeholders. Since PFAS regulation affects many parties, EPA should consult with local government, state officials, tribal governments, federal agencies, and other stakeholders, including the business community, prior to regulatory decisions.

Congress Should Provide Regulatory Agencies with the Proper Oversight and Funding Necessary to Evaluate and Address Specific Priority PFAS. Congress should provide oversight to ensure a coordinated and timely government response and must appropriate the funding necessary to invest in peer-reviewed scientific research and the management, mitigation, and ongoing monitoring of specific PFAS.

RECOMMENDATION

The Linen, Uniform and Facility Services Industry is actively collaborating with federal agencies and local and state government stakeholders to ensure an effective and balanced approach to addressing PFAS related concerns based on the best science and appropriate consideration of risk. However, investment and research are necessary to identify attainable treatment technologies and safe and cost-effective waste disposal methods.