

PFAS UPDATES FROM SWANA

Iowa Recycling & Solid Waste Management Conference
September 30, 2025

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Communications, SWANA



SWANA's Key Role:

Where we're focused



Prioritizing safety.



Championing progress on
sustainability.



Promoting professional
opportunities.



Delivering greater value to
members.

SWANA LETTER TO EPA ADMINISTRATOR

- Landfill Management
- PFAS
- Waste to Energy
- Resource Management:
Organics and Recycling
- Batteries
- Workforce and Safety



February 28, 2025

The Honorable Lee Zeldin
U.S. Environmental Protection Agency Administrator
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Administrator Zeldin,

On behalf of the Solid Waste Association of North America (SWANA), an association of 10,000 members across the waste and resource management industry, congratulations on your confirmation to lead the Environmental Protection Agency (EPA). I am pleased to introduce SWANA and to share the association's key priorities and areas of concern. SWANA is committed to advancing from waste management to resource management through a shared emphasis on education, advocacy, and research.

We are building a stronger waste and resource management industry, empowering our members to deliver essential services to communities today and anticipate their needs for tomorrow. Our members are subject matter experts in a wide range of topics related to landfills, landfill gas, PFAS, waste-to-energy, recycling, organics management, collection of materials, safety, workforce development, and much more.

As you plan the agency's priorities, we urge you to consider the daily importance of waste and resource management. The industry makes modern life convenient, safe, efficient, and sustainable. On behalf of SWANA, I would like to share our views on several topics under the jurisdiction of the EPA for your consideration.

Landfill Management

Modern, engineered landfills are essential for protecting public health and the environment by safely containing society's waste, safeguarding water and soil resources.

A significant number of laws, regulations and permits oversee the operation of landfills. We urge you to set reasonable requirements with a measure of flexibility for landfill operators to continue to operate safely and efficiently. When regulations are excessively complicated or cumbersome, they can restrict the operational efficiency and financial viability of landfills.

In recent years, new technologies for methane detection, measurement and monitoring have been introduced to the field of landfill gas management. Aerial and ground-based methane emissions measurement methods can both play a role. Studies and tests of aerial technologies have had mixed findings on the aerial technologies' consistency and ability to track findings back to a source. These technologies need to be tested and proven before landfills are held accountable to their readings. If the EPA seeks to incorporate new technologies into landfill gas measurement and reporting requirements, we encourage the use of reliable proven measurement technologies and consistent measurement standards.

There is tremendous potential in landfill gas to energy projects. Companies and governments are investing significant amounts of funding into infrastructure to capture landfill gas as a renewable resource. The technology to capture and upgrade landfill gas to RNG continues to advance. Landfill gas will support the EPA goal of moving away from reliance on energy sources from other countries. The federal property tax credits for energy upgrading equipment have been

EPA PFAS UPDATES

- EPA designated two common PFAS chemical sub-types as hazardous substances under CERCLA in April 2024.
- This was upheld by the EPA in September 2025.



SWANA ADVOCACY ON PFAS

- Implications of CERCLA designation for the waste and resource management industry.
- CERCLA's strict, joint and several, and retroactive liability is a concern.
- EPA Enforcement Discretion Memo provides some protections but is limited.
- SWANA and other industry groups are advocating for statutory protections.

INTERSECTION OF LANDFILLS AND WASTEWATER TREATMENT PLANTS

- Restrictions on the use of biosolids is a concern for both landfills and wastewater treatment plants
- Maine was the first state to prohibit land application of biosolids while other states have implemented restrictions and testing requirements.
- Safe Drinking Water Act PFAS regulations have been loosened.
- Some progress in restrictions and commitments to limit PFAS production and use.

EPA INTERIM GUIDANCE DOCUMENT

- Thermal Destruction Technology
 - Thermal destruction, including waste to energy, can destroy PFAS.
- Secure Landfilling
 - Secure landfilling isolates PFAS waste.
- Underground Injection
 - Underground injection requires strict geological assessments for safe containment.
- Updated Screening and Compliance
 - New screening methods assess impacts on vulnerable populations, ensuring regulatory compliance and public health protection.

PFAS TRENDS

- **Regulatory Challenges and Costs**

- Rising compliance costs stem from increased monitoring, testing, and infrastructure upgrades.

- **Liability and Risk Management**

- PFAS designation as hazardous substances increases risk of potential liability,.

- **Innovation in Treatment Technologies**

- Demand for advanced PFAS destruction methods drives innovation in technologies.

- **Collaborative Strategic Approach**

- Partnerships with regulators and stakeholders are vital for navigating regulations.



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Nov. 12-15 • Columbus, OH

NEW SWANA COURSE ON PFAS

ESSENTIAL LEACHATE PFAS TREATMENT AND

MANAGEMENT TRAINING FOR LANDFILL PROFESSIONALS

Course Dates at RCon:

Tuesday, November 11, 2025; 1:00 p.m. - 5:00 p.m. ET

Wednesday, November 12, 2025; 8:00 a.m. - 12:00 p.m.

Friday, November 14, 2025; [Revive Environmental](#) tour - 7:30 a.m. - 9:15 a.m.

- This course equips landfill personnel with the terminology and understanding necessary to engage with regulators, engineers, and vendors about leachate management and treatment options and requirements.
- Topics include: Leachate basics, PFAS sources and regulations, PFAS destruction technologies, and leachate treatment system selection.
- Participants will take part in a tour of Revive Environmental on Friday, November 14.
- This course provides 6 PDHs upon completion.

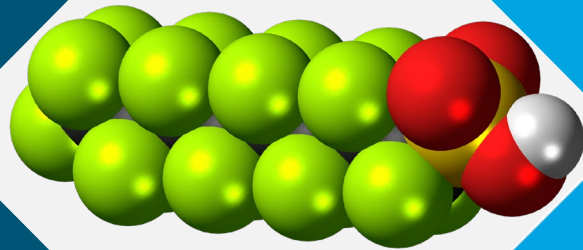
<https://swana.org/events/rcon2025/agenda/swana-training-at-rcon>

<https://swana.org/resources/pfas>



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PFAS Update



A presentation to:
2025 Iowa Recycling & Solid Waste
Management Conference

Agenda

- ◆ Regulatory Updates
- ◆ Highlights from Minnesota Solid Waste PFAS Groundwater Study



Regulatory Updates

USEPA Announcements

- ◆ May 14, 2025: Commitment to Drinking Water Standards
 - <https://www.epa.gov/newsreleases/epa-announces-it-will-keep-maximum-contaminant-levels-pfoa-pfos>
 - Maintain Maximum Contaminant Levels (MCLs) for PFOA and PFOS
 - Extend Compliance Deadlines for Water Supply Systems
 - New Outreach Initiative: PFAS OUT
 - Intent to Rescind and Reconsider PFHxS, PFNA, GenX, and Hazard Index MCLs



USEPA Announcements

- ◆ September 17, 2025: Retain CERCLA Hazardous Substance Designation
 - <https://www.epa.gov/newsreleases/trump-epa-announces-next-steps-regulatory-pfoa-and-pfos-cleanup-efforts-provides>
 - Became Effective July 8, 2024 for PFOA and PFOS
 - Intends to Develop Section 102(a) Framework Rule to Guide Future Designations
 - Increased Consideration of Costs



- ◆ September 2025: Incineration Study
 - [PFAS Destruction by a Hazardous Waste Incinerator: Testing Results](#)
 - High-Temperature Incineration at Clean Harbors Aragonite Facility in Northern Utah
 - ~2,000 – 2,200 °F
 - <99% Removal Efficiency for 9 Spiked PFAS
 - ~69% of Targeted PFAS = Non-Detect
 - Nearly All Detected PFAS <10 ng/m³



Minnesota Solid Waste PFAS Groundwater Study

Prepared by Barr Engineering Co. for
the Minnesota Landfill Coalition
PFAS Group



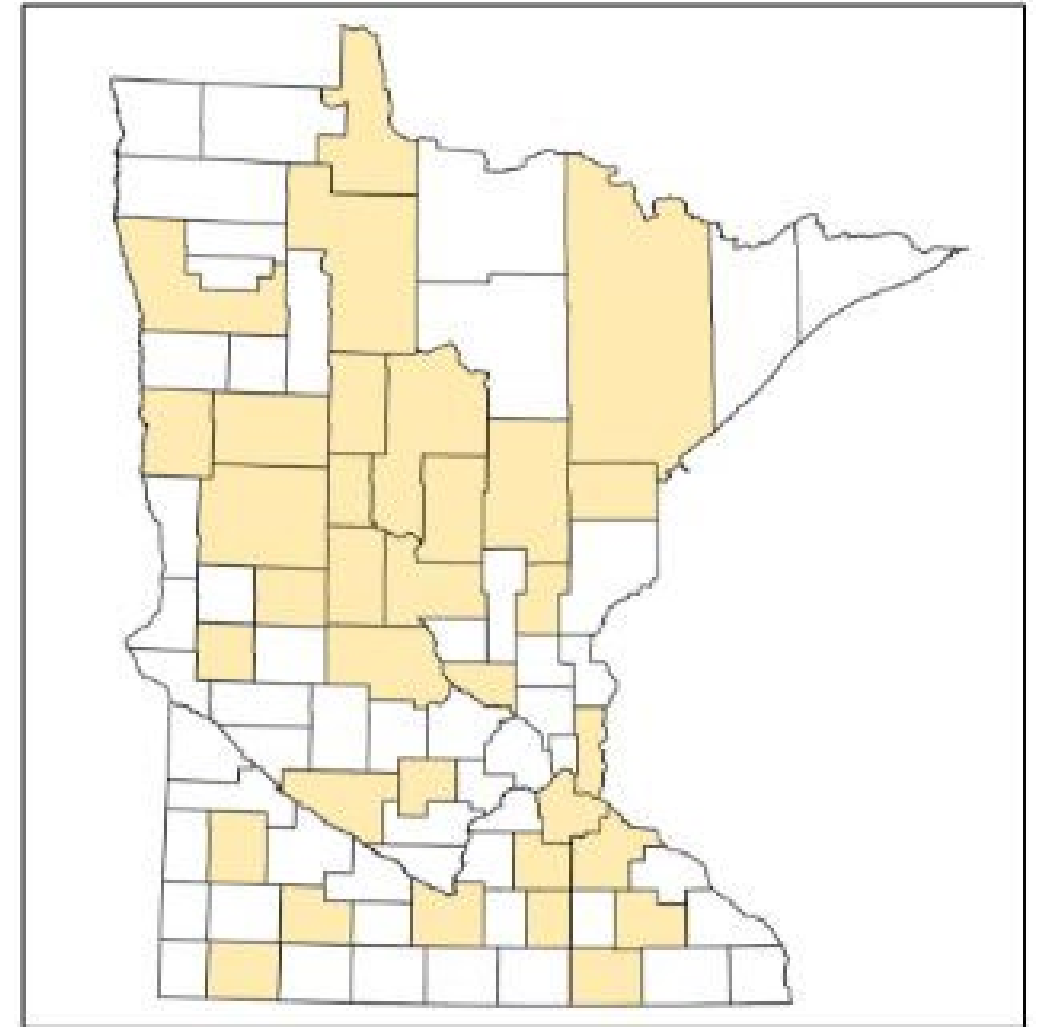
Report Distribution and Purpose

- ◆ Statewide Study on the Occurrence and Distribution of PFAS in Groundwater at Minnesota Landfills
 - Prepared by Barr Engineering Co.
 - Final Report Released in 2025
 - <https://www.barr.com/project/statewide-study-on-pfas-in-groundwater-at-minnesota-landfill>
- ◆ Voluntary Study to Advance Understanding of PFAS in Groundwater near Landfills



Study Data

- ◆ 48 of 153 Permitted Landfills
 - Municipal Solid Waste
 - C&D
 - Industrial
 - MSW Combustor Ash
- ◆ Two Monitoring Events
- ◆ April 2023 – May 2024
- ◆ Non-PFAS analytical data and Survey



Source: Figure 3-1, Barr Engineering, Co.

Study Data

- ◆ 555 Samples from 282 Wells
 - 32% Upgradient
 - 62% Downgradient
 - 6% Side Gradient
- ◆ Analyzed for 33 PFAS using Modified 537.1



Upgradient Results

- ◆ Regulated PFAS Detected in Upgradient Groundwater at 76% Landfills
- ◆ Upgradient Sources Not Determined
- ◆ More Prevalent with Industrial/Solid Waste or Agricultural Land Use
- ◆ Highlights the Widespread Presence of PFAS in the Environment



Downgradient Results

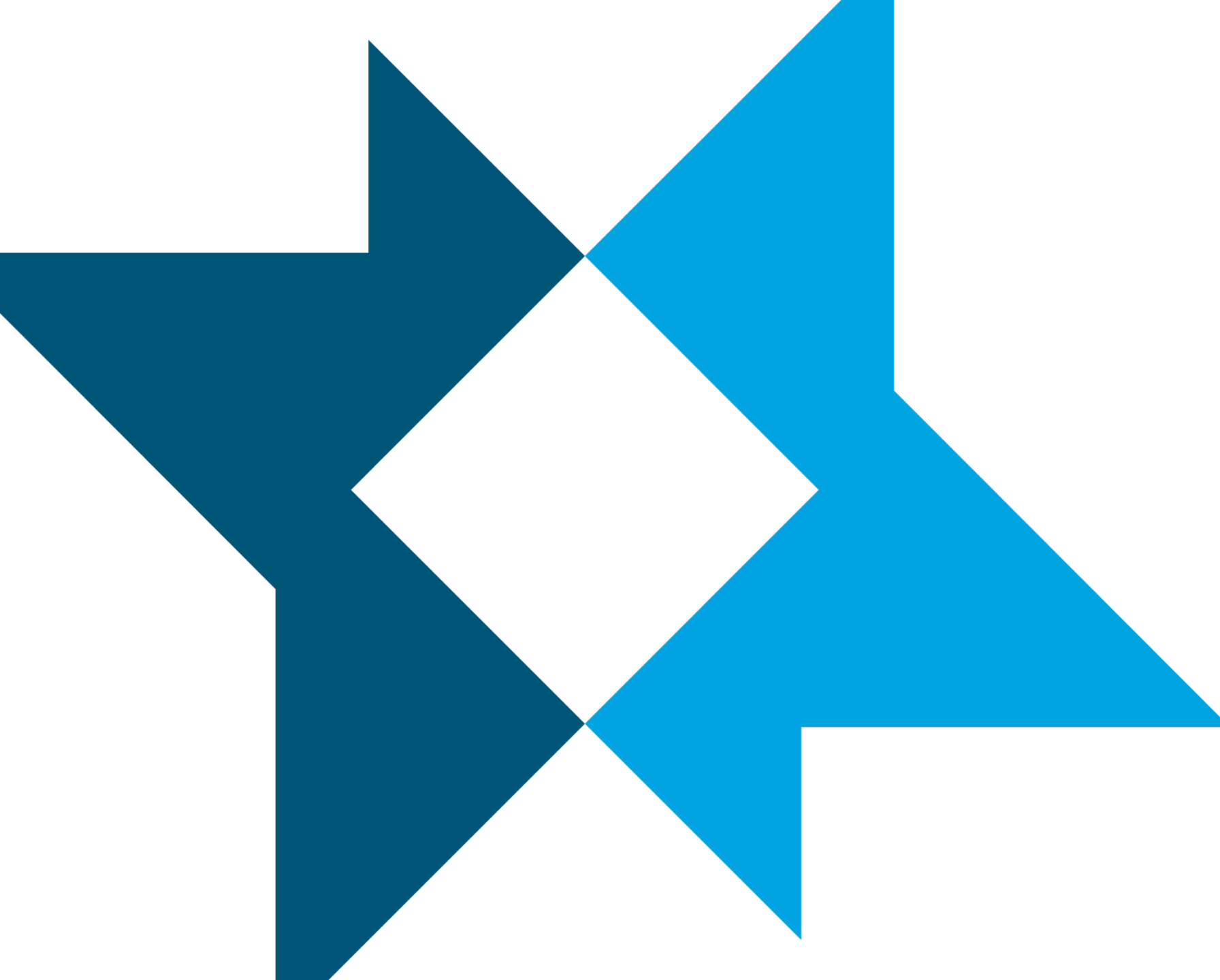
- ◆ 46% of Legacy Closed (Unlined) Landfills Detected 1+ PFAS > Limit
- ◆ 50% of Unlined C&D Landfills Detected 1+ PFAS > Limit
- ◆ **No Regulated PFAS > Limit at Lined MSW and C&D Landfills**
- ◆ In Total, 20% of Downgradient Samples had 1+ PFAS > Limit

Inferences

- ◆ Upgradient Concentrations – PFAS is Pervasive
- ◆ Landfill Liners Effectively Manage Solid Waste Containing PFAS
- ◆ Variable PFAS Concentrations Downgradient of Legacy Closed and Unlined C&D Landfills
- ◆ Suggests Considering the Inclusion of PFAS in Assessment Monitoring

Questions & Answers





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