June 25, 2026

ASTSWMO, Providing Pathways to Our Nation's Environmental Stewardship Since 1974

U.S. Environmental Protection Agency
EPA Docket Center
OLEM Docket, Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460

(via regulations.gov)

Re: Docket ID No. EPA-HQ-OLEM-2020=0526

Dear Sir/Madam:

The Contaminants of Emerging Concern Steering Committee (CEC) of the Association of State and Territorial Solid Waste Management Officials (ASTSWMO) appreciates the opportunity to provide comments on the U.S. Environmental Protection Agency's (EPA's) Interim Guidance on the Destruction and Disposal of PFAS and Materials Containing PFAS – 2026 Version. ASTSWMO represents the waste management and remediation programs of the 50 U.S. States, five Territories, and the District of Columbia (States). These comments are submitted by ASTSWMO's CEC Steering Committee, which includes representatives from several State waste and remediation programs. These comments have not been reviewed or adopted by the ASTSWMO Board of Directors.

ASTSWMO and the CEC Steering Committee support EPA's ongoing efforts to develop guidance regarding the destruction and disposal of PFAS and PFAS-containing materials. This remains an area of active research and rapidly evolving understanding. EPA's continued commitment to updating this guidance to reflect emerging science, technological advances, and implementation experience is appreciated. The transition to an annual update cycle demonstrates EPA's commitment and recognition of the importance of providing timely information to States and other stakeholders responsible for managing PFAS-containing materials.

In its recent 2026 position paper entitled "Addressing Per- and Polyfluoroalkyl Substances" ASTSWMO advocated for a "coordinated, science-based federal regulatory framework—developed and implemented in partnership with States and supported by clear authority, timelines, and funding." EPA's 2026 update to the Destruction and Disposal Guidance represents an important step toward providing information necessary to develop and refine that framework. The identification of data gaps, research needs, and site-specific considerations such as regional disposal capacity helps support informed decision-making by States and other partners. Likewise, the framework provided for evaluating proposed treatment and destruction technologies will assist States in assessing technologies presented for consideration. The Fact Sheet, included as Appendix E promotes consistent, plain-language communication that can improve public understanding and support meaningful community engagement. Collectively, these efforts align with and support the recommendations in the ASTSWMO PFAS Position Paper.

EPA's expanded discussion of emerging PFAS treatment and destruction technologies, along with the continued development of the Technology Evaluation Framework, provides important directions such as research, demonstration projects, and full-scale applications progress. The CEC Steering Committee encourages EPA to support robust funding for research and demonstration projects that focus on destruction technologies while emphasizing, in this document and in all messaging, that destruction of PFAS should be the preferred management approach when it is demonstrated to be effective and capable of safely destroying PFAS, while minimizing byproducts. EPA should include in this document other factors supporting the preference for destruction technologies, including public acceptance, that are likely to support an emphasis on destruction technologies versus landfilling and deep well injection. Adding a clear definition of destruction may assist readers in understanding the capacities and limitations of various technologies. EPA also should consider inclusion and discussion of other emerging destruction technologies, such as oxidation/reduction technologies and chemical treatment technologies, in addition to incineration.

While continued development of disposal options remains necessary, the guidance should acknowledge the long-term goal of transitioning away from disposal-oriented approaches toward destruction technologies that are technically feasible, economical, and available at scale. Additionally, as EPA develops annual updates to this guidance, consideration could be given to pairing various technologies with the types of waste materials or PFAS (such as

short- vs. long-chain compounds) commonly being managed. This would better link the guidance to practical decision-making.

The updates included in the Destruction and Disposal Guidance are necessary and valuable, as will be future annual revisions that reflect evolving science, regulatory requirements, and technological advancements. However, this Steering Committee notes that the management of PFAS-containing wastes and materials is influenced not only by the availability and performance of destruction and disposal technologies, but also by the regulatory programs that generate and govern those waste streams, as well as upstream regulations and material management aimed at minimizing future production of PFAS-containing waste. Future regulatory decisions related to PFAS in drinking water, wastewater, biosolids, remediation programs, air emissions, and waste management will directly affect the volume, characteristics, and geographic distribution of PFAS-containing materials requiring management, destruction and disposal. As EPA continues to refine this guidance, ASTSWMO encourages consideration of how future regulatory actions may affect treatment and disposal capacity needs, infrastructure planning, implementation timelines, and the development of practical management approaches. Continued coordination between regulatory development and destruction and disposal planning will be critical to ensuring that States, regulated entities, and communities have access to effective and sustainable PFAS management solutions.

ASTSWMO appreciates EPA's commitment to periodically updating this guidance and soliciting stakeholder input. Continued engagement with States and other partners will be essential to ensure that future revisions reflect implementation experience, emerging scientific understanding, and the practical management challenges encountered across the country. If you have any questions, please contact me at kasey.kathan@vermont.gov or 802-522-0561.

Sincerely,

Kasey Kathan (VT), Chair

ASTSWMO Contaminants of Emerging Concern Steering Committee