



June 9, 2025

MEMBER COMPANIES

Arcwood Environmental
Arkema, Inc.
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INDIVIDUAL MEMBERS

Ronald E. Bastian, PE
Ronald O. Kagel, PhD

ACADEMIC MEMBERS

(Includes faculty from:)

Clarkson University
Colorado School of Mines
Lamar University
Louisiana State University
Mississippi State University
New Jersey Institute of Technology
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University of Dayton
University of Kentucky
University of Maryland
University of Utah

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Via email.

Dr. Maureen Gwinn
Acting Assistant Administrator
Office of Research and Development
U. S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Mail Code: 8101R
Washington, DC 20460

Dear Dr. Gwinn:

The Coalition for Responsible Waste Incineration (CRWI) is a trade organization that represents 11 companies that own/operate hazardous waste combustors, two companies that generate hazardous waste, and 18 companies that provide equipment and services to the hazardous waste combustion industry. One of CRWI's goals is to work with federal and state environmental agencies to develop practical and pragmatic regulations that can be implemented. CRWI has worked closely with EPA for many years on combustion research. A current focus is to help develop methods to show destruction of per- and polyfluoroalkyl substances (PFAS). This collaboration has taken many forms ranging from discussions on operating conditions of hazardous waste combustors, reviews of concepts, and collaboration on field experiments.

CRWI understands that the Office of Research and Development (ORD) is currently considering a reorganization. CRWI does not pretend to know what is the best organizational structure for ORD but we do have some opinions on what research we would like to see continue. The PFAS work being done in the Center for Environmental Measurement and Modeling (CEMM) is critical to developing methods for destroying PFAS compounds. Laboratory research from CEMM has shown that under certain conditions, incineration can destroy PFAS compounds with no detectable products of incomplete destruction.

However, there is still much to be learned. This work needs to be expanded to the pilot scale rotary kiln housed in the RTP laboratory. EPA, the Department of Defense, and Clean Harbors recently conducted a test burn at a commercial hazardous waste incinerator. This type of collaboration has occurred in other industry sectors. It is critical that this work be continued.

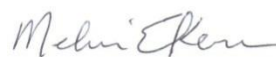
The Agency also needs to complete the work of incorporating various PFAS compounds into the thermal stability index. This index is used by all hazardous waste combustors to show destruction and removal efficiency during tests. There are several other projects relating to PFAS destruction technologies that have been started and need to be completed.

Also, the Agency needs to continue work on air sampling methods for PFAS. EPA has released OTM-45 and OTM-50. Both have shown some success in measuring PFAS compounds in flue gases, but both need additional work to refine and validate the method. In addition, EPA needs to complete the work on OTM-55 and to validate that method. Without validated reference methods, the Agency should not set emission limits for any PFAS compounds. CEMM has teams in place currently working on all these issues. While we would like results to be released on a more timely basis, this group is doing most things right and that work should continue. CRWI believes that if it is not broke, don't fix it.

Finally, if the Agency is serious about addressing the issues in the April 28, 2025, PFAS action list, the team of researchers in CEMM need to be kept intact to accomplish those goals.

CRWI would be happy to discuss this further and provide additional details should that be desired. I can be contacted at mel@crwi.org or 703-431-7343.

Sincerely yours,



Melvin E. Keener, Ph.D.
Executive Director

cc: L. Zeldin
T. Watkins
S. Cook
L. Phelps