



CRWI Update June 30, 2026

MEMBER COMPANIES

Arcwood Environmental
Arkema, Inc.
Bayer CropScience
Clean Harbors Environmental Services
Eastman Chemical Company
Formosa Plastics Corporation, USA
INV Nylon Chemicals Americas, LLC
Ross Incineration Services, Inc.
The Dow Chemical Company
Veolia ES Technical Solutions, LLC
Westlake US 2, LLC

GENERATOR MEMBERS

Eli Lilly and Company

ASSOCIATE MEMBERS

ALL4 LLC
Alliance Source Testing LLC
B3 Systems
Coterie Environmental, LLC
Envitech, Inc.
Eurofins TestAmerica
Focus Environmental, Inc.
Franklin Engineering Group, Inc.
Montrose Environmental Group, Inc.
Ramboll
Strata-G, LLC
TEConsulting, LLC
Trinity Consultants
W.L. Gore and Associated, Inc.

INDIVIDUAL MEMBERS

Ronald E. Bastian, PE

ACADEMIC MEMBERS (Includes faculty from:)

Colorado School of Mines
Lamar University
Louisiana State University
Mississippi State University
New Jersey Institute of Technology
Northern Illinois University
University of California – Berkeley
University of Dayton
University of Kentucky
University of Maryland
University of Utah

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Reworld PFAS test

In 2024, Reworld (formally Covanta) and EPA conducted a per- and polyfluoroalkyl substances (PFAS) test at their Lake County Resource Recovery Facility, a 15-megawatt waste-to-energy operation in Okahumpka, FL. The report was released on June 30, 2026. A copy can be found at

https://cfpub.epa.gov/si/si_public_record_Report.cfm?dirEntryId=369509.

The facility processes over 160,000 tons of municipal solid waste per year. There are two identical units at this location. Each unit processes 228 tons per day. Each unit is a reverse reciprocating grate mass burn waterfall furnace that has estimated temperatures in the flame area exceeding 1100 °C. Each unit produces approximately 70,000 pounds of steam per hour. The air pollution control equipment consists of a spray dryer with pebble lime, carbon injection, selective non-catalytic reduction, and a baghouse. Sampling was done in front of the air pollution control devices (labeled inlet) and in the stack (labeled outlet). The first test consisted of three runs feeding municipal solid waste. This test used OTM-45, OTM-50, and what is to be OTM-55 at both the inlet and outlets. The second test included injection of C₂F₆ in the underfired air. This test used OTM-50 and FTIR at both the inlet and outlets. Reworld did not attempt to quantify the amounts of PFAS in the waste for either test. There was no determination of DRE in the first test. The second test consisted of three runs to determine a DRE for C₂F₆. Table 6 of the report shows inlet and outlet concentration for all of the OTM-45 analytes. The majority were non-detects. Interestingly, the outlet concentration for each analyte was always less than the inlet, indicating that there was some removal by the air pollution control. Five compounds were measured above the reporting limit in at least one run. Only one (perfluorooctanoic acid) showed up two of the runs (0.879 and 0.951 ng/m³). None showed up in all three runs. Results from the soon-to-be OTM-55 did not show any evidence of semi-volatile fluorinated compounds. Table 8 shows the concentrations of the analytes measured by OTM-50. None had concentration above the reporting limit and most were below the MDL. The calculated DREs of C₂F₆ using OTM-50 were 97.6%, 98.7%, and 97.6 % with an average of

98.0%. The DREs using FTIR were 97.0%, 98.5%, and 97.6% with an average of 97.6%. The only product of incomplete destruction found in the second test was chlorotrifluoromethane.

Three observations from these results are that there are minimal emissions of PFAS as measured by OTM-45 and OTM-50 from this unit, there is removal of PFAS compounds by the air pollution control system, and that FTIR and OTM-50 gives similar DREs for C₂F₆.

Other PFAS issues

The Rocco Water Treatment Plant is located across the street from the Robeson County, North Carolina municipal landfill. The water treatment plant sources its water from wells located approximately 4500 feet from the landfill. Data gathered during the fifth Unregulated Contaminant Monitoring rule showed that the finished water from the water treatment plant had the highest levels of PFAS of any water treatment plant in North Carolina and the highest level of hexafluoropropylene oxide dimer acid in the nation (28-34 ppt). The Southern Environmental Law Center filed a citizen suit on June 16, 2026, in the U.S. District Court for the Eastern District of North Carolina alleging that the landfill was creating an “imminent and substantial endangerment” under RCRA caused by PFAS leaching from the landfill. The suit asks the court for an injunction to require the landfill to clean up the groundwater contamination, cease the use of the water treatment plant until adequate drinking water treatment can be put into place, and provide an alternate supply of water to the residents.

In 2025, the Department of Defense sent Congress a detailed progress report of the cleanup of military installations showing further delays in addressing PFAS cleanup. On June 26, 2026, a group of 24 Senators, all Democrats or Independents, responded by sending a letter to the Department of Defense urging them to reverse any delays. The letter also requested additional information on several specific facilities (e.g., why additional testing was required before moving forward, why there was a 15-year gap between completing the Remedial Investigation/Feasibility Study (RI/FS) and the record of decision for one site, why RI/FS scheduled has been changed from “underway” to “planned,” etc.). A copy of the letter can be found at <https://static.notus.org/68/92/56985a504cd8a13a574f2c3be2e5/letter-to-dod-re-additional-delays-to-pfas-remediation-schedules-final.pdf>.

The Senate Armed Services Committee has completed their markup of the 2027 National Defense Authorization Act. In the report that accompanied the bill (S 4784), the Committee told the Department of Defense to submit a report to Congress by March 1, 2027, on the use of PFAS destruction technologies that have been demonstrated to have no less than 99.99% destruction and removal efficiencies using EPA validated methods.

EPA has included seven ultrashort organic fluorine compounds in the sixth Unregulated Contaminant Monitoring proposed rule. This regulation is promulgated under the Safe

Drinking Water Act and, if finalized, will require public water systems serving more than 3,300 people to collect data on the occurrence of these compounds. EPA will use this data to make decisions on whether these compounds should be regulated in the future. Others may use the data for citizen suits. The proposed rule is scheduled for publication in the July 1, 2026, *Federal Register*.

In 2025, the Biden Administration released a draft risk assessment of the potential harm posed by the land application of biosolids containing PFAS compounds. After reviewing comments, the current administration released a second draft (June 29, 2026) that addresses “a number of flaws” in the 2025 draft. Some of the flaws identified were: failing to conduct a national survey; using hypothetical high risk scenarios instead of more probable scenarios; and suggested that disposing of biosolids containing 1 ppb of perfluorooctanoic acid and perfluorooctane sulfonic acid) created an unacceptable risk. EPA is asking for comments on these three issues as well as several other issues pertaining to the use of biosolids. The notice of availability is expected to be published in the July 6, 2026, *Federal Register*. It will have a 60-day comment period.

EPCRA reporting aligned with OSHA

On June 22, 2026, EPA published a final rule that aligns the hazardous chemical inventory reporting regulations under the Emergency Planning and Community Right-to-Know Act (EPCRA) with OSHA hazard categories. This rule directly incorporates the 118 OSHA hazard categories as the EPCRA hazard categories, amending the definitions for hazard category and Safety Data Sheets, removes the use of the term Material Safety Data Sheets, and stating that OSHA's definition of combustible dusts is applicable to 40 CFR part 370. This rule becomes effective on August 21, 2026. The compliance date is January 1, 2028. Additional details can be found in the *Federal Register* notice.

Federal plan – OSWI

EPA published emission guidelines for the Other Solid Waste Incinerator (OSWI) source category in 2025. Because this rule was promulgated under Section 129 of the Clean Air Act, it is not implemented until a state develops an implementation plan or the federal government implements a plan. EPA released a pre-publication copy of a proposed rule to implement the federal plan. The proposed rule is scheduled to be published in the July 2, 2026, *Federal Register*. It will have a 45 day comment period.

Superfund initiatives

On June 3, 2026, EPA announced initiatives to speed the cleanups at Superfund sites using three board initiatives: enhanced project management; deploy tools and authorities earlier; and apply smarter science. Under enhanced management, EPA plans to:

- Move more quickly from the evaluation phase into the cleanup phase;

- Increase targeted water, soil, and air sampling and conduct more timely inspections of facilities;
- Accelerate the selection of the best cleanup approach;
- Modernize site management practices so that EPA can reach decisions faster; and
- Streamline EPA's use of licensed contractors to reduce cleanup timelines.

Under deploy tools and authorities earlier, EPA plans to:

- Simultaneously evaluate all options under Superfund, RCRA hazardous waste cleanup programs, and the Brownfields program;
- Start work on short-term projects while comprehensive site cleanup approaches are finalized;
- Provide more training and tools to the states; and
- Standardize approaches to prevent reinventing the wheel for every cleanup action.

Under the apply smarter sciences, EPA plans to:

- Align risk assessment approaches with science and ensure they address site-specific risks;
- For residential lead cleanup sites, use the guidelines in the October 16, 2025, Residential Lead Directive (<https://www.epa.gov/superfund/residential-soil-lead-directive-cercla-sites-and-rcra-hazardous-waste-cleanup-facilities>); and
- Use the latest innovations to assess the potential for critical minerals recovery at legacy hard rock mining sites.

Additional details can be found at <https://www.epa.gov/superfund/superfund-solutions-initiative>.

OSHA fine – BWC Terminals

In December 2025, BWC Terminals had a sulfuric acid spill at their facility in Channelview, TX. They hired Coastal Environmental Solutions to handle the hazardous waste cleanup. Coastal hired a One Way Environmental Services to provide the labor for the cleanup and remediation. OSHA cited One Way for 18 willful egregious and five serious violations after it was discovered that the company sent workers without adequate training, respirator fit tests, or safety measures. OSHA is proposing \$3,045,452 in penalties. Coastal is facing \$392,501 in proposed penalties for two willful and five serious violations for lack of training. BWC was cited for six serious violations for exposing workers to chemical burns and failing to provide hazmat training with a \$82,750 proposed penalty.

Chemours PFAS settlement

On June 29, 2026, EPA and the Department of Justice published a proposed consent decree with Chemours. The initial complaint was made by the state of West Virginia and alleged that for years, Chemours had been releasing per- and polyfluoroalkyl substances from facilities in West Virginia, North Carolina, and New Jersey that had affected the drinking water supplies near the three facilities. The proposed consent decree would require:

- Installation of pollution control equipment at the West Virginia facility;
- Sampling of drinking water in the communities surrounding the West Virginia and New Jersey facilities and if necessary, making provision for clean drinking water;
- Chemours committing to \$90 million in mitigation projects; and
- Civil penalties of \$22.5 million.

Copies of the complaint and the proposed decree can be found at <https://www.justice.gov/enrd/consent-decree/us-et-al-v-chemours-company-et-al>. Comments will be accepted on this proposed decree until July 29, 2026.

Presidential auto parts tampering memo

On June 29, 2026, President Trump sent a memo to EPA Administrator Zeldin. The purpose of the memo was to relieve the regulatory burdens that was increasing the costs to repair vehicles and to set up an alternate process to the California Air Resources Board certification process for aftermarket parts. The memo directing Mr. Zeldin to provide guidance within 30 days on what actions individuals can take to repair their own vehicles as long as they stay consistent with the Clean Air Act, set up an alternative certification process for aftermarket parts, and deprioritize civil tampering enforcement actions. A copy of the memo can be found at <https://www.whitehouse.gov/presidential-actions/2026/06/lowering-the-cost-of-living-by-promoting-the-freedom-to-fix/>.

CRWI meetings

The next CRWI meeting will be held on August 19-20, 2026, in Elyria, OH. It will feature a tour of Ross' incineration operation. Please contact CRWI (703-431-7343 or mel@crwi.org) if you are interested in attending.