

Strategies for Assessing PFAS Enterprise Risk

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Bright ideas.
Sustainable change.

Define Your Risk – And Risk Tolerance

Conduct a pragmatic assessment of the factors relevant to your business.

- For example, manufacturing versus warehousing/distribution

What PFAS-related questions do you need to answer?

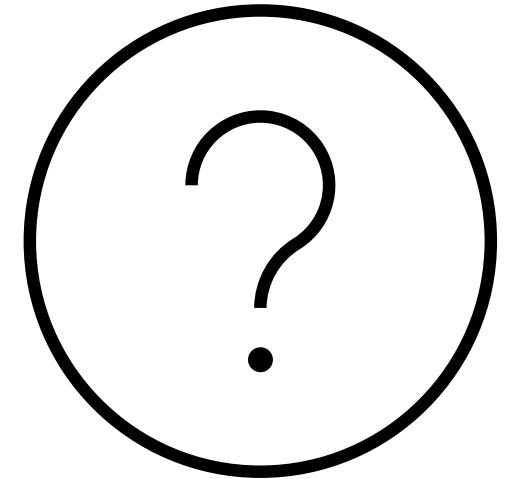
- Regulatory reporting (TRI, TSCA)? Agency requests? Customer inquiries?

Should counsel be involved?

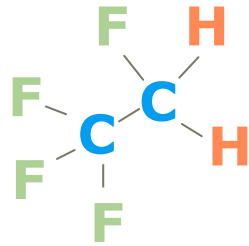
- Conduct assessment under attorney-client privilege

Should you sample?

- Be cautious generating data

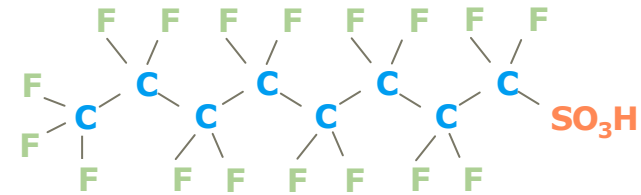


Consider the PFAS that Matter



HFC-134a

- 1,1,1,2-tetrafluoroethane
 - Widespread use
- Certain environmental screening criteria
- Meets the structural definition of PFAS under TSCA 8(a)(7)



Perfluorooctane sulfonic acid (PFOS)

- Widely recognized as PFAS by most definitions
- Historic use in a range of applications
- Reporting obligations under TRI, TSCA, CERCLA, etc.
- Environmental screening criteria in many media
 - Potential human health implications

PFAS Operational Assessments

Non-intrusive



Identify relevant regulations



Material storage



Review current and historical operations



Waste handling practices



Walk the facility



Review available sampling data



Review safety data sheets, purchasing records, or chemical inventories



Evaluate potential PFAS release pathways

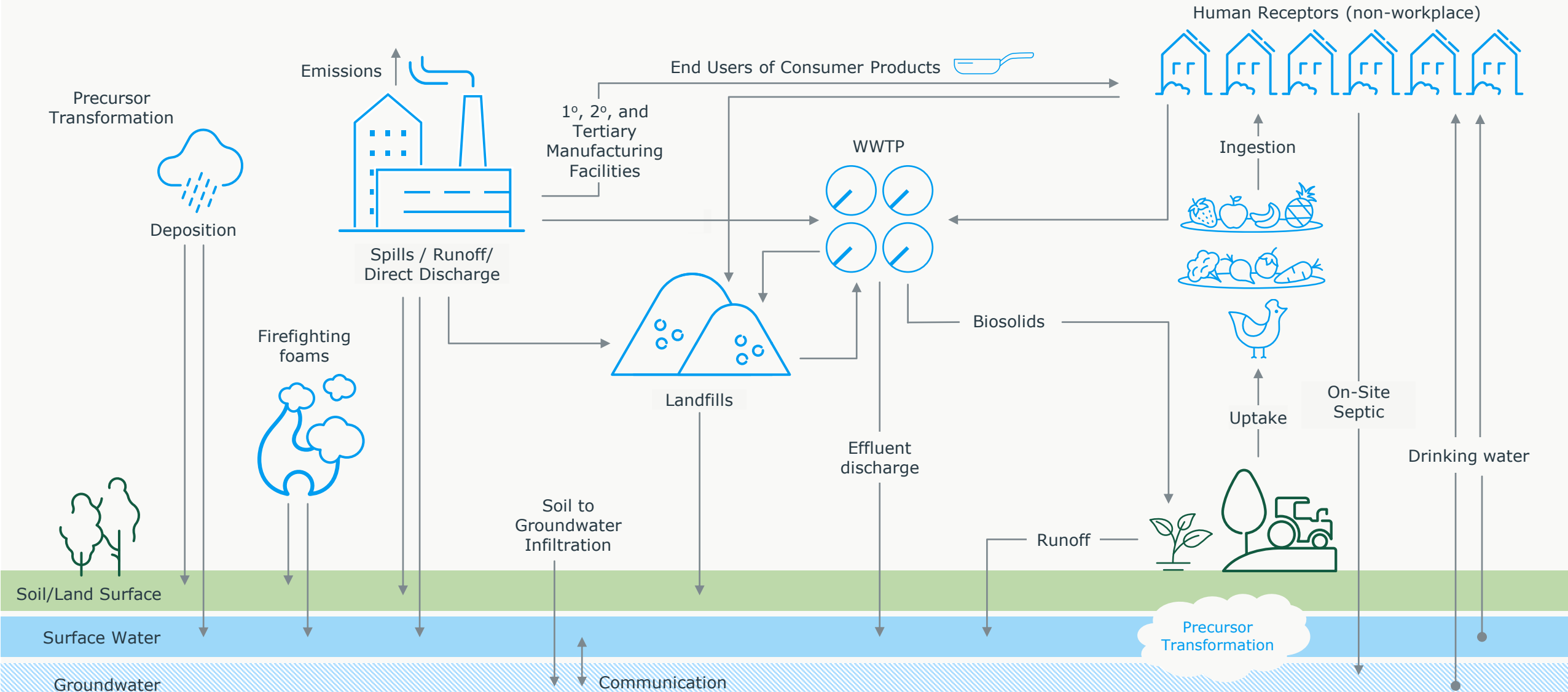


Evaluate supply chain



Identify nearby sensitive receptors

Define the Conceptual Site Model for Intrusive Assessments



Build a Risk Mitigation Plan

Preventative measures

- Material substitution
- Supplier management
- Process modification

Detection and monitoring

- Develop sampling protocols
- Implement continuous monitoring

Regulatory compliance

- Stay informed of changing regulations
- Reporting and documentation

Stakeholder communications

- Educational initiatives
- Engagement with industry groups



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