EPA Publishes Notice of Extension of Comment Period for Draft Sewage Sludge Risk Assessment for Perfluorooctanoic Acid and Perfluorooctane Sulfonic Acid

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On April 17, 2025, the U.S. Environmental Protection Agency (EPA) published a notice of extension of the comment period for the agency's "Draft Sewage Sludge Risk Assessment for Perfluorooctanoic Acid (PFOA) Perfluorooctane Sulfonic Acid (PFOS)." 90 Fed. Reg. 16,128 (Apr. 17, 2025). PFOA and PFOS are collectively referred to as per-and polyfluoroalkyl substances or PFAS. EPA extended the public comment period until August 14, 2025.

EPA originally published notice of availability of the draft risk assessment in the *Federal Register* at 90 Fed. Reg. 3,859 (Jan. 15, 2025).

In our prior blog post on EPA's notice of availability, we reported the draft risk assessment "reflects the agency's latest scientific understanding of the potential risk to human health and the environment posed by the presence of PFOA and PFOS in sewage sludge" under a variety of circumstances, including as a soil conditioner or fertilizer. *Id*. EPA focused on the risks and impacts to "those living on or near impacted sites or those that rely primarily on their products (*e.g.*, food crops, animal products, drinking water)" and noted that "the risk assessment does not model risks for the general public." *Id*. The findings are preliminary, and, after review of public comment and any resulting revisions, the EPA expects to publish a final risk assessment to inform its future regulatory actions under the Clean Water Act.

This is the second extension of the public comment period. The first extension was published on February 21, 2025. *See* 90 Fed. Reg. 10,078. In response to stakeholder requests for still more time, EPA has extended the public comment period for another 120 days to "allow interested parties additional time to thoroughly review and analyze this draft science document." 90 Fed. Reg.at 16,129. Comments previously submitted need not be resubmitted as they are already incorporated into the public record and will be considered in the final risk assessment as appropriate.

A copy of the notice of extension, including directions for comment submission, can be found here.