Addressing Per- and Polyfluoroalkyl Substances (PFAS): Association of State and Territorial Solid Waste Management Officials Issues Position Paper



Walter Wright, Jr.
wwright@mwlaw.com
(501) 688.8839

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The Association of State and Territorial Solid Waste Management Officials ("ASTSWMO") issued a position paper titled:

Addressing Per- and Polyfluoroalkyl Substances (PFAS) ("Position Paper").

ASTSWMO describes the organization as representing the 50 States, 5 Territories and the District of Columbia whose mission is to enhance and promote effective State and Territorial programs and to affect relevant national policies for waste and materials management, environmentally sustainable practices, and environmental restoration.

The Position Paper notes that PFAS are:

… are a large class of man-made compounds that are contaminants of emerging concern (CEC) in both the environment and for human health.

The Position Paper further notes that:

… widespread production, use, and disposal of PFAS-containing materials and wastes have significantly impacted State and Territorial (State) environmental cleanup and waste management programs posing unique and complex challenges.

Additional initial points include:

- Understanding of PFAS and their effects has advanced significantly over the past decade.
- Detection, treatment, and remediation technologies have improved.
- Many States have established their own regulatory standards and protocols for addressing PFAS contamination.
- States continue to review emerging science/federal actions to make the necessary policy and regulatory changes to protect public health and the environment.

ASTSWMO states that its position includes:

… A coordinated, science-based federal regulatory framework – developed and implemented in partnership with States and supported by clear authority, timelines, and funding – is essential to

effectively address PFAS nationwide. States are prepared to lead implementation and enforcement, but federal clarity and statutory alignment is needed to ensure consistency, accountability, and progress. The Association urges accelerated development of this framework based on science as understanding of PFAS behavior and impacts continues to evolve.

Components of the Position Paper also include:

- FEDERAL ACTION
- REGULATORY ISSUES
- Noting that the absence of direction in regulatory framework makes it unclear how responsible parties will be compelled to properly manage PFAS-containing waste and remediate in a timely manner, resulting in uncertainty such as:
- State programs conducting their own research and developing independent standards and guidelines;
- Some federal cleanup agencies failing to recognize State-derived PFAS standards for various environmental media as Applicable or Relevant and Appropriate Requirements (ARARs) during cleanup activities;
- Limitations on States' ability to recover costs from responsible parties; and
- Challenges in risk communication, leading to public confusion and reduced confidence.
- RECOMMENDATIONS
- Planning
- Establishing a Federal Regulatory Framework
- Recognition of State-Specific PFAS Standards
- Development of Analytical Methods
- Continued and Expanded Research
- Support for States

A copy of the Position Paper can be found here.