

Message

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Sent: 5/6/2025 8:48:51 PM
To: Zeldin, Lee [Zeldin.Lee@epa.gov]
CC: Abboud, Michael [abboud.michael@epa.gov]; Risley, David [Risley.David@epa.gov]; Kramer, Jessica L. [kramer.jessical@epa.gov]; Durbin, Martin [MDurbin@USChamber.com]; Varcoe, Andrew [AVarcoe@USChamber.com]; Merrifield, Trevor [TMerrifield@USChamber.com]
Subject: coalition letter on the PFAS Action Plan and other recommendations
Attachments: 250506Coalition_PFASActionPlan_OtherRecommendations_EPA.pdf

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Dear Administrator Zeldin:

Attached is a coalition letter providing several key recommendations for the agency to consider as it develops an integrated and strategic approach to PFAS policy.

As you know, the Chamber supports accelerating clean up of PFAS in the environment, based on the best science and risk management, while maintaining access to essential chemistries in key sectors across the economy.

We welcome the opportunity to engage with you and your team on these important issues. Perhaps during the coming weeks?

Please feel free to contact me if I can ever be of service.

Thanks in advance, and I look forward to following up,

Chuck

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For The Pursuit



U.S. Chamber of Commerce

May 6, 2025

The Honorable Lee Zeldin
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

RE: A new PFAS Action Plan and other recommendations

Dear Administrator Zeldin:

The undersigned organizations are heartened to hear your commitment to sound, science-based, commonsense regulations and believe your leadership at EPA will be essential to achieving many of your goals, as outlined in the five key pillars announcement.

As collaboration between industry and regulators is vital to right-size policy solutions for implementation, we appreciate your early engagement with the business community to better understand our challenges. Many of our organizations sent a letter of principles and policy recommendations to you on February 14, 2025.¹ Among our highest priorities is to appropriately accelerate the cleanup of PFAS in the environment, based on sound science and risk management best practices, while maintaining access to essential chemistries in critical sectors across the economy. To achieve these goals, a number of decisions made by the prior Administration must be corrected and, in some instances, reversed.

Accordingly, the following are several key issues and actions for your consideration:

- **Partner with experts across EPA, other agencies, and the broad stakeholder community to update the PFAS Action Plan and implement a commonsense and integrated strategy that focuses on appropriate and effective cleanup of PFAS in the environment.** Our organizations support you, EPA, and the U.S. government in developing a balanced PFAS strategy. EPA should leverage its previous work on the first Trump Administration's PFAS Action Plan to engage across the U.S. government, the states, the private sector, and academia to develop a comprehensive plan. The Biden EPA pushed forward regulations that were neither based in sound science, nor appropriately reflective of EPA's crucial previous work on the PFAS Action Plan. This resulted in many legally and factually problematic rules that have made it challenging to manufacture essential products in the U.S. We suggest utilizing the interagency PFAS

¹ <https://www.uschamber.com/environment/business-coalition-on-pfas-principles-policy-recommendations>

task force and water subcabinet as important mechanisms to bring together all relevant federal agencies for this key discussion. The high-level priorities that the agency released offer an important first step.

- **Champion and fix important underlying science processes at the agency.** EPA has gotten away from robust, peer reviewed, and balanced science to support its regulatory actions, especially related to PFAS. The agency must fix the flawed science-related processes at the root of current PFAS rules issued by the previous Administration, including the national primary drinking water standard, and must update them utilizing the best available science and risk management. We welcome the reconstitution of the Science Advisory Board and urge addressing the flawed science of the Integrated Risk Information System (IRIS) program as well.
- **Engage in an ongoing national dialogue around essential chemistries and the lack of viable alternatives.** PFAS chemistries, particularly fluoropolymers and f-gases, are so important that the U.S. Chamber of Commerce published an [extensive study](https://www.uschamber.com/environment/essential-chemistries-providing-benefits-across-the-u-s-economy)² on the impacts to the economy should PFAS be banned from use. These essential industries include aerospace, data centers, energy, health care, mobility, and semiconductors. The report underscored the significant threat to GDP, jobs, and tax revenue should access to essential chemistries be limited. More engagement is needed with all relevant stakeholders on the policy approaches to support these important issues.

As you and your colleagues well know, it is vital to understand that all PFAS are not the same. Depending on the definition, the category of PFAS could include upwards of 10,000 different substances. They can have significantly different exposure and hazard profiles, and some are indispensable in many vital industries as they offer unmatched strength, durability and reliability as well as chemical resistance and thermal stability, while generally being considered safe. Lumping them all together in a one-size-fits-all approach does not speak to the degree of risk posed by a specific PFAS nor its essential uses and benefits.

We believe there is a logical path forward that will enable the United States to continue the manufacture, import, and essential uses of PFAS chemistries, while also being the global leader in the protection of human health and the environment. We stand ready to work with EPA on all these matters and look forward to supporting the use of sound science to inform renewed, reformed decision-making processes for EPA as it addresses these critical issues.

² <https://www.uschamber.com/environment/essential-chemistries-providing-benefits-across-the-u-s-economy>

We appreciate your attention to begin this important policy work.

Sincerely,

Alliance for Automotive Innovation
Alliance for Chemical Distribution
American Chemistry Council
American Coatings Association
American Fuel & Petrochemical Manufacturers
American Petroleum Institute
Communications Cable & Connectivity Association
Cookware Sustainability Alliance
Council of Industrial Boiler Owners
Fluid Sealing Association
Fuel Cell & Hydrogen Energy Association
International Association of Plumbing and Mechanical Officials
National Asphalt Pavement Association
National Association of Manufacturers
National Association for Surface Finishing
National Council of Textile Organizations
National Mining Association
Printing United Alliance
SEMI
TRSA – The Linen, Uniform and Facility Services Association
U.S. Chamber of Commerce
Value Manufacturers Association of America

Cc: Jessica Kramer, Senior Advisor
Peggy Browne, Acting Assistant Administrator, Office of Water