

March 14, 2025

Dr. Lynn Dekleva
Office of Pollution Prevention and Toxics
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

RE: Extension of Reporting Submission Period; Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) Data Reporting and Recordkeeping Under the Toxic Substances Control Act (TSCA); Change to Submission Period; EPA-HQ-OPPT-2020-0549

Dear Dr. Dekleva:

The undersigned organizations urge you to extend the submission date for the Toxic Substances Control Act 8(a)7 Reporting and Recordkeeping Requirements for Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) by at least an additional six months — after the beta testing of the application has completed, the application has been made public, and clear agency guidance is published.

EPA has previously determined that the resources and technical capability to effectively execute the requirements of the rule were not practically in place, and accordingly, extended the submission period start date from November 12, 2024 to July 11, 2025. 89 Fed. Reg. 72,336 (Sept. 5, 2025). These facts persist and should compel the agency to act immediately to grant additional compliance time while the agency addresses unresolved implementation challenges.

This extension will also allow EPA to thoroughly consider initiating a new rulemaking that executes needed changes to this TSCA reporting rule before regulated entities make significant expenditures building compliance plans. In a letter earlier this year to Administrator Zeldin¹, we recommended that EPA modify the rule to reduce the burden on businesses by recognizing that the rule's broad and somewhat unprecedented data collection approach is unnecessary to meet TSCA's statutory requirements. EPA should provide a phased, two-tiered system that acknowledges the value of collecting data from major sources, reconsiders the need for information from small business and other insignificant data, and offers initial exemptions consistent with other TSCA reporting requirements. These important changes will reduce the potential cost burden, especially on small businesses.

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

We welcome the opportunity to present these concepts in person and look forward to working with you and your team as this issue proceeds.

Sincerely,

Alliance for Automotive Innovation
Alliance for Chemical Distribution
American Apparel & Footwear Association
American Chemistry Council
American Coatings Association
American Fuel & Petrochemical Manufacturers
American Petroleum Institute
Associated General Contractors of America
Fluid Sealing Association
Fuel Cell & Hydrogen Energy Association
National Asphalt Pavement Association
National Association of Manufacturers
National Council of Textile Organizations
National Mining Association
The Chlorine Institute
The Fertilizer Institute
TRSA – The Linen, Uniform and Facility Services Association
U.S. Chamber of Commerce