

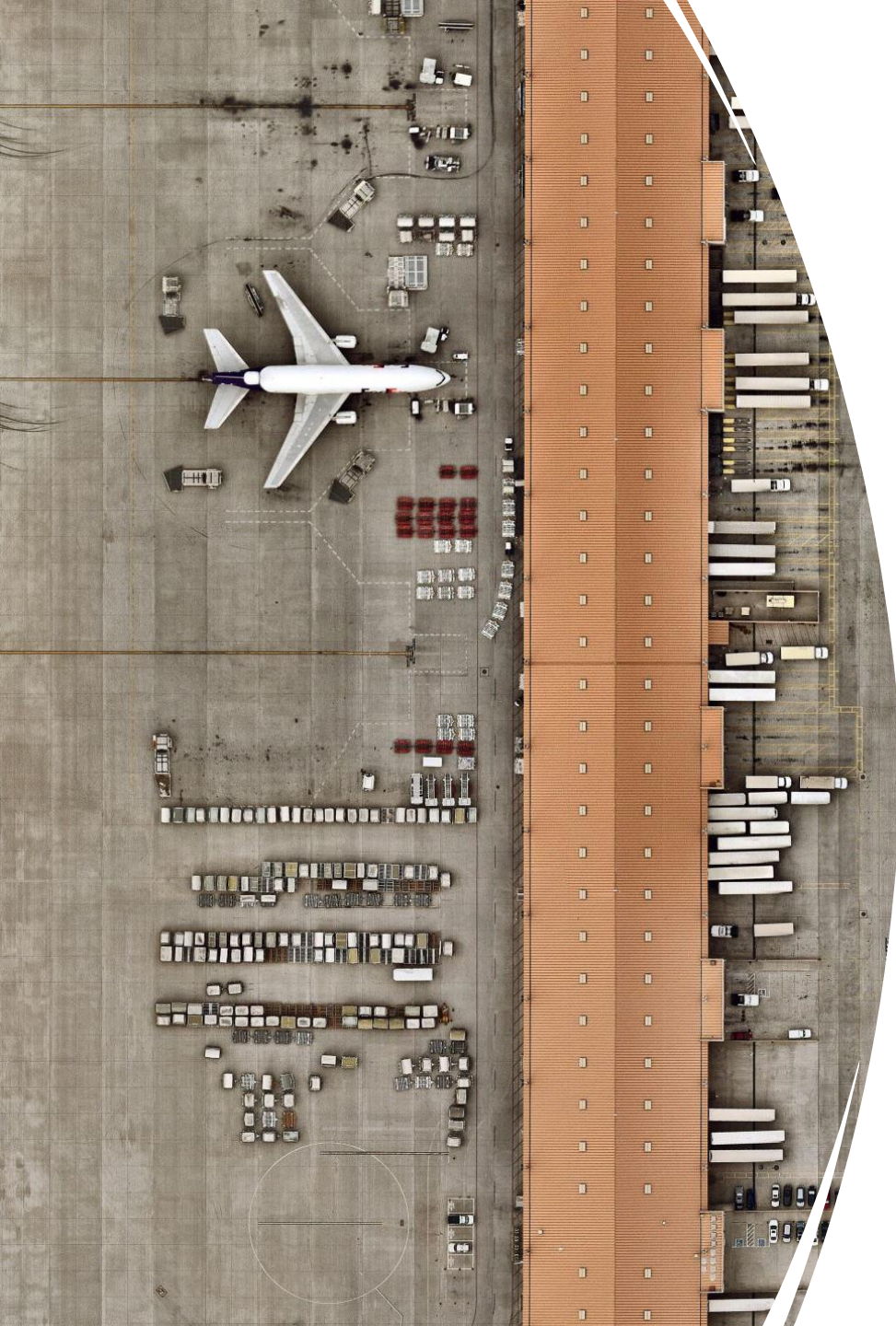
2025 Florida Airports Council Education & Training Summit PFAS Updates

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The latest (as of April 28, 2025)

- EPA will name a PFAS Czar to craft PFAS policy/legislation
- PFAS to remain in the Toxic Release Inventory for reporting; however, EPA is signaling that a “de minimis” reporting exemption will be available
- EPA is emphasizing “passive receivers” i.e., airports would be shielded from cleanup liability under CERCLA (and RCRA)
- Managing PFAS under RCRA will likely be abandoned
- The most important: EPA will continue to develop effluent limitations under the Safe Drinking Water Act, and it is indicating that the PFAS and PFOS drinking water levels **will remain** as part of the PFAS Agenda, but EPA will work on reducing costs

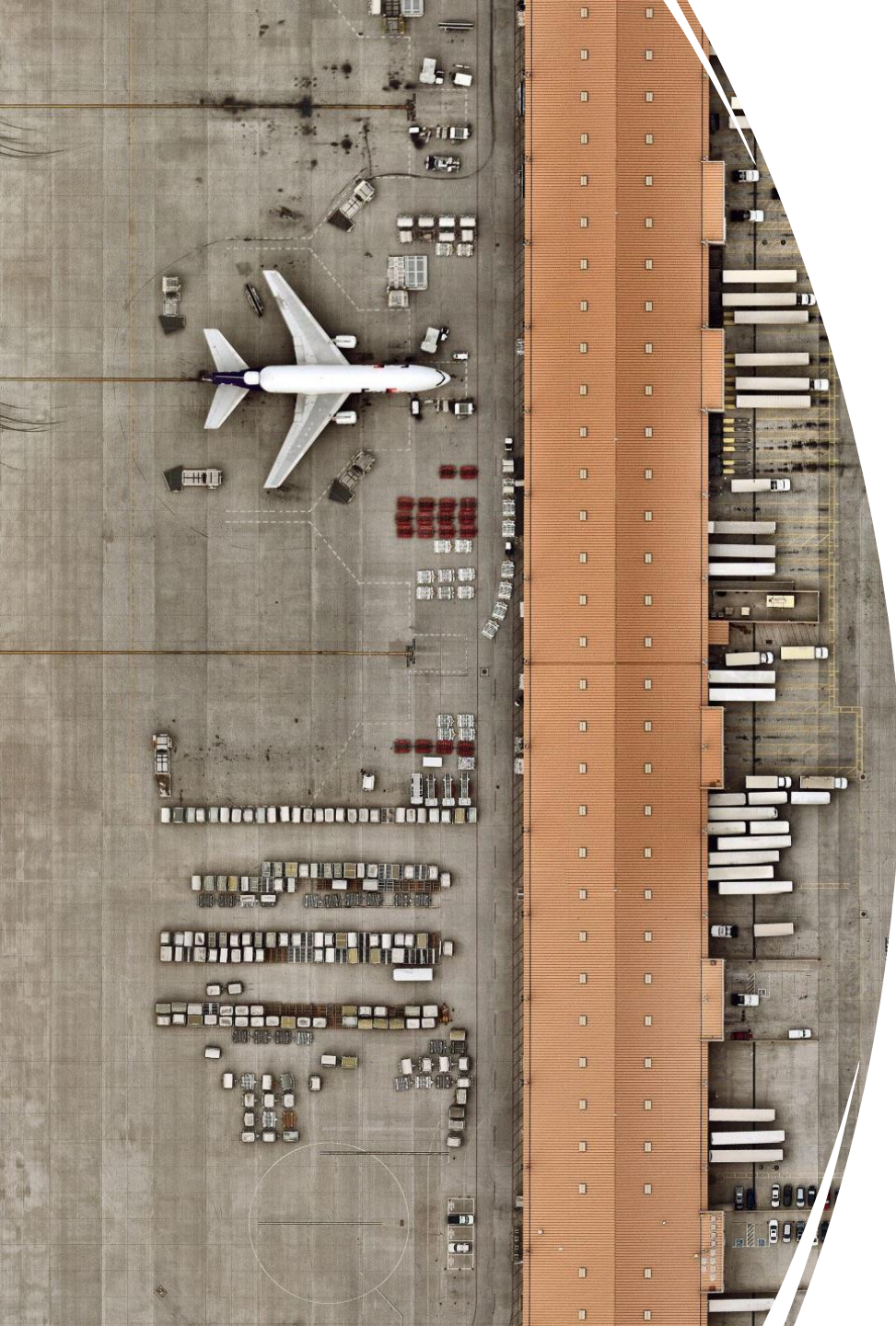


Lots of questions (related and unrelated to the announcement). **Env Policy**

- With the EPA's 4/28/2015 announcement, what does the panel think in how this plan affect airports? Do you think we will see any changes during this administration?
- EPA is again emphasizing “enforcement discretion”. For plumes leaving an airport’s property boundary and affecting private property or sensitive ecosystems, how do you see this “discretion” working?
- EPA is indicating that the drinking water standards **will remain** but that the economic factor will play a major role in not affecting the public (i.e., utilities may not have to bear the burden of providing clean water); however, in FL the drinking water standard IS the groundwater standard and so assessment and remediation will likely ensue; how do airports prepare? Even with enforcement discretion?

Lots of questions (related and unrelated to the announcement) **Legal**

- **The Judge in the MDL has chosen 12 “sites” to identify which companies contributed to contaminating groundwater in order to apportion liability. What effect may this have on environmental claims?**
- **We understand that Kidde Fenwal (one of the defendants in the MDL) has scheduled a bankruptcy hearing (5/7/25) in US Bankruptcy Court (Delaware) to potentially discuss PFAS settlement options (under its parent company Raytheon). Once settlement is agreed, airports that have not filed claims may be out of any Kidde settlement funds. Can you comment?**
- **What timeframe do you think is reasonable for env damage claims?**



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Lots of questions (related and unrelated to the announcement). **PFAS transition**

- **What are we seeing across the country in how airports are addressing foam transition? Are there consistent trends that are relevant to Florida airports? For instance, Naples International is done; Tampa, Sarasota and Orlando Sanford are in procurement.**
- **What are the panel's thoughts on "how clean is clean enough" after cleanouts/purges? What have been experiences to date?**
- **Construction. At some point airports may encounter PFAS in soil and groundwater as part of construction, in your experience, how are airports dealing with this issue and what recommendations may you offer?**

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**PFAS in stormwater
and remediation**

**How are other States handling
PFAS in stormwater permitting?
Does the panel think stormwater
permitting will become a serious
issue in Florida? Timeframes?**

**Any new technologies that are
promising in soil and
groundwater remediation?**

*Thank
you
Love*

