



MEMBER COMPANIES

Arcwood Environmental
Arkema, Inc.
Bayer CropScience
Clean Harbors Environmental Services
Eastman Chemical Company
Formosa Plastics Corporation, USA
INV Nylon Chemicals Americas, LLC
Ross Incineration Services, Inc.
The Dow Chemical Company
Veolia ES Technical Solutions, LLC
Westlake US 2, LLC

GENERATOR MEMBERS

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ALL4 LLC
Alliance Source Testing LLC
B3 Systems
Coterie Environmental, LLC
Envitech, Inc.
Eurofins TestAmerica
Focus Environmental, Inc.
Franklin Engineering Group, Inc.
Montrose Environmental Group, Inc.
Ramboll
Strata-G, LLC
TEConsulting, LLC
Trinity Consultants
W.L. Gore and Associated, Inc.

INDIVIDUAL MEMBERS

Ronald E. Bastian, PE

ACADEMIC MEMBERS

(Includes faculty from:)

Colorado School of Mines
Lamar University
Louisiana State University
Mississippi State University
New Jersey Institute of Technology
Northern Illinois University
University of California – Berkeley
University of Dayton
University of Kentucky
University of Maryland
University of Utah

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CRWI Update April 30, 2026

PFAS disposal and destruction guidance

On April 28, 2026, EPA published a notice that Version III of the PFAS Disposal and Destruction Guidance was available. The 2026 version focuses on three commercially available technologies (Subtitle C landfills, deep well injection, and incineration at a RCRA and Clean Air Act permitted incinerator) in no particular order of priorities. It includes new test results for hazardous waste incinerators and adds a discussion on using sewage sludge incinerators. Hazardous waste incineration moved up on the list of technologies ranked from the lowest to highest potentials for release to the environment from sixth place in 2024 to fourth place in 2026. The Agency also committed to updating the guidance once a year. EPA is accepting comments on this revision until June 29, 2026. A copy of the guidance can be found at <https://www.epa.gov/pfas/interim-guidance-destruction-and-disposal-pfas-and-materials-containing-pfas>.

Other PFAS news

EPA published a rule in 2023 requiring manufacturers and users of per- and polyfluoroalkyl substances (PFAS) materials to report all uses of these materials from January 1, 2011 through December 31, 2022. The initial reports were to begin on November 12, 2024. The reporting period was delayed until July 11, 2025. In May 2025, EPA again extended the beginning of the reporting period until April 13, 2026. In November 2025, EPA proposed a rule to modify the reporting requirements. In an April 13, 2026, *Federal Register* notice, EPA pushed the beginning of this reporting date to January 31, 2027 or 60 days after a forthcoming final rule on the requirements for reporting is published, whichever is earlier. EPA did not give a timetable for completing the 2025 proposed rule.

When questioned by Congressmen on the FY 2027 budget request, EPA Administrator Zeldin indicated that EPA is not planning on preemption any state regulations on PFAS. He reiterated EPA's support for the 4 ppt maximum contaminant level for perfluorooctanoic acid and perfluorooctane sulfonic acid under the Safe Drinking Water Act and the addition of these two compounds to the list of hazardous substances under CERCLA. He also encouraged Congress to develop legislation to protect "passive

receivers” of PFAS from Superfund liability. There continues to be activity in both the House and Senate to develop this legislation but it is unclear what vehicle will be used. It would be difficult to get a stand-alone bill passed. The most common vehicle in the past few years has been the National Defense Authorization Act.

Uniform hazardous waste manifests

On April 8, 2026, EPA proposed a rule to allow contractors to sign Uniform Hazardous Waste Manifests at EPA worksites for both Superfund and non-Superfund sites. The proposed rule would also allow work to continue when EPA personnel are not on site. Comments on these proposed changes will be accepted until June 8, 2026.

RMP proposed rule

On April 2, 2026, EPA extended the comment period for the proposed modification to the risk management plan requirements. Comments are now due on May 11, 2026.

EPA FY 2027 budget request

EPA's FY 2026 budget is \$8.8 billion. On April 3, 2026, EPA sent their FY 2027 budget request to Congress. This request was for \$4.2 billion. The request is a repeat of the FY 2026 request to reduce funds for state environmental programs, water infrastructure programs, research, Superfund programs, climate programs, and environmental justice programs. The request includes \$200 million to integrate artificial intelligence into permitting decisions, rulemaking, and public comment analysis. Congress ignored EPA's budget request for 2026 and is expected to do the same for 2027.

However, the budget request can often be used to determine EPA's priorities for the coming year. In the request, EPA states two main goals: streamline the permitting process; and reduce PFAS risks to the public. There are no additional details on the PFAS goal. Additional information in the budget on permitting reform is discussed below.

Permitting reform

The proposed FY 2027 EPA budget included several specific permitting reforms. One example is the development of a cross-office working group to examine permitting strategies, initiatives, partnerships, and reforms to identify those that would reduce time, uncertainty, and costs associated with permitting. Another was a continuing project to standardize permitting of Class VI (CO₂ injection wells) across the regions and to reduce the time needed to issue Class VI permits. In addition, there are several modifications mentioned for National Environmental Policy Act permits.

During a presentation to the Environmental Council of States, Aaron Szabo, Assistant Administrator for the Office of Air, said the Agency plans to update the 1985 New Source Review guidance on when final preconstruction permits must be revised. This is

designed to speed permitting of data centers. He also said the Agency is working on guidance to streamline Title V operating permitting and to add an affirmative defense provision back into permits. In addition, Mr. Szabo released a memo to the regions on April 16, 2026. This memo reaffirms the policy that if there are no changes to a permit or their applicable requirements, applicants can resubmit the previous application with a changed date. For permits that are not changing, the applicant may use cross referencing to previous applications to satisfy requirements. The memo also allows the permitting authority to skip the legal and technical basis for unchanged permit terms in the Statement of Basis and encourages the permitting authority to concentrate on issues that are new or different. A copy of this memo can be found at <https://www.epa.gov/title-v-operating-permits/title-v-operating-permit-policy-and-guidance-document-index>.

The White House Council on Environmental Quality (CEQ) invited (April 28, 2026) technology companies, startups, researchers, and non-profits to submit proposals to modernize federal permitting. CEQ invites solutions to accelerate and modernize the federal environmental review and permitting process for all environmental statutes. This Call for Solutions is open through 6:00 pm ET on June 2, 2026. Once the process has closed, a panel will evaluate the submissions. Up to 50 solutions with the highest scores will be invited to a Permitting Innovators Expo in July 2026 in Washington, D.C. where the participants will demonstrate their solutions to federal agency leaders and lay the groundwork for potential partnerships with key agencies. An informational webinar that covers the program timeline, the submission process, and Expo details will be held on May 14, 2026. Additional information can be found at <https://www.whitehouse.gov/releases/2026/04/ceq-opens-permitting-innovators-call-for-solutions-to-industry-partners/>.

OASES

EPA's Office of Research and Development (ORD) has been mostly dismantled. About 400 of the former ORD employees have been moved to the Office of Applied Science and Environmental Solutions (OASES). The rest of ORD's employees have taken the voluntary separation package or been assigned to other program offices. On April 21, 2026, EPA Administrator Zeldin named Teresa Boeshaghi as the Associate Administrator for OASES.

On April 16, 2026, EPA released two memos on how the OASES would operate. The first (OASES Interim Clearance Policy & Routing Guidelines) states that "all draft and final scientific and technical work products must be approved by the appropriate level of OASES management prior to being published, issued, exhibited, or presented ... outside of OASES." The memo states that the process is designed to "maintain a comprehensive and robust process for the release of scientific and technical work products." This appears to add a level of review that may delay release of documents. The second (Interim Approval Process for OASES Science Activities and Deliverables) sets up the process to decide which projects OASES staff will work on in the future. The process has three criteria:

- The work aligns with current administration priorities;
- The work is designed to enhance the Agency's ability to meet its statutory and regulatory obligations; and
- It addresses a specific scientific need identified by an EPA program office.

All project must meet all three criteria. A copy of these two memos can be obtained from CRWI.

Advanced recycling

On April 27, 2026, EPA Administrator Zeldin published an op-ed in The Hill, a Washington DC newspaper that focuses on the federal government. In this op-ed, Mr. Zeldin promoted the use of pyrolysis as a method to “undo” plastics and return them to raw materials. He identified one of the major hurdles to encourage more of this “advanced recycling” is the “outdated classification of pyrolysis as incineration under the Clean Air Act.” EPA published a proposed rule (March 20, 2026) to recognize advanced recycling as a manufacturing process instead of a waste management process. The op-ed can be found at <https://www.epa.gov/newsreleases/icymi-administrator-zeldin-hill-trump-epa-has-plan-unmake-plastic-waste>.

CRWI meetings

The next CRWI meeting will be held on May 20-21, 2026, in Farragut, TN. It will feature a tour of an Oak Ridge Incineration facility. Please contact CRWI (703-431-7343 or mel@crwi.org) if you are interested in attending.