

IHMM Guidance Document: PFAS Reporting & Compliance

Responsibilities

This guidance document provides CHMM and CHMP certificants with a structured approach to complying with EPA's Proposed PFAS Reporting and Recordkeeping Rule (40 CFR Part 705). It explains obligations, exemptions, reporting standards, and practical steps for compliance.

1. Overview of PFAS Reporting Rule

EPA requires reporting of all PFAS manufactured or imported since January 1, 2011, unless exempt under the proposed rule. Reporting includes chemical identity, uses, quantities, byproducts, health/environmental effects, and release data.

2. Key Exemptions Certificants Must Understand

- 0.1% de minimis exemption for PFAS in mixtures/articles
- PFAS imported in articles
- PFAS as byproducts, impurities, or non-isolated intermediates without commercial purpose
- PFAS manufactured solely for R&D
- Municipal solid waste imports
- Certain federal agency activities

3. Compliance Steps for CHMM/CHMP Professionals

- Conduct PFAS lifecycle inventory (2011–2022)
- Audit supply chain and SDS records for PFAS indicators
- Validate applicability of exemptions
- Assemble exposure, disposal, release, and byproduct information
- Document “known or reasonably ascertainable” data per TSCA standards

4. Documentation Requirements

Certificants must ensure records are complete, accurate, and retained for auditing. This includes SDS, manifests, purchase records, transport documentation, analytical reports, and environmental release data.

5. OECD Harmonized Templates (OHT)

Certificants must ensure that any unpublished PFAS health or environmental study is reported using OHT formats unless exposure data are already captured in mandatory fields.

6. Avoiding Compliance Pitfalls

- Do not assume PFAS absence without verification
- Beware of gaps in SDS prior to 2015
- Ensure byproduct vs. impurity classification is correct
- Validate commercial purpose of PFAS byproducts

7. Implications for IHMM Practice

The proposed rule aligns directly with CHMM and CHMP domains involving identification, reporting, waste management, emergency response, remediation, and environmental assessment.