

EPA Test Methods 1633 and 1621 Shape Future of PFAS Management

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The U.S. Environmental Protection Agency (EPA) finalized [Test Methods 1633 and 1621](#), environmental sampling methods for analyzing up to 40 target per- and polyfluoroalkyl substances (PFAS) in soil, groundwater, and other environmental media. The EPA's recent adoption of Methods 1633 and 1621 aims to establish standardized and quantifiable standards for measuring detectable levels of PFAS in soil and groundwater samples, setting the stage for regulatory enforcement.

These technical developments come on the heels of the EPA proposing to designate certain PFAS as [hazardous substances](#) under federal Superfund law (the Comprehensive Environmental Response, Compensation, and Liability Act, or CERCLA), expected to occur in the coming weeks and in tandem with the move to designate hazardous constituents under the Resource Conservation and Recovery Act (RCRA), [expected to occur](#) in the coming months. Likewise, it will also trigger the evaluation of PFAS in all Phase I Environmental Site Assessments prepared in connection with environmental due diligence and opens up the "potential future liability" for sites never assessed for PFAS or the existence of PFAS contamination.

The EPA's recent adoption of Test Methods 1633 and 1621 signifies a substantial step in regulating PFAS contamination in the environment with far-reaching implications for manufacturers. These are the overall implications:

Analytical Methodologies

Methods 1633 and 1621 are standardized analytical methods that allow for the simultaneous detection of up to 40 different PFAS compounds in various environmental media, including soil, groundwater, surface water, leachate, and solids such as biosolids. These methods were developed through collaborative efforts across federal and state agencies, industry, and academia and standardizes the approach to PFAS testing, enabling data consistency, comparability, and reliability. Prior to Methods 1633 and 1621, the lack of uniform testing methods made it challenging to compare data across studies or geographical areas.

Industry Implications of Methods 1633 and 1621

With the adoption of Methods 1633 and 1621, industry now has an agreed-upon methodology to use for detecting and quantifying the presence of PFAS in environmental media. Industry can use these test methods as means for more effective monitoring of PFAS contamination and to identify PFAS pollution at its source. These

test methods can be used for conducting risk assessments and developing remediation plans. This will also enable manufacturers to conduct compliance and performance audits and, if appropriate, take steps to address any noncompliance.

Regulatory and Enforcement

The adoption of these methods marks a cornerstone for regulatory agencies as they work to develop standards and guidelines for PFAS management and, consequently, enforcement. It strengthens the EPA's PFAS Strategic Action Plan, which seeks to address PFAS at the national level. States now have a clear pathway to generating comparable data, which is crucial for interstate collaborations, setting enforceable cleanup standards, and holding responsible parties liable.

Wastewater Management

Industry stakeholders, including manufacturers of PFAS-containing products and wastewater treatment facilities, will be impacted by the adoption of Methods 1633 and 1621. The standardization of testing imposes new monitoring requirements and potentially stricter discharge limits. This may lead to increased operational costs for compliance but also encourages innovation in PFAS treatment technologies and alternative substance development.

Future Research and Technological Advancements

Methods 1633 and 1621 open the door to more comprehensive research on PFAS by providing a consistent methodology for analysis. However, there are hundreds of PFAS compounds, and Methods 1633 and 1621 only target 40, suggesting that continued methodological improvements are necessary. It also highlights the need for ongoing technological advancements in PFAS detection and remediation.

The Takeaway

The EPA's adoption of Methods 1633 and 1621 represents the EPA's effort to develop a consistent and standardized method for detecting PFAS contamination and sets the stage for robust enforcement. Manufacturers may want to consider conducting performance and compliance audits under an audit privilege and, if appropriate, taking advantage of voluntary action cleanup programs.

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