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## **OMB Completes Review of Proposed Rule to Designate PFOA and PFOS as CERCLA Hazardous Substances**

Article By:

Lynn L. Bergeson

Carla N. Hutton

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On August 12, 2022, the Office of Management and Budget (OMB) completed its review of a proposed rule that would designate perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS) as hazardous substances under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Such designations would require facilities to report on PFOA and PFOS releases that meet or exceed the reportable quantity. Publication of the proposed rule in the *Federal Register* will begin a public comment period.

As reported in our October 19, 2021, [memorandum](#), as part of a multi-agency effort to address pollution from per- and polyfluoroalkyl substances (PFAS), the U.S. Environmental Protection Agency (EPA) released its [PFAS Strategic Roadmap](#) on October 18, 2021. The key actions outlined in the roadmap include proposing to designate PFOA and PFAS as CERCLA hazardous substances.

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