

## EPA Proposes to Update Proposed SNURs for 17 PFAS, Designating Manufacture (Including Import) as a Significant New Use

Article By:

Lynn L. Bergeson

Carla N. Hutton

---

On November 29, 2024, the U.S. Environment Protection Agency (EPA) issued a supplemental notice of proposed rulemaking (SNPRM) that would update the December 2, 2022, proposed significant new use rules (SNUR) for 17 per- and polyfluoroalkyl substances (PFAS) that were the subject of premanufacture notices (PMN) and are also subject to an Order issued by EPA pursuant to the Toxic Substances Control Act (TSCA). [89 Fed. Reg. 94642](#). The SNURs would require persons who intend to manufacture (defined by statute to include import) or process any of these 17 PFAS for an activity that is proposed as a significant new use by this rulemaking to notify EPA at least 90 days before commencing that activity. EPA notes that the manufacture or processing for the significant new use may not commence until EPA has conducted a review of the required notification, made an appropriate determination regarding that notification, and taken such actions as required by that determination. Comments are due **December 30, 2024**.

As reported in our December 9, 2022, [blog item](#), on December 2, 2022, EPA proposed SNURs for certain PFAS that were the subject of PMNs and are also subject to Orders issued by EPA pursuant to TSCA. [87 Fed. Reg. 74072](#). EPA states in the SNPRM that those SNURs would have required notice prior to manufacturing or processing the PFAS in a way that does not conform to the measures in the Order; “additionally, EPA proposed to require notice for annual production volumes greater than 2,500 pounds and for uses other than the uses described in the PMNs, on the basis that notices of commencement (NOC) had not been received for these chemical substances and the substances were not on the TSCA Inventory.” According to the SNPRM, EPA received comments on the December 2022 proposal suggesting that EPA designate “any use” of a PFAS not on the TSCA Inventory as a significant new use, thus allowing EPA to reassess risks from the PFAS under any conditions of use according to current weight-of-evidence on the PFAS. EPA “agrees with the commenter and is issuing this supplemental proposal for the seventeen chemical substances for which NOCs have not been received and the substances are not on the TSCA Inventory.”

Because the 17 PFAS are not on the TSCA Inventory (and no exemptions were granted for their manufacture), EPA states that it proposes to find that there are no ongoing uses of these chemicals. Therefore, EPA proposes SNURs that identify manufacture (which includes import) or processing the

17 PFAS for any use as a significant new use, to enable it to evaluate and manage risks, where appropriate, from activities associated with use of these PFAS before manufacture or processing begins.

©2025 Bergeson & Campbell, P.C.

---

National Law Review, Volume XIV, Number 341

Source URL: <https://natlawreview.com/article/epa-proposes-update-proposed-snurs-17-pfas-designating-manufacture-including-import>