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New EPA Guidance on PFAS and Safe Drinking Water: Health Advisories, Regional Screening Levels, Remediation Levels

TUESDAY, SEPTEMBER 20, 2022

1pm Eastern | 12pm Central | 11am Mountain | 10am Pacific

Today's faculty features:

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Lathrop GPM & Morgan Lewis present:

New EPA Action on PFAS and Safe Drinking Water

Cynthia M. Teel
Lathrop GPM

Stephanie R. Feingold
Morgan Lewis

September 20, 2022

Morgan Lewis

Lathrop GPM

Overview

- EPA's June 15, 2022 issuance of four new lifetime health advisory levels (HALs) for four PFAS under its Safe Drinking Water Act authority:

PFOA (Perflurooctanoic acid)
PFOS (Perfluorooctane sufonic acid)
Gen X Chemicals (HFPO-DA)
PFBS (Perfluorobutane sulfonate)

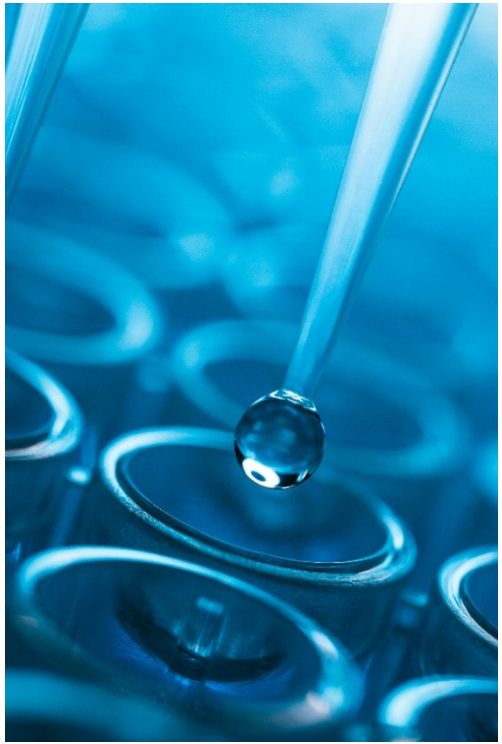
- What that might mean for other existing and upcoming regulations at both the state and federal levels

Regulation of PFAS in Drinking Water: The Story So Far

Morgan Lewis

Safe Drinking Water Act ("SDWA")
42 U.S.C. § 300 *et seq.*

- Requires public drinking water systems to test water provided to customers for certain contaminants and report results to customers, state regulatory agencies, and EPA.
- EPA identifies potential contaminants of drinking water, evaluates them, and, depending on the results, develops regulatory standards for them.
- No MCL for PFAS (yet …)



CCL and UCMR

- Contaminant Candidate List (CCL):
  - Published by EPA every five years
  - List of contaminants known or anticipated to occur in public water systems that are not currently subject to EPA drinking water regulations.
  - PFOA and PFOS Listed on Fourth CCL (2018)
- Unregulated Contaminant Monitoring Rule (UCMR):
  - Published by EPA every five years.
  - Various PFAS included on third and fifth UCMRs

National Primary Drinking Water Standards and MCLs

- EPA must select no fewer than five contaminants from the Contaminant Candidate List (CCL) and determine whether to regulate these contaminants with a National Primary Drinking Water Regulation (NPDWR).
- When EPA proposes a national primary drinking water regulation, it must determine a "maximum contaminant level goal," which is "the level at which no known or anticipated adverse [health] effects … occur and which allows an adequate margin of safety." 42 USC § 300g-1(a)(3), (b)(4)(a).
- National primary drinking water regulation → Maximum Contaminant Level (MCL)
- NPDWR and MCLs are legally enforceable standards

Safe Drinking Water Act, cont'd

- Pending: National Primary Drinking Water Regulations (NPDWRs) for PFOA and PFOS.
  - Proposed Rule expected Fall 2022; final rule 2023 (following public comment)
- Also evaluating additional PFAS and considering regulatory actions to address groups of PFAS through UCMR and CCL.
- SDWA authorizes EPA to issue HAs for contaminants that are not subject to an NPDWR

What are HALs?

- Health Advisory Levels
  - Health Advisories v Health Advisory Levels
- HALs identify the concentration of a contaminant in drinking water at which adverse health effects and/or aesthetic effects are not anticipated to occur over specific exposure durations (e.g., 1 day, 10 days, a lifetime).
- Non-Regulatory and Non-Enforceable
- Can be used:
  - in development of drinking water regulations and limits
  - to influence state and local regulations
  - to shape public debate around the safety of particular chemicals

"Old" HALs – PFOA and PFOS

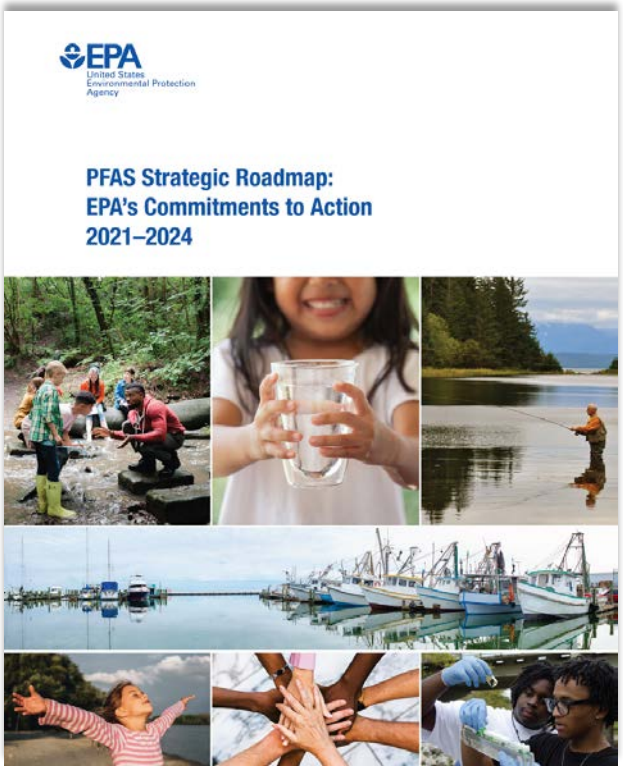
- **2009**: Provisional Health Advisories of **400 ppt for PFOA and 200 ppt for PFOS**
  - based on health effects information available at that time.
  - short-term (weeks to months) risk assessment exposure scenarios
  - intended as guidelines for public water systems while allowing time for EPA to develop final lifetime health advisories for PFOA and PFOS
- **2016**: Final Lifetime Drinking Water Health Advisory of **70 ppt for PFOA and PFOS** (individually, or in combination)
- Used by DOD (and other military departments) as trigger for remediation of drinking water at federal / military sites

Use of HALs by States

- Development of state and local drinking water standards
- Provides technical information to state agencies and other public health officials regarding health effects, analytical methodologies, and treatment technologies associated with drinking water PFAS contamination.
- Five states adopted EPA's HAL of 70 ppt for PFOA and PFOS as de facto drinking water standards
  - Alaska, Colorado*, Delaware, New Mexico, Ohio
- In absence of a federal standard, states can regulate as they choose; if a federal standard (MCL) is promulgated, however, states can only be the same as, or more stringent than, the federal standard

*also includes PFNA (guidance)

USEPA PFAS Strategic Roadmap (2021-2024)



Three Primary Directives

- **Research**
- **Restrict**
- **Remediate**

PFAS Roadmap - Research

RESEARCH

Invest in research, development, and innovation to increase understanding of PFAS exposures and toxicities, human health and ecological effects, and effective interventions that incorporate the best available science.

Objectives

- Build the evidence base on individual PFAS and define categories of PFAS to establish toxicity values and methods.
- Increase scientific understanding on the universe of PFAS, sources of environmental contamination, exposure pathways, and human health and ecological effects.
- Expand research on current and emerging PFAS treatment, remediation, destruction, disposal, and control technologies.
- Conduct research to understand how PFAS contribute to the cumulative burden of pollution in communities with environmental justice concerns.

*Source: EPA PFAS Strategic Roadmap: EPA's Commitments to Action 2021-2024

Research

Science Advisory Board Review of Draft PFOA/PFAS Scientific Documents

National PFAS Testing Strategy

Released Preliminary Toxics Release Inventory Data on PFAS

Office of Chemical Safety and Pollution Prevention

- National Testing Strategy released October 2021
  - In December 2021 EPA granted a petition to compel companies to study 24 categories of PFAS
  - First TSCA Section 4 test order in June 2022
- Review new PFAS under Toxic Substances Control Act (TSCA) (ongoing)
- Review existing PFAS under TSCA (ongoing)
  - In March 2022, EPA stated it will remove two PFAS from the Safer Chemical Ingredients List
- Enhance PFAS reporting under the Toxics Release Inventory (TRI)
  - In January 2022, EPA added four PFAS to the TRI list
  - Proposed rule to remove de minimis reporting exemption sent to OMB August 2022 (rule to be issued this month, finalized by November 2023)
- Finalize new PFAS reporting/recordkeeping under TSCA Section 8 (Winter 2022)

Office of Research and Development

- Develop methods to detect and measure PFAS, including targeted methods for specific PFAS, non-targeted methods for identifying unknown PFAS, and “total PFAS” methods (ongoing)
- Evaluate and develop technologies for reducing PFAS to inform treatment, cleanup and remediation, emission controls, and end-of-life management (ongoing)
  - Identify initial PFAS categories for removal technologies
  - Develop treatment technologies for drinking water systems (Treatability Database)

Office of Research and Development/Office of Water

Develop human health toxicity assessments and study potential cumulative impacts

PFAS	Action	Status
GenX	Final Human Health Toxicity Assessment	Issued October 2021
PFBA	Human Health Toxicity Assessment	Ongoing
PFBS	Final Human Health Toxicity Assessment	Issued April 2021
PFDA	Human Health Toxicity Assessment	Ongoing
PFHxA	Human Health Toxicity Assessment	Ongoing
PFHxS	Human Health Toxicity Assessment	Ongoing
PFNA	Human Health Toxicity Assessment	Ongoing
PFOA	Final Human Health Toxicity Assessment	Issued 2016
PFOS	Final Human Health Toxicity Assessment	Issued 2016

PFAS Roadmap - Restrict

RESTRICT

Pursue a comprehensive approach to proactively prevent PFAS from entering air, land, and water at levels that can adversely impact human health and the environment.

Objectives

- Use and harmonize actions under all available statutory authorities to control and prevent PFAS contamination and minimize exposure to PFAS during consumer and industrial uses.
- Place responsibility for limiting exposures and addressing hazards of PFAS on manufacturers, processors, distributors, importers, industrial and other significant users, dischargers, and treatment and disposal facilities.
- Establish voluntary programs to reduce PFAS use and release.
- Prevent or minimize PFAS discharges and emissions in all communities, regardless of income, race, or language barriers.

*Source: EPA PFAS Strategic Roadmap: EPA's Commitments to Action 2021-2024

Restrict

Expanding PFAS Monitoring in Drinking Water

Establishing a National Primary Drinking Water Standard for PFOA/PFOS

Office of Water – Fifth Unregulated Contaminant Monitoring Rule (UCMR 5)

Safe Drinking Water Act § 1445(a)(2)	• **Requires EPA to establish a program to monitor for priority unregulated contaminants in drinking water every 5 years** • **Used to monitor for priority unregulated contaminants for public water systems** • **Requires all public water systems serving between 3,300 and 10,000 people to monitor for the contaminants in a particular UCMR cycle (with a nationally representative sample of public water systems serving <3,300 people)**
America's Water Infrastructure Act of 2018	Amended to include public water systems serving populations of >10,000 people
National Defense Authorization Act for Fiscal Year 2020	Specified that EPA should include each PFAS for which a drinking water method has been validated in UCMR 5 and that are not subject to primary drinking water regulation

UCMR 5

- Published December 2021
- 29 PFAS in drinking water
- 2022-2026
- Sampling 2023 through 2025

29 Per- and Polyfluoroalkyl Substances (PFAS)

11-chloroeicosafluoro-3-oxaundecane-1-sulfonic acid (11Cl-PF3OUdS)	perfluoro-4-methoxybutanoic acid (PFMBA)	perfluorooctanesulfonic acid (PFOS)
1H, 1H, 2H, 2H-perfluorodecane sulfonic acid (8:2 FTS)	perfluorobutanesulfonic acid (PFBS)	perfluorooctanoic acid (PFOA)
1H, 1H, 2H, 2H-perfluorohexane sulfonic acid (4:2 FTS)	perfluorobutanoic acid (PFBA)	perfluoropentanesulfonic acid (PFPeS)
1H, 1H, 2H, 2H-perfluorooctane sulfonic acid (6:2 FTS)	perfluorodecanoic acid (PFDA)	perfluoropentanoic acid (PFPeA)
4,8-dioxa-3H-perfluorononanoic acid (ADONA)[1]	perfluorododecanoic acid (PFDoA)	perfluoroundecanoic acid (PFUnA)
9-chlorohexadecafluoro-3-oxanone-1-sulfonic acid (9Cl-PF3ONS)	perfluoroheptanesulfonic acid (PFHpS)	n-ethyl perfluorooctanesulfonamidoacetic acid (NEtFOSAA)
hexafluoropropylene oxide dimer acid (HFPO-DA) (GenX)	perfluoroheptanoic acid (PFHpA)	n-methyl perfluorooctanesulfonamidoacetic acid (NMeFOSAA)
nonafluoro-3,6-dioxaheptanoic acid (NFDHA)	perfluorohexanesulfonic acid (PFHxS)	perfluorotetradecanoic acid (PFTA)
perfluoro (2-ethoxyethane) sulfonic acid (PFEESA)	perfluorohexanoic acid (PFHxA)	perfluorotridecanoic acid (PFTrDA)
perfluoro-3-methoxypropanoic acid (PFMPA)	perfluorononanoic acid (PFNA)	

1. Although the abbreviation used is ADONA, indicating the ammonium salt, 4,8-dioxa-3H-perfluorononanoic acid is the parent acid.

Source: EPA Fact sheet, Revisions to the Unregulated Contaminant Monitoring Rule (UCMR 5) for Public Water Systems, Fact Sheet for the Proposed Rule (December 2020) (available at https://www.epa.gov/sites/default/files/2021-01/documents/ucmr5-proposal-factsheet-draft.pdf)

Office of Water

- Establish a National Primary Drinking Water Regulation (NPDWR)
  - Legally enforceable
  - Maximum contaminant level (MCL) or treatment techniques applying to public water systems
- PFOA and PFOS
- Science Advisory Board consultation ongoing
- Timing
  - Proposed Rule expected Fall 2022
  - Final Rule expected Fall 2023

Office of Water

- Leverage National Pollutant Discharge Elimination System permitting to reduce PFAS discharges to waterways
  - April 2022 memo on how EPA will address PFAS discharges in NPDES permits
  - Federally-issued permits:
    - Product elimination and substitution conditions, when reasonable
    - Best Management Practices (BMPs) for PFAS in firefighting foams for stormwater permits
    - Public for downstream communities and public water systems
    - Pre-treatment for WWTP discharges and biosolids
  - State permitting authorities:
    - Monitoring requirements at facilities where PFAS expected
- Restrict PFAS discharges from industrial sources through a multi-faceted Effluent Limitations Guidelines (ELG) program

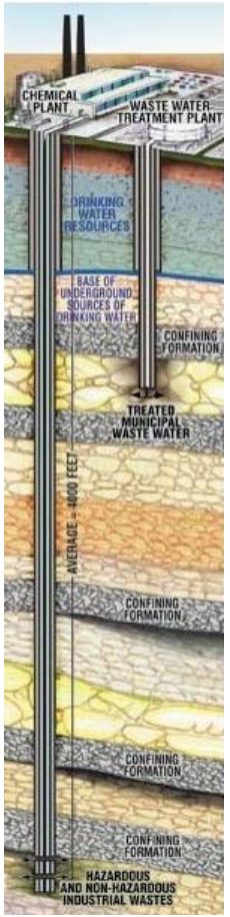
Photo: Chesapeake Bay, Maryland, https://www.maxpixel.net/Sky-Maryland-Reflection-Chesapeake-Bay-Water-1310538

Effluent Limitation Guidelines

Industrial Categories	Status	Action	Timeline
Organic chemicals, plastics and synthetic fibers Metal finishing and electroplating	EPA already has data	Rulemaking to restrict PFAS discharges	Summer 2023 Summer 2024
Electrical and electrical components, textile mills, landfills	EPA has only preliminary data not sufficient to support rulemaking	Detailed studies	Fall 2022 (Rulemaking by end of 2022)
Leather tanning and finishing, plastics molding and forming, paint formulating	Little known information on PFAS discharges	Data reviews	Winter 2023

Office of Land and Emergency Management

- 2020 Interim Guidance on Destroying/Disposing PFAS
  - Three destruction or disposal technologies:
    - Thermal treatment
    - Landfilling
    - Underground injection control
- Issue updated guidance on destruction and disposal technologies for PFAS by December 2023
- Roadmap commits ORD to collect data and issue guidance on destroying and disposing of certain PFAS (ongoing through Fall 2023)



PFAS Roadmap - Remediate

REMEDIATE

Broaden and accelerate the cleanup of PFAS contamination to protect human health and ecological systems.

Objectives

- Harmonize actions under all available statutory authorities to address PFAS contamination to protect people, communities, and the environment.
- Maximize responsible party performance and funding for investigations and cleanup of PFAS contamination.
- Help ensure that communities impacted by PFAS receive resources and assistance to address contamination, regardless of income, race, or language barriers.
- Accelerate the deployment of treatment, remediation, destruction, disposal, and mitigation technologies for PFAS, and ensure that disposal and destruction activities do not create new pollution problems in communities with environmental justice concerns.

*Source: EPA PFAS Strategic Roadmap: EPA's Commitments to Action 2021-2024

Remediate

Rule Development for designating PFOA/PFOS as CERCLA Hazardous Substances

Initiation of Two Rulemaking Efforts Under RCRA

Cross-program enforcement tools to address releases

- The Four “Is”
  - Information requests
  - Inspections
  - Investigations of nature and extent
  - Installation of controls

CERCLA Rulemakings

Office of Land and Emergency Management

1. Proposed Rule designating PFOA and PFOS as CERCLA hazardous substances
   - Designated “economically significant”
   - Comments due November 7, 2022
   - **Timing:** Published September 2022, final rule in August 2023
2. Advance Notice of Proposed Rulemaking to seek public comment on designating other PFAS
   - **Timing:** Advance notice of proposed rulemaking in Winter 2022/2023 (delayed from Spring 2022)

Resource Conservation and Recovery Act (RCRA) Rulemakings

- In Oct. 2021, EPA partially granted a petition from New Mexico Governor Lujan Grisham (and others)
- Left out of the Roadmap only because of timing
- EPA did not grant the petition's request to list all PFAS as a class
- EPA agreed to propose two RCRA rulemakings

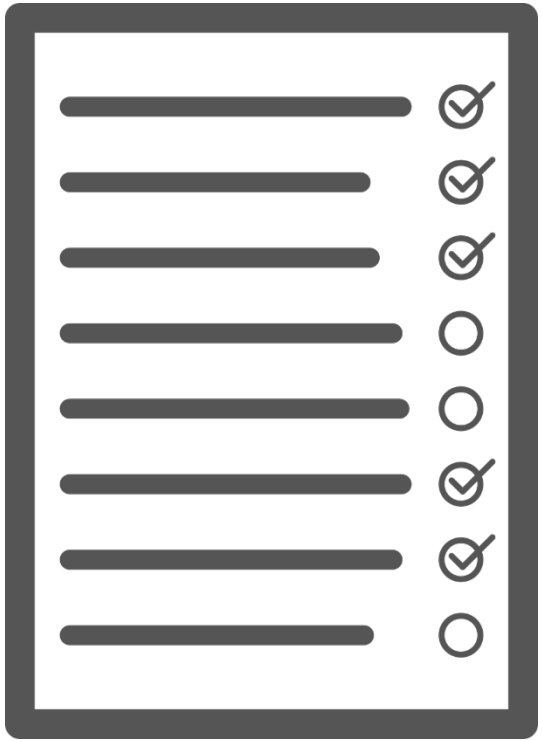
Proposed RCRA Rulemakings

1. List PFOA, PFOS, PFBS, and GenX as RCRA “Hazardous Constituents”
   - **Timing**: Proposed rule in 2023
     - Requires detailed data evaluation expected to last at least nine months followed by rule-writing process
   - 40 CFR Part 261 Subpart B Appendix VIII: list of hazardous constituents
     - Appendix VIII is generally drawn from various statutory and scientific sources
     - Constituents must be “shown in scientific studies to have toxic, carcinogenic, mutagenic or teratogenic effects on humans or other life forms” 40 CFR § 261.11(a)(3)
     - They must be measurable by standardized, uncomplicated and available testing protocols
   - EPA then considers 11 factors to determine whether wastes that contain a hazardous constituent are considered RCRA listed hazardous wastes
     - “Must be capable of posing a substantial… hazard to human health or the environment.” § 261.11(a)(3)

Proposed RCRA Rulemakings

2. Emerging contaminants are subject to RCRA Corrective Action
   - Make clear that the Corrective Action Program can be applied to “hazardous waste” that meets the RCRA statutory definition—much broader than the CFR definition
   - EPA states that this rule codifies the broader approach already reflected in agency guidance

- Implications
  - Greater federal authority to require investigation and cleanup of PFAS and emerging contaminants generally
  - Expand the universe of facilities subject to corrective action



New Health Advisory Levels

Morgan Lewis

The New HALs

PFAS	Concentration
PFOA (Perflurooctanoic acid)	0.004 ppt (interim)
PFOS (Perfluorooctane sufonic acid)	0.02 ppt (interim)
Gen X Chemicals (HFPO-DA)	10 ppt (final)
PFBS (Perfluorobutane sulfonate)	2,000 ppt (final)

Interim HALs for PFOA and PFOS

- PFOA and PFOS HALs several orders of magnitude lower than the 2016 HALs

	2009 (provisional)	2016 (final)	2022 (interim)
PFOA	400 ppt	70 ppt	0.004 ppt
PFOS	200 ppt	70 ppt	0.02 ppt

- 0.004 ppt = 4 ppq
- 0.02 ppt = 20 ppq
- 1 ppq = one drop of water in a cube of water measuring approximately 368 meters on a side and about as tall as the Empire State Building

Challenges

- Well below any current methods of detection for PFOA/PFOS
  - Under currently approved analytical methods, minimum reporting levels for PFOA and PFOS are 4 ppt—1000x and 200x above EPA's interim HALs for PFOA and PFOS, respectively.
- Practical Impact: Any detection requires action (treat as HAL exceedance)
- Disposal/destruction of PFAS remediation wastes
  - Currently no clear guidance
  - Updated guidance due by December 2023

Unpacking “Interim” Designation

- New PFOA and PFOS “interim” HALs
  - Based upon new toxicity data
  - Acknowledges that these are draft analyses currently under review by the Agency’s Science Advisory Board, and that additional new data is likely to become available
  - EPA does not anticipate any changes that will result in HALs that are greater than the minimum reporting levels
  - Intended to remain in place until EPA’s forthcoming PFAS National Primary Drinking Water Regulation goes into effect, unless otherwise updated by EPA
    - Interim HALs for PFOA and PFOS are intended to provide information to states and public water systems until that time

Why Now?

- Delivering on commitment announced in November 2021
- Seeking to avoid creating the misimpression that the substances pose lower risks than PFBS and GenX (replacement chemicals for PFOA and PFOS).
- “It “would look really odd” and would be misinforming people if EPA had held back on the health advisory information for PFOA and PFOS while issuing final HALs for their replacements, PFBS and GenX.”
  – Deborah Nagle, director of the Office of Science and Technology, EPA Office of Water (June 17, 2022)

PFBS and GenX – Final HALs

- PFBS and GenX chemicals are generally considered replacements for PFOS and PFOA, respectively

PFAS Substance	Final HAL
PFBS (Perfluorobutane sulfonate)	2,000 ppt
Gen X Chemicals (HFPO-DA)	10 ppt

- Based on EPA's final 2021 animal toxicity studies for PFBS and GenX chemicals
- While final, still non-enforceable and non-regulatory
- Above MRLs for both substances (unlike PFOA/PFOS)
- **STAY TUNED**! More HALs for additional PFAS expected as toxicity and other data are developed.

Challenges to new HALs

- American Chemistry Counsel v. U.S. Environmental Protection Agency, No. 22-1177, U.S. Court of Appeals for the D.C. Circuit
  - Filed July 2022
  - ACC is suing EPA over its PFOA and PFOS advisories, arguing in part that the agency issued interim advisories even though the Science Advisory Board had not completed its review and EPA had not yet addressed panelists' concerns.
- The Chemours Company, FC, LLC, Petitioner, v. United States Environmental Protection Agency, et al., Respondents, No. 22-2287, U.S. Court of Appeals for the Third Circuit
  - Filed July 2022
  - Challenging EPA's GenX HAL, charging the level violates both administrative law and constitutional requirements

Implications for Remediation

Implications of Final CERCLA Designations and HALs

1. Increased agency information requests to a broader range of parties
2. Mandatory reporting of releases above reportable quantities
3. New Superfund sites
   - Hazard Ranking System used to place sites on the National Priorities List
   - Potential for more facilities with federal PRPs
4. Five Year Reviews

CERCLA Designations and HALs

5. Reopening of completed remedies
   - Reopener language in consent decrees
   - New information significantly changing requirements may lead to a remedy modification
6. PRP cost recovery and contribution litigation
   - For new or changed remedy costs
   - Reopeners in PRP settlements
7. Citizen suits

Implications of RCRA “Constituent” Listing and HALs

1. Expand industry responsibility (and liability) for investigation and cleanup
   – RCRA corrective actions to investigate and remediate RCRA-permitted facilities
2. RCRA permit modifications
   – Permits may incorporate discharge limits for these four PFAS (see New Mexico)
3. Citizen suits
4. Eventual designation as listed RCRA hazardous wastes subject to Subtitle C regulation
   – Cradle-to-grave regulation
   – Exemptions could narrow liability
   – RCRA hazardous wastes are automatically considered CERCLA hazardous substances

Lobbying

- Lobbying by industry for exemptions (i.e. water/wastewater treatment facilities, airports)
- EPA does not have authority to grant exemptions, but has said it will address these concerns with enforcement tools:
  - New policy documents (i.e. enforcement discretion policies)
  - Entry into settlement agreements
  - Site-specific needs
  - Address potential liability based on equitable considerations to protect parties from litigation “by those principally responsible for… contamination” and to minimize transaction costs
  - Public service entities specifically mentioned (water utilities, airports, biosolids)

Looking Ahead

Morgan Lewis

Impact of New HALs

- Impact on development of future federal and state regulation
  - Springboard for stricter state enforcement?
  - Impact on state cleanup requirements
- Impact on identification and cleanup of contaminated sites
  - Use by military of 70 ppt HAL to identify cleanup levels (e.g.)
- Signal of EPA's possible approach to future PFAS regulation and guidance
- Foreshadowing potential litigation trends

Impact on RSLs and RMLs

- EPA Office of Land and Emergency Management revised its Regional Screening Levels (RSLs) and Regional Removal Management Levels (RMLs) this past spring for five PFAS, including PFOA, PFOS and GenX
  - New HALs present questions about the long-term usefulness of the recent RSL and RML revisions
  - Regulated entities can expect the RSLs and RMLs to be adjusted in the next semi-annual update

Next Steps

- Stay up to date re: new developments/pending regulations
- Engagement with regulators on rulemaking
  - Provide comments to pending regulations during applicable comment periods
  - Participate in webinars, stakeholder listening sessions
- Know what PFAS are in your processes and possible legacy liabilities
- Evaluate current and future PFAS liability in light of state and federal regulation
- Ensure that PFAS are evaluated in environmental due diligence, where appropriate
- Be prepared for increased litigation

Biography

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Stephanie R. Feingold represents clients in litigation and dispute resolution with a focus on environmental issues, and provides environmental and regulatory counseling. Her work spans investigations, cost recovery and contribution actions, and enforcement actions brought by and against environmental agencies and government authorities, as well as private party actions, under both federal and state environmental laws. She defends major corporations and businesses in toxic tort actions, commercial litigation, and product liability litigation. Stephanie also counsels clients in matters involving drinking water contamination and emerging contaminants, including per- and polyfluoroalkyl substances (PFAS) and 1,4-dioxane, and compliance with regulations such as FIFRA and TSCA. Stephanie also works with potentially responsible parties (PRPs) in connection with contaminated sites, including working closely with consultants and experts, and negotiating with regulatory agencies.

Our Global Reach

Africa
Asia Pacific
Europe
Latin America
Middle East
North America

Our Locations

Abu Dhabi
Almaty
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Brussels
Century City
Chicago
Dallas
Dubai
Frankfurt
Hartford
Hong Kong*
Houston
London
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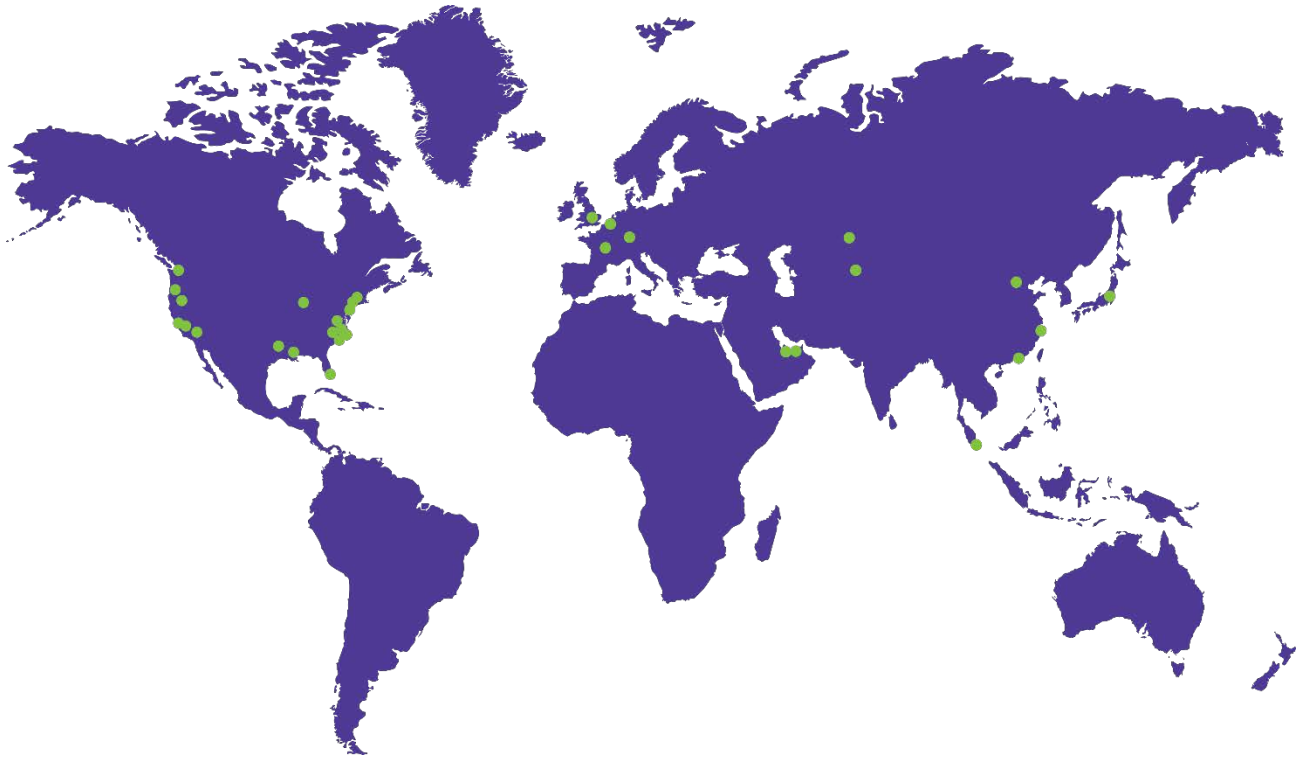

Morgan Lewis

Biography

Cynthia M. Teel
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Lathrop GPM

Cynthia Teel advises clients on environmental issues that arise in the litigation, transactional, and regulatory contexts. She has extensive knowledge of state and federal requirements, particularly as they relate to landfills/solid waste, hazardous substances, agriculture, and oil & gas.

Cynthia has represented clients in environmental negotiations and enforcement actions with federal and state agencies, and assisted with litigation of environmental claims in administrative tribunals and state and federal courts. She manages a portfolio of over fifty Superfund sites and has litigated or mediated cost recovery and contribution actions, allocation proceedings, and nuisance class actions.

Cynthia now focuses a substantial portion of her practice on emerging contaminants such as per- and polyfluoroalkyl substances (PFAS), and dealing with technologically enhanced naturally occurring radioactive materials (TENORM). She monitors state and federal regulation of PFAS, and helps businesses develop strategies to adapt to regulatory developments.

Her professional experience prior to law school includes conducting public affairs and media relations for the Los Angeles/Ventura Chapter of the Building Industry Association and providing public relations services to a variety of organizations ranging from public companies to government entities to not-for-profits.

Locations

Lathrop GPM's nearly 400 attorneys practice in 14 offices nationwide, from coast to coast, allowing us to respond to clients' needs at the local, state or national levels.

Lathrop GPM was formed in 2020 through the combination of two 100+-year firms, both with strong Midwestern cores – Lathrop Gage (founded in Kansas City in 1873) and Gray Plant Mooty (founded in Minneapolis in 1866).

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