



## OFFICE OF POLLUTION PREVENTION AND TOXICS

WASHINGTON, D.C. 20460

May 22, 2025

David B. Fischer  
Keller and Heckman LLP  
1001 G Street, NW  
Suite 500 West  
Washington, DC 20001  
T: (202) 434-4224  
E: fischer@khlaw.com

**Re: Closeout of Petition PET-001907: TSCA Section 21 Petition to Initiate a Proceeding for the Amendment of 40 C.F.R. Part 705 – Reporting and Recordkeeping Requirements for Certain Per- and Polyfluoroalkyl Substances (PFAS)**

Dear Mr. Fischer:

On May 2, 2025, on behalf of a coalition of chemical companies (“Coalition”), you submitted a petition pursuant to section 21 of the Toxic Substances Control Act, 15 U.S.C. § 2620, and the February 19, 2025, Executive Order titled “Ensuring Lawful Governance and Implement the President’s ‘Department of Government Efficiency’ Deregulatory Initiative.” The petition asked EPA to reduce the anticipated burdens to potential submitters under reporting and record keeping requirements for per and polyfluoroalkyl substances (PFAS) by reproposing a rule to explicitly exempt from reporting listed activities described in 40 CFR 711.10 (a)–(c) (e.g., imported articles, R&D materials, impurities, byproducts, non-isolated intermediates) and PFAS manufactured in quantities of less than 2,500 lbs.

On May 16, 2025, the Coalition withdrew its petition via email to EPA Administrator Lee Zeldin. EPA now considers this petition closed.

If you have any questions, please email the Office of Chemical Safety and Pollution Prevention’s petitions response team at [petitions-ocspp@epa.gov](mailto:petitions-ocspp@epa.gov).

Sincerely,

Mary Elissa Reaves, Ph.D.  
Director  
Office of Pollution Prevention and Toxics