

Date: June 30, 2025

To: Environmental Quality Commission

From: Leah Feldon, Director

Subject: Agenda item E, Informational item: Per- and Polyfluoroalkyl Substances (PFAS) Strategic Plan
July 10-11, 2025, EQC meeting

Purpose of item DEQ will provide an update on the PFAS Strategic Plan, which focuses on strengthening scientific understanding, managing existing contamination, and preventing future pollution to address the risks associated with PFAS. This update includes a presentation highlighting the plan's vision, objective, goals, current actions, and next steps.

Prior EQC involvement There is no prior EQC involvement.

Background The Oregon Department of Environmental Quality is developing a PFAS Strategic Plan as part of the U.S. Environmental Protection Agency's Columbia River Basin Restoration Program (CRBRP) Grant. This program funds efforts to reduce toxic pollution in the Columbia River watershed. The initiative responds to increasing concerns about contamination from per-and polyfluoroalkyl, or PFAS, in Oregon's environment. This update outlines DEQ's strategy for addressing the contamination and risks associated with PFAS and next steps forward.

Like other chemicals in the environment, several state and federal authorities oversee this work. This update to the strategic plan builds upon existing actions taken by both EPA and DEQ. EPA's 2021 PFAS Strategic Roadmap established national priorities that Oregon's plan will complement. Currently, data on environmental occurrence of PFAS in Oregon is limited. However, existing information indicates some potential contamination, highlighting significant data gaps that this strategic plan aims to address. These initiatives align with Oregon's broader Toxics Reduction Strategy and reflect DEQ's commitment to reduce pollution risks.

The development timeline requires completion and publication of the strategic plan by June 30, 2025, to meet grant requirements.

PFAS Strategic Plan PFAS are a group of over 15,000 synthetic organic chemicals (USEPA 2025) with diverse applications in fire suppression, industrial processes, and consumer products (ATSDR, 2021; USEPA 2025). Oregon statute defines PFAS as fluorinated organic

chemicals containing at least one fully fluorinated carbon atom (ORS 459.465 to ORS 459.477; OR SB543, 2023). Their strong carbon-fluorine bonds make them extremely persistent in the environment and difficult to destroy (Cousins et al., 2020), which is why they are commonly referred to as "forever chemicals." In Oregon, PFAS have been detected in water, soil, air, and wildlife across the state.

As Oregon's primary environmental regulatory agency, DEQ has the authority and expertise needed to lead strategic planning for PFAS. The agency's Laboratory, Water Quality, Land Quality, and Air Quality divisions are already actively engaged in multiple PFAS-related initiatives. These include efforts to update regulations to classify certain PFAS compounds as hazardous substances in Oregon, as well as obtaining laboratory certifications for methods to analyze PFAS substances.

This comprehensive PFAS Strategic Plan outlines a multi-media approach to managing contamination, preventing future releases, and safeguarding Oregon's communities and natural resources. It establishes priorities and approaches for reduction, management, investigation, and collaboration with communities and interested parties, both internal and external. Public communication is a crucial element of this plan; therefore, it includes strategies for sharing information through various platforms and actively engaging with the community and Tribal nations. The PFAS Strategic Plan will be coordinated with EPA priorities to ensure alignment with broader goals for the restoration of the Columbia River Basin.

The development of this plan marks the first step in the EPA grant process. After the plan is completed, implementation will follow. Currently, the primary goals of this strategic plan are:

- a. Reducing or minimizing additional introduction of PFAS through consumer products
- b. Managing environmental contamination resulting from PFAS
- c. Collecting and utilizing scientific data to inform decision-making
- d. Fostering meaningful collaboration both internally and externally

Funding will be allocated internally based on proposals from various environmental media programs within DEQ that align with goals of this strategic plan and specifically focus on the Columbia River Basin. The funded programs and initiatives will be implemented over the next three years. In the fourth year, DEQ will compile a final report for the EPA Columbia River Basin Restoration Program Grant. This report will detail the work accomplished, the outcomes achieved, and their significance in addressing PFAS contamination in the Columbia River Basin.

This strategic effort directly supports DEQ's core mission and goals. It seeks to advance efforts in vulnerable communities, target sensitive and threatened ecological habitats and leverage partnerships and resources through proactive environmental governance.

Key issues

Several risks could affect successful implementation. This plan builds on EPA's action plan. Changes at the federal level in how the EPA addresses PFAS contamination may impact which implementation actions are prioritized. Several policy discussions were

anticipated during the development and implementation of the plan. Proposed PFAS regulations may generate debate about impacts on affected industries. Resource constraints, including limited staff and laboratory capacity, may challenge expanded monitoring efforts. Differing stakeholder priorities between industry representatives and community advocates may create tensions around regulatory timelines. Finally, the rapid evolution of PFAS science may outpace existing regulatory frameworks, requiring ongoing adjustments to plans.

Key policy considerations will guide these discussions. The plan must strike a balance between scientific certainty and the need to act on emerging PFAS threats despite the current data gaps. Environmental justice principles will inform decisions to ensure overburdened communities benefit equitably from protective actions. Effective interagency coordination and collaboration will be essential to avoid duplication of efforts with partners such as the Oregon Health Authority and the Oregon Department of Agriculture.

In finalizing the strategic plan, DEQ established a robust feedback process. Internal reviews involved subject matter experts from across the agency's Water, Land, Air, and Laboratory programs. External input was requested from partner agencies, including Oregon Health Authority, Oregon Department of Agriculture, Oregon State Fire Marshall, and Oregon Department of Justice.

**EQC
involvement**

There is no current EQC action associated with this item, however, DEQ staff can provide updates on the work as requested by the commission.

**Supporting
materials**

Attachment A: PFAS Strategic Plan

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