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Testimony of Eric Gerstenberg
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Before the Committee on Environment and Public Works
of the United States Senate
Hearing to Examine the Future of PFAS Cleanup and Disposal Policy
November 19, 2025

Madame Chair, Ranking Member Whitehouse, and members of the Committee, my name is Eric Gerstenberg, and I am the co-CEO of Clean Harbors, the nation's leader in environmental services. My testimony today draws upon our 45 years of experience in delivering a broad range of services including hazardous and non-hazardous waste management, and emergency response. I will summarize my written statement and respectfully request that my full statement be included in the hearing record.

Thank you for the opportunity to address the intersection of hazardous waste management and the challenge of emerging contaminants – and more specifically, the Resource Conservation and Recovery Act (or RCRA), and PFAS (or "forever chemicals.")

RCRA framework

RCRA was enacted in 1976. Before that the landscape of waste management was vastly different than today. Across America, hazardous waste was often disposed of in open dumps, abandoned lots, or poorly constructed landfills. Drums were left to rust and leak, contaminating soil and groundwater. Environmental disasters were common.

RCRA changed all of that by establishing a comprehensive federal framework for the safe management of hazardous waste.

Today, we face new challenges. PFAS compounds were used for decades in firefighting foams at places like airports, firefighting schools and military installations; and also used in coatings, consumer goods and other applications.

The presence of PFAS in groundwater, soil, and drinking water is widespread. In fact, nearly everyone in this room today has some level of PFAS in their bloodstream. It is a growing concern for regulators, communities, and industry alike. The science is clear: PFAS does not break down naturally and is a serious threat to human and animal health. At Clean Harbors, we believe the existing RCRA framework provides the tools to manage PFAS waste safely.

Clean Harbors background

We have operations in all 50 states and Canada, with a vast transportation network and facilities strategically located nationwide. Our company operates 10 RCRA-permitted high temperature incinerators and 7 hazardous waste landfills. Our 360,000 customers include the Fortune 500, as well as government agencies.

Through our 25,000 employees, we deliver cradle-to-grave solutions under the RCRA framework, ensuring that every shipment is tracked and every community is protected. Clean Harbors has an industry-leading safety record. Our technical expertise and that commitment to safety are at the heart of everything we do.

Clean Harbors is also a national provider of critical response services. We have addressed events such as the Deepwater Horizon oil spill, the East Palestine Ohio train derailment, and the recent fatal plane crash in Louisville, Kentucky.

PFAS destruction testing & partnership with EPA and Pentagon

Regarding PFAS, we introduced a Total PFAS Solution with offerings ranging from lab analytics to water filtration to site remediation to disposal. Last November, we completed our third full-scale PFAS destruction testing at our RCRA-permitted incinerator in Utah. This study was completed in partnership with the EPA ORD Office and the Pentagon's Military SERDP Office.

The peer-reviewed results of this study was recently released by EPA and it demonstrates that common legacy PFAS ***is effectively destroyed in RCRA permitted, high-temperature incineration systems at levels exceeding 99.9999 percent*** while limiting emissions to 2-8 orders of magnitude ***below*** any state ambient air limit or guideline**.**

Sophisticated incineration facilities like ours provide an opportunity to address a top health and safety concern of Americans in impacted communities – including military service members and their families at hundreds of military installations.

For PFAS to be fully addressed, many are looking to the EPA to provide a PFAS regulatory framework beyond its initial drinking water standard. Clean Harbors is proud to have partnered with the EPA and the Pentagon for science-based testing to validate an effective method for destroying PFAS in various forms, even at high concentrations.

Disposal Hierarchy, Solutions, and Hierarchy

At Clean Harbors, we have done extensive analysis on the PFAS contamination footprint throughout the US. We believe there is adequate capacity to manage PFAS contamination in the environment through the following hierarchy:

- Highly contaminated soils, liquids, and AFFF foam, should be properly remediated and destroyed in high temperature RCRA permitted incinerators.
- Lower contaminated materials can be adequately managed through RCRA permitted subtitle C landfills which have extensive liners and closed loop leachate collection systems.
- Very low contaminated material, such as construction debris and soils excavated for the development of infrastructure which have "background" PFAS levels, never exposed to AFFF firefighting foam, can be managed to properly lined Subtitle D landfills and deep well injection.

In addition to managing solids and AFFF concentrate there is an enormous amount of water that has been impacted by PFAS containing AFFF and other sources of PFAS used in countless products that we use every day. Treating drinking water and industrial water that flows into our rivers, streams and WWTPs can be treated with systems that utilize media to separate and purify PFAS contaminants from water. The management of this media that has collected and concentrated PFAS from millions of gallons of water can also be managed to the end of its' lifecycle through high temperature RCRA permitted incineration**.** Clean Harbors currently treats and manages drinking water following this process at Joint Base Pearl Harbor-Hickam Naval Base in Hawaii.

There is adequate RCRA permitted and subtitle D capacity throughout the US to properly manage all PFAS contaminated sites for years to come through this infrastructure that adequately protects human health and the environment.

We look forward to continuing that partnership and applying our diverse capabilities to address the scourge of PFAS.

Thank you for the opportunity to testify today. We appreciate the Committee's leadership on this critical topic and are happy to address any questions you have.

Very respectfully,



Eric Gerstenberg
Co-CEO