October 28, 2026

PFAS Statement

Recently several jurisdictions and organizations have proposed expansive definitions of perfluoroalkyl and polyfluoroalkyl substances (PFAS):

United States Environmental Protection Agency (EPA)

The U.S. Environmental Protection Agency defines PFAS for the purpose of TSCA section 8(a)(7) (codified at 40 C.F.R. Part 705) as:

> any chemical substance or mixture containing a chemical substance that structurally contains at least one of the following three sub-structures:
>
> (1) R-(CF_2)-CF(R′)R″, where both the CF_2 and CF moieties are saturated carbons;
> (2) R–CF_2 OCF_2 -R′, where R and R′ can either be F, O, or saturated carbons; and
> (3) CF_3 C(CF_3)R′R″, where R′ and R″ can either be F or saturated carbons.

A non-exhaustive list of chemical substances that fall within this definition is available through the EPA's Central Data Exchange (CDX).

European Chemicals Agency (ECHA)

In the European Union (EU/UE), the ECHA has defined PFAS as:

> any substance that contains at least one fully fluorinated methyl (–CF_3) or methylene (–CF_2–) carbon atom (without any H/Cl/Br/I attached to it).

Organization for Economic Cooperation and Development (OECD)

The OECD defines PFAS as follows:

Vital Polymers, LLC
3651 Wrightway Road • Dayton, OH 45424
Tele: (937) 235-6311 • Toll-Free: (866) 398-4825 • Fax: (937) 235-9223

PFASs are defined as fluorinated substances that contain at least one fully fluorinated methyl or methylene carbon atom (without an H/Cl/Br/I atom attached to it), i.e. with a few noted exceptions, any chemical with at least a perfluorinated methyl group ($–CF_3$) or a perfluorinated methylene group ($–CF_2–$) is a PFAS.

International Aerospace Environmental Group (IAEG)

The IAEG publishes the Aerospace and Defense Declarable Substances List (AD-DSL), a list of substances subject to supplier reporting in the aerospace and defense supply chain. PFASs in general are on the AD-DSL, and PTFE specifically is on the IAEG's PFAS list (AD-PFAS).

Applicability of Above Definitions to PTFE

PTFE is a PFAS under the structural definitions set forth by the EPA, ECHA, and OECD, and is specifically identified as a PFAS by the IAEG.

Material Name	Acronym	CAS Number	Molecular Formula
Polytetrafluoroethylene	PTFE	9002-84-0	(C2F4)x

R. Garrett Worley III
General Manager
Vital Polymers, LLC

Vital Polymers, LLC
3651 Wrightway Road • Dayton, OH 45424
Tele: (937) 235-6311 • Toll-Free: (866) 398-4825 • Fax: (937) 235-9223