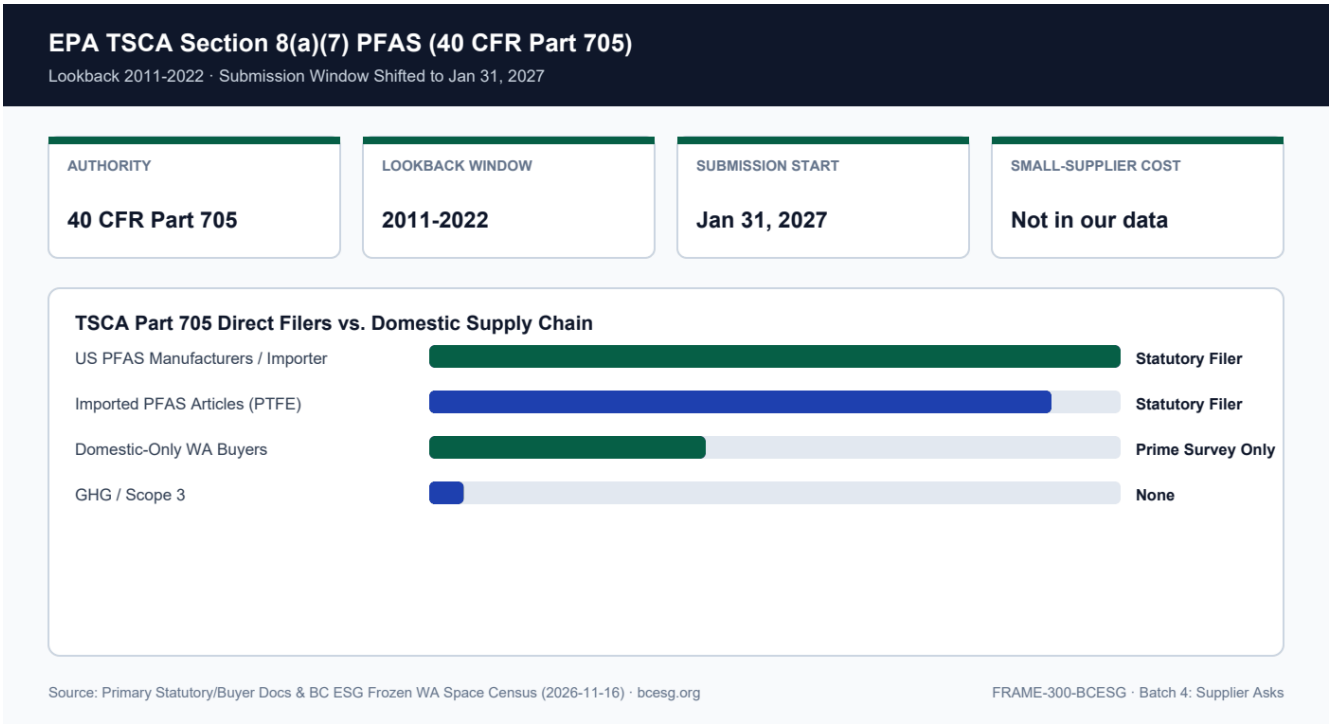
EPA TSCA Section 8(a)(7) PFAS (40 CFR Part 705) Supplier Inquiries

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Verification & Authority Baseline: Binding US federal law (40 CFR Part 705) for entities that manufactured or imported PFAS (including PFAS-containing articles like PTFE seals/wiring) between 2011 and 2022. EPA shifted the submission window start to January 31, 2027. Purely domestic purchasers are not direct filers, but receive upstream prime questionnaires.



Role in Supply Chain	Statutory Duty under 40 CFR Part 705	Expected Evidence
Imported PFAS or PFAS-containing parts (2011–2022)	Binding EPA CDX filing (window starts Jan 31, 2027)	CDX submission + 5-yr recordkeeping
Domestic-only buyer/machinist of US-made PTFE	No direct EPA Part 705 filing duty	Prime PFAS attestation / AD-DSL if PO-required
Scope 3 / GHG Emissions	Not part of TSCA Part 705	None

Who Issues This Ask, Authority, and Binding Status

PFAS supplier questionnaires come from aerospace primes and Tier-1 integrators preparing their own **US EPA TSCA Section 8(a)(7)** (`40 CFR Part 705`) filings—or screening BOMs for fluoropolymers (PTFE/Teflon seals, Viton O-rings, fluorosilicone, wire insulation, and AFFF/coatings).

Statutorily, `40 CFR Part 705` is **binding US federal law** on any entity that *manufactured* or *imported* PFAS (including PFAS inside imported articles) for commercial purposes between **January 1, 2011 and December 31, 2022**. EPA subsequently pushed the official submission period start to **January 31, 2027** (or 60 days after a forthcoming final rule). If a WA shop bought domestic PTFE seals from a US distributor and never imported parts directly, it is **not a statutory Part 705 filer**, though primes may still ask for PFAS presence under contractual material-disclosure terms.

Evidence Required & Small-Supplier Effort Cost

Direct importers file electronically via EPA's CDX (Central Data Exchange) under the 'known to or reasonably ascertainable by' standard; domestic sub-tier suppliers respond to prime surveys with a **PFAS Presence/Absence Attestation** or IPC-1754 / AD-DSL declaration.

Exact small-supplier administrative and CDX-prep hours are **not in our data**.

WA Space Cluster Segments & Companies Affected

PFAS inquiries land squarely on Components & Suppliers and Propulsion—including cryogenic valve makers like Space Valves (PTFE/PCTFE valve seats), PacAero, Karman Space & Defense, and Aerojet Rocketdyne.

Verified Primary Sources & Internal Bridges

• eCFR — 40 CFR Part 705 (TSCA Section 8(a)(7) PFAS):
https://www.ecfr.gov/current/title-40/chapter-I/subchapter-R/part-705

• US EPA — TSCA Section 8(a)(7) Reporting & Recordkeeping:
https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/tsca-section-8a7-reporting-and-recordkeeping