Article

Q&A with Tiffany Thomas: Haley & Aldrich's emerging contaminants leader on PFAS-

Tiffany Thomas is a recognized national expert on PFAS. As Haley & Aldrich's emerging contaminants leader, she guides clients through the evolving PFAS regulatory landscape, providing them with holistic project solutions. With more than two decades of experience, Tiffany offers clients lifecycle services related to PFAS and other emerging contaminants, including investigations, due diligence, remediation, risk assessments, replacement, upstream uses, and litigation support across multiple market sectors.-

Tiffany has deep technical roots. She holds a Ph.D. in chemistry and conducted research at Lawrence Livermore National Laboratory before starting her consulting career. She has since built a broad skill set based on practical problem solving for clients across industries. "I always try to zoom out and think about clients' needs in terms of not just what answers the technical questions, but what addresses real-world concerns," she says. "Those factors can often drive a different technical answer — you can never just look at a technical solution in a vacuum."-

The news coverage and regulatory attention on PFAS has grown in 2023. What should clients know now about PFAS?

Despite all the excellent work done in this field, there are still more data gaps than data. We have some bright spots in our technical understanding, particularly around AFFF [aqueous film-forming foam, used to fight high-hazard flammable liquid fires] because significant research funding has come from the Department of Defense [DOD], a

historical and current user of AFFF. But there's a whole universe of other PFAS, and the chemistry is much more complicated than the broad brush strokes that tend to be used in current discussions. There's a lot more to discover, which means a big learning curve from a technical perspective and in how we deal with PFAS. That's where our diverse bench of experts and our multidisciplinary approach can really support decision making, even in light of all these uncertainties.-

How has the growing attention to PFAS impacted your work with clients?

I'd say we're transitioning from an educational phase to strategic actions. For industrial clients, for example, I've largely helped them understand the science of PFAS in the context of possible regulatory and/or litigation risks and liabilities, but now that the regulations have started to be more consistently promulgated, those clients have more specific needs. They want us to evaluate site data or help understand how specific regulations might apply to them and how to prepare.-

How do you help clients solve challenges related to PFAS and other emerging contaminants?--

It depends on the market, but many clients may initially want a due diligence assessment for potential sources of PFAS or other contaminants. In some cases, there's a known use of a PFAS-containing product, like AFFF at airports or DOD sites. So we may develop a timeline for transitioning away from PFAS to fluorine-free replacement options, looking closely at the regulatory and technical changes that support that transition. We consider things like, how can we put the pieces in place to move away from the product? What does that mean in terms of your lease agreements and your other operational procedures? How about for your environmental programs, permits, compliance, etc.?-

There's no cookie-cutter approach to these challenges. There never is with emerging contaminants; we call them "emerging" for a reason. So ultimately, it's about understanding the unique set of conditions that each client has to contend with — like their operational history and their site conditions — as well as what state regulations might apply, their risk tolerance, and what's prudent for them at this point in time.--

You considered a career in academia but decided to join the consulting world. What motivates you as a consultant?--

I think both are very important to advance the science and to provide solutions. I personally like doing applied work that results in solutions [for] clients based on their needs. It's immediate in a way that academia is not. I like to focus on the big picture to create a strategy and a solid path forward.--

There is a lot of innovation in academia that I like and appreciate. But I realized that there is also much innovation and creativity in consulting. There's always some weird thing, some piece of data that doesn't make sense. That's how I started with PFAS: The science was new, so I had to do some digging and self-educating. I've gotten attracted to those

projects — the projects that have that one weird thing.-