

PFAS Regulation Update

ADEM Surface Water Meeting

October 15, 2025

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What Will Be Covered

- ▶ The Current Regulations
 - ▶ Sampling
 - ▶ MCLs
- ▶ Recent Announcements

What Will Not Be Covered



National Primary Drinking Water Regulations for PFAS

- ▶ EPA announced final rule April 10, 2024.
 - ▶ 5 Individual MCLs
 - ▶ One combined “Hazard Index” MCL
 - ▶ Initial monitoring to be completed within 3 years of promulgation
 - ▶ Compliance with MCL within 5 years of promulgation

Initial Sampling

- ▶ The initial monitoring must be completed by April 2027
- ▶ The most recent set of results that satisfy initial monitoring requirements can be used, including UCMR5

Initial Sampling

- ▶ For all surface source and ground source systems serving a population greater than 10,000 persons
 - ▶ Quarterly sampling for a 12-month period
 - ▶ Samples should be collected 2 to 4 months apart

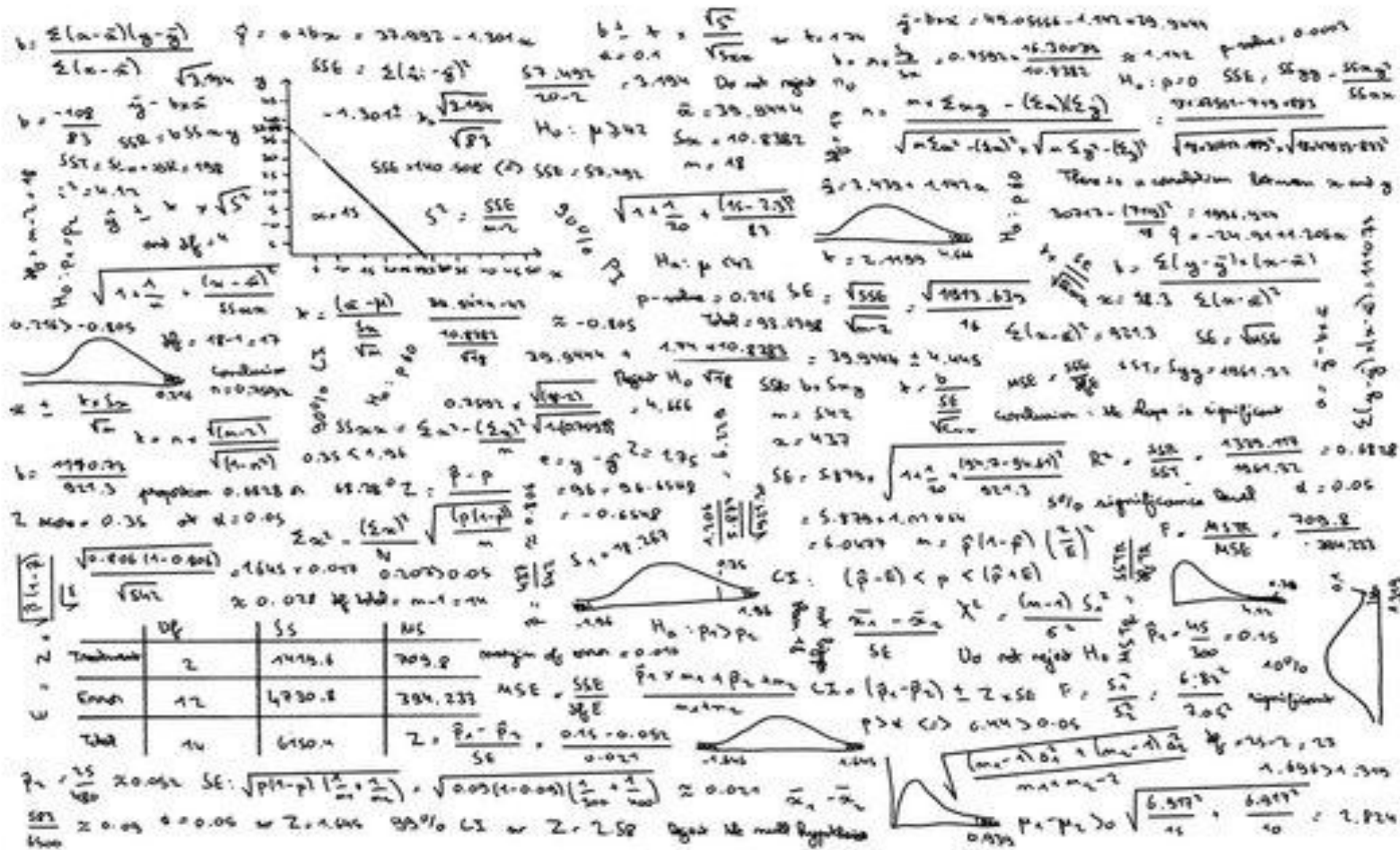
Initial Sampling

- ▶ For ground source systems serving a population of 10,000 persons or fewer
- ▶ Collection of two samples taken between 5 to 7 months apart within a 12-month period

Ongoing Sampling

- ▶ Systems will be placed on quarterly monitoring
- ▶ Reduced monitoring
 - ▶ Yearly sampling
 - ▶ Triennially sampling
- ▶ Failure to monitor will result in Tier 3 public notice requirements.

The MCLs



The MCLs

- ▶ Compliance will be based on a quarterly running annual average
- ▶ For compliance determination sample results less than the practical quantitative limit will use a zero in the calculations

The MCLs

Chemical	MCLG (mg/L)	MCL (mg/L)
PFOA	0	0.0000040
PFOS	0	0.0000040
PFNA, PFHxS, HFPO-DA (GenX)	10 ppt Each	0.000010
PFBS, PFNA, PFHxS, HFPO-DA (GenX)	1 Hazard Index	1 Hazard Index*

The MCLs

▶ The Hazard Index

- ▶ The limit for the Hazard Index is 1
- ▶ It is rounded to one significant digit
- ▶ The system can incur an MCL violation even if it did not have an exceedance on any individual parameter
- ▶ Requires the detection of at least 2 analytes

The MCLs

► The Hazard Index

$$HI\ MCL = \left(\frac{HFPO - DA_{water}}{10\ ppt} \right) + \left(\frac{PFBS_{water}}{2000\ ppt} \right) + \left(\frac{PFNA_{water}}{10\ ppt} \right) + \left(\frac{PFHxS_{water}}{10\ ppt} \right) = 1$$

The MCLs

- ▶ An example of a Hazard Index calculation

HI MCL

$$= \left(\frac{5 \text{ ppt}}{10 \text{ ppt}} \right) + \left(\frac{5 \text{ ppt}}{2000 \text{ ppt}} \right) + \left(\frac{0 \text{ ppt}}{10 \text{ ppt}} \right) + \left(\frac{3 \text{ ppt}}{10 \text{ ppt}} \right) = 1$$

$$0.5 + 0.0025 + 0.0 + 0.3 = 0.8025$$

The MCLs

- ▶ An example of a Hazard Index quarterly calculation

Quarter 1 = 0.8025

Quarter 2 = 0.5025

Quarter 3 = 0.8000

Quarter 4 = 0.6025

The average is 0.6769

The Hazard Index is 0.7

(Rounding to 1 significant digit)

The MCLs

- ▶ An MCL violation will result in a public notice that must be completed within a 30-day time frame.
- ▶ Systems are required to repeat the notice annually as long as the violation persists

The MCLs

- ▶ Compliance with the MCLs must occur in 2029.
- ▶ Once the MCL has been exceeded, the system will be required to add treatment or use an alternative source.

May 2025 Announcement



May 2025 EPA Announcements

- ▶ Intent to Rescind and Reconsider Regulatory Determination for:
 - ▶ PFHxS
 - ▶ PFNA
 - ▶ Gen X
 - ▶ The Hazard Index

May 2025 Announcements

- ▶ Proposal to Extend Compliance Deadline to 2031.

Contact Information

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