



PFAS Regulatory Updates

Lucas Martin P.E. – District Engineer, Drinking Water Protection, MDH

May 15, 2024

EPA Maximum Contaminant Levels (MCLs) for PFAS

April 10th, 2024 – EPA announced final National Primary Drinking Water Regulation (NPDWR) for **six** PFAS chemicals

The regulation includes:

- MCLs: enforceable standards
- Maximum Contaminant Level Goals (MCLGs)
 - health-based goals
- Hazard Index (HI): accounts for additive health effects of two or more PFAS



EPA MCLs for PFAS (Cont.)

Chemical	MCL (ppt)	MCLG (ppt)
PFOA	4.0	0
PFOS	4.0	0
PFHxS	10	10
HFPO-DA (GenX)	10	10
PFNA	10	10
Hazard Index (HI)	1 (unitless)	1 (unitless)

EPA Hazard Index (HI)

$$HI = \frac{[PFBS]}{2000} + \frac{[PFHxS]}{10} + \frac{[GenX]}{10} + \frac{[PFNA]}{10}$$

HI > 1 is an MCL violation

- Only used if 2 or more are detected

Rounding

- 1.4 rounds down to 1 – NOT a violation
- 1.5 rounds up to 2 - violation

EPA PFAS Rule Implementation

Public Water Systems will be **required** to:

Test

- Initial – within 3 years
- Ongoing

Inform Public

- Consumer Confidence Report – after 3 yrs
- Public Notification if > MCL

Take Action

- Notice of Violation – **after 5 years**
- Compliance Plan

EPA MCLs for PFAS - Compliance

- Compliance based on Quarterly Running Annual Average (QRAA)
- If a sample result is <PQL, use **zero** in QRAA or HI calculations
 - Example: PFOA at 3.5, 3.8, 5.0, 6.0 (QRAA = 4.6) → 0, 0, 5.0, 6.0 (QRAA = 2.8)

Chemical	PFOS	PFOA	PFHxS	GenX	PFNA	PFBS
PQL	4.0	4.0	3.0	5.0	4.0	3.0

PQL = Practical Quantification Level

Entry Points

- Entry Point - where treated water enters the distribution system
 - SDWA compliance samples are collected at Entry Points
- Types of Entry Points:
 - Individual well with only chemical feed
 - Combined Discharge – multiple wells that connect together for chemical addition
 - Treatment Plant – water from one or more wells receives treatment other than just chemical addition
- An individual well does not receive a notice of violation (NOV); an entry point receives a NOV