



Understanding the EPA PFAS Regulation

What is the EPA's new rule?

Chemical	Maximum Contaminant Level (MCL) <i>Parts per trillion</i>
PFOA	4.0 ppt
PFOS	4.0 ppt
PFNA	10 ppt
PFHxS	10 ppt
HFPO-DA (GenX chemicals)	10 ppt
Mixture of two or more: PFNA, PFHxS, HFPO-DA, and PFBS	Hazard Index calculation = 1 (unitless)

Key points

- Five PFAS compounds with an enforceable MCL: PFOA, PFOS, PFNA, PFHxS, HFPO-DA (GenX)
- MCLs for PFOA AND PFOS are equal to the Practical Quantitation Level (PQL), meaning the lowest concentration testing instruments can reliably detect for those particular chemicals.
- Compliance calculated as a running annual average of quarterly samples (similar to TTHM/HAA5 monitoring)
- Hazard Index (HI): Actual concentration in water ÷ Health Based Water Concentration (HBWC)
 - *Results below PQL count as zero in the HI calculation*
 - *Only required if two or more chemicals from the HI group are detected*

Hazard Index calculation

$$HI \text{ MCL (unitless)} = \left(\frac{[HFPO - DA_{water} \text{ ng/L}]}{[10 \text{ ng/L}]} \right) + \left(\frac{[PFBS_{water} \text{ ng/L}]}{[2000 \text{ ng/L}]} \right) + \left(\frac{[PFNA_{water} \text{ ng/L}]}{[10 \text{ ng/L}]} \right) + \left(\frac{[PFHxS_{water} \text{ ng/L}]}{[10 \text{ ng/L}]} \right)$$

What is the EPA's regulation timeline?

	2024				2025				2026				2027				2028		2029	
	Qtr 1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2		
PFAS National Primary Drinking Water Regulation finalized																				
Initial monitoring (requires one year of quarterly sampling by Q2 2027). These results must be shared with the public in Consumer Confidence Reports (CCRs).																				
Routine compliance monitoring begins in Q2 2027. Monitoring results must be included in CCRs; monitoring and testing violations require public notification.																				
Systems have five years to implement changes if needed to meet all MCLs.																				

What are the next steps?



Monitoring

- Identify [certified labs](#)
- Develop sampling plan based on your water source and system size
- Complete initial round of quarterly sampling by Q2 2027



Compliance

- Review initial monitoring results
- Identify treatment strategy using [digital models](#), bench testing, and/or pilot testing
- [Implement treatment and management strategy](#)



Communication

- Include all PFAS results in CCRs moving forward
- [Proactively communicate with your customers](#)

How are utilities going to pay for this?



The [Bipartisan Infrastructure Law](#), signed into law in November 2021, provided \$10 billion for the removal of emerging contaminants through the existing Drinking Water State Revolving Fund and Clean Water State Revolving Fund, as well as the new Emerging Contaminants in Small or Disadvantaged Communities Grants program. All of these funds are grants or principal forgiveness. States are still developing and implementing these programs, which will receive funds over a five-year period.