



Understanding Proposed USEPA PFAS Regulations

What is USEPA's proposed rule?

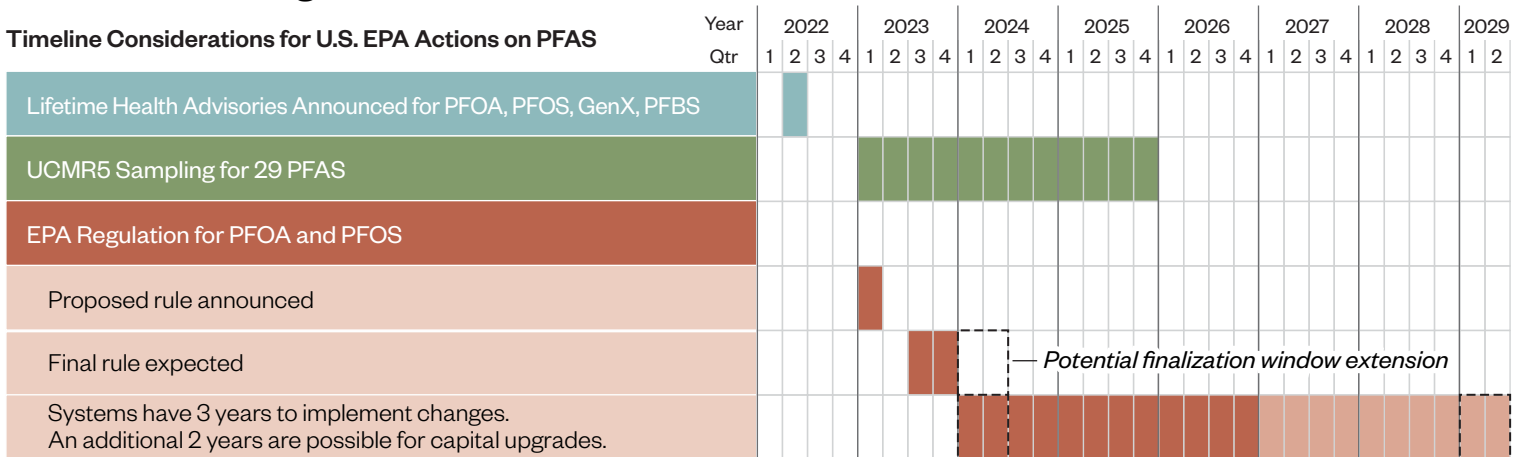
Compound	Proposed MCLG	Proposed MCL (enforceable levels)
PFOA	Zero	4.0 parts per trillion (also expressed as ng/L)
PFOS	Zero	4.0 ppt
PFNA	1.0 (unitless) Hazard Index	1.0 (unitless) Hazard Index
PFHxS		
PFBS		
HFPO-DA (GenX Chemicals)		

Key Points

- Limits are significantly low
 - *MCL = Practical Quantitation Level (PQL)=lowest limit of reliable measurement of instrument*
- Hazard Index (HI)
 - *Actual concentration in water ÷ Health Based Water Concentration (HBWC)*
$$HI_{MCL} = \left(\frac{[HFPO - DA_{water}]}{[10 \text{ ng/L}]} \right) + \left(\frac{[PFBS_{water}]}{[2000 \text{ ng/L}]} \right) + \left(\frac{[PFNA_{water}]}{[10 \text{ ng/L}]} \right) + \left(\frac{[PFHxS_{water}]}{[9 \text{ ng/L}]} \right)$$
- Compliance calculated as a running annual average of quarterly samples initially (similar to TTHM/HAA5 monitoring)

What is USEPA's regulation timeline?

Timeline Considerations for U.S. EPA Actions on PFAS



What are the next steps?



Monitoring plan

- Identify certified labs [LINK](#)
- Develop sampling & monitoring plan
- Analyze data to determine potential impact



Compliance plan

- Understand the implications of the hazard index calculation
- Develop treatment feasibility study
 - *Desktop study* [LINK](#)
 - *Benchscale evaluation*



Communication plan

- Get engaged in public comment period [LINK](#)
- Prepare public communication [LINK](#)
- Be ready for internal communication

How are utilities going to pay for this?



The Bipartisan Infrastructure Law which was signed into law on November 15, 2021 provided \$10 billion in funding for the removal of emerging contaminants through the existing Drinking State Revolving Fund, Clean Water State Revolving Fund, and Emerging Contaminants in Small or Disadvantaged Communities Grants. All of these funds are in the form of grants or principal forgiveness. States are still developing and implementing these programs which will receive funds over a five year period.