
Final PFAS National Primary Drinking Water Regulation, DoD PFAS Cleanup Actions, Maine Interim Maximum Contaminant Levels for PFAS Compounds

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Retired State of Maine Epidemiologist; Member of Restoration Advisory Board for the Former Naval Air Station Brunswick, Superfund Site; Member of Brunswick Area Citizens for a Safe Environment (BACSE)

February 24, 2024

Brunswick Area Citizens for a Safe Environment

Key Messages

- PFAS exposure over a long period of time can cause cancer and other illnesses that decrease quality of life or result in death
- PFAS exposure during critical life stages such as pregnancy or early childhood can also result in adverse health impacts
- PFAS pollution can have disproportionate impacts on small, disadvantaged, and rural communities already facing environmental contamination
- As the lead federal agency responsible to protect drinking water, EPA is using the best available science on PFAS to set national standards

Key Messages

- EPA is issuing this rule after reviewing extensive research and science on how PFAS affects public health, while engaging with the water sector and with state regulators to ensure effective implementation
- EPA also considered 120,000 comments on the proposed rule from a wide variety of stakeholders
- The final rule will reduce PFAS exposure for approximately 100 million people, prevent thousands of deaths, and reduce tens of thousands of serious illnesses

Summary of Final Rule



EPA is taking a signature step to protect public health by establishing legally enforceable levels for several PFAS known to occur individually and as a mixture in drinking water.

- **Jennifer McLain**, Director
Office of Ground Water and Drinking Water

Regulatory Levels: Maximum Contaminant Level Goals

- EPA is taking a signature step to protect public health by establishing legally enforceable levels for several PFAS known to occur individually and as mixtures in drinking water
- For **PFOA** and **PFOS**, EPA is setting a **non-enforceable health-based goal of zero**. This is called a Maximum Contaminant Level Goal (MCLG).
 - This reflects the latest science showing that there is no level of exposure to these two PFAS without risk of health impacts
- For PFNA, PFHxS, and HFPO-DA (GenX Chemicals), EPA is setting MCLGs of **10 parts per trillion**.

Regulatory Levels: Maximum Contaminant Levels

- EPA is setting enforceable Maximum Contaminant Levels (MCLs) at **4.0 parts per trillion** for PFOA and PFOS, individually
 - This standard will reduce exposure from these PFAS in our drinking water to the lowest levels that are feasible for effective implementation
- For PFNA, PFHxS, and HFPO-DA (GenX Chemicals), EPA is setting MCLs of **10 parts per trillion**

Regulatory Levels: Hazard Index

- EPA is also regulating, through a **Hazard Index (HI) MCL**, mixtures of four PFAS— **PFNA, PFHxS, HFPO-DA (Gen X), and PFBS**
- Decades of research show some chemicals, including some PFAS, can combine in mixtures and have additive health effects, even if the individual chemicals are each present at lower levels
- PFAS can often be found together and in varying combinations as mixtures

Regulatory Levels: Hazard Index

- Hazard Index MCL applies to any mixture containing two or more of PFHxS, PFBS, GenX Chemicals (HFPO-DA), and PFNA
- Water systems use sampling results as inputs into a formula comparing them to their **Health-Based Water Concentration** (HBWC)
- These are the level below which no health effects are known or expected for that PFAS and allow for an adequate margin of safety
- The **final HBWCs** for each of the four PFAS are below

Compound	Health-Based Water Concentration (ppt)
PFHxS	10
GenX Chemicals	10
PFNA	10
PFBS	2000

Regulatory Levels: Hazard Index

- The Hazard Index is a long-established approach that the EPA regularly uses, for example in the Superfund program, to determine the health concerns associated with exposure to chemical **mixtures**
- The Hazard Index is calculated by adding the ratio of the water sample concentration to a Health-Based Water Concentration

Regulatory Levels: Summary

Chemical	Maximum Contaminant Level Goal (MCLG) Non-Enforcable	Maximum Contaminant Level (MCL) Enforcable
PFOA	0	4.0 ppt
PFOS	0	4.0 ppt
PFHxS	10 ppt	10 ppt
HFPO-DA (GenX chemicals)	10 ppt	10 ppt
PFNA	10 ppt	10 ppt
Mixture of two or more: PFHxS, HFPO-DA, PFNA, and PFBS	Hazard Index of 1	Hazard Index of 1

*Compliance is determined by running annual averages at the sampling point

Costs and Benefits

- By reducing exposure to PFAS, this final rule will:
 - Save **thousands of lives**
 - Prevent **tens of thousands of serious illnesses**, including cancers, liver disease, heart attacks, and strokes
 - Reduce immune impacts and developmental impacts to pregnant women, children and babies
- The benefits are quantified by considering the costs of illness such as **lost wages, medical bills**, and the **value of every life lost**
- The **quantifiable** health benefits of this rule are estimated to be **\$1.5 billion** annually in the US
- There are also many other substantial health impacts that will be avoided which EPA does not have data to quantify

Costs and Benefits

- Compliance with this rule is estimated to cost approximately \$1.5 billion annually. These costs include
 - water system monitoring
 - communicating with customers, and if necessary
 - obtaining new or additional sources of water or
 - installing/maintaining treatment technologies to reduce six PFAS in drinking water
- EPA considered all available information and analyses for costs and benefits, quantifiable and non-quantifiable, of this rule and determined that the **benefits justify the costs**

Implementation

Under the rule requirements, public water systems must:

- Conduct initial and ongoing compliance monitoring for the regulated PFAS
- Implement solutions to reduce regulated PFAS in their drinking water if levels exceed the MCLs
- Inform the public of the levels of regulated PFAS measured in their drinking water and if an MCL is exceeded

Implementation: Timeframes for Water Systems

Within **three years** of rule promulgation (2024 – 2027):

- Initial monitoring must be complete

Starting **three years** following rule promulgation (2027 – 2029):

- Results of initial monitoring must be included in Consumer Confidence Reports (i.e., Annual Water Quality Report)
- Regular monitoring for compliance must begin, and results of compliance monitoring must be included in Consumer Confidence Reports
- Public notification for monitoring and testing violations

Starting **five years** following rule promulgation (starting 2029)

- Comply with all MCLs
- Public notification for MCL violations

Implementation

- EPA's final rule does not dictate how water systems remove these contaminants. The rule is flexible, allowing systems to determine the best solutions for their community.
- Drinking water utilities can choose from multiple proven water treatment options to remove PFAS from drinking water including
 - granular activated carbon (GAC)
 - reverse osmosis
 - ion exchange systems
- In some cases, systems can close contaminated wells or obtain new uncontaminated source of drinking water.

Memo: Prioritization of DoD Cleanup to Implement Federal Drinking Water Standards for PFAS (Sept 2024)

- ...recognizes the need to take quick actions...to ensure cleanup begins as quickly as possible,
- ...**will initiate removal actions** to address **private drinking water wells impacted by PFAS from DoD activities** where at or above three times the MCL (i.e., *PFOA = 12 ppt; PFOS = 12 ppt; PFHxS = 30 ppt; GenX = 30 ppt; PFNA = 30 ppt; HI = 3*)
- This **prioritizes action** where PFAS levels from **releases are the highest** rather than delay action via CERCLA process
- Will use a CERCLA “Time Critical Removal Action” for these efforts

US States May Develop Their Own Clean-up Standards

- **Primacy agencies** must have regulations for contaminants regulated under National Primary Drinking Water Regulations (NPDWRs) that are **no less stringent** than the regulations promulgated by the EPA
- States have up to **two years to develop regulations** after the date of rule promulgation to apply for approval (by April 2026)

State of Maine Draft MCLs

In June 2021 Maine **promulgated interim standard of 20 ppt** for the six PFAS (alone or in combination) which is currently still in effect

USEPA Maximum Contaminant Level - PFAS	Maine Interim Drinking Water Standard - PFAS
PFOA	PFOA
PFOS	PFOS
PFNA	PFNA
PFHxS	PFHxS
PFBS	PFHpA
HPFO_DA (GenX) chemicals	PFDA



Questions?

Drinking Water Regulations

US EPA (Federal)

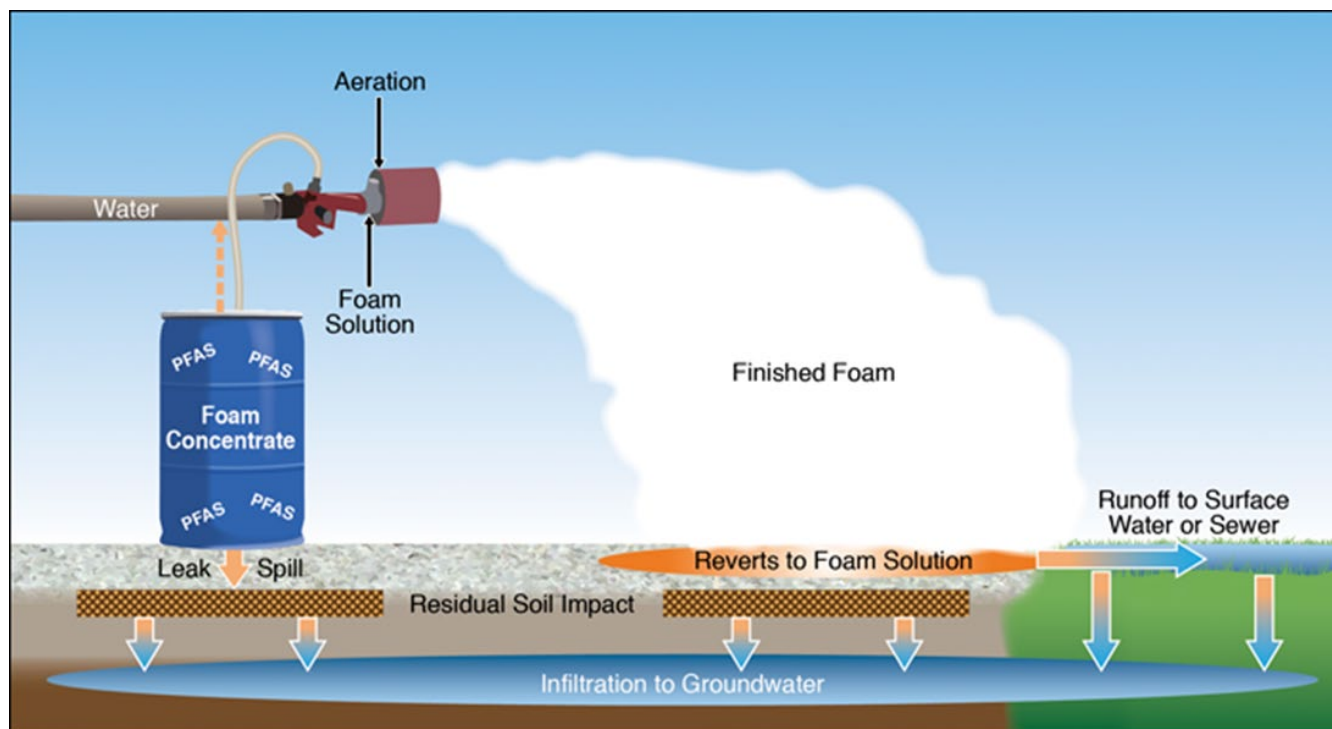
*Applies to public water systems only (not private wells)
and five years (until 2029) to comply*

Compound	Maximum Contaminant Levels (MCLs)
PFOA	4.0 parts per trillion (ppt) (also expressed as ng/L)
PFOS	4.0 ppt
PFHxS	10 ppt
PFNA	10 ppt
HFPO-DA (commonly known as GenX Chemicals)	10 ppt
Mixtures containing two or more of PFHxS, PFNA, HFPO-DA, and PFBS	1 (unitless) Hazard Index

Maine DEP

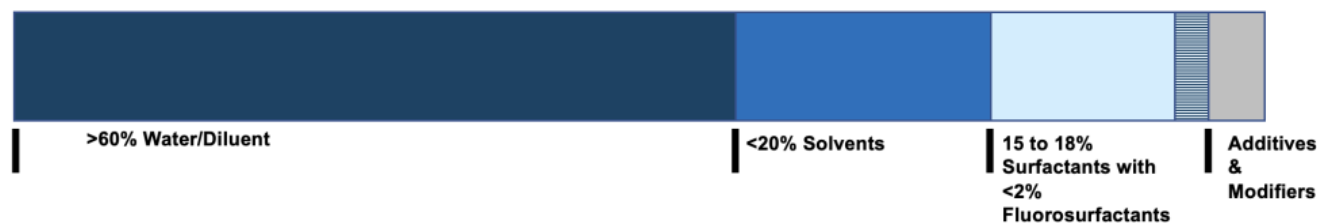
Compound	Interim drinking water standard
Sum of 6 PFAS (PFOA, PFOS, PFNA, PFHxS, PFHpA, and PFDA)	20 ppt

State and Federal Drinking Water Standards do not apply to private wells!



AFFF

Aqueous Film-Forming Foam



PFAS – Per- and Polyfluoroalkyl Substances

ENHANCED BY Google

Welcome
Technical Resources for Addressing Environmental Releases of Per- and Polyfluoroalkyl Substances (PFAS)

PFAS HOME

This Interstate Technology and Regulatory Council (ITRC) online document includes the resources that the ITRC PFAS Team has developed since it began work in 2017.

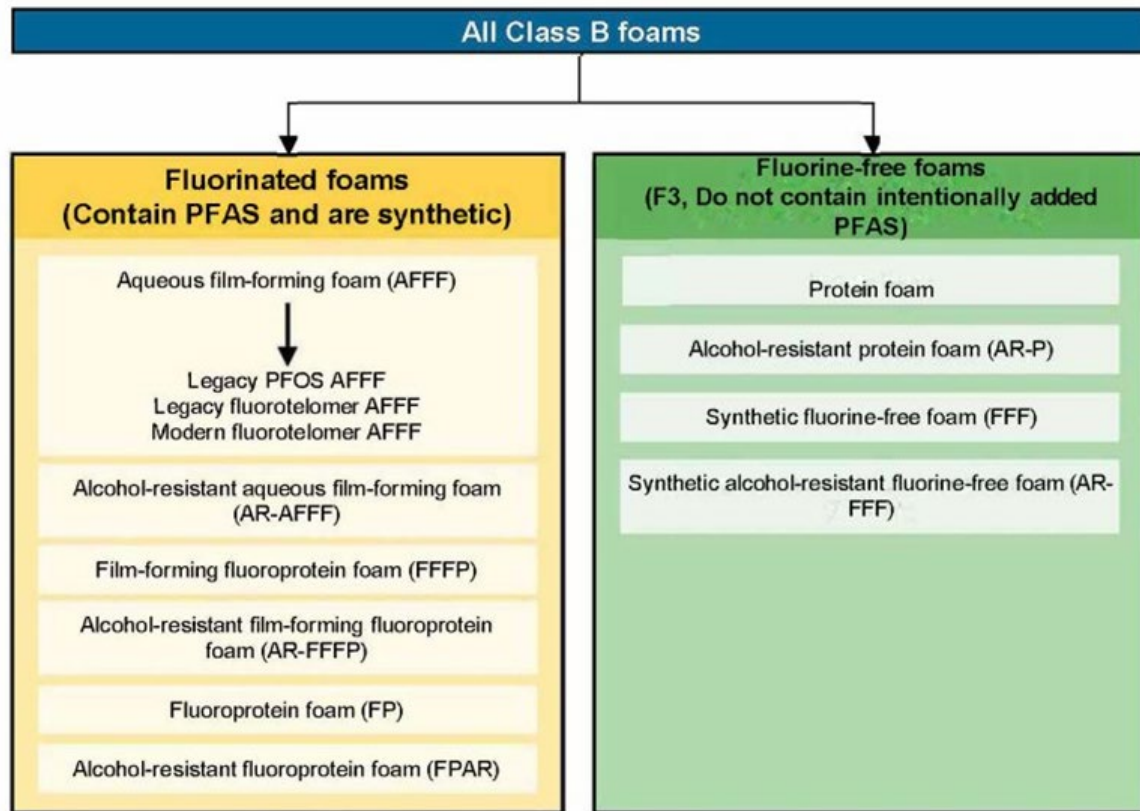
- [PFAS Fact Sheets](#)
- [PFAS Technical and Regulatory Guidance Document](#)
 - [External Data Tables](#)
- Training Resources
 - [Quick Explainer Videos](#)
 - [Longer PFAS Training Module Videos](#)
 - [Archived Roundtable Sessions](#)
 - [PFAS Training Page](#)

You can reach this PFAS Home page from any of the pages on this web site with the Home button at the top of screen.

PFAS Technical and Regulatory Guidance Document

Table of Contents:

- 1 Introduction
- 2 Naming Conventions and Use
- 3 Firefighting Foams
- 4 Physical and Chemical Properties
- 5 Fate and Transport
- 6 Occurrence
- 7 Health Effects
- 8 Basis of Regulations
- 9 Site Risk Assessment
- 10 Site Characterization
- 11 Sampling and Analysis
- 12 Treatment Technologies



Legacy PFOS AFFF

PFAS composition mostly PFOS (3M Lightwater)

Legacy Fluorotelomer AFFFs

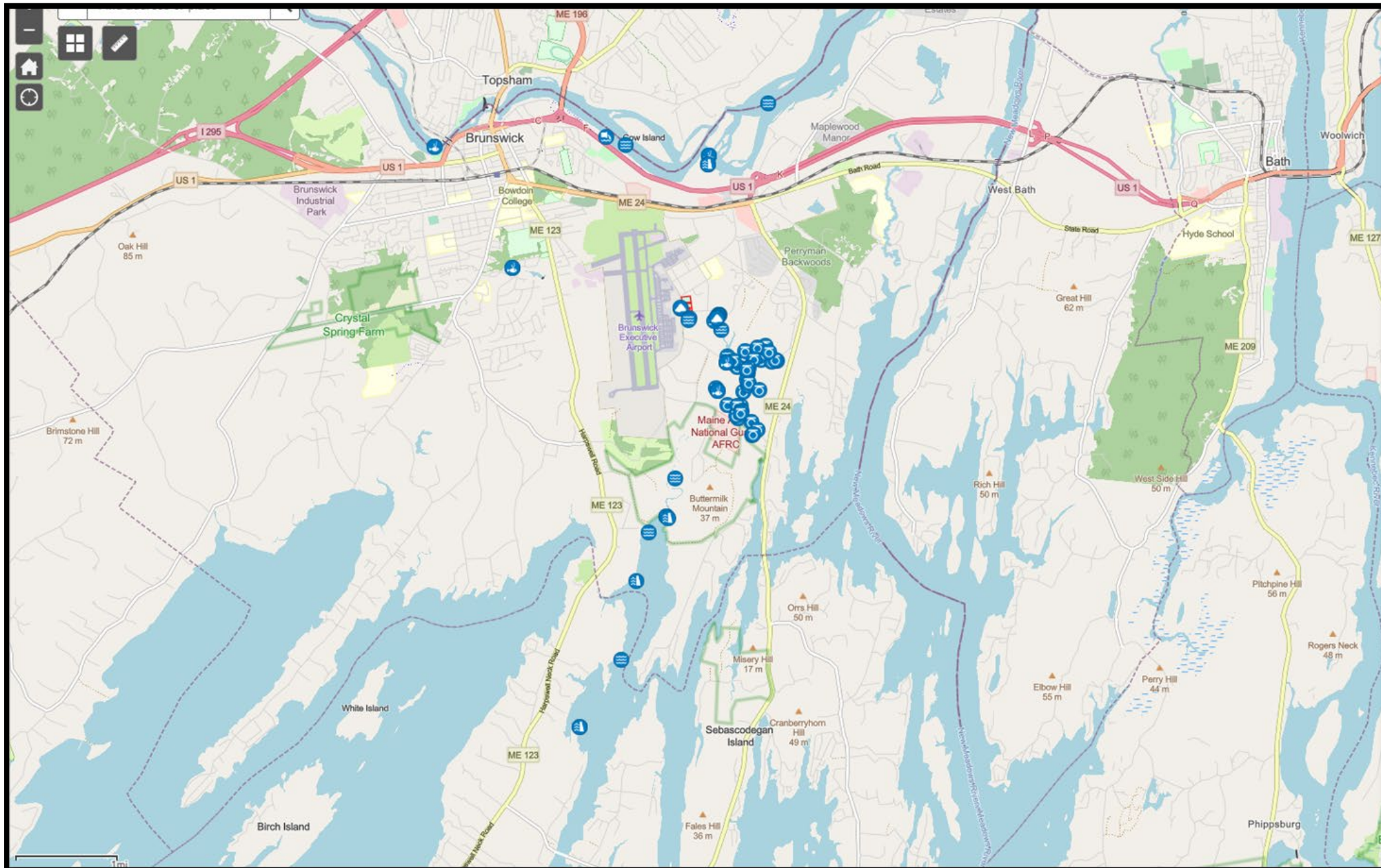
Contain polyfluorinated PFAS which can transform to PFCAs, Contain no PFOS and cannot transform to PFOS. (Ansulite)

Modern Fluorotelomer AFFFs

Developed in response to PFOA/PFOS phaseout, contains short chain PFAS(C6), may have trace amounts (ppb) PFOA, may transform to PFCAs.

CLASS B Foams- Used to fight fires involving flammable and combustible liquids and gases; petroleum greases, tars, oils and gasoline; and solvents and alcohols





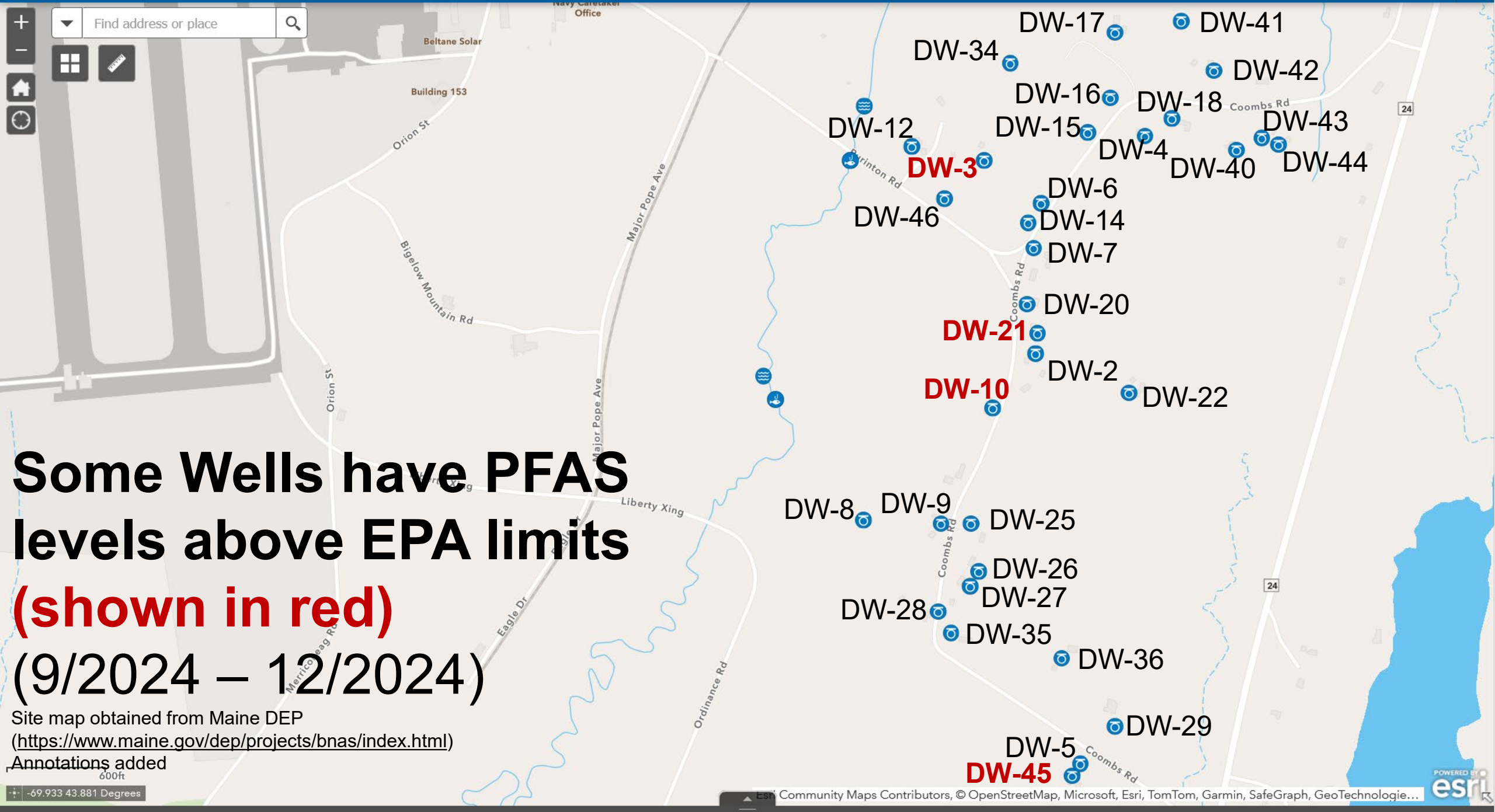
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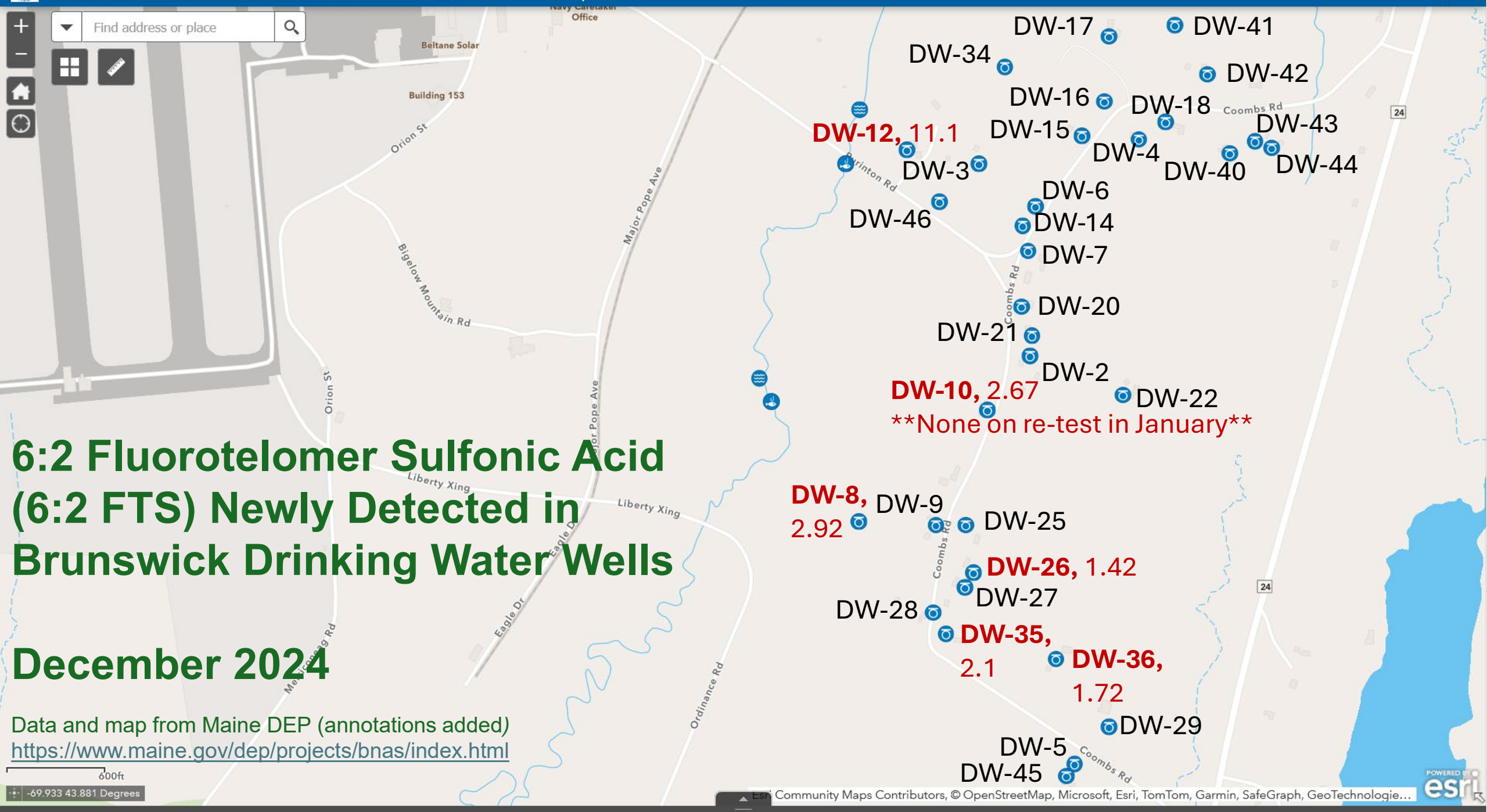
Sample Locations

- Domestic Water Well
- Discrete Soil Sample
- Fish Sample
- Marine-Biota
- Surface Water
- Treated Wastewater Sample

Sample Areas

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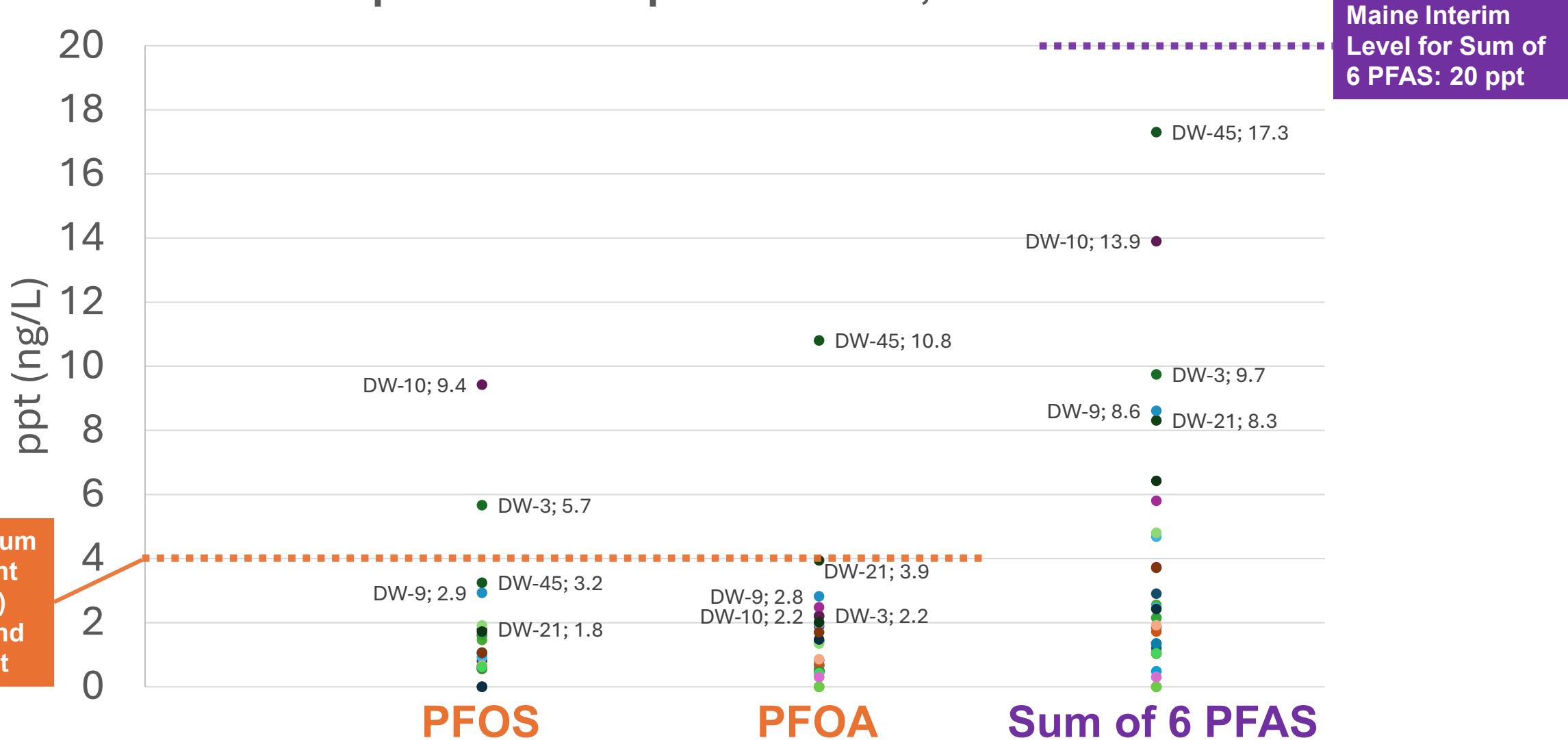


6:2 Fluorotelomer Sulfonic Acid (6:2 FTS) Newly Detected in Brunswick Drinking Water Wells

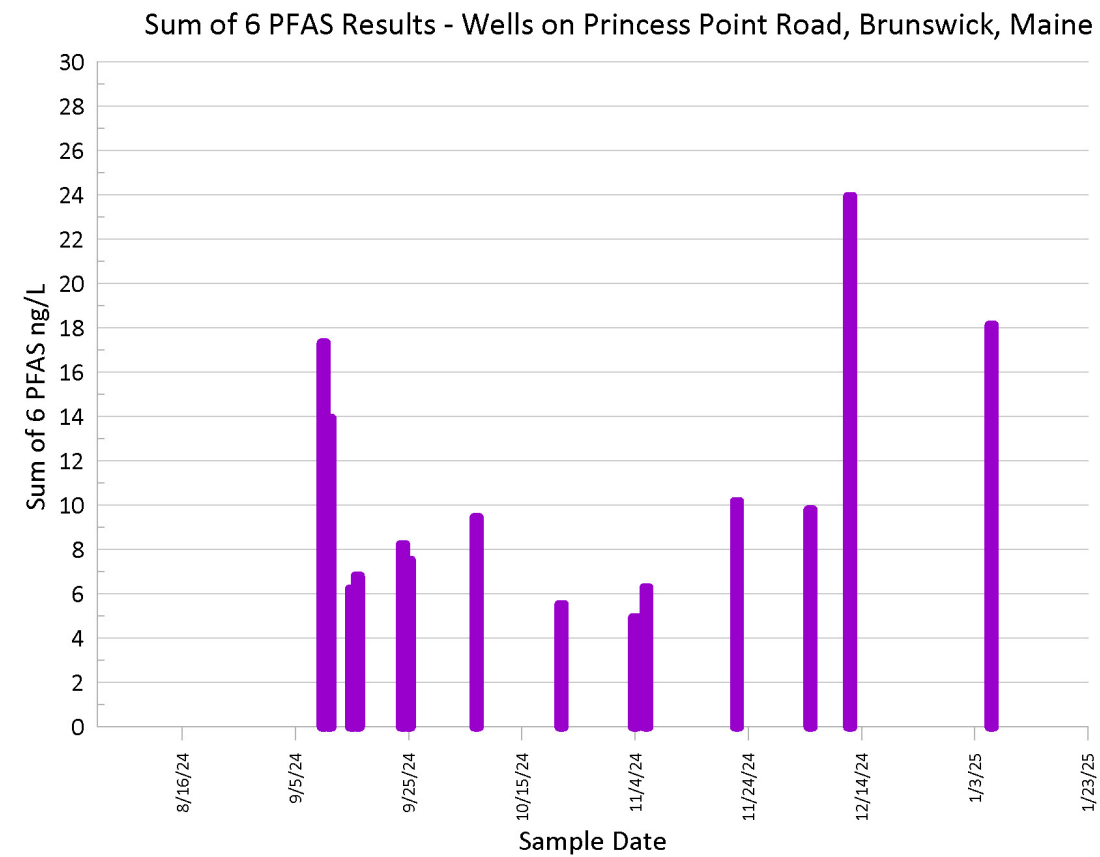
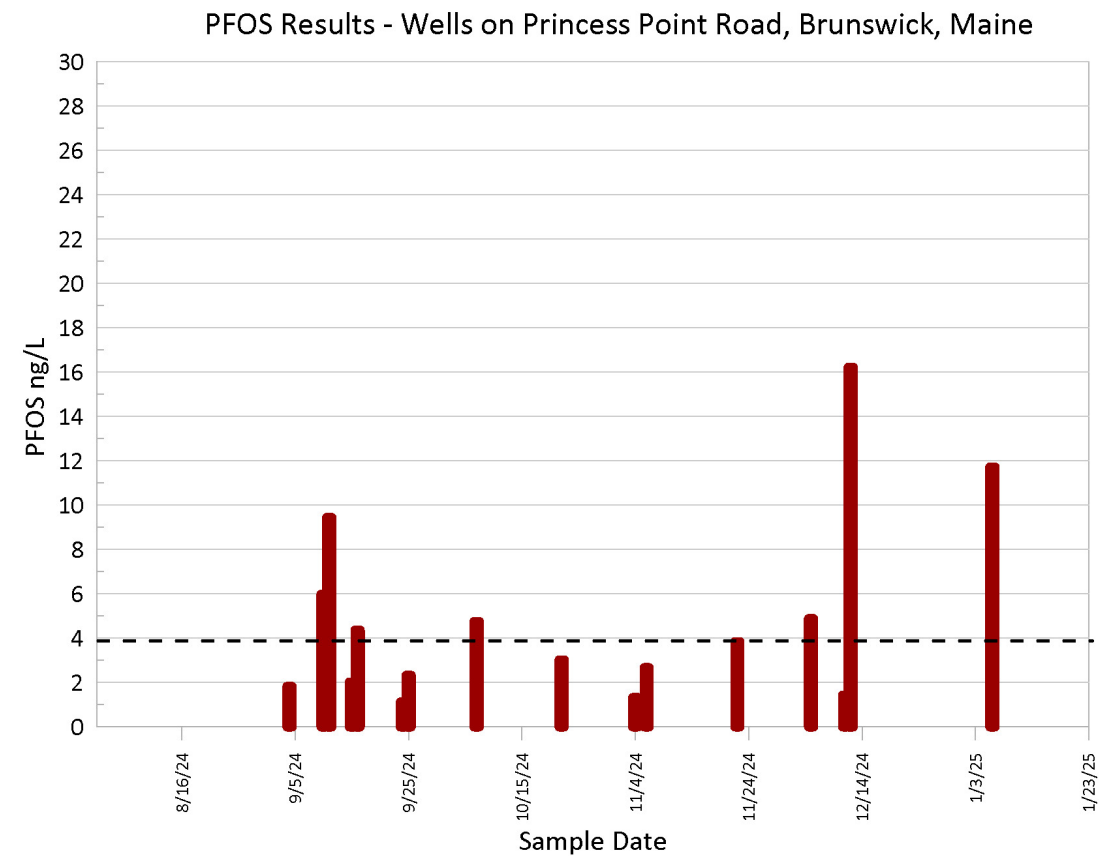
December 2024

Data and map from Maine DEP (annotations added)
<https://www.maine.gov/dep/projects/bnas/index.html>

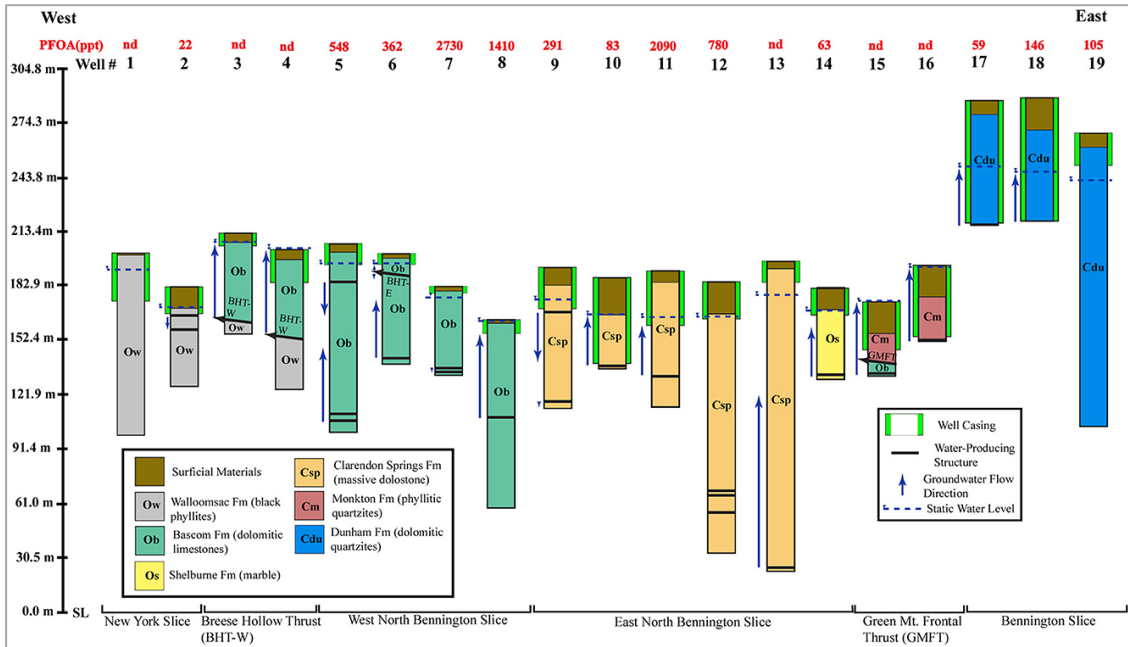
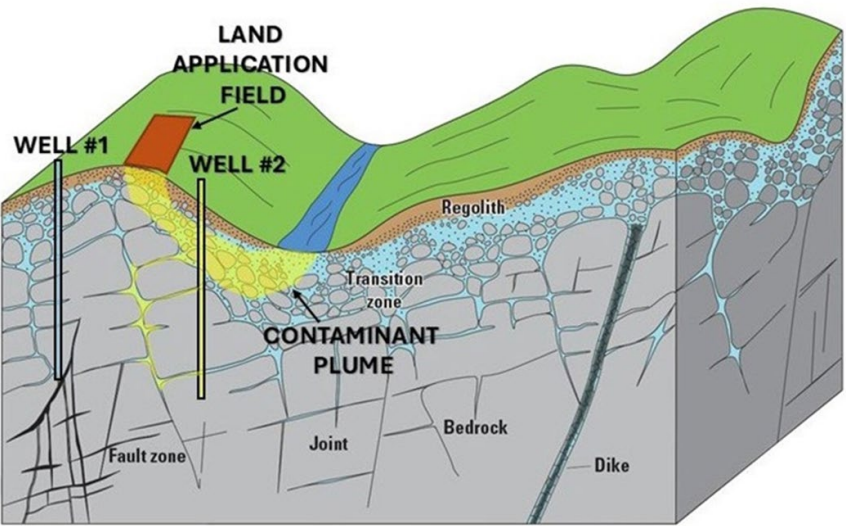
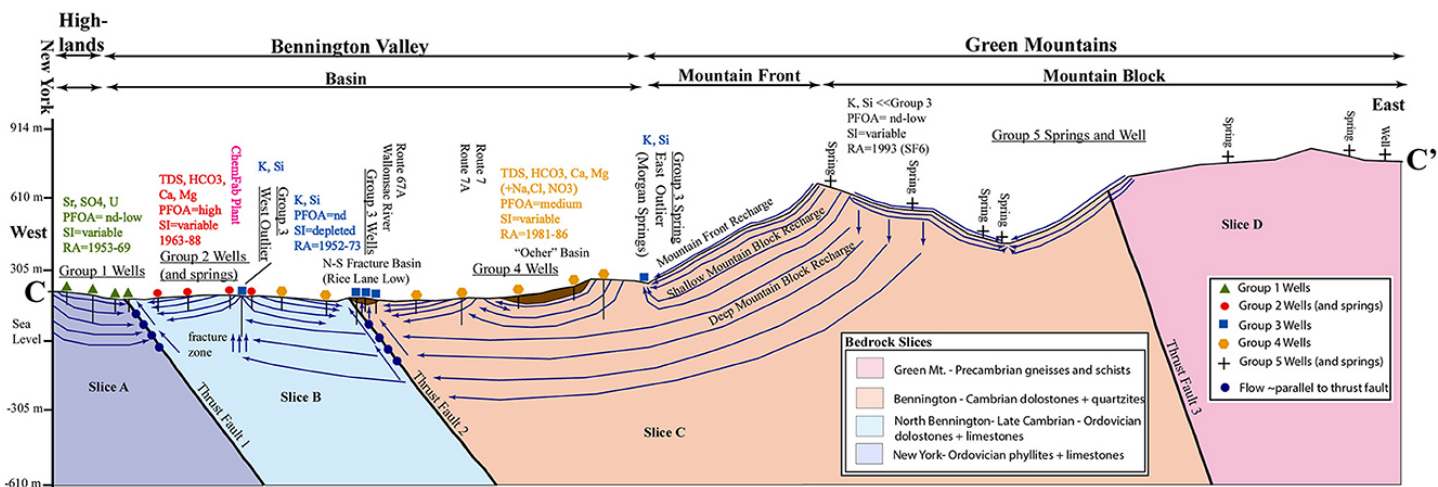
Brunswick Water Wells Tested by Maine DEP Sample Dates: September 9-10, 2024



PFAS Results from Princess Point Road Wells



Groundwater flow and PFAS transport in fractured bedrock aquifers is *very complex*





Private Well Technical Assistance

The Drinking Water Program can provide free help to private well owners who have questions about their wells, water sampling, and water treatment. (A "private well" being any well that is not regulated by the DWP as a Public Water System.) This service offers property owners assistance with...

- General well questions** – Specialty Well applications, ideal well location, and potential threats to wells and water quality.
- Drinking water and well drilling rules, best practices, and construction standards** such as casing requirements and setbacks to septic systems.
- Sampling** – help with sample collection, explanation of test results, and follow-up testing. Guidance on laboratories is also available.
- Water Quality Review** – contaminants and the need for treatment.
- Treatment** – exposure risk assessment and treatment types to consider.
- Disinfection advice** on proper methods and products.
- Potential conflicts** between homeowners and drillers, abutting land owners, and local officials.

There is no charge for private well technical assistance. This is a free service of the Maine CDC Drinking Water Program.

To learn more, please contact **Alex Pugh**: [Email](#), or phone (207) 287-2070.

Water Treatment Options



FACT SHEET

Reducing PFAS in Your Drinking Water with a Home Filter

In April 2024, the U.S. Environmental Protection Agency (EPA) finalized the first-ever national drinking water standards for several PFAS in drinking water. If you learn there are PFAS in your drinking water, then you may consider installing a home filter. A home filter could be an effective way to reduce PFAS levels, and there are a variety of types of filters available at many different price points.

What are PFAS?

PFAS are a category of chemicals that have been used in industry and consumer products since the 1940s. PFAS repel oil and water and resist heat, making them useful in a variety of products, including nonstick cookware and food packaging, waterproof clothing, stain-resistant furniture, and firefighting foam. People can be exposed to PFAS in a variety of ways, and PFAS in drinking water can be a significant portion of a person's total PFAS exposure. Exposure to PFAS may lead to health problems, so reducing your exposure to PFAS lowers your risk for these health problems.

Learn About PFAS in Your Water and Decide if a Filter is Right for You

Many public water systems already have test results for PFAS available. First, contact your local water provider to find out which PFAS, if any, are in your drinking water. You can also search EPA's [database of PFAS water system test results](#) or EPA's map-based [PFAS Analytic Tools](#) to see if your water system has been tested as part of EPA's monitoring program. If PFAS have not been measured in your water, or if PFAS have been measured but are below federal limits, a filter may not be useful to you.

Your state [environmental protection agency or health department](#) may also have more information about PFAS in your drinking water and recommendations for actions you can take.

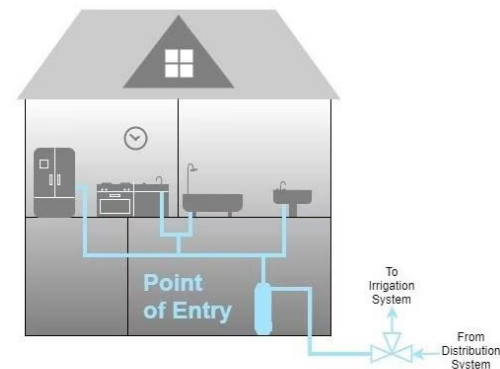
Types of Filters

There are many water filters on the market, but not all filters address PFAS. If you choose to use a filter, be sure to get one that is certified to remove or reduce PFAS in drinking water. As of April 2024, filter certifications focus on removing the chemicals PFOA and PFOS, which are two specific types of PFAS. A filter can cost as little as \$20 or more than \$1,000 (not including maintenance costs), with variations between types, brands, and whether they are pitcher filters, installed on your faucet, or for your entire home. There may also be maintenance- and disposal-related costs that also vary between filters. Here are some of the types of filters that are currently available and can be effective at reducing PFAS:

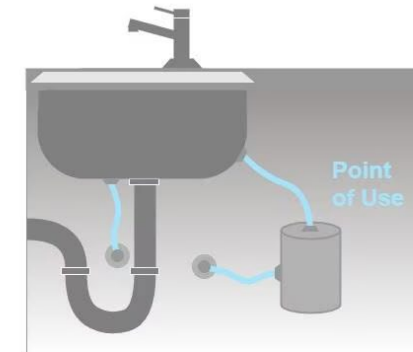
- **Charcoal (Granular Activated Carbon or GAC):** These filters use carbon to trap chemicals as water passes through them.
- **Reverse Osmosis (RO) Systems:** Reverse osmosis is a process that forces water through an extremely thin barrier that separates chemicals from the water.
- **Ion Exchange Resins:** Resins are tiny beads that act like powerful magnets that attract and hold the contaminated materials from passing through the water system.

Check for Certification

Certification by an independent entity is an assurance that the filter works as the manufacturer says it does. To



Point of Entry (POE) Treatment



Point of Use (POU) Treatment



Table 9: Average Costs of Filtration System Installations Per Individual System

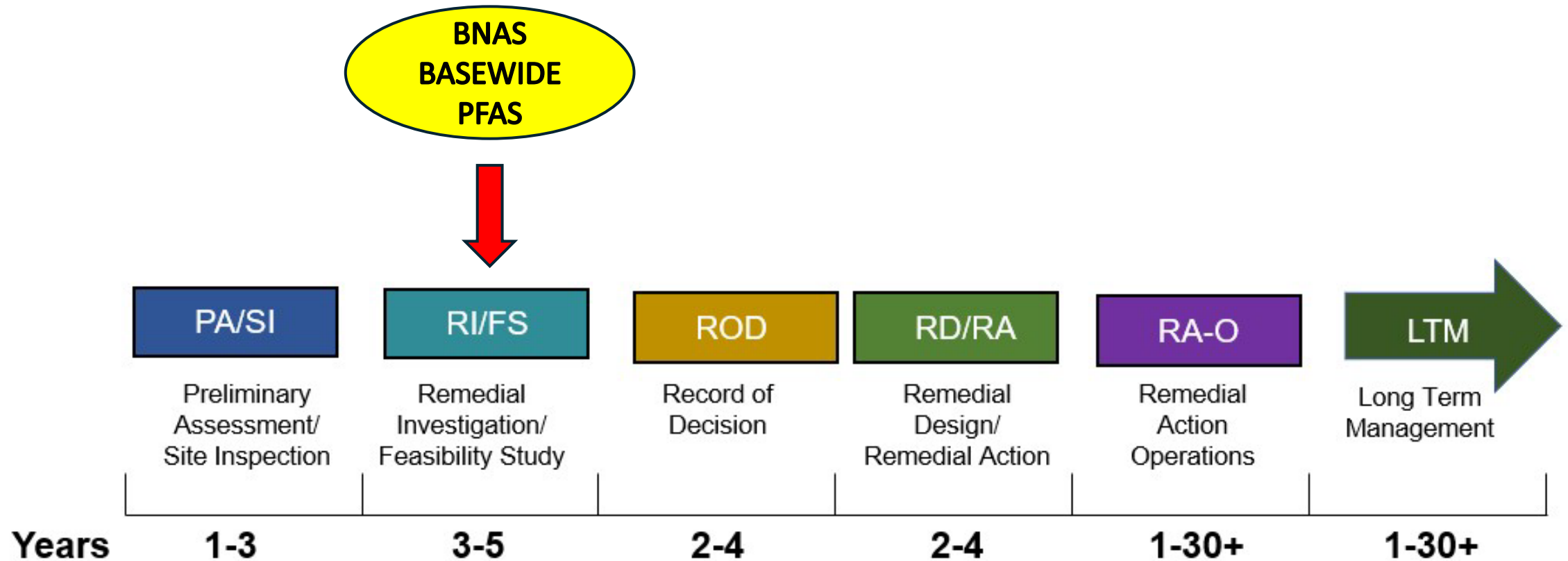
Filter System Installation (One time)	\$3,545
Pre-Treatment Systems (One time only as needed)	\$3,875
Sheds† (One time only as needed)	\$8,500
Filter Changeouts* (Annual cost per changeout)	\$1,535
Routine Sampling ** (Annual cost)	\$3,500

** The frequency of filter changeouts varies based on the levels of PFAS detected in a well and how the system is functioning. It can be as little as once a year, or as much as four times a year.*

*** This is dependent on contractor rates. Some are higher than this per residence, and some are lower. The frequency of sampling is determined once the system is confirmed to be working effectively and may be as frequent as monthly or as little as once or twice a year. The range of costs is between \$2,500 to \$4,500 per year.*

†Installation of sheds is relatively uncommon. Since the beginning of the investigation just under 20 sheds have been installed.

The CERCLA Investigation and Cleanup Process



CERCLA Remedial Action

Short-Term Removal Action

Groundwater Treatment

Bottled Water

Wellhead Drinking Water Treatment

2

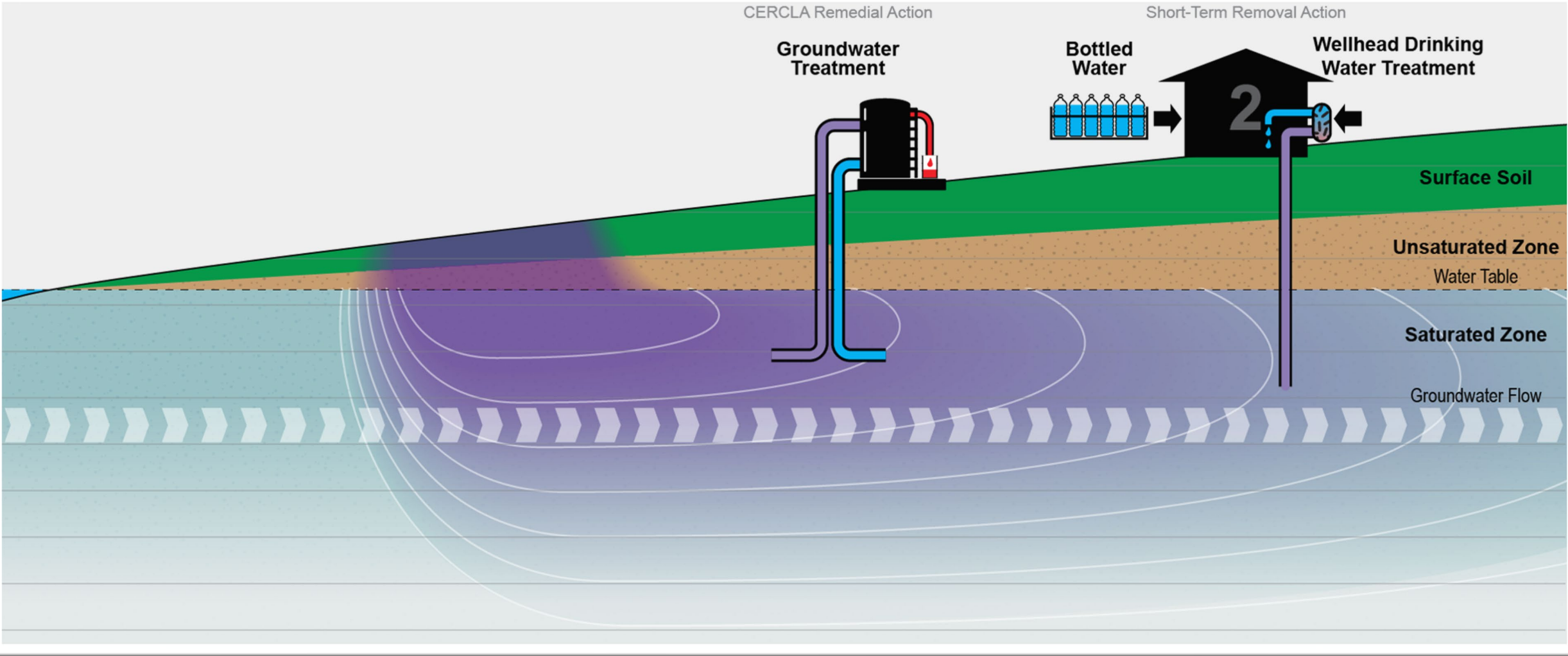
Surface Soil

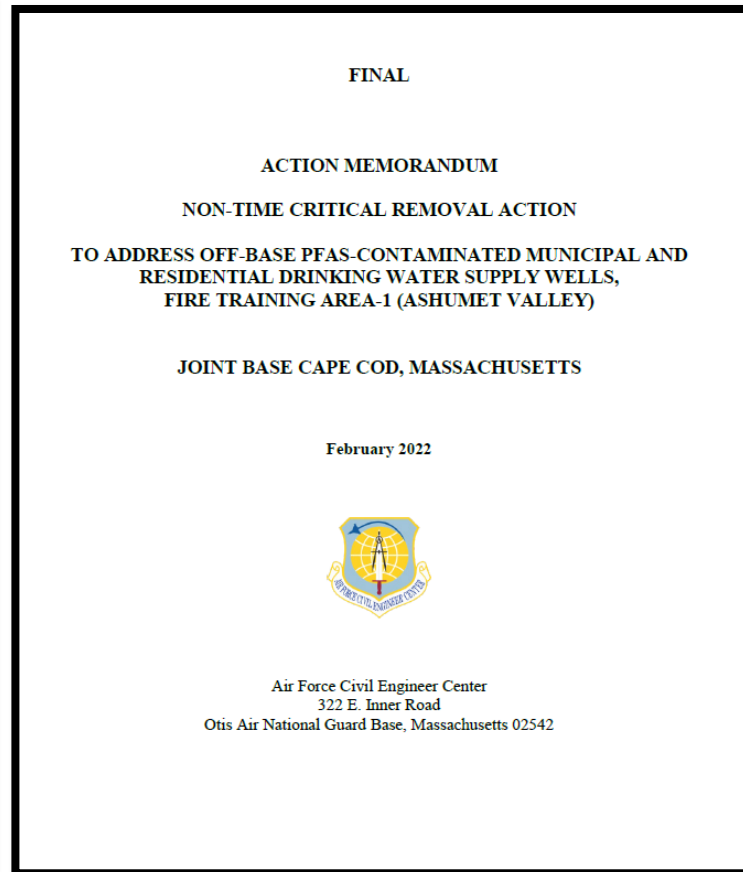
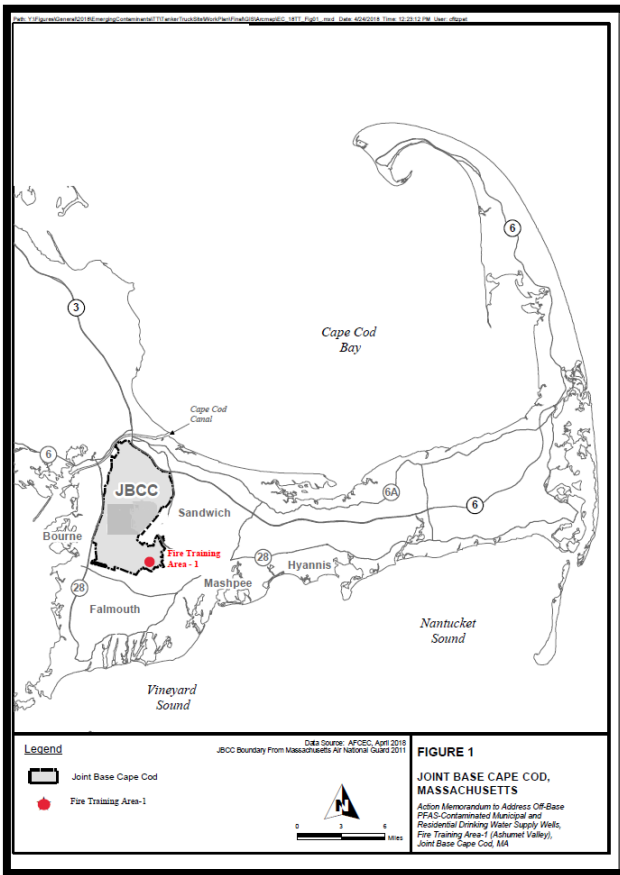
Unsaturated Zone

Water Table

Saturated Zone

Groundwater Flow





From Action Memorandum

Typically, under the NCP, an unacceptable human health risk is present when cumulative human health cancer risk exceeds 1×10^{-4} and the non-cancer hazard index exceeds one. The EPA lifetime HAs are the concentration of PFOA and PFOS in drinking water at which adverse health effects are not anticipated to occur over a lifetime.

As sampling results for PFOS and PFOA show exceedances of the EPA lifetime HA in drinking water wells with the same hydrogeological conditions as the drinking water wells that exceed the PFAS6 MMCL but are below the EPA lifetime HA, there are sufficient grounds to find that an imminent and substantial danger to human health may exist.

CERCLA and the NCP along with EPA Office of Solid Waste and Emergency Response (OSWER) guidance equate “**threat**” and “**danger**” with “**unacceptable risk**”

(see 42 United States Code (USC) § 9604(a)(1) and (b)(1)), 40 CFR § 300.430(d) and OSWER 9355.0-30, Role of the Baseline Risk Assessment in Superfund Remedy Selection Decisions, 22 April 1991).



The former Naval Air Warfare Center (NAWC) Warminster, an 824-acre facility in Warminster Township, Ivyland Borough, Bucks County, Pennsylvania, is located in a populated suburban area surrounded by private homes, various commercial and industrial activities, and a golf course. The base is now closed and has been redeveloped for nonmilitary use by the Bucks County Federal Lands Reuse Authority



Sound Familiar ?

Private Drinking Water Well Sampling Area

Private drinking water well sampling for PFOA/PFOS and provision of bottled drinking water is being performed by Tetra Tech, a U.S. Navy contractor.

Point of contact is:

Coleman Nelson

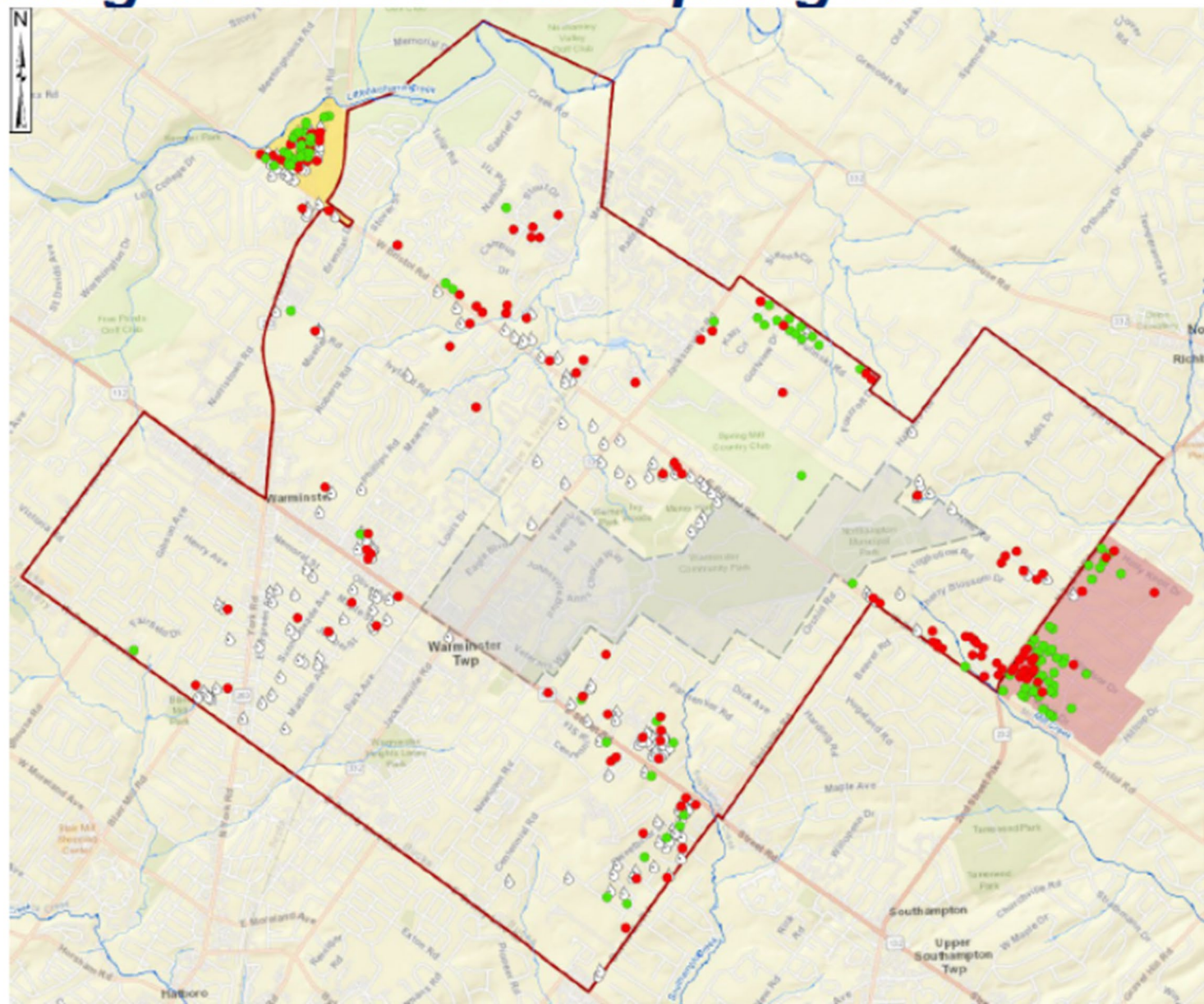
Tetra Tech Sampling Coordinator

E-mail: coleman.nelson@tetrattech.com

Phone: (610) 491-9688

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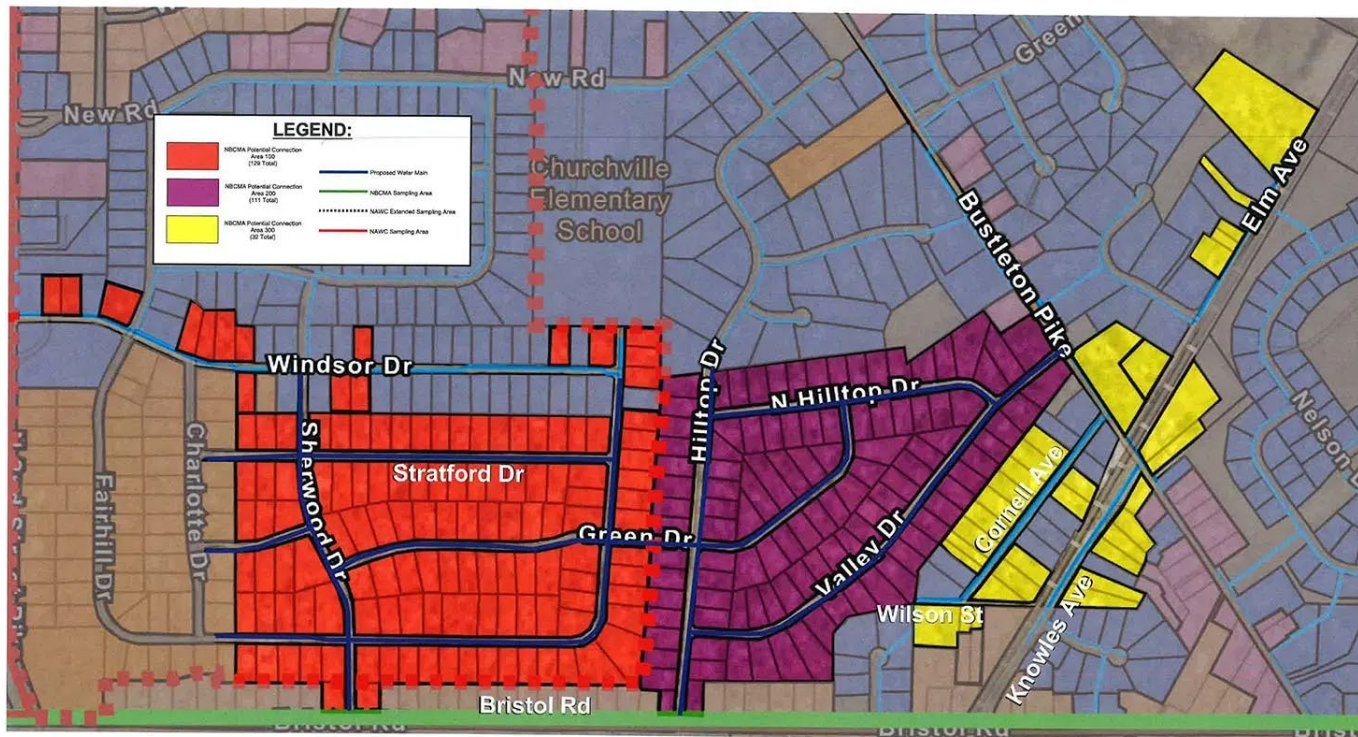
- PFOA or PFOS Concentration > PA MCL: 111
- PFOA or PFOS Concentration < PA MCL: 74
- ⦿ Public Water Connection (Some not by Navy): 185
- Creek
- Tributary
- ▭ NAWC Sampling Area
- ▭ NAWC Expanded Sampling Area
- ▭ Hartsville Area





**NORTHAMPTON, BUCKS COUNTY
MUNICIPAL AUTHORITY**

NBCMA 2025 CHURCHVILLE AREA WATER MAIN EXTENSION & CONNECTIONS - 12/16/2024



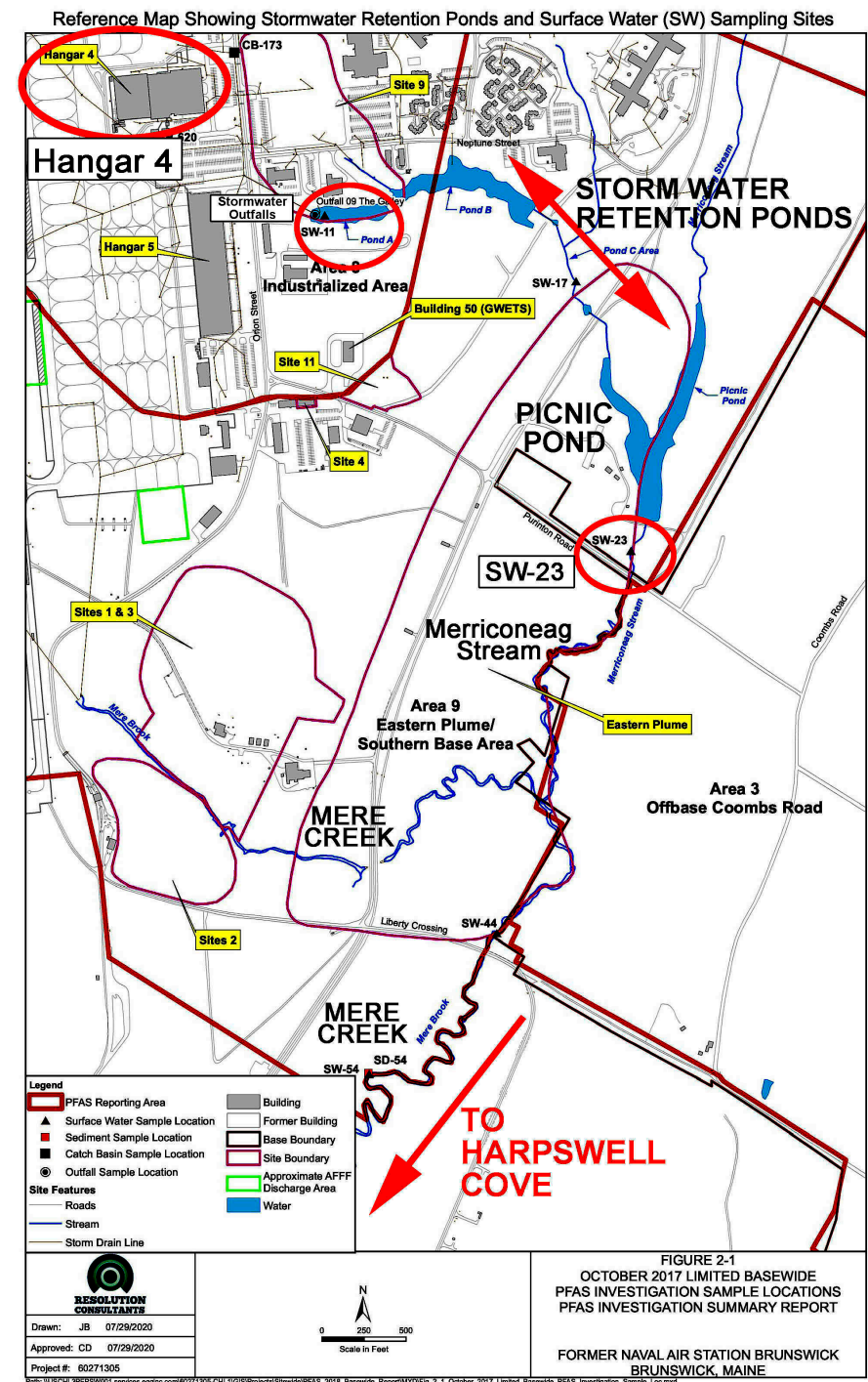
What is the Navy doing to protect our community?
The Navy is currently identifying private wells that may be affected and has committed to remediation for those found contaminated.

However, the Township with NBCMA believe these efforts are insufficient and urges the Navy to enhance its communication and support for residents impacted by this issue.

Questions?

PFAS from Ongoing Operations

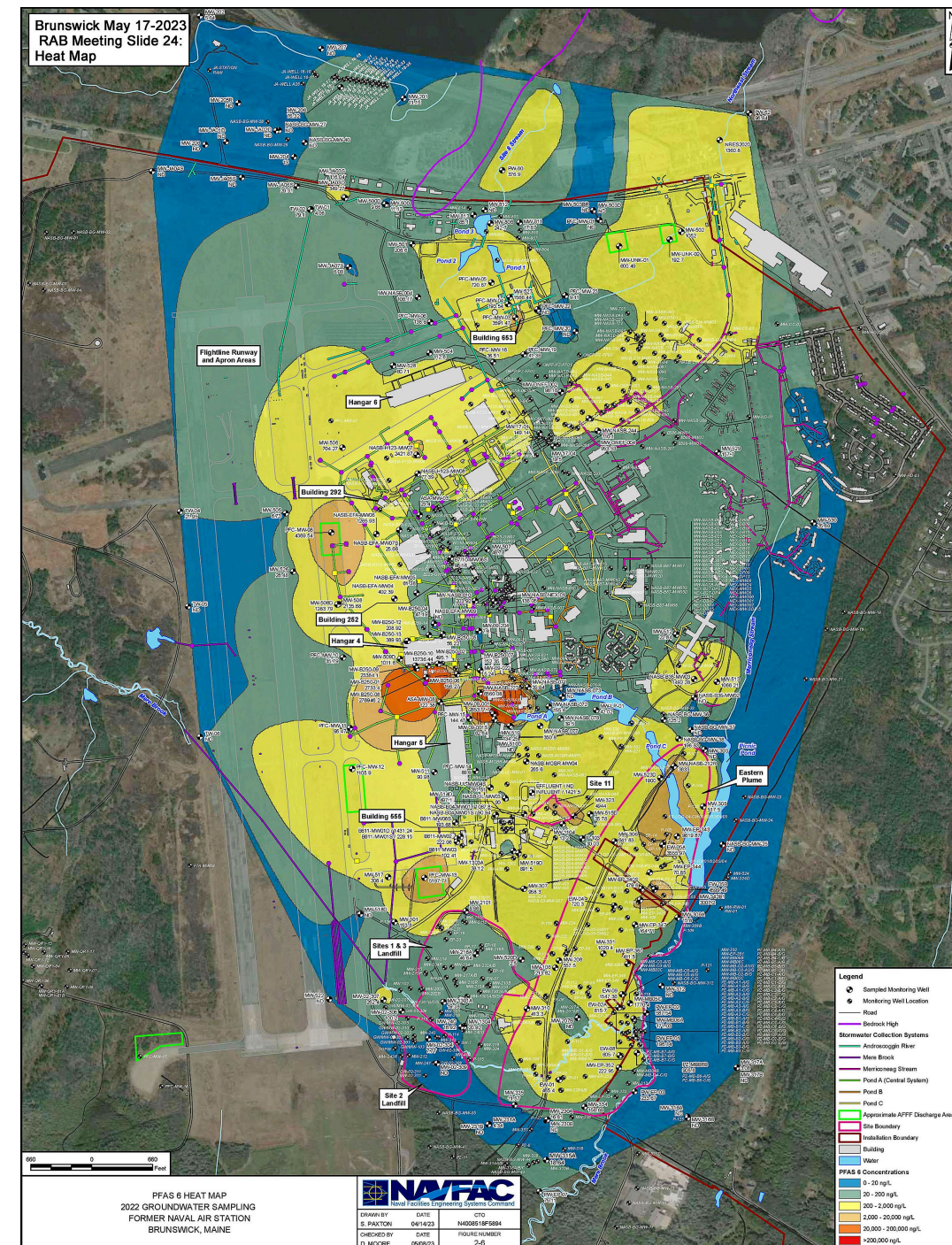
1. The HANGARS 4 & 6
2. Surface Water
3. Harpswell Cove



Hangar 4 and Hangar 6

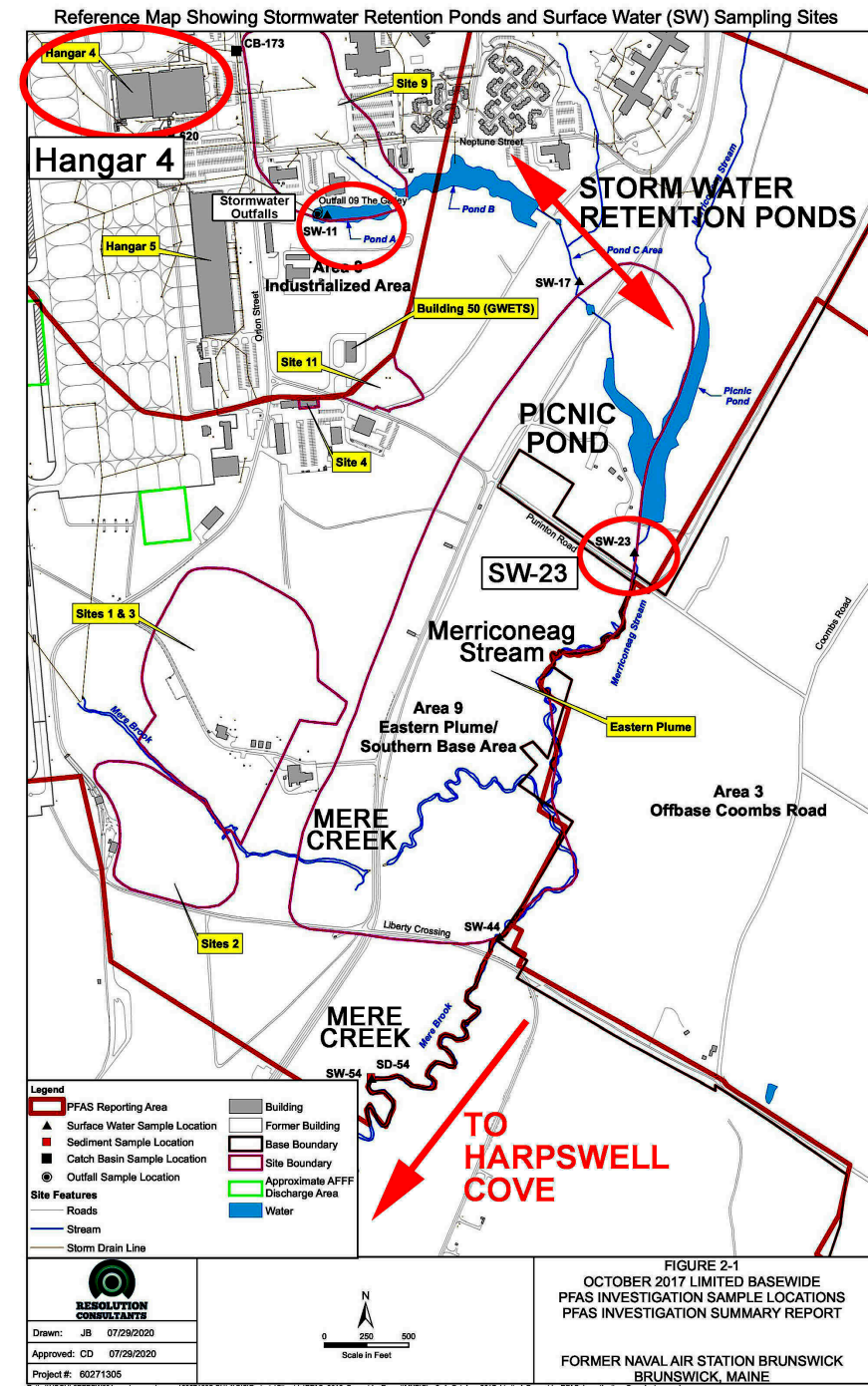
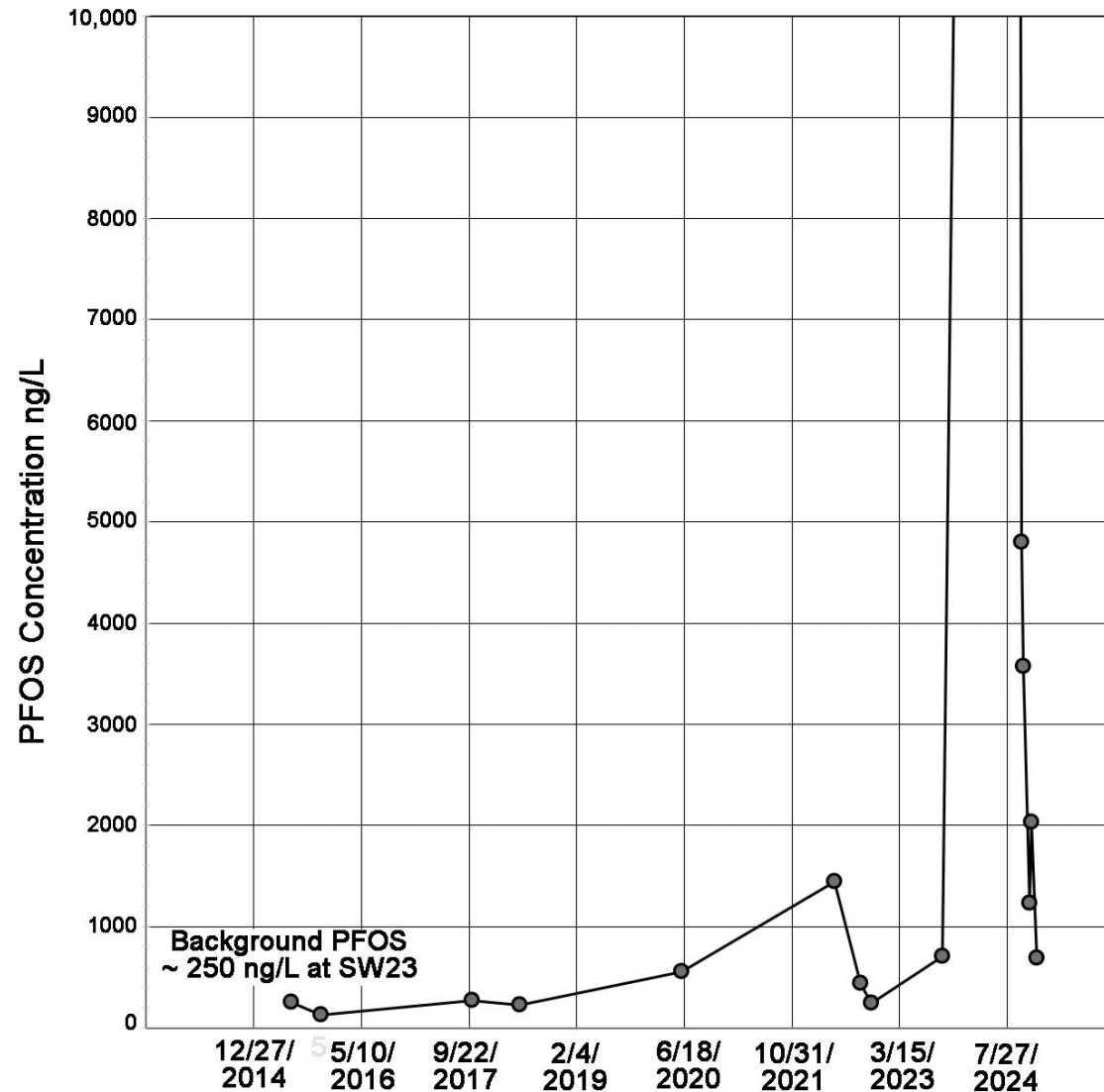
- 1) Hangar 4 built 1956
 - a) Many AFFF spills: PFOS Ground Water hotspot
- 2) Hangar 6 built 2006
 - a) Currently contains ~800 gal PFOS-based AFFF.
 - b) Variable leakage of AFFF materials from Hangar into sewer system

PFAS 6 Ground Water Conc : Blue 0-20 ppt; Green 20-200 ppt; Yellow 200-2,000 ppt; OrangeYellow 2,000-20,000 ppt; Orange 20,000-200,000 ppt; RED >200,000 ppt



SURFACE WATER

2015-2024 PICNIC POND OUTLET SW23 PFOS CONCENTRATION ng/L



Harpswell Cove

- MEDEP found high levels of PFOS in the marine surface waters of Harpswell Cove 3 weeks post-spill.
- SW67 at the head of Harpswell Cove had a PFOS concentration of 385 ppt on 9/9/24. This compares to Navy data for the same station of 5.5 ppt in 2022.
- MEDEP still found high levels of PFOS in Mere Creek surface waters on 12/12/14, 4 months post-spill of 247 ppt.
- EPA Region 1 has a child recreator screening level for PFOS of 203 ppt. Anything above this children should not swim in.



Questions?



DEPARTMENT OF
ECOLOGY
State of Washington

Regulations & Permits
Research & Data
Blog
Contact Us

Home
Air & Climate
Water & Shorelines
Waste & Toxics
Spills & Cleanup

Waste & Toxics > Reducing toxic chemicals > Product Replacement Program > AFFF disposal

Product Replacement Program

AFFF disposal
AFFF EIS
Automotive degreaser
Safer Salons
PCB lights
Recreational foam
Replace PERC
Thermal receipts

Aqueous film-forming foam (AFFF) collection & disposal program

i

Want to participate?

Fire departments that want to participate in this program can follow these steps:

1. [Fill out the participation agreement.](#)
2. [Fill out this survey](#) to let us know how much AFFF you have on-site.
3. [Register for a site ID number](#) if you don't have one already.

Funding for this program will end on June 30, 2025. Please complete the above steps as soon as possible. Contact Sean Smith at 425-324-0328 or Sean.Smith@ecy.wa.gov with any questions.

We are working to implement a program to help fire departments and other first responders in Washington collect, remove, and dispose of stockpiles of [AFFF \(aqueous film-forming foam\)](#).

In 2018, the [Toxics in Firefighting law](#) passed, which restricts the sale, manufacture, and use of AFFF for fire training in Washington. This leaves fire departments and other first responders with stockpiles of AFFF on-site they may not be able to use.

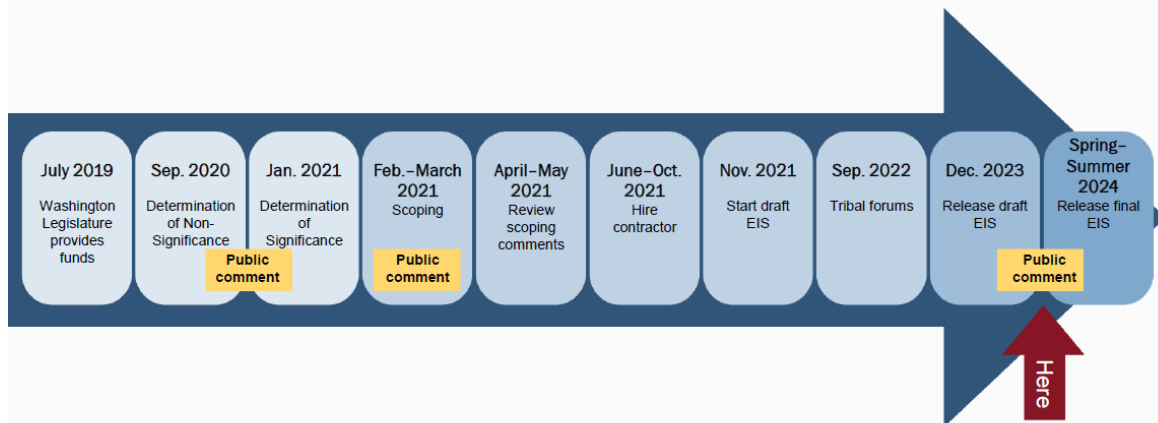


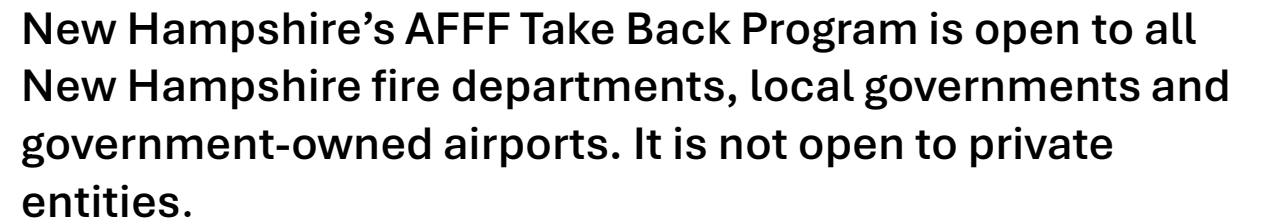
Foam Stockpiles

- More than 100 departments.
- Up to 59,000 gallons of AFFF.
- Drafted guidance and provided resources.



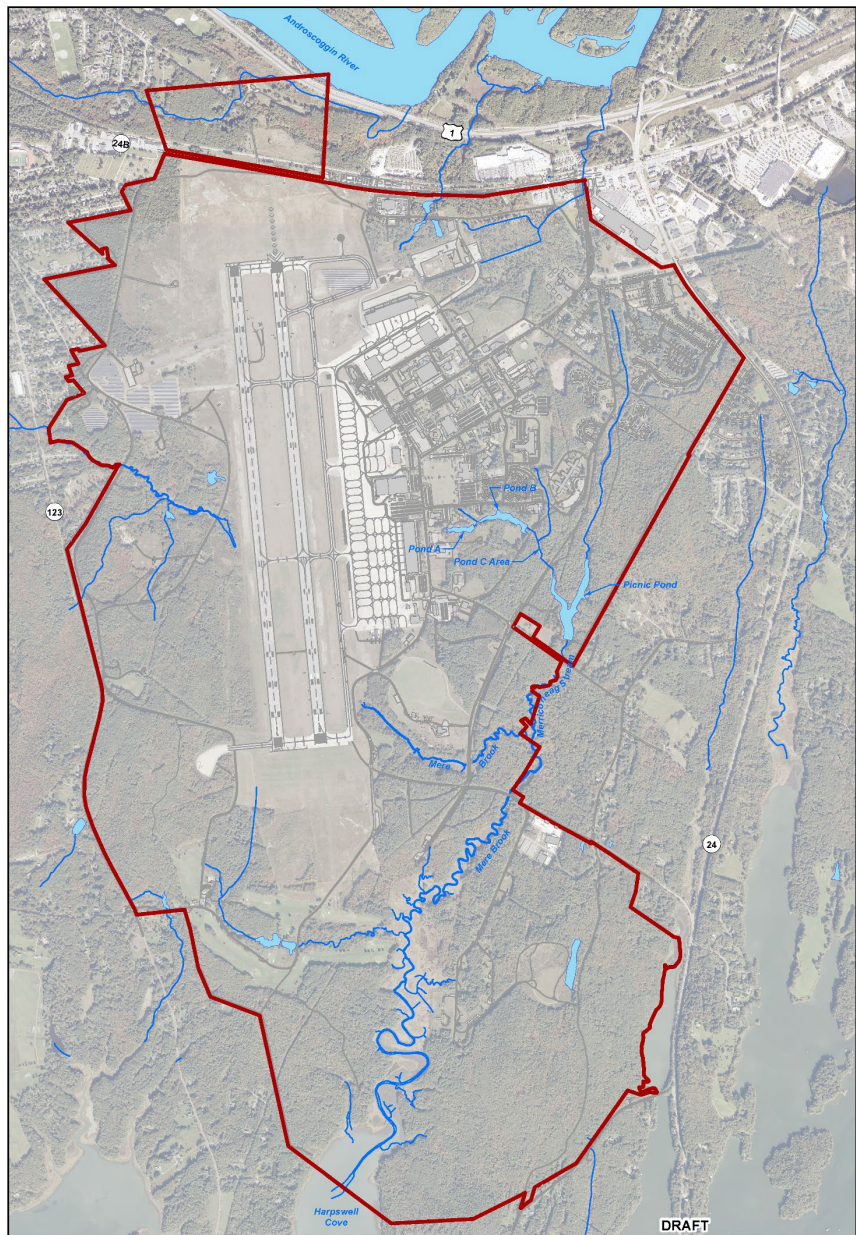
What's the Disposal Program Timeline?





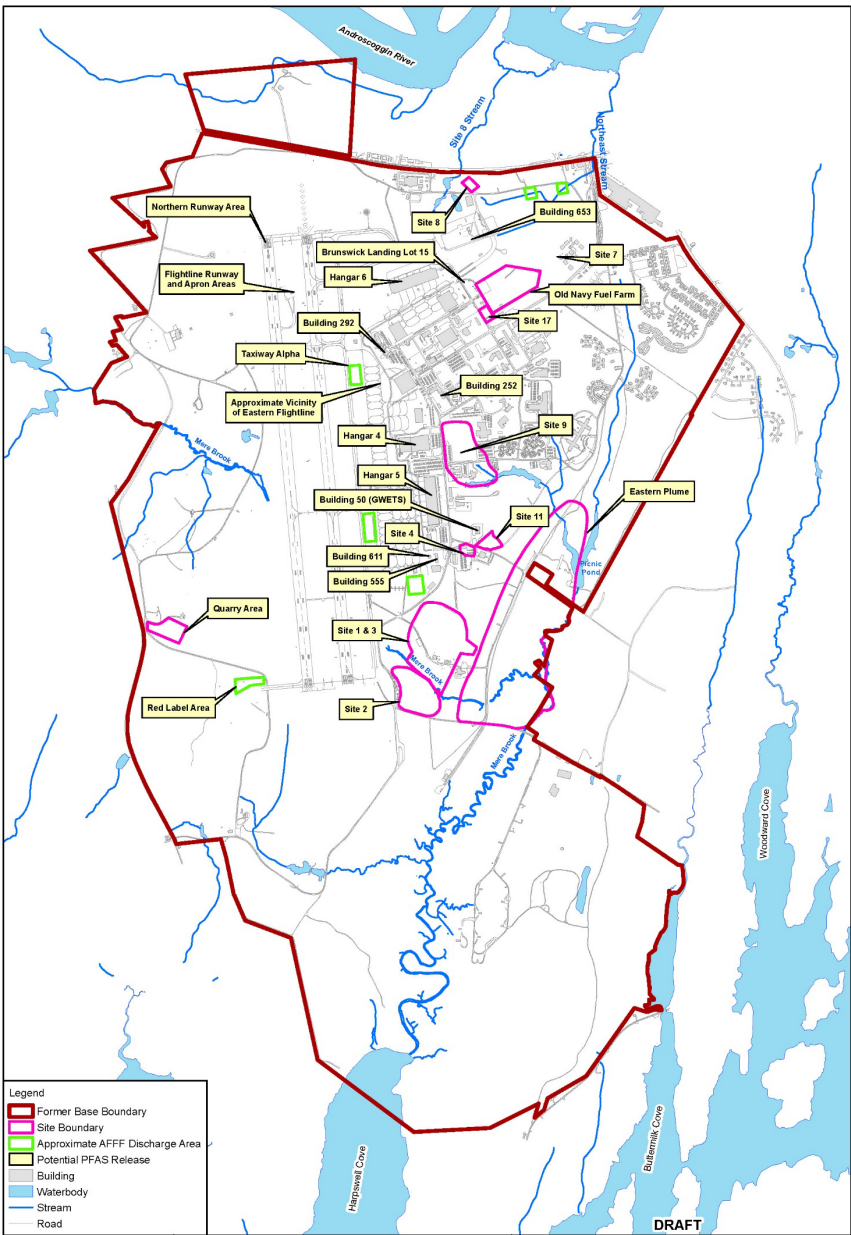
Questions?

Extra slides



		Legend Building Waterbody Stream Road Installation Area	 Scale in Feet	FIGURE 10-1 SITE LOCATION MAP SAMPLING AND ANALYSIS PLAN PFAS DRINKING WATER WELL SAMPLING FORMER NAVAL AIR STATION BRUNSWICK BRUNSWICK, MAINE
Drawn: JB 01/27/2025 Approved: CD 01/27/2025 Project #: 60708191		Source Orthoimagery from NOAA, 2021.		

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		Legend Former Base Boundary Site Boundary Approximate AFFF Discharge Area Potential PFAS Release Building Waterbody Stream Road	 Scale in Feet	FIGURE 10-2 SITE MAP WITH SIGNIFICANT PFAS CONCERNS SAMPLING AND ANALYSIS PLAN PFAS DRINKING WATER WELL SAMPLING FORMER NAVAL AIR STATION BRUNSWICK BRUNSWICK, MAINE
Drawn: JB 01/27/2025 Approved: CD 01/27/2025 Project #: 60708191		Source Orthoimagery from NOAA, 2021.		

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Maine DEP Testing Plans – Drinking water Wells

- Maine DEP Commissioner Loyzim
(<https://tv3hd.brunswickme.org/CablecastPublicSite/show/5874?site=1>, beginning around 26:20)
- Do not expect wells to be impacted immediately: “*quite a bit of time for any contamination to...reach Coombs Rd*”
 - First wall of defense: 10 extraction wells (West side of Picnic pond and stream)
 - Streams – water flows strongly south to Harpswell cove
- DEP plans to test “*before any time when we think that the contamination could reach there and then continue to do quarterly sampling after*”
- Additional testing if there are changes

PFAS in AFFF Released From Hangar 4

