



## **PA Department of Environmental Protection – PFAS MCL Rule**

Per- and polyfluoroalkyl substances (PFAS) are synthetic chemicals with known health effects.

DEP's rulemaking has evolved since 2019. In 2023 the rulemaking process set Maximum Contaminant Level (MCLs) compliance provisions, including monitoring and reporting requirements, analytical methods, acceptable treatment technologies, and public notification requirements.

Through various statewide studies DEP has established MCLs for two PFAS chemicals: PFOA and PFOS; perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS)

Established MCLs:

- PFOA = 14(ng/l) or parts per trillion (ppt)
- PFOS = 18 (ng/l) or parts per trillion (ppt)

[Drinking Water Regulations \(pa.gov\)](https://www.pa.gov/drinking-water-regulations)

[Pennsylvania Bulletin \(pacodeandbulletin.gov\)](https://www.pacodeandbulletin.gov/)

### **CBSD Impact:**

CBSD has 5 schools that operate on individual wells and are regulated by DEP as Non-transient/Noncommunity Public Water Systems (PWS). The new MCL Rule requires monitoring these systems starting in 2024. Monitoring, or water sampling, is required quarterly for a minimum of 1 year. Based on results after 1 year of testing, the monitoring frequency may be adjusted to quarterly, annual, or triannual. All other CBSD facilities are connected to municipal water systems.

CBSD schools with Public Water System (PWS) Permits.

- Groveland Elementary School
- Gayman Elementary School
- Tohickon Middle School
- Holicong Middle School
- East High School

### **Compliance and Public Notification Requirements:**

Monitoring will begin in the first quarter 2024 for both PFOA and PFOS. Compliance against the MCL will be calculated on a rolling averaged over 4 quarters for each compound. The rolling average must exceed the MCL for either PFOA or PFOS to be considered a violation.

The Rule states that an MCL Violation requires a Tier 2 Public Notification. For Noncommunity Water Systems, a Tier 2 Public Notification requires physically posting the public notice in the school for 7 days and must be done within 30 days of learning of the violation.

**PFAS Treatment Options**

In the event of an MCL Violation over the initial year of monitoring, DEP will assess the need for treatment on a case-by-case basis. It is not clear what DEP's position will be regarding treatment if PFAS is detected but not considered a violation.

DEP is currently permitting three forms of treatment:

- Granular Activated Carbon
- Ion Exchange
- Reverse Osmosis

Selection and implementation of treatment would require engineering assistance with design, permitting and construction, and likely taking 12 months for completion.