

State and PWS Perspectives on PFAS Rule and CCR Revisions

*2025 HWWA Annual Conference
October 16, 2025*



PFAS Rule Update



PFAS Rule

- On 4/10/2024, EPA announced the final PFAS Rule with 6 regulated PFAS.

Effective Date 6/25/2024

Initial Monitoring 6/25/24-4/26/27

Ongoing Compliance Monitoring by 4/26/29

Compliance – Starting 2029



PFAS Rule Updates

- On 5/14/2025, EPA updated the PFAS rule:
 - Regulate PFOA and PFOS with MCL.
 - Propose to extend the compliance timeline from 2029 to 2031.
- On 9/11/2025, EPA filed a “motion for partial vacatur” with the U.S. Court of Appeals for the D.C. Circuit.



Rescission and Reconsideration

■ Rescinding 4 PFAS

<i>PFAS</i>	<i>MCLG (ppt)</i>	<i>MCL(ppt)</i>
PFOA	0	4.0
PFOS	0	4.0
PFHxS	10	10
PFNA	10	10
HFPO-DA (GenX)	10	10
Mixt. of 2 or more PFHxS, PFNA, HFPO-DA and PFBS	Hazard Index of 1	Hazard Index of 1



PFAS Rule Timeline

Effective Date 6/25/2024

Initial Monitoring 6/25/24-4/26/27

Ongoing Compliance Monitoring by 4/26/29



SDWB

- Enforce the deadline of Initial Monitoring, April 2027.
- Encourage the water systems to test both regulated and unregulated PFAS.
- Will revise the MCL list and new and reactivated water source test list accordingly.
- Apply an extension on adaption of PFAS rule to EPA.



UCMR 5 Monitoring Data

- Large water systems (POP > 10,000) contacts the laboratories to reprocess the UCMR 5 data.
- For small water systems (POP \leq 10,000), EPA provided the first batch revised data with on 8/27/2025.



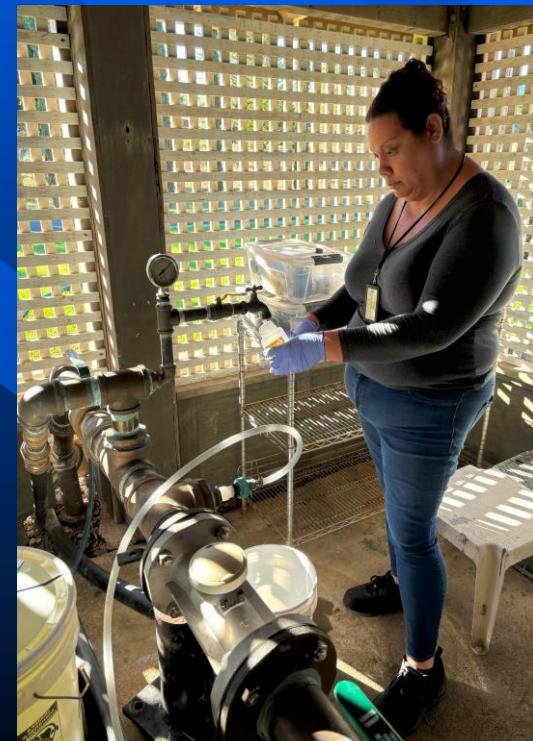
UCMR 5 Monitoring Data (cont.)

- 19 Small systems in Hawaii were covered in August's report.
- By using this revised data, 14 small water systems met the PFAS Initial Monitoring requirements.
- SDWB starts issuing the PFAS IM completion letter to these systems.



Assistance on Small Systems

- Since 10/2024, SDWB has assisted 47 disadvantaged systems to complete the Initial Monitoring.
- Over 80 samples have been collected.



Assistance on Small Systems (cont.)

- The sample collection will be done for all 47 systems by 10/31/2025.
- PFAS were detected from two small systems.
- SDWB will issue the PFAS IM completion letter to these systems.



Suggestion to Water Systems

- Plan to complete the compliance sample collection
 - use the previous data or not?
- What is the plan for the detection?
- Will PWS report the result in CCR for 2025 and 2026?

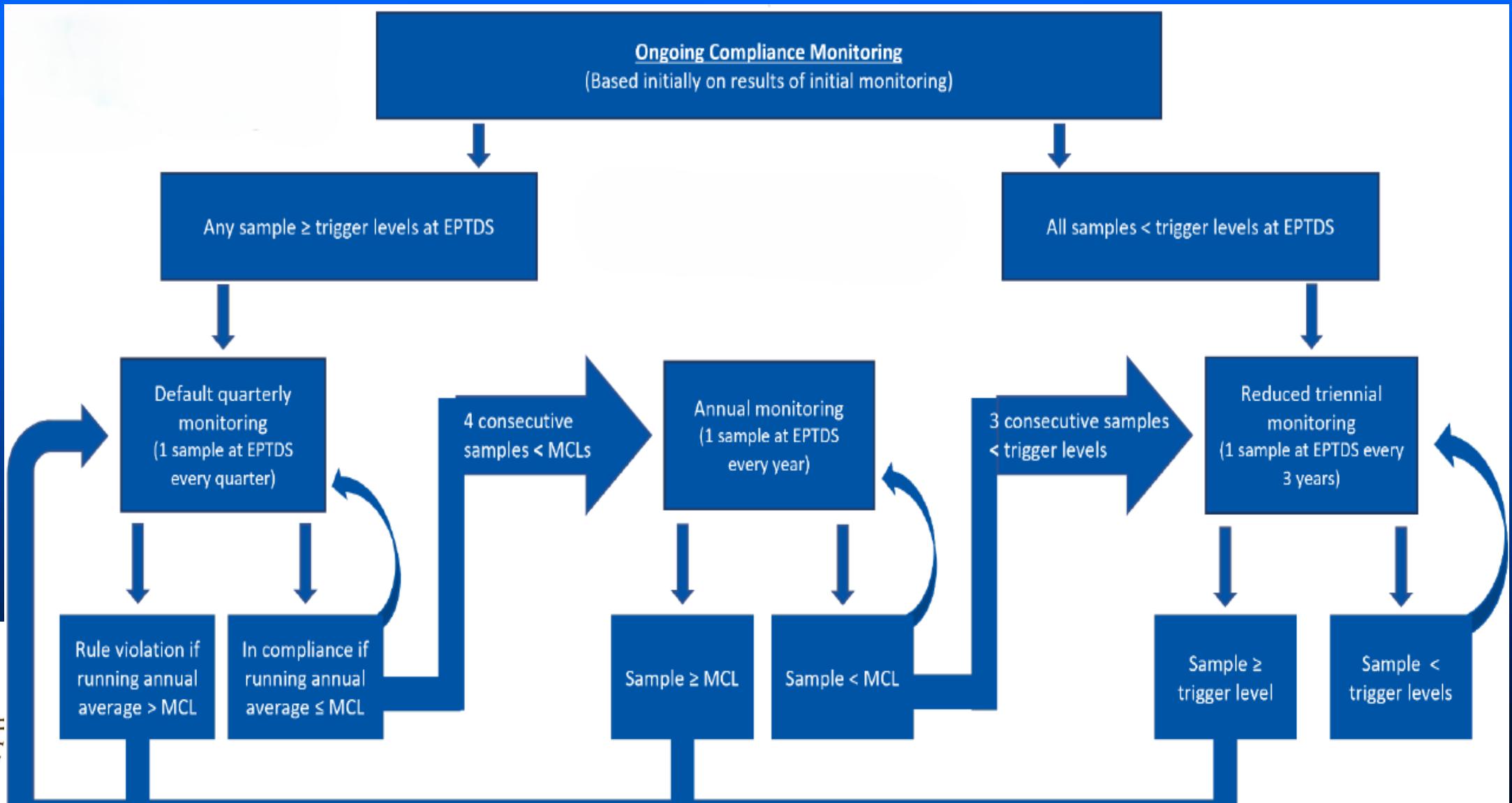


Ongoing Compliance Monitoring

- Ongoing Compliance Monitoring will start on 4/27/2027.
- The regulated PFAS result must be included in CCR of 2027.
- Monitoring and test procedure violations will trigger a public notice.
- The monitoring frequency is determined based on initial results relative to trigger levels.
- Ongoing Compliance Monitoring may be extended to 2031.



Ongoing Compliance Monitoring Frequency



Consumer Confidence Report Rule Revisions



CCR Revisions

- On 5/24/2024, EPA published the CCR Revisions.
- Effective Date: New requirements take effect in 2027 to cover CCR of the year of 2026.



Biannual CCR Delivery

- Requirement: Systems serving 10k+ must provide reports twice a year.
 - the 1st report by July 1st
 - the 2nd report by December 31st
- For the wholesalers to the consecutive systems:
 - the applicable information by April 1st
 - the applicable information by October 1st



Biannual CCR Delivery (cont.)

- 6-month update: Resend the original CCR from July 1st but include any updates (violations, AL exceedances, and/or UCMR reporting results).
- If no new information – resend original CCR.



Mandatory Report Summary

Summary at the beginning of each CCR:

- Violations
- Contact Information
- Translation on Assistance
- Public Notices



Mandatory Language

- If nitrate and arsenic $> \frac{1}{2}$ MCL, educational information on health effects will be included.
- RTCR: Updated standard language for the RTCR compliance in the reports.
- UCMR: A brief explanation of the reasons.



Mandatory Language (cont.)

- Lead AL exceedance:

- identify the exceedance in the contaminant data section
- an explanation of the exceedance
- the steps consumers can take to reduce the exposure
- a description of any corrective actions



Report Delivery and notification

- CWSs must send CCRs to customers by mail or an electronic delivery method.
- CWSs using electronic delivery must provide a paper copy to customers upon request.
- For consumers who do not get water bills, CWSs need send postcards, email/text, or inform them via social media, or public meetings.



Recordkeeping

- Requirement: Systems serving 50k+ must post its current year's report to a publicly accessible site on the internet.
- Websites need to contain an online link to the past 3 years of CCR.
- Systems serving <50k can choose reporting delivery methods.
 - if choosing website, link needs to obey the “3 years of reports” requirement.



CCR Certification

- Change from 3-months to 10-days

CWSs must submit a copy of the report and certification to SWB no later than 10 days after CWSs distributing CCR to customers.



Suggestion to Water Systems

- Not only for large systems
- know your customers
 - those who do not pay the bill
 - those who speak other languages
- The format change/new mandatory language
- Plan to complete the CCR and certification at the same time
- Record/data keeping
- IT/communication



Mahalo!

Any questions?

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