

**Pennsylvania Department of Environmental Protection
Land Recycling Program**
January 12, 2026

IMPORTANT NOTICE
**Applicability Determination of EPA PFAS MCL Rule
Hazard Index for Soil MSC Development**

On April 26, 2024, the United States Environmental Protection Agency (EPA) published the final National Primary Drinking Water Regulation (NPDWR) for six per- and polyfluoroalkyl substances (PFAS) compounds. The EPA established maximum contaminant levels (MCLs) for those six PFAS but also required a Hazard Index (HI) calculation if more than one of the following PFAS compounds is detected:

- HEXAFLUOROPROPYLENE OXIDE (HFPO) DIMER ACID (Gen-X)
- PERFLUOROBUTANE SULFONIC ACID (PFBS)
- PERFLUOROHEXANE SULFONIC ACID (PFHxS)
- PERFLUORONONAOIC ACID (PFNA)

25 Pa. Code § 250.304(c) of the Pennsylvania Department of Environmental Protection's (DEP) Land Recycling Program regulations state that the Statewide health standard medium-specific concentrations (MSCs) are the MCLs established by EPA. Therefore, the PFAS MCLs published in EPA's April 26, 2024, NPDWR became the MSC values for groundwater effective June 25, 2024. The HI for Gen-X/PFBS/PFHxS/PFNA also became the MSC, but the HI can only be met by calculating and maintaining a running annual average (RAA) HI less than one for the most recent four quarters of groundwater samples. Note: These MSC changes may not be reflected in the current Chapter 250 regulations due to the timing of EPA's MCL rule.

DEP has determined that because the EPA MCL rule applies to drinking water, the HI calculation only applies to groundwater MSCs and does not impact the soil MSCs. This includes both the direct contact and soil to groundwater MSCs. Groundwater is constantly moving through the subsurface and therefore concentrations of contaminants in individual wells will most likely vary. This variation explains why quarterly sampling is required to meet the HI MCL and why it is often required to attain an Act 2 standard for groundwater. Soil contamination on the other hand, moves very little compared to groundwater so quarterly sampling for Act 2 attainment in soil is unwarranted. Therefore, DEP has determined the EPA PFAS MCL Rule HI requirement is not applicable to PFAS soil contamination.

If you have questions or desire clarification of the above, please contact the Land Recycling Program at (717) 783-1566 or email at ra-eplandrecycling@pa.gov.