

Addressing PFAS in Private Drinking Water Wells



Incorporating the PFAS MCL Drinking Water Rule into the CERCLA Process

Well Status	Activity
Known Wells >MCL	 Prioritize Wells >3x MCL POUTS install if >3X MCL Cost Benefit/Technical Analysis if >MCL Municipal Connection, filter system, *bottled water
Known Wells <mcl< td=""><td> Resample wells POUTS install if >3X MCL Cost Benefit/Technical Analysis if >MCL Municipal Connection, filter system, *bottled water </td></mcl<>	 Resample wells POUTS install if >3X MCL Cost Benefit/Technical Analysis if >MCL Municipal Connection, filter system, *bottled water
New off-base well sampling or step out sampling	 Investigate/identify private drinking water wells Sample wells POUTS install if >3X MCL Cost Benefit/Technical Analysis if >MCL Municipal Connection, filter system, *bottled water

*Long-term bottled water with waiver from OSD

CERCLA Clean-Up Process

As part of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA):

Wells Historically Reported Above the MCL

- Install POUTS when PFAS exceeds 3x the MCL
- Issue an Emergency Removal Action Memo with public notice + 30-day comment period
- Cost benefit/technical analysis of wells above the MCL to determine longer-term response action (priority order)
 - Municipal connection
 - POETS
 - POUTS
 - Long-term bottled water with waiver with OSD

- Resample wells historically reported below the MCL
 - If above 3x MCL, will receive a POUTS as Emergency Removal action
 - If above MCL will complete a Cost Benefit/Technical Analysis
- Initial off base or step out well sampling
 - Identify potential off-base private drinking water wells and obtain permission from property owner to sample
 - If above 3x MCL, will receive a POUTS as Emergency Removal action
 - If above MCL will complete a Cost Benefit/Technical Analysis



