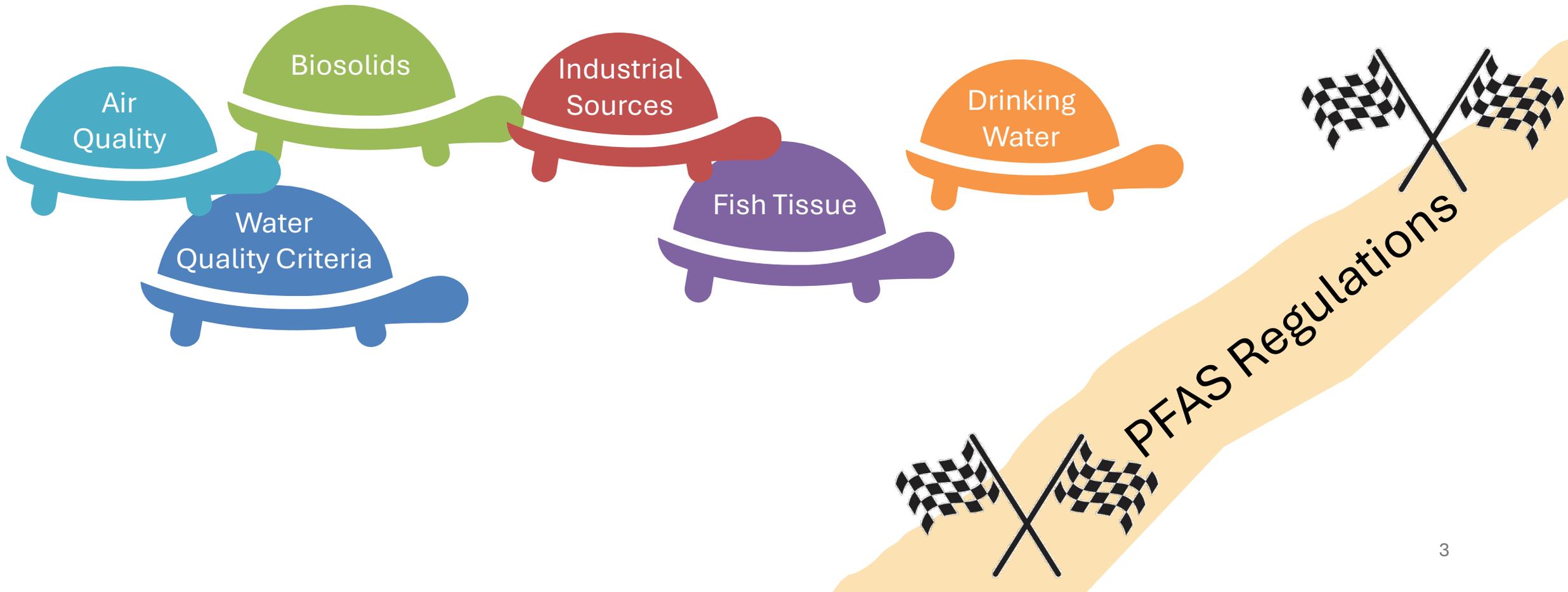


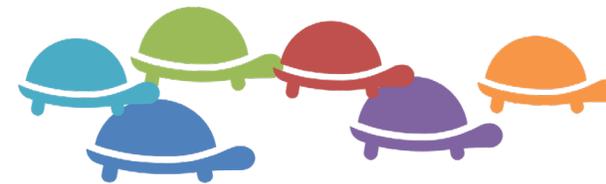
PFAS Regulatory Updates
for
Clean Water SoCal Pretreatment Committee
February 3, 2026



B A C W A
BAY AREA
CLEAN WATER
AGENCIES

PFAS Regulations for the Wastewater Sector: A Slow Race to Limit “Forever” Chemicals





Drinking Water

Wastewater Linkage:

Basin Plans reference drinking water limits as water quality standards

Drinking water limits → NPDES effluent limits

Only applies to water bodies that support drinking water supplies



- **Federal:** USEPA has adopted and plans to keep limits for PFOA and PFOS. Compliance Date: 2031
- **State:** CA Division of Drinking Water is working on adopting state drinking water limits.
State is doing preliminary work to support rollout of limits:
 - Revising notification and response levels for PFOA, PFOS, PFHxS, and PFHxA (Oct 2025)
 - Ongoing monitoring of drinking water system

Fish Tissue



Women
(18-49 Years)

Children
(1-17 Years)

4 TOTAL
SERVINGS
A WEEK

OR

2 TOTAL
SERVINGS
A WEEK

OR

1 TOTAL
SERVING
A WEEK

0 DO NOT
EAT

California Office of
Environmental Health
Hazard Assessment

web www.oehha.ca.gov/fish
email fish@oehha.ca.gov
phone (916) 324-7572

A GUIDE TO EATING FISH *from* SANTA MONICA BEACH SOUTH OF SANTA MONICA PIER TO SEAL BEACH PIER

(LOS ANGELES AND ORANGE COUNTIES)

**WOMEN 18 - 49 YEARS AND
CHILDREN 1 - 17 YEARS**

Eat the Good Fish

Eating fish that are
low in chemicals
may provide
health benefits to
children and
adults.



Avoid the Bad Fish

Eating fish with higher
levels of chemicals
like mercury or PCBs
may cause health
problems in children
and adults.



Choose the Right Fish

Chemicals may
be more harmful
to unborn
babies and
children.



Jacksmelt



California Corbina



Opaleye



Pacific Chub
Mackerel
♥ high in omega-3s



Queenfish



Surfperch



Yellowfin
Croaker



California Halibut



California Scorpionfish (Sculpin)



Kelp Bass
(Calico Bass)



Pacific Sardine
♥ high in omega-3s



Rockfish



Sargo



Shovelnose
Guitarfish



Barred Sand Bass



Black Croaker



Pacific Barracuda



Topsmelt



White Croaker
(Kingfish or Tomcod)

Serving Size

A serving of fish is about
the size and thickness of
your hand. Give children
smaller servings.

For Adults



For Children



Eat only the
skinless fillet



Eat only the meat



Some chemicals are higher in the skin, fat, and guts.

Fish Tissue

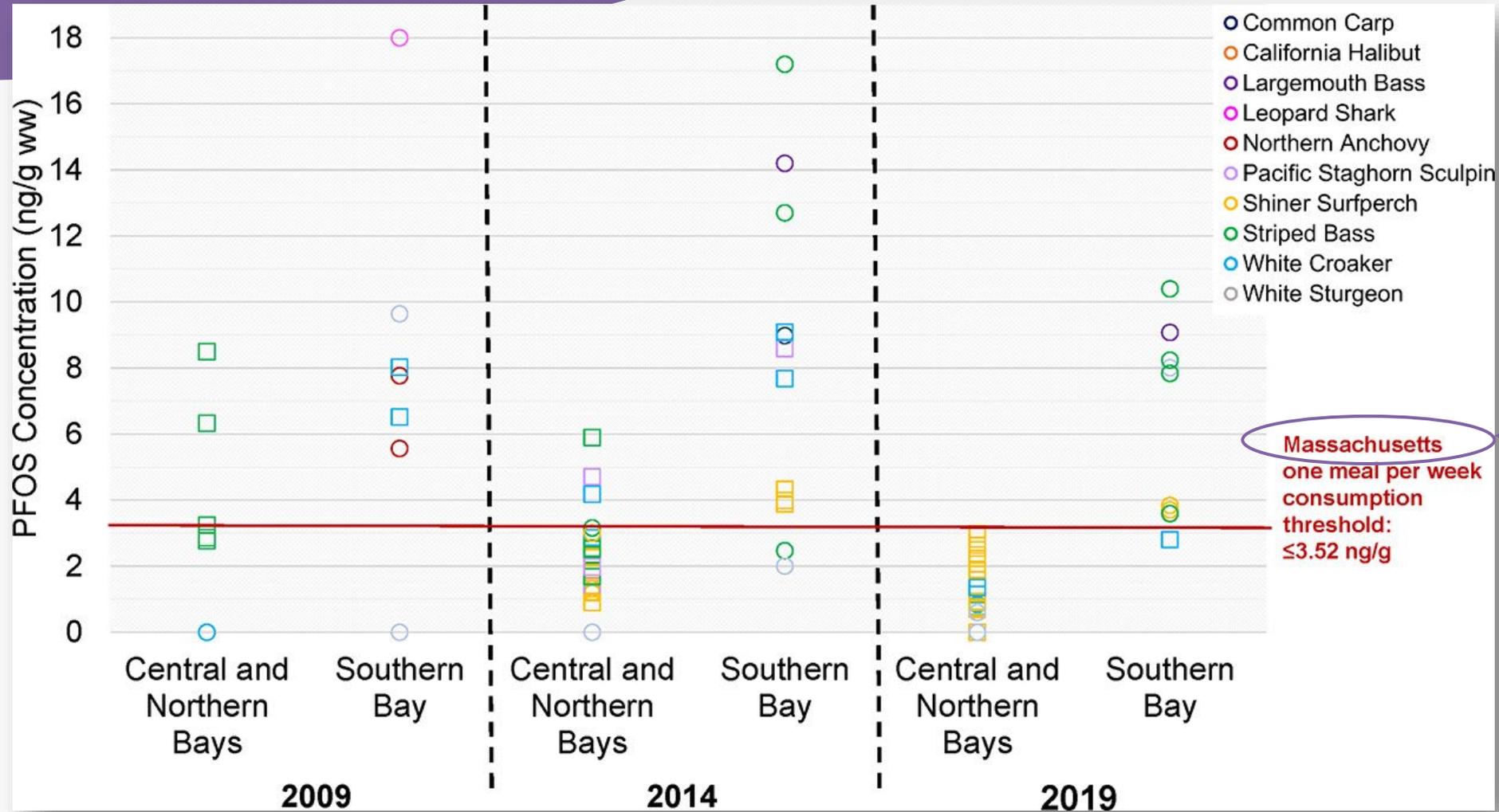


**PFOS
Only**

- OEHHA is actively working on recommended thresholds for fish consumption at various concentrations
 - Advisory Tissue Levels (ATLs): Consider **health benefits** of eating fish and correspond to a 10^{-4} cancer risk for various consumption rates.
 - Fish Contaminant Goals (FCGs): Concentration at which there is lifetime 10^{-6} cancer risk from 1/week serving
 - Thresholds may be developed as soon as ~2026-2027
- These criteria are used to establish 303(d) listings
 - Next 303(d) listing cycle for Regions 2, 4, and 8 is in 2030
- 303(d) listings can trigger TMDLs and/or limits in NPDES permits. **Example: Dioxin**



Fish Tissue



Massachusetts
one meal per week
consumption
threshold:
≤3.52 ng/g

CA-specific
thresholds
coming soon

Source: Méndez et al., ACS ES&T Water, May 20, 2025

Industrial Sources



Federal Pretreatment Program

- USEPA is developing **effluent limitation guidelines** for categorical dischargers that are **PFAS Manufacturers (2026)** and **Metal Finishers**.
- Limits for other industries appear to be lower priority (e.g., **landfills**)
- Once new categorical limits are adopted, enforcement is the responsibility of local wastewater agencies with pretreatment programs
- Possible Water Boards Action?



Biosolids



Federal:

- USEPA conducted a **Draft Sewage Sludge Risk Assessment** for PFOA and PFOS. Public comment period ran through August 2025.
 - Current administration may revisit the science of the Draft Risk Assessment.
 - Risk Assessment ≠ regulation, but **could** be followed by regulations
- PFOS and PFOA are Hazardous Substances under CERCLA (2024)
 - USEPA has heard public utilities' concern about **CERCLA liability**
 - In September 2025, USEPA requested that Congress provide statutory language to exempt “passive receivers” (e.g., biosolids) - HR 1267



Water Quality Criteria

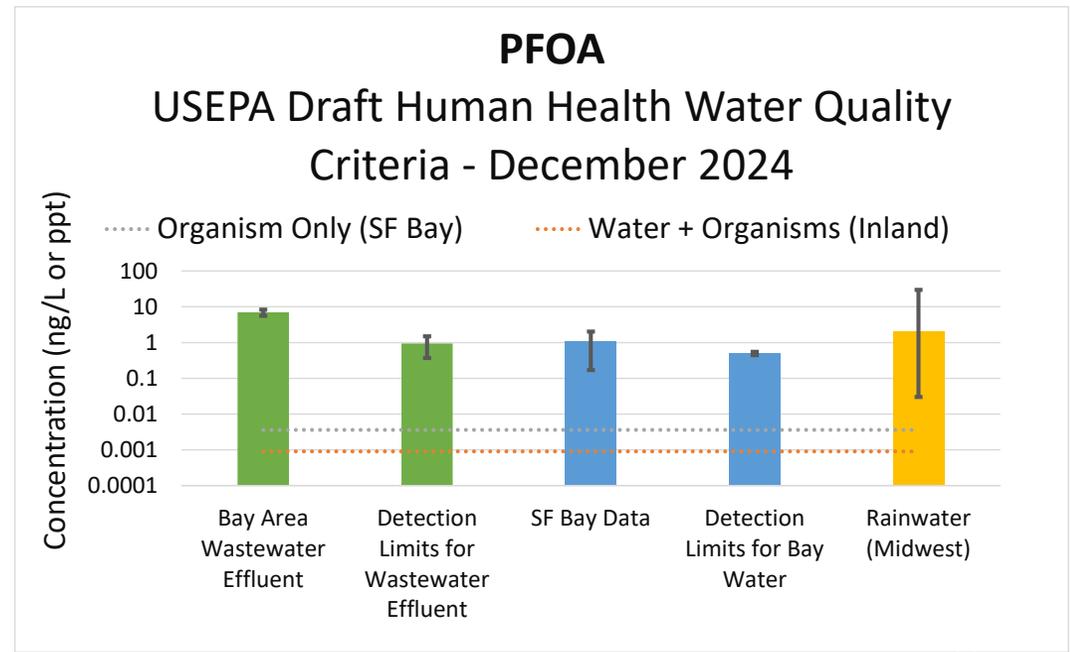


- In 2024, USEPA developed draft water quality criteria based on human health: fish consumption, drinking water.
- Federal water quality criteria **could** be added to Basin Plans
- **This effort is currently paused.**

Table 1. Draft Human Health Criteria (HHC) for Three PFAS.

PFAS	Water + Organism HHC (ng/L; ppt) ¹	Organism Only HHC (ng/L; ppt) ¹
PFOA	0.0009	0.0036
PFOS	0.06	0.07
PFBS	400	500

¹ Values are provided in ng/L units to aid in comparison to method detection limit (MDL).

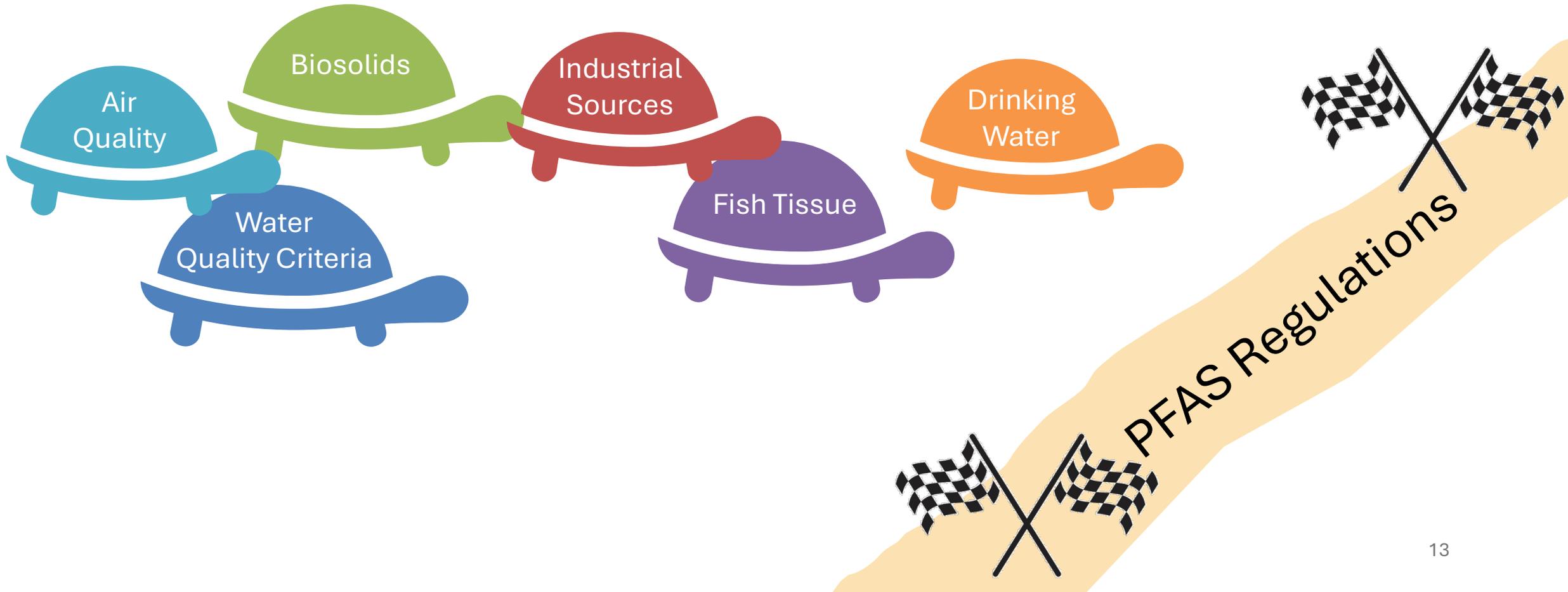


Air Quality



- Some PFAS compounds are volatile – air emissions *may* be a concern in the future
- Air emissions are critical for differentiating PFAS destruction from PFAS reduction
- Analytical methods for use in a regulatory context are still under development by USEPA and partners

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Methods and Monitoring

 USEPA – Planned-for *POTW Influent PFAS Study* is paused

 USEPA – Planning to promulgate PFAS Methods 1633 and 1621 as **Clean Water Act Methods**.

USEPA Schedule: Finalize March 2026

 **NPDES Permit Reissuances** will likely trigger PFAS effluent monitoring.

USEPA Schedule was to propose in Late 2025, Finalize by 2027

Source Control – Wins and Losses

- ✓ **Cosmetics:** Ban on intentionally-added PFAS in effect in 2025
- ✓ **Textiles:** Ban on intentionally-added PFAS in effect in 2025
- ✓ Department of Toxic Substances Control continues to consider PFAS in the Safer Consumer Products Program – evaluation of floor polishes and waxes underway in 2025-2026
- ✗ **SB 682:** Would have banned PFAS in cleaning products, ski wax, food packaging, dental floss, and cookware, but Governor vetoed
- ✗ **Toxic Substances Control Act (TSCA):** 2023 rule required reporting on manufactured and imported PFAS. EPA proposed new exemptions and extensions in Nov. 2025