



PFAS/PFOA Regulatory Update

Bureau of Land/Division of Land Pollution Control

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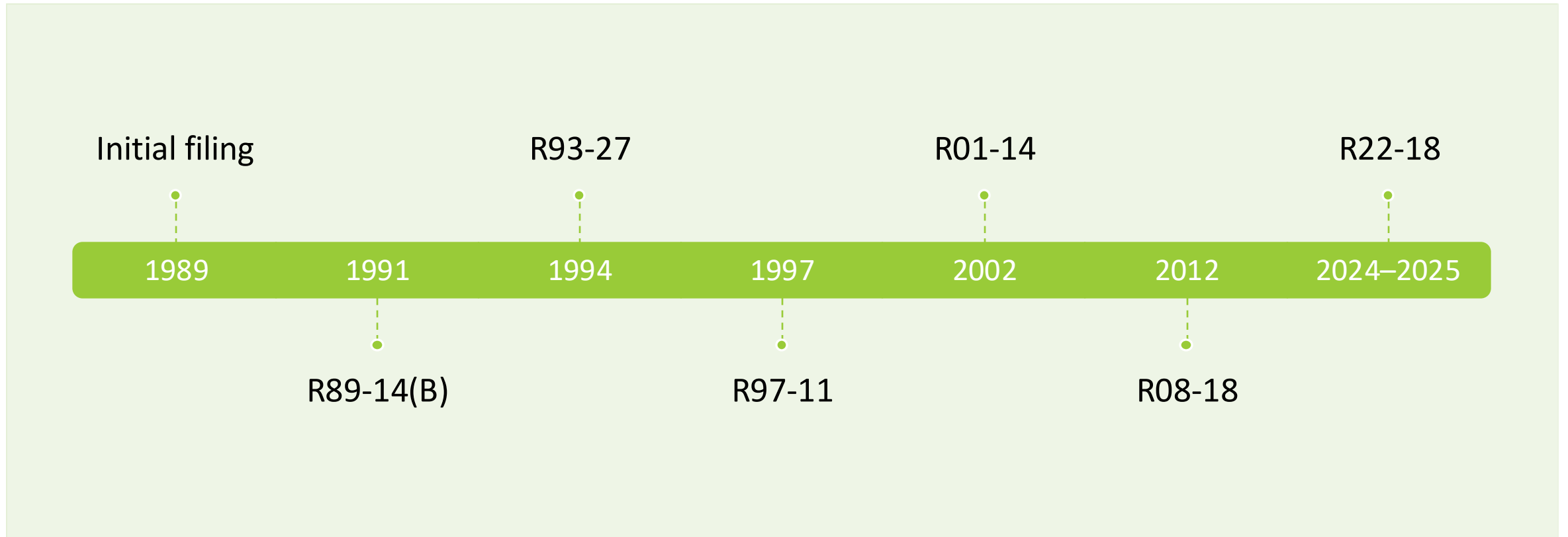
Manager, Permit Section

BOL/DLPC

FEBRUARY 27, 2025

9:10 AM – 9:40 AM

Timeline of Amendments



Rulemaking R22-18

December 7, 2021

- proposal to amend 35 Ill. Adm. Code Part 620 filed

March 7, 2024

- Board issued first notice Opinion and Order

March 29, 2024

- First notice publication in Illinois Register

October 17, 2024

- Board issued proposed second notice Opinion and Order

January 23, 2025

- Second notice Opinion and Order

TBD

- Second notice publication in Illinois Register

Amendments

- Established standards for 10 new chemicals
 - 6 per- and polyfluoroalkyl substances (PFAS), molybdenum, lithium, aluminum, and 1-methylnaphthalene.
 - Based on USEPA's drinking water maximum contaminant levels (MCLs) or health-based water concentrations (HBWC)
- Updates to the existing Class I and Class II Standards
 - including cobalt, selenium, and vanadium
- Sub-docket for potential costs associated with landfills
- Exception to applicability for landfills
 - See 620.410(f) and 620.420(e)

CONSTITUENT	First Notice (mg/L)	Second Notice (mg/L)
Perfluorooctanoic acid (PFOA)	0.000002	0.000004 (4ppt)*
Perfluorooctane sulfonic acid (PFOS)	0.0000077	0.000004 (4ppt)*
Perfluorononanoic acid (PFNA)	0.000012	0.000010 (10ppt)*
Perfluorobutane sulfonate (PFBS)	0.0012	0.002 (2000 ppt)
Perfluorohexanesulfonic acid (PFHxS)	0.000077	0.000010 (10 ppt)*
Hexafluoropropylene Oxide-dimer Acid (HFDO-DA [aka GenX])	0.000012	0.000010 (10 ppt)

* - Equivalent to MCL

Impacts

Immediate Impacts to Landfills (Parts 811 and 814)

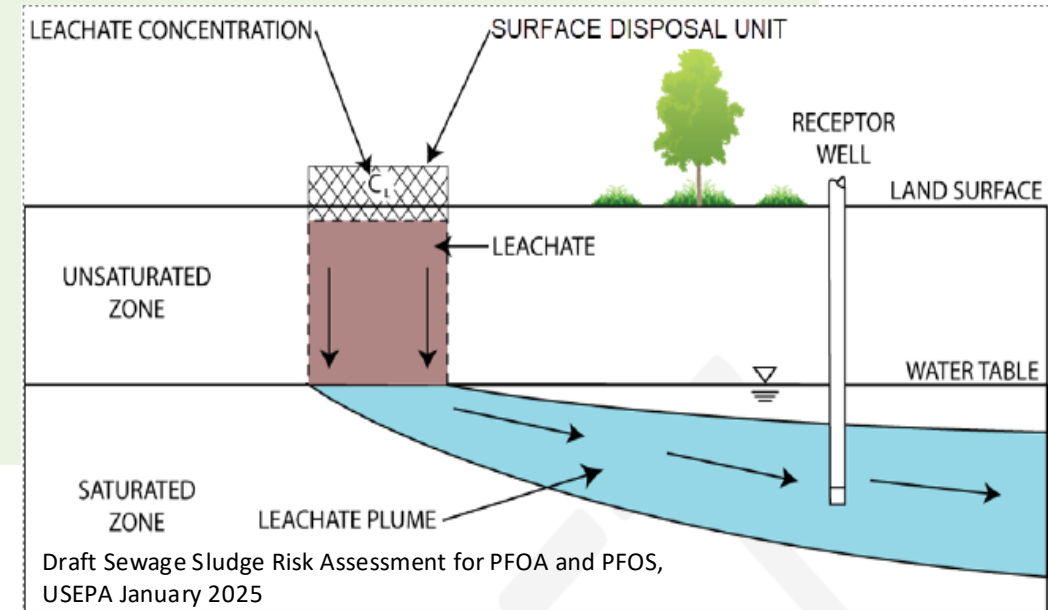
- New or expanding
 - Establish background concentrations for constituents:
 - with Part 620 standards
 - expected to appear in leachate
- Existing
 - Assessment Monitoring
 - monitor for 35 Ill. Adm. Code 620.410 constituents
 - establish background for any constituents detected during assessment monitoring

RCRA

- lack TACO Tier 1 RO
- currently not listed as hazardous constituents
- use of area background will be allowed as RO

Additional Considerations

- Groundwater Impact Assessment
 - Waste Disposal Facility
 - Landfills (Parts 812 Subpart C and 814 Subpart C)
 - Part 620 constituents become part of the GIA process:
 - Background concentrations must be established – 811.315(e)(1)(G)(i)
 - Concentrations in leachate determined from actual samples – 811.317(a)(2)
 - Modeled to estimate concentrations of leachate constituents – 811.317(a)(3)
 - Background Concentrations
 - Cross-contamination
 - Well construction/pump materials/sampling QAQC
 - Source Concentrations:
 - Increased PQL due to matrix interference
 - Cross-contamination



Thank You!

“The mission of the Illinois EPA is to safeguard environmental quality, consistent with the social and economic needs of the State of Illinois, so as to protect health, welfare, property, and the quality of life.”



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