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The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES

Robert R. Scott, Commissioner

May 28, 2026

Her Excellency, Governor Kelly A. Ayotte
and the Honorable Council
State House
Concord, New Hampshire 03301

INFORMATIONAL ITEM

Pursuant to RSA 485-H:8, the New Hampshire Department of Environmental Services (NHDES) is providing a summary report of the progress made relative to PFAS contamination for years 2020 through 2025.

Respectfully submitted,

Robert R. Scott
Commissioner

Attachment:
2020-2025 PFAS Response Program Report

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2020-2025
PFAS Response Program Report

Robert R. Scott, Commissioner

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May 2026

Prepared by

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EXECUTIVE SUMMARY

Per- and polyfluoroalkyl substances (PFAS) are a group of synthetic or human-made chemicals that are increasingly being found in our environment. PFAS do not break down easily and can move through soil, groundwater, and surface water, and be carried through air. Because they are stable chemicals and move so easily in the environment, PFAS have been found far away from where they were made or used.

PFAS have been used for decades to manufacture household and commercial products that resist heat, oil, stains, grease and water. These chemicals have been used in many consumer products, including non-stick cookware, stain-resistant furniture and carpets, waterproof clothing, microwave popcorn bags, fast food wrappers, pizza boxes and personal care products They have also been used in certain firefighting foams and various industrial processes.

Certain PFAS chemicals are no longer manufactured in the United States as a result of phase-out programs, including the EPA PFOA Stewardship Program in which eight major chemical manufacturers agreed to eliminate the use of perfluorooctanoic acid (PFOA) and PFOA-related chemicals in their products. Although PFOA and perfluorooctane sulfonic acid (PFOS) are no longer manufactured in the United States, they are still produced and used internationally and can be imported into the United States in consumer goods such as carpet, leather, apparel, textiles, paper, packaging, coatings, rubber and plastics.

New Hampshire regulates the occurrence of four PFAS chemicals in soil, surface water and groundwater: PFOS, PFOA, perfluorononanoic acid (PFNA) and perfluorohexanesulfonic acid (PFHxS). All four compounds have been detected in New Hampshire's groundwater, surface water and soils. The New Hampshire Department of Environmental Services (NHDES) has responded to these emerging contaminants through testing, sampling and monitoring our groundwater, drinking water, surface water, fish tissue, soil, wastewater, biosolids, waste sites and landfills; as well as conducting thorough and ongoing site investigations at various sites contaminated by discharges of PFAS. This report details NHDES' response to PFAS contamination, as well as the agency's ongoing efforts to protect the health and safety of the state's residents and the environment.

INTRODUCTION

PFAS was first discovered in New Hampshire drinking water in April 2014 when the Haven Well at the Pease Tradeport (the former Pease Air Force Base) exhibited PFOS at concentrations above the EPA Provisional Health Advisory at that time. In 2016, PFOA was detected in a tap water sample collected inside the facility at Saint-Gobain Performance Plastics (Saint-Gobain) located in Merrimack. Tap water at the Saint-Gobain facility was provided by the public water system operated at Merrimack Village District, which obtains groundwater from a network of water supply wells. The detection of PFOA in the public water system prompted NHDES to immediately initiate an investigation into the source and extent of PFAS contamination. The investigation into the nature and extent of PFAS contamination in New Hampshire has expanded statewide.

In the nine years since NHDES began investigating PFAS and in response to legislative directives to NHDES; the agency has reviewed and tested around manufacturing facilities, commercial businesses, landfills, fire training sites, and other potential sources of PFAS contamination. In addition to investigating concentrations of PFAS in water, soil and air, NHDES investigated PFAS concentrations in shellfish, deer, freshwater fish, and vegetables as well as in wastewater processes including wastewater sludge and biosolids, and land application sites.

Since its discovery, NHDES and the State of New Hampshire have been leading the way in remediating current and preventing future PFAS contamination across the state. Our Story Map details investigation milestones as well as current and future advances.

Pursuant to RSA 485-H:8 II, please find enclosed the first report evaluating the progress made relative to PFAS contamination, the efficiency of the PFAS Response Fund established under RSA 485-H, whether it continues to provide the maximum benefit to New Hampshire citizens and recommendations for potential additional uses of the fund to address PFAS contamination.

LEGISLATIVE BACKGROUND

The following provides a summary of PFAS-related NH bills that became law between 2018 and 2025.

2018 Legislation

House Bill 1766

Directs NHDES to report every 6 months to the general court on the results of monitoring, testing and any other analysis or data relative to PFOS and PFOA levels at statewide sites that have been identified as sources of those contaminants. The reports are also to include preliminary results from bedrock testing conducted at the Coakley Landfill site beginning in the summer of 2018 until completion of such testing.

Senate Bill 309

Allows NHDES to make rules regarding air pollution and the deposit of perfluorochemicals on soils and water and regulates devices emitting or having the potential to emit air pollutants that may harm soil and water through the deposit of such pollutants.

Directs NHDES to evaluate the ambient ground water quality standards for PFOA and PFOS and set ambient groundwater quality standards for PFNA and PFHxS.

Establishes the criteria for setting maximum contaminant limits for public drinking water and directs NHDES to set maximum contaminant limits for PFOA, PFOS, PFNA and PFHxS.

Establishes within NHDES one classified toxicologist position and one classified human health risk assessor for the purposes of developing appropriate standards to protect groundwater and drinking water quality under RSA 485-C.

Directs NHDES to develop a plan, including a schedule and cost estimates, for establishing surface water quality standards for PFOS, PFOA, PFNA and PFHxS in class A and class B waters.

2019 Legislation

House Bill 4

Makes an appropriation of $6,000,000 from the Drinking Water and Groundwater Trust Fund (DWGTF) to NHDES for the purpose of studying, investigating and testing for contamination caused by PFAS and for the preliminary design for a treatment system for such contamination. The appropriation was to lapse June 30, 2021. An extension was approved through House Bill 2 (2021) to June 30, 2023.

Directs NHDES, in coordination with the attorney general, to report to the fiscal committee of the general court upon any significant developments relative to the state's lawsuit against companies for the manufacturing and dissemination of perfluorinated chemicals in New Hampshire.

House Bill 737

Establishes the Commission on the Environmental and Public Health Impacts of Perfluorinated Chemicals to investigate and analyze the environmental and public health impacts relating to releases of perfluorinated chemicals in the air, soil and groundwater in Merrimack, Bedford and Litchfield. The commission submits an interim report of its findings on November 1, each year through 2024. Requires a final report of its findings and any recommendations for proposed legislation to be submitted to the speaker of the house of representatives, the president of the senate, the house clerk, the senate clerk, the governor and the state library on or before November 1, 2024.

Legislative amendments to the Commission on the Environmental and Public Health Impacts of Perfluorinated Chemicals were established through House Bill 256 (2021) and House Bill 1114 (2024) outlined below.

Senate Bill 257

Prohibits the use of foams containing perfluoroalkyl chemicals in fighting fires; directs NHDES to conduct a survey of stocks of legacy aqueous film forming foam (AFFF) throughout the state, and to subsequently establish an AFFF Take Back Program; and requires disclosure to the purchaser at the time of sale if firefighting personal protective equipment contains PFAS chemicals.

2020 Legislation

House Bill 1264

Sets maximum contaminant levels (MCLs) for perfluorochemicals in drinking water in RSA 485:16-e and, in turn, sets ambient groundwater quality standards (AGQS) equivalent to the MCLs.

Establishes the PFAS Remediation Grant & Loan Fund (PFAS RLF) and programs, codified as RSA 485-H, with a capital appropriation of $50,000,000 to NHDES to administer loans to public and

private entities for the remediation of PFAS in the state's drinking water sources and wastewater residuals.

Requires insurance coverage for PFAS and perfluorinated compound blood testing, and requires that such benefits shall not be subject to any greater co-payment, deductible or coinsurance than any other similar benefits provided by the insurer.

2021 Legislation

House Bill 256

Amends the Commission on the Environmental and Public Health Impacts of Perfluorinated Chemicals established in HB 737 (2019) by adding members from Londonderry to the commission.

House Bill 271

Amends RSA 485:16-e and RSA 125-C:10-e to change perfluorochemicals to per and polyfluoroalkyl substances in name and definition.

Amends RSA 485-H to include these main revisions:

- RSA 485-H:3 adds municipalities as an eligible entity under the PFAS RLF.
- Addition of RSA 485-H:11 expands the program to include the administration of grants to entities that meet the eligibility criteria for up to the greater of $1,500,000 or 30 percent of the total eligible cost of the project, with no appropriation of funds.

2022 Legislation

House Bill 1547

Adds RSA 485-H:13 directing NHDES to adopt rules specific to the application of RSA 485, RSA 485-C, RSA 147-A and RSA 47-B to PFAS contamination to include soil remediation standards for PFOA, PFOS, PFNA and PFHxS.

Amends RSA 485-H:3 to allow NHDES to establish a rebate program to assist private well users with water treatment or connection to a public water system with an appropriation of $25,000,000 to fund grants and rebate reimbursements.

House Bill 1546

Requires the commissioner of NHDES to consider peer-reviewed studies of the acute, chronic, mutagenic, reproductive or developmental health effects in humans as a result of inhalation exposure to an individual per- and polyfluoroalkyl substance, and whether to establish or modify any classification or ambient air limit for such individual per- and polyfluoroalkyl substance by adopting rules in accordance with the provisions of RSA 541-A.

2023 Legislation

House Bill 2

Amends RSA 485-H by changing the name of the fund from the PFAS loan fund to the PFAS Response Fund.

Adds duties to NHDES under RSA 485-H:8 relative to investigating, testing and monitoring for PFAS in soil, groundwater, surface water, wastewater, air, biota and other media and allows up to 10 percent of the moneys appropriated under HB 1547 (2022) to be used to fund such duties.

Appropriates the sum of $2,000,000 to the PFAS response fund established under RSA 485-H:10 to fund grants and reimbursements in accordance with RSA 485-H:11.

Appropriates the sum of $9,700,000 for the purpose of funding a new drinking water transmission main between the existing Nashua Core water distribution system and the existing Litchfield water distribution system, including all ancillary projects needed, including, but not limited to booster pumping stations, directional drilling under the Merrimack River and all associated design and construction permits.

2024 Legislation

House Bill 398

Amends RSA 477:4-a to include PFAS in the notification requirement prior to the sale of real property.

House Bill 1114

Extends the Commission on the Environmental and Public Health Impacts of Perfluorinated Chemicals established in HB 737 (2019) for five years to continue investigation and analysis of the environmental and public health impacts relating to releases of perfluorinated chemicals in the air, soil and groundwater in Merrimack, Bedford, Londonderry and Litchfield. This bill adds to the commission a representative from Hudson, appointed by the governing body of such town, and a resident of Hudson who is a member of a drinking water related environmental advocacy citizen organizations which are not affiliated with any government or state agency, recommended by the senators appointed to the commission and appointed by the president of the senate.

House Bill 1649

Restricts the use of intentionally added PFAS in certain consumer products sold in New Hampshire. The bill also makes appropriations to NHDES to fund and staff the PFAS products control program.

Amends RSA 147-B regarding civil actions for PFAS contamination relative to strict liability for containment, cleanup, restoration or other remediation related to the release or threatened

release of hazardous waste or hazardous material in accordance with applicable law and departmental rules.

Provides that funds received by the state in settlement of PFAS litigation attributable to impacts to public drinking water systems shall be deposited in the drinking water and groundwater trust fund and used to provide grants and loans to public water systems whose water sources have been impacted by PFAS above applicable standards.

Exempts NHDES from any rulemaking requirements contained in RSA 485-H and RSA 541-A, for the biennium ending June 30, 2025, regarding the PFAS Removal Rebate Program for Private Well Users authorized pursuant to RSA 485-H:3, II-a.

House Resolution 28

A resolution urging for the compensation for injuries from PFAS and for the closure and cleaning of sites affected by PFAS.

Senate Bill 393

Appropriates the sum of $2,000,000 from general funds and the sum of $4,500,000 from a combination of federal funds and the drinking water and groundwater trust fund established under RSA 485-F for the purpose of funding regional drinking water infrastructure as part of Phase 2 of the southern New Hampshire regional water project to increase water supply by over 2 million gallons per day to multiple towns impacted by PFAS contamination and growing water demands. The project shall include design of all ancillary projects needed, construction of chemical feed at existing water storage tanks in Derry and Salem and raising the water level of Lake Massabesic.

2025 Legislation

House Bill 2
Amended RSA 485-H:6 to include the establishment of an application approval process to administer the monies received from settlements to eligible public water systems and to apply these funds to those systems that may have PFAS contamination below applicable standards.

Appropriated the sum of $11,500,000 for the purpose of funding regional drinking water infrastructure as part of Phase 2B of the southern New Hampshire regional water project to increase water supply by over 2 million gallons per day to multiple towns impacted by PFAS contamination and growing water demands.

House Bill 167

Amends RSA 149-M:64, IV to include the prohibition of the sale of ski, boat, and board waxes that contain intentionally added PFAS.

FUNDING SUMMARY

Legislative Funding

Table 1 below summarizes legislative appropriations associated with the legislative actions outlined in the previous section regarding PFAS.

Table 1 – Summary of Legislative Funding

Funding Source	Studying, Investigation, Testing & Monitoring	PFAS RLF Loan	PFAS RLF Grant	PFAS Rebate Program	Nashua/ Litchfield Watermain Interconnection	PFAS Products Control Program	Phase 2 SONH Regional Water Project
HB 4	$6M						
HB 1246		$50M					
HB 1547			$10M	$15M			
HB 2 (2023)	$2.5M		$2M	($2.5M)	$9.7M		
HB 1649						$0.25M	
SB 393							$2M
HB 2 (2025)							$11.5M
Total:	**$8.5M**	**$50M**	**$12M**	**$12.5M**	**$9.7M**	**$0.25M**	**$13.5M**

Grand Total 106.45M

Non-Legislative Funding

In addition to legislative appropriations, the PFAS Response Fund received monies through the American Rescue Plan Act of 2021 (ARPA) and the DWGTF. Approximately $26,000,000 of the State of New Hampshire (State) ARPA grant that was allocated to NHDES was administered as grants through the PFAS RLF. In February 2022, NHDES requested and was granted $5,000,000 from the DWGTF to establish and administer the PFAS Removal Rebate Program for Private Well Users.

NHDES is further receiving federal funding from the Bipartisan Infrastructure Law (BIL) to address emerging contaminants, like PFAS, in drinking water. Starting in 2022, BIL provides five years of emerging contaminant funding through the Drinking Water State Revolving Loan Fund (DWSRF EC) as 100% forgivable loans, and the United States Environmental Protection Agency's (EPA) Emerging Contaminants in Small or Disadvantaged Communities (EC-SDC) Grant Program. NHDES has received four years of funding (2022-2025) from these two programs. Besides

providing loans and grants for drinking water infrastructure to remediate PFAS, the EC-SDC funds are being utilized to equip the Public Health Laboratories with the capability to analyze for PFAS and to support continued private well sampling. It is important to note that the BIL monies are also being utilized by NHDES to fund manganese and 1,4-dioxane projects with the primary focus on PFAS. Table 2 summarizes funding allocated to NHDES specifically for PFAS-related activities from outside of legislative appropriations.

Table 2 – Summary of Additional PFAS Funding

Funding Source	PFAS RLF Grant	PFAS Rebate Program	DWSRF EC (2022-2025)	EC-SDC (2022-2025)
American Rescue Plan Act	$26,000,000			
Drinking Water Groundwater Trust Fund		$5,000,000		
Bipartisan Infrastructure Law			$38,382,000	$47,285,000

Total: 116,667,000

IMPLEMENTATION OF LEGISLATIVE ACTIONS

The following section summarizes the accomplishments of NHDES in order of the legislative actions beginning in 2018 outlined above while providing the progress NHDES has made relative to PFAS contamination over the past nine years.

Occurrence Reporting

Pursuant to the laws of the State of New Hampshire, January Session of 2018 Chapter 306:2 (House Bill 1766), NHDES prepares a status report on the occurrence of PFAS contamination in New Hampshire twice-yearly for the Legislature. The first report was submitted in December 2019 and twice-yearly thereafter. The latest "Status Report on The Occurrence of Per- And Polyfluoroalkyl Substance (PFAS) Contamination In New Hampshire" is dated December 2025.

Air

In 2016, when PFOA was first detected in a tap water sample at Saint-Gobain facility, the Air Resources Division (ARD) began to investigate other potential air emission sources. New Hampshire Chapter Laws 345 of 2018 (Senate Bill 309) authorized NHDES to regulate new and existing devices that emit PFAS or precursors that may cause exceedances of Ambient Groundwater Quality Standards (AGQS) or (Surface Water Quality Standard (SWQS). Under this law, Saint-Gobain was identified as an active PFAS emitting source in operation at the time that had emissions of sufficient quantity to continue to contribute to groundwater contamination above AGQS. ARD issued a permit to Saint-Gobain in 2020 that required the installation and operation of a regenerative thermal oxidizer for the control of PFAS emissions. The facility ceased operations in 2024.

While ARD has evaluated other existing industrial sources for potential PFAS air emissions, thus far only Saint-Gobain was identified as emitting PFAS at levels high enough to require the installation of best available control technology. ARD has been actively involved with

investigations of other industrial and municipal facilities to ensure PFAS emissions are not contributing to groundwater contamination in New Hampshire. In addition, ARD is kept apprised of any new devices that are being proposed for installation in New Hampshire to ensure that potential PFAS or precursor emissions are evaluated under the law.

Senate Bill 309 also authorized NHDES to adopt rules regarding air emissions from new and existing sources. ARD is developing a stack testing plan to evaluate other potential devices where feed streams likely contain PFAS or precursors which may trigger evaluation under the law. Since the law applies to PFAS for which an AGQS or SWQS has been established in New Hampshire and current AGQS are for long-chain PFAS, the devices of interest to ARD as part of this stack testing plan are devices located at facilities such as landfills or incinerators that have air feed streams with historical longer chain PFAS or precursors.

In 2017, NHDES requested assistance from the United States Environmental Protection Agency's Office of Research and Development (EPA ORD) to conduct analyses of various samples for the potential existence of PFAS. The type of samples identified by NHDES for analysis included industrial coating formulations, air emissions, groundwater, surface water, soil and leachate. Specifically, NHDES was interested in samples taken near sites where there was the potential for air emissions associated with processes that historically and currently use PFAS-containing raw materials. The results are summarized in the "2018 Results for Per- and Polyfluoroalkyl Substances (PFAS) Analyses Performed by United States Environmental Protection Agency's Office of Research and Development for Samples Collected in Southern New Hampshire," dated April 2019.

Since 2022, NHDES has conducted an annual review of scientific literature and regulatory assessments by state and federal partners and has not identified any new information relative to inhalation exposure that would change NHDES assessment of PFAS regulated under RSA 125-I.

Maximum Contaminant Levels/Ambient Groundwater Quality Standards

New Hampshire Chapter Laws 345 of 2018 (Senate Bill 309) authorized NHDES to consult with New Hampshire Health and Human Services (NHDHHS) and to initiate rulemaking to adopt maximum contaminant levels (MCLs) for PFOA, PFOS, PFHxS and PFNA by January 1, 2019. The legislation required that NHDES consider, 1) the extent the contaminant is found in New Hampshire; 2) the ability to detect the compound; 3) the ability to treat the contaminant; 4) benefits associated with adopting an MCL; and 5) the costs associated with adopting an MCL.

MCLs are water quality standards that apply to public water systems (PWS). Most MCLs are set for long-term, chronic exposure to a contaminant and apply to community water systems (serves at least 15 service connections used by year-round residents or regularly serves at least 25 year-round residents) and non-transient non-community water systems (not a community water system and serves the same 25 people, or more, over six months per year). These PWS are required to sample for compounds with MCLs and submit the results to NHDES to demonstrate compliance with MCLs.

Existing state law requires NHDES to adopt rules establishing AGQS that are the same as any MCLs established by NHDES. Existing state law also requires that AGQS be the same or more stringent than any federal MCL or health advisory established under the federal Safe Drinking Water Act (SDWA).

AGQS are the standards used to require site investigations and remedial action at and around contamination sites. AGQS are also used to identify where the provision of alternative drinking water is required when contaminated sites impact offsite private and/or public water supply wells and dictate the conditions under which wastewater and wastewater residuals may be discharged to groundwater. NHDES adopted an AGQS for PFOA and PFOS of 70 nanograms per Liter (ng/L) [or parts per trillion (ppt)] for these two compounds combined in May of 2016. The laws enacted in 2018 required NHDES to re-assess these standards and to also adopt AGQS for PFHxS and PFNA.

NHDES established a toxicologist position and a human health risk assessor position for the purposes of developing appropriate standards to protect groundwater and drinking water quality. These two positions were filled in October 2018, and work to develop these standards began in earnest.

The "Summary Report on The New Hampshire Department of Environmental Services Development of Maximum Contaminant Levels and Ambient Groundwater Quality Standards for Perfluorooctanesulfonic Acid (PFOS), Perfluorooctanoic Acid (PFOA), Perfluorononanoic Acid (PFNA) and Perfluorohexanesulfonic Acid (PFHxS)," dated January 4, 2019 provides information on how New Hampshire's proposed MCLs and AGQSs for PFOA, PFOS, PFNA and PFHxS were developed to ensure they are protective of human health at all life stages. The report also provides information on the criteria that the law requires NHDES to consider when establishing MCLs including: occurrence in drinking water, the ability to detect the contaminant, the ability to treat to achieve compliance with the MCLs and the costs and benefits to parties affected by establishing the standards.

The "Technical Background Report for the June 2019 Proposed Maximum Contaminant Levels (MCLs) and Ambient Groundwater Quality Standards (AGQSs) for Perfluorooctane sulfonic Acid (PFOS), Perfluorooctanoic Acid (PFOA), Perfluorononanoic Acid (PFNA) and Perfluorohexane sulfonic Acid (PFHxS)", dated June 28, 2019 provides the technical basis for the proposed MCLs, which by law become AGQSs. As a result of this process, NHDES proposed the following MCLs:

- 12 ng/L for Perfluorooctanoic acid, or perfluorooctanoate (PFOA).
- 15 ng/L for Perfluorooctane sulfonic acid, or perfluorooctane sulfonate (PFOS).
- 11 ng/L for Perfluorononanoic acid, or perfluorononanoate (PFNA).
- 18 ng/L for Perfluorohexane sulfonic acid, or perfluorohexane sulfonate (PFHxS).

These proposed MCLs were established in Env-Dw 709 -713 followed by the adoption of AGQS in Env-Or 600, both effective September 30, 2019. In July 2020, New Hampshire House Bill 1264 was signed into law further establishing these MCLs and AGQS in state law.

On March 24, 2023, EPA proposed the PFAS National Primary Drinking Water Regulation (NPDWR). Concurrent with the proposed rule, EPA also announced preliminary regulatory determinations for PFHxS, PFNA, hexafluoropropylene oxide dimer acid (HFPO-DA) and perfluorobutane sulfonic acid (PFBS) in accordance with the Safe Drinking Water Act (SDWA) regulatory development process. EPA proposed to regulate PFOA and PFOS with individual MCLs and PFHxS, PFNA, HFPO-DA and PFBS using a Hazard Index which accounts for co-occurring mixtures of these four PFAS. Concurrent with the final PFAS NPDWR announced on April 10, 2024, EPA also announced final individual regulatory determinations for PFHxS, PFNA and HFPO-DA, and final regulatory determination for mixtures containing two or more of these three PFAS and PFBS. EPA also issued final health-based, non-enforceable Maximum Contaminant Level Goals (MCLG) for these PFAS.

Table 3 – EPA Final NPDWR for PFAS

Compound	**Final MCLG[1]**	**Final MCL (enforceable levels)[2]**
PFOA	Zero	4.0 ppt
PFOS	Zero	4.0 ppt
PFHxS	10 ppt	10 ppt
PFNA	10 ppt	10 ppt
HFPO-DA (commonly known as GenX Chemicals)	10 ppt	10 ppt
Mixtures containing two or more of PFHxS, PFNA, HFPO-DA and PFBS	1 (unitless) Hazard Index[3]	1 (unitless) Hazard Index

[1] Maximum Contaminant Level Goal (MCLG): The level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety and are non-enforceable public health goals.

[2]Compliance with MCLs is determined by running annual averages at the sampling point.

[3]Hazard Index (HI): The Hazard Index is a long-established approach that EPA regularly uses to understand health risk from a chemical mixture (i.e., exposure to multiple chemicals). The HI is made up of a sum of fractions. Each fraction compares the level of each PFAS measured in the water to the health-based water concentration.

On February 7, 2025, the D.C. Circuit Court granted EPA a 60-day stay on the American Water Works Association (AWWA) and Association of Metropolitan Water Agencies (AMWA) litigation challenging the PFAS NPDWR. The stay was granted in response to an EPA motion filed on the same day to allow administration time to review and consider making changes to the April 2024 PFAS NPDWR that sets limits for six PFAS.

On May 14, 2025, EPA announced that it plans to retain the current drinking water standards for PFOA and PFOS but delay related compliance deadlines from 2029 to 2031. Notably, EPA now intends to rescind regulations for PFHxS, PFNA, HFPO-DA and PFBS. EPA had planned to issue a proposed rule in the Fall of 2025. A draft revised rule has not yet been proposed.

Per the SDWA (Title XIV, Section 1413(a)(1)), New Hampshire shall adopt drinking water regulations no less stringent than the NPDWR no later than two years after the date on which the regulations were promulgated. The final rule took effect on June 25, 2024. This date will not be extended as a result of the May 14th announcement, but states may request an extension. NHDES is following the current federal rulemaking process to inform necessary next steps towards MCL adoption in NH.

Public Water Systems

NHDES began a statewide initiative to test drinking water from all community water supplies for PFAS in 2016. Since the adoption of the MCLs, community PWS and non-transient non-community PWS have been required to complete sampling for PFOA, PFOS, PFNA and PFHxS for compliance. Based on the sampling results to date, PFAS has been detected at about 30% of the public water system sources that have been sampled. Exceedances of PFAS drinking water standards have occurred at about 7% of those sources.

There is an ongoing effort to sample transient non-community water systems at least once to characterize PFAS at these public water systems.

All water quality results (not only PFAS) for all regulated public water systems in the state can be found on NHDES' OneStop Data Retrieval site (OneStop). PFAS results for all compounds analyzed for can also be found on the NHDES PFAS Sampling Dashboard. It is important to note that a PWS is only required to analyze samples for the four regulated PFAS compounds.

In addition, the biannual status report of the occurrence of PFAS in the state includes the most recent concentrations of PFOA, PFOS, PFNA and PFHxS detected for each public water system that has been sampled. Given the fact that treatment systems for PFAS removal have been, and are in-process of, being installed at some PFAS-impacted water systems, some of the sampling results reported reflect low or no presence of PFAS due to operation of these systems. Treatment system installation or water system interconnections have occurred at approximately 75 public water systems to address PFAS contamination.

As of June 25, 2024, under the EPA PFAS NPDWR, community water systems and non-transient non-community water systems must comply with the final PFAS drinking water regulation. The final rule requires:

- PWS to monitor for the six federally regulated PFAS, to complete the initial monitoring by 2027, and to conduct ongoing compliance monitoring. Water systems must also provide the public with information on the levels of these PFAS in their drinking water beginning in 2027.

- PWS to implement solutions that reduce these PFAS, by 2029, if monitoring shows that drinking water levels exceed these MCLs.
- PWS that have PFAS in drinking water which violate one or more of these MCLs to take action to reduce levels of these PFAS in their drinking water and to provide notification to the public of the violation, beginning in 2029. As mentioned above as part of EPA's May 14th announcement, this compliance deadline may be extended from 2029 to 2031.

Surface Water

In December 2019, NHDES produced a Plan to Generate PFAS Surface Water Quality Standards, prepared for the New Hampshire Legislature in accordance with Laws of 2018 Chapter 368 (Senate Bill 309), that contains a schedule and cost estimates for the State to generate its own criteria, as well as information on data needs for standard development and implementation and the impacts to different segments of the state.

A number of site-specific projects have evaluated surface water PFAS concentrations, and in 2017, NHDES sampled the 40 trend monitoring sites that are used to track the long-term water quality changes in a broad range of watersheds with varying sizes and land use characteristics as part of NHDES's Water Monitoring Strategy. The 2017 sampling is summarized in Section 4.3 of the aforementioned plan. The full range of surface water PFAS sampling can be seen by selecting layers on the NHDES PFAS Sampling Map and ensuring the only layer selected is "Surface Water Sample."

NHDES initiated rulemaking to update the surface water quality standards (Env-Wq 1700) in October 2024, and the revisions to Env-Wq 1700 were approved by the Joint Legislative Committee on Rules (JLCAR) on February 25, 2025. Amongst the revisions, NHDES adopted the four New Hampshire PFAS MCLs as the applicable water and fish ingestion criteria to protect human health for locations within 20-miles upstream of public water supply surface water intakes. On April 18, 2025, the revisions to Env-Wq 1700 were then submitted to EPA for approval and use under the Clean Water Act (CWA) pursuant to 40 CFR 131. As of July 31, 2025, NHDES awaits EPA action on that submittal. Upon EPA approval, the revised surface water quality standards will become usable in any federal action such as National Pollution Discharge Elimination System (NPDES) permitting.

Study, Investigation and Testing Initiatives

New Hampshire Laws of 2019 Chapter 364:304 (House Bill 4) appropriated $6,000,000 from the DWGTF for the purpose of studying, investigating and testing for contamination caused by perfluorinated chemicals, and for the preliminary design of a treatment system for such contamination. The following outlines NHDES initiatives funded through this appropriation.

Identification of Impacted Private Water Supply Wells – Private Well Sampling

In March of 2016, NHDES initiated sampling in Merrimack and Litchfield in response to elevated PFAS levels detected in the tap water at Saint Gobain's Merrimack facility. The

sampling was initially focused on a dozen nearby properties served by private wells to perform a preliminary assessment of groundwater and determine if more widespread private well sampling would be necessary. Following receipt of the first analytical results, it was quickly determined that additional sampling would be needed. Early efforts were focused on properties within a half mile of Saint Gobain and later expanded to 1 mile with continued expansion outward to encapsulate what is now referred to as the Consent Decree area.

Most of these initial sampling efforts confirmed the presence of elevated PFAS levels meaning additional private well sampling was needed to protect public health and fully characterize the extent of contamination. For the next several years, NHDES sampling efforts continued with exploratory work near existing remedial sites to better assess the extent of PFAS contamination statewide. Eventually, rules were adopted that required remedial sites to conduct their own background investigations for PFAS. This allowed NHDES to shift internal sampling priorities to areas with elevated levels of PFAS, but no known release or liable party.

When a New Hampshire ambient groundwater quality standard is exceeded, RSA 485-C:14-b requires NHDES to notify property owners located within 500' of the exceedance, of the presence of contamination. If the property is in an area without a liable party, NHDES will invite the property owner to participate in the state private well sampling program. This notification process is driving the current sampling program as it allows NHDES to focus and prioritize resources on the large number of properties located outside of areas with a liable party. However, New Hampshire residents with a private well can request sampling from NHDES. These requests are compared against NHDES records to determine sampling eligibility and priority since NHDES is not able to sample the wells of everyone that would like to be sampled.

It is estimated that approximately 45% of residents in New Hampshire obtain their drinking water from one of approximately 230,000 private wells in the state. Table 4 provides a summary of the occurrence of PFAS in drinking water obtained from over 12,000 private wells. Based on the testing data associated with drinking water obtained from these wells, PFAS occurs above a MCL adopted by the United States Environmental Protection Agency (USEPA) approximately 56% of the time. It is important to note that because NHDES prioritizes sampling efforts in areas of known or suspected contamination, the overall percentage of exceedances is elevated as evident in the data for Hillsborough and Rockingham counties as outlined in Table 4.

Table 4 – Summary PFAS Occurrence in Private Wells

County	Estimated # of private wells	Private wells sampled to date	Number of private wells tested exceeding a NH PFAS AGQS	Percentage of private wells tested exceeding a NH PFAS AGQS	Number of private wells exceeding a PFAS MCL adopted by USEPA	Percentage of private wells tested exceeding a PFAS MCL adopted by USEPA
BELKNAP	14,092	126	14	11%	28	22%
CARROLL	13,405	148	11	7%	18	12%
CHESHIRE	16,417	153	9	6%	19	12%
COOS	5,162	143	4	3%	5	3%
GRAFTON	18,505	583	11	2%	27	5%
HILLSBOROUGH	47,348	7,046	2,307	33%	4,584	65%
MERRIMACK	28,238	578	38	7%	174	30%
ROCKINGHAM	60,841	6,560	1,749	27%	3,901	59%
STRAFFORD	18,617	510	56	11%	161	32%
SULLIVAN	8,521	84	4	5%	8	10%
TOTAL	**231,146**	**15,931**	**4,203**	**26%**	**8,925**	**56%**

NHDES produced the PFAS Sampling Dashboard that displays a searchable database of PFAS sample results for surface water, groundwater, private drinking water wells, public water supply wells and monitoring wells. This dashboard is public facing on the New Hampshire PFAS Response website.

PFAS Treatment System Design/Consolidation Study Programs

In 2020, NHDES contracted with Weston & Sampson to provide a method by which NHDES could estimate the cost of designing the modifications necessary for small PWS systems to comply with PFAS standards. Understanding the typical cost of such designs would inform NHDES's implementation of an assistance program to reimburse the small PWS system owners for their design costs. The proposed reimbursement model for the design of modifications to small PWS systems to provide treatment of PFAS, for use when the design/engineering component is not otherwise itemized is:

Total Capital Cost of PFAS System Eligible	Reimbursement Value/Percentage
≤ $18,500	$4,816 lump sum
> $18,500	26% of total PFAS system capital cost

With this evaluation, NHDES offered the PFAS Treatment Design Services Reimbursement program for schools, childcare centers, transient public water systems and non-transient public water systems to receive a reimbursement for PFAS treatment design services up to 26% of the total cost of the project that pertains to PFAS remediation through NHDES. The program reimbursed five applicants (Table 5) over three years and ended in March 2023.

Table 5 – Summary of PFAS Treatment Design Services Reimbursement Program

Applicant	City/Town	Reimbursement Amount
Ellis School	Fremont	$4,816.00
Kearsarge Regional Middle School	Sutton	$15,379.26
Merrimack School District	Merrimack	$34,848.32
East Kingston Elementary School	Kingston	$7,753.72
M and C Children's Learning Place	Candia	$1,141.40
	Total:	**$63,938.70**

Given the relatively low participation rate in the Design Services Program, NHDES worked to broaden the funding impact and availability. The PFAS Consolidation Study Reimbursement program was created to make funding available to community water systems, non-profit non-transient water systems and municipalities to evaluate the feasibility and cost-effectiveness of connecting to another community water system versus installing treatment to address PFAS contamination. This program reimbursed 12 applicants (Table 6) over two years and ended in March 2023.

Table 6 – Summary of the PFAS Consolidation Study Reimbursement Program

Applicant	City/Town	Reimbursement Amount
Gilford Municipal Complex	Gilford	$10,119.35
Paradise Estates	Rochester	$3,200.00
Pembroke Water Works	Pembroke	$16,441.61
Olde Country Village	Londonderry	$8,500.00
Cornish Elementary School	Cornish	$9,685.00
Rolling Meadows Condos	Londonderry	$19,262.50
Morningside Drive	Derry	$13,633.00
Town of Stratham	Stratham	$66,474.44
Midridge Condos	Londonderry	$1,750.00
Lochmere Village District	Tilton	$12,500.00
Wagon Wheel	Londonderry	$1,500.00
Centennial Estates	Derry	$10,000.00
	Total:	**$173,065.90**

Shellfish Sampling

Beginning in 2020, NHDES conducted preliminary sampling of shellfish (e.g., clams, oysters and other bivalves) and sediment surrounding the Great Bay Estuary to investigate concerns about PFAS in shellfish. This was in response to community concerns about PFAS following erroneous testing results from a contractor lab's analyses of shellfish samples as part of study not related to NHDES's PFAS efforts. NHDES funded Clarkson University to provide analytical services for this project totaling $9,900. The findings from this effort have resulted in two published journal articles (Giffard et al., 2022; Bangma et al., 2023) with a third in preparation.

Shellfish sampling projects from 2020-2022 within Great Bay supported the application of funding from the Department of Defense's Strategic Environmental Research and Development Program (SERDP) totaling $691,099 to further characterize and evaluate the occurrence of PFAS in Great Bay, as well as study the toxicity of these mixtures in marine organisms. No NHDES PFAS funding was spent for this specific grant application, but securing the SERDP grant funding to support technician jobs and analyses in New Hampshire would not have been possible without prior work supported by NHDES. The primary awardee of this grant is Dartmouth College, who also oversees administration and reporting requirements. Peer reviewed study findings were published in the July 15 volume of Science and the Total Environment (released May, 2025). NHDES engaged with stakeholders, including members of the aquaculture community, and supported communication of findings to a broader audience through development of a fact sheet titled Summary of the Great Bay Estuary Study of PFAS in Water, Sediment and Shellfish.

Surface Water, Sediment, Fish

In 2020, NHDES funded a lake study focusing on medium sized lakes expected to have reasonably high fishing pressure. Twelve of those lakes are in medium to highly developed areas of the state and two lakes were selected from very low development areas. PFAS

analysis from each lake consisted of two game species (fillets from 5 fish per species), 3 surface water samples and 1 sediment sample. Additional surface water samples were collected for commonly-measured parameters (chlorophyll-a, dissolved oxygen, pH, dissolved organic carbon, alkalinity, hardness, specific conductance) that would inform the overall health of the lakes at the time of sampling. A full description of the lake study as well as the resulting datasets can be found in the report, PFAS Baseline Study of Lake Fish Specimen, Surface Water and Sediment in Multiple Lakes, New Hampshire.

Consumption of fish and shellfish is one of the potentially direct exposure impacts of PFAS in surface waters to New Hampshire residents. The data from the 2020 lake fish study was used by the NHDES's Environmental Health Bureau to issue new fish consumption advisories for five lakes in Southern New Hampshire in November 2021.

In 2022, NHDES funded the analysis of 144 loon eggs representing 64 lakes and covering 82 loon territories in New Hampshire for which the Loon Preservation Committee had one or more archived, non-viable loon eggs that had not been tested within the last 6 years. The objective of this research was to evaluate the concentrations of PFAS in loon eggs to understand where significant bioaccumulation of PFAS is occurring in fish and other aquatic organisms. The results of that analysis highlight a collection of lakes for which fish tissue sampling should be conducted as funds become available to understand the risk to human health as well as a need to better understand the movement of PFAS through aquatic food webs.

In 2023, NHDES provided a $90,000 match for a collaborative grant from the U.S. Geological Survey (USGS) awarded to and managed by Dartmouth College. The USGS Emerging Contaminants Grant titled Uptake and Bioaccumulation of PFAS and Precursor Compounds in Lake Food Webs provides a total of $500,000, including the match from the NHDES PFAS Fund as well as funds from Dartmouth College and $250,000 from the USGS. This funding supports the investigation of PFAS fate, transport and bioaccumulation in freshwater lakes across southern NH, especially in areas with known impacts from industrial releases. This project's partners currently include Dartmouth College, Middlebury College, Clarkson University and Battelle Memorial Institute. This project is on-going with analysis of samples occurring in 2025 and anticipated reports in 2026.

Wastewater/Sludge

NHDES samples its Sludge Quality Certificate (SQC) holders annually per RSA 485-A:4, XVI-c which sets chemical quality standards to ensure that sludge applied for beneficial use in the state of New Hampshire does not pose a threat to human health or the environment. The SQC Program was developed for sludge generators to certify that their sludge distributed in bulk (>100 pounds), is acceptable for beneficial use as a soil fertilizer/conditioner for agricultural purposes. The SQC also allows NHDES to document and continually monitor the quality of treated sludge materials that are being land applied throughout the state.

Since PFAS are emerging contaminants, they were not historically included in NHDES' annual sampling. From 2019 through 2023, PFAS were included in NHDES' annual sampling of its SQC permittees. During NHDES sampling visits and in its communications, it encouraged its SQC permittees to incorporate use of pretreatment and pollution prevention techniques as well to ensure sludge generated was the highest quality possible.

In December 2020, NHDES entered into a contract with New England Interstate Water Pollution Control Commission (NEIWPCC) of Lowell, Massachusetts to provide administrative and analytical services as part of its Northeast Regional Sludge End-Use and Disposal Estimate project. The contract provided services for administering the National Biosolids Survey in the northeast with a focus on the occurrence of PFAS, the analysis of information, and a final report dated September 2022. This regional project was funded collaboratively by EPA Regions 1 and 2 and NEIWPCC's member states, Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island and Vermont. NHDES contributed $8,000 towards these efforts.

The project's goal was to develop a clear picture of the quantity and characteristics of sludge being produced across the region as a precursor to development of regional approaches for cost effective sludge management. An additional component of this effort was the creation of a repository of PFAS wastewater data from the member states entitled Wastewater Residuals BioHub.

In 2022, NHDES also performed limited wastewater collection system sampling for Merrimack, Concord, Sunapee, New London, Conway and Hampton. The goal of the collection system sampling program was to identify potential sources of PFAS in the collection systems that may be able to be addressed through education and outrea

Soil Occurrence Study

NHDES partnered with the United States Geological Survey (USGS) to evaluate the occurrence of PFAS in shallow soil across the state, to better understand how PFAS move through New Hampshire soils, and to understand occurrence and factors influencing movement of PFAS from biosolids. Results of the occurrence and leaching studies are documented on the USGS website:

- "Statewide survey of shallow soil concentrations of per- and polyfluoroalkyl substances (PFAS) and related chemical and physical data across New Hampshire, 2021" prepared by the USGS and dated October 19, 2022.
- "Solid/Water Partitioning of Per- and Polyfluoroalkyl Substances (PFAS) in New Hampshire Soils and Biosolids: Results from Laboratory Experiments at the U.S. Geological Survey" prepared by the USGS and dated February 9, 2023.

Pursuant to RSA 485-H:13, NHDES established Soil Remediation Standards (SRS) for the four PFAS with AGQS and MCLs. Due to the unique chemical nature of PFAS and the numerous factors influencing fate and transport of these substances through the soil column, NHDES worked with a contractor to evaluate modeling approaches for PFAS leachability. An

evaluation of modeling approaches to assess PFAS leaching from soil to groundwater is documented in "Development of Leaching-Based Soil Values for Select Per- and Polyfluoroalkyl Substances (PFAS)," prepared by Sanborn, Head & Associates for NHDES and dated September 29, 2023. The modeling evaluation used data generated by the USGS study for New Hampshire-specific soils.

NHDES prepared a Technical Summary Report for the Proposed SRS for Perfluorooctanoic Acid (PFOA), Perfluorooctane Sulfonic Acid (PFOS), Perfluorohexane Sulfonic Acid (PFHxS) and Perfluorononanonoic Acid (PFNA) dated October 6, 2023, to summarize the derivation of the proposed Soil Remediation values, which includes an evaluation of the soil-to-groundwater (i.e., leaching) pathway.

Garden Study

In 2023, NHDES funded a study on the occurrence and uptake of PFAS into common garden produce, as well as sample garden items from the Amherst Community Garden that was impacted by AFFF contamination in groundwater. NHDES partnered with the New Hampshire Technical Institute to conduct a greenhouse experiment to manipulate factors that are expected to influence PFAS uptake into common garden vegetables grown and consumed by residents in NH. The project was completed in early 2023, with presentations of findings to the Amherst Community.

Groundwater Discharge Sampling Efforts

In 2021, the NHDES Groundwater Discharge program initiated several projects aimed at characterizing PFAS in residential and commercial wastewater discharges. Projects involved sampling wastewater derived from cleaning operations at marinas (boat washing), schools (floor stripping/waxing) and commercial cleaning businesses (carpet/upholstery cleaning). PFAS present in each of these discharges – especially floor stripping wastewater – prompted NHDES to issue letters to dischargers and request or require modification to their discharge practices. DWGTF funding was also used to identify PFAS in domestic wastewater through sampling of a) wastewater derived from specific household activities such as in-home carpet cleaning and laundering, and b) domestic-only septic tank effluent and septage.

The NHDES Groundwater Discharge program is continuing and expanding its work on PFAS source identification supported by USEPA's Emerging Contaminants in Small or Disadvantaged Communities (EC-SDC) Grant program. Projects include sampling wastewater at additional commercial businesses (e.g. salons, veterinary clinics, laundromats), expanding domestic-only wastewater sampling efforts, performing off-the-shelf consumer product testing and investigating PFAS precursor fate and transport in the subsurface.

Aqueous Film Forming Foam

Class B firefighting foam concentrates (commonly referred to as aqueous film-forming foam or "AFFF") are specialized products intended for use in fighting flammable liquid fires and contain PFAS. Pursuant to New Hampshire Laws of 2019 Chapter 337:1 (Senate Bill 257) and RSA

154:8-b, NHDES surveyed NH municipalities on the quantity of their stocks of legacy Class B firefighting foams and implemented a take back program to inventory, consolidate and dispose of municipal stocks of legacy AFFF.

AFFF Self-Inventory

NHDES in partnership with the State Fire Marshal's Office issued a Legacy PFAS Firefighting Foam Self Inventory Survey letter to New Hampshire municipalities on July 31, 2020. NHDES provided a report to the legislature dated December 1, 2020, which summarized the survey findings and provided recommendations and a framework for an AFFF take back program.

NHDES conducted a second statewide AFFF self-inventory in June 2022 to catalog known stores of legacy AFFF that would need to be disposed of as part of the AFFF Take Back Program.

AFFF Take Back Program

The AFFF takeback program was delayed, as recommended in the December 1, 2020, report, two years (from July 2021 to July 2023), based on the scientific and regulatory uncertainties of the time, and the challenges in identifying appropriate disposal facilities for AFFF.

NHDES identified super critical water oxidation (SCWO) as a potential technology for AFFF destruction in 2023 and began discussions with Revive Environmental (Revive) regarding the take-back program. SCWO is a chemical process that uses increased temperature and pressure in the presence of an oxidant to break down "forever chemicals" like PFAS and other organics.

The AFFF Take Back Program was initiated in August 2024 with the collection of approximately 11,000 gallons of AFFF from New Hampshire fire service agencies, including local fire departments, Manchester Airport, and the NH Fire Academy. The collected AFFF was transported to Revive's facility in Columbus, Ohio, for treatment using SCWO technology. While the project duration was originally estimated at one year, unanticipated delays and limitations have extended the projected completion date to June 2027. Table 7 summarizes the collection of AFFF.

Table 7 – AFFF Take Back Program Summary

County	Pick Up Event Location	Number of towns participating	Gallons	Number of containers
Rockingham	Newton	19	2370	225
Hillsborough	Nashua	11	2440	256
Merrimack	Concord	15	2971	251
Coos	Gorham	5	365	73
Grafton	Littleton	15	640	128
Strafford	Dover	9	345	59
Belknap	Laconia	9	606	83
Cheshire	Keene	12	755	131
Carrol	Bartlett	7	410	82
Sullivan	Claremont	2	115	23
All	**All**	**104**	**11,017**	**1,311**

Per- and Polyfluoroalkyl Substances Remediation Grant and Loan Fund

The PFAS RLF, established under New Hampshire Laws of 2020 Chapter 30 (House Bill 1264), RSA 485-H, initially only provided low interest loans to certain entities for drinking water, groundwater, surface water and aquatic life protection. New Hampshire Laws of 2020 Chapter 30:6 made a capital appropriation of $50 million for the remediation of PFAS in the state's drinking water sources and wastewater residuals.

A grant element was added to RSA 485-H under New Hampshire Laws of 2021 Chapter 223 (House Bill 271) which has been funded using $26,000,000 of the State ARPA funds, $10,000,000 of a $25,000,000 appropriation granted in New Hampshire Laws of 2022 Chapter 326 (House Bill 1547) to fund grants and reimbursements in accordance with RSA 485-H:11, and $2,000,000 appropriated in New Hampshire Laws of 2023 Chapter 79 (House Bill 2) to fund grants and reimbursements in accordance with RSA 485-H:11.

Drinking Water Protection Program

Under RSA 485-H:3, the PFAS RLF provides grants and low-interest loans for publicly and privately owned community water systems, non-profit non-transient public water systems and municipalities to address exceedances of PFAS drinking water standards.

NHDES adopted Env-Dw 1400 Per and Polyfluoroalkyl Substances (PFAS) Remediation Grant and Loan Fund Programs for Certain Public Water Systems to govern the drinking water aspect of the PFAS RLF in January 2021 with readoption with amendments in April 2022 to incorporate statute changes. The program has provided funding for 45 projects totaling approximately $75 million, providing relief to approximately 175,500 residents. Table 8 summarizes the projects funded through the program.

Table 8 – Summary of PFAS RLF Projects

Project #	Project	Town	Project Type	ARPA Grant	Grant	Loan
PRLF-1	Aquarion Water	Hampton	Treatment	$1,341,259		
PRLF-2	Merrimack Village District	Merrimack	Treatment	$3,369,375		$8,530,836
PRLF-5	East Derry Memorial Elementary School	Derry	Interconnection	$150,000		
PRLF-6	Town of Stratham	Stratham	Private Well Treatment		$350,000	
PRLF-7	Town of Windham	Windham	Private Well Treatment		$247319	
PRLF-8	Paradise Estates	Rochester	Interconnection	$181,662		
PRLF-9	Century Village Condominiums	Londonderry	Interconnection	$1,733,000		$774,287
PRLF-10	Cornish Elementary School	Cornish	Treatment	$143,882		
PRLF-11	Dover Water Department	Dover	Treatment	$5,188,000		
PRLF-12	Town of Merrimack	Merrimack	Private Well Treatment		$1,072,500*	
PRLF-13	Town of Atkinson	Atkinson	Private Well Interconnection	$270,702		
PRLF-14	Town of Bedford	Bedford	Private Well Interconnection	$1,351,769		
PRLF-15	Town of Bedford	Bedford	Private Well Treatment		$7,640*	
PRLF-16	Pembroke Water Works	Pembroke	Interconnection		$1,782,000	$4,158,000
PRLF-18	Town of North Hampton	North Hampton	Interconnection	$78,222		
PRLF-19	Rolling Meadows Condos	Londonderry	Interconnection	$1,500,000		
PRLF-20	Olde Country Village	Londonderry	Interconnection		$200,000	

Project #	Project	Town	Project Type	ARPA Grant	Grant	Loan
PRLF-21	Jaffrey Water Department	Jaffrey	Treatment	$2,988,860		$4,011,563
PRLF-22	Morningside Drive	Derry	Interconnection	$1,500,000		
PRLF-23	Iron Wheel Mobile Home Park	Danville	Treatment	$102,000		
PRLF-24	Town of Plaistow	Plaistow	Private Well Interconnection	$915,143		
PRLF-25	Town of Amherst	Amherst	Private Well Interconnection		$741,236	
PRLF-26	Town of New Ipswich	New Ipswich	Private Well Interconnection	$76,900		
PRLF-27	Wagon Wheel Mobile Home Park	Londonderry	Interconnection	$854,757		
PRLF-28	Midridge Condos	Londonderry	Interconnection	$586,255		
PRLF-29	Lochmere Village District	Tilton	Treatment		$1,305,831	
PRLF-30	Hollis Pines Cooperative Mobile Home Park	Hollis	Treatment		$1,500,000	
PRLF-31	Merrimack Village District	Merrimack	Private Well Interconnection	$1,500,000		
PRLF-32	Merrimack Village District	Merrimack	Private Well Interconnection		$1,500,000	
PRLF-34	Golden Hill	Plaistow	Treatment	$26,141		
PRLF-35	Little Arrows Child Care Services	Milford	Treatment		$5,000	
PRLF-36	Centennial Estates	Derry	Treatment	$340,000		
PRLF-37	Town of Kingston	Kingston	Private Well Treatment	$288,000		
PRLF-38	Chisholm Farm	Stratham	Treatment	$136,353		

Project #	Project	Town	Project Type	ARPA Grant	Grant	Loan
PRLF-39	Rutledge Place	Plaistow	Interconnection		$603,250	
PRLF-40	Hanafin Farm	Londonderry	Interconnection		$605,000	
PRLF-41	Town of Epping	Epping	Private Well Interconnection		$39,397	
PRLF-42	Harbourside on Winnipesuakee	Moultonborough	Treatment		$306,100	
PRLF-43	Northbrook Mobile Home Park	Belmont	Treatment		$250,000	
PRLF-44	Ellis School	Fremont	Private Well Treatment		$192,500	
PRLF-45	Pennichuck Water Works	Nashua	Treatment			$17,500,000
PRLF-46	Town of Londonderry	Londonderry	Private Well Interconnection	$1,500,000		$2,950,000
PRLF-47	Historic Harrisville	Harrisville	Treatment	$29,581		
PRLF-48	Town of Madison	Madison	Private Well Treatment		$66,752	
PRLF-50	Pine Haven	Londonderry	Interconnection		$1,300,000	
All	**All**	**All**	**N/A**	**$26,151,861**	**$10,994,385**	**$37,924,686**

* Rebate funds administered through the PFAS RLF

Groundwater, Surface Water and Aquatic Life Protection Program

Under RSA 495-H:4, the PFAS RLF provides grants and loans to publicly owned and non-profit wastewater and/or wastewater residual treatment or storage facilities that are required to treat effluent and residuals to achieve applicable PFAS standards prior to discharge or disposal. When the fund was established in 2020, there were not applicable PFAS standards. Since PFAS surface water standards were adopted in 2025, NHDES will be drafting rules to govern the wastewater aspect of the PFAS RLF.

Soil

In November 2019, NHDES developed direct contact risk-based soil concentrations for four PFAS compounds (PFOA, PFOS, PFNA and PFHxS) considered protective of potential exposure in residential (S-1) and maintenance worker (S-2) scenarios to address soil contamination at and around Saint-Gobain.

New Hampshire Laws of 2022 Chapter 326 (House Bill 1547) required NHDES to initiate rulemaking to establish Soil Remediation Standards (SRS) for these PFAS by November 1, 2023, pursuant to RSA 485-H:13. NHDES initiated the rulemaking to amend Env-Or 600 to address this requirement in the fall of 2023, and JLCAR unanimously approved the amendments at its December 19, 2024 meeting. The new SRS became effective on December 25, 2024.

Removal Rebate Program

In January 2022, NHDES approached the DWGTF Advisory Commission with a proposal to establish a rebate program for the removal of PFAS in private drinking water wells at an estimated cost of $5 million. The final initiative was approved on May 4, 2022, thereby establishing the PFAS Removal Rebate for Private Wells Program. The program provides rebates to private residential well owners of up to $5,000 to assist in the installation of a treatment system designed to remove PFAS or up to $10,000 for a service connection to a public water system. In order to be eligible, well owners must demonstrate that their well is contaminated with PFAS and that they are not being provided with alternate water, temporary or permanent, from a potentially liable third party.

New Hampshire Laws of 2022 Chapter 326 (House Bill 1547) approved on July 8, 2022 gave NHDES authority to establish a rebate program under RSA 485-H:3 II-a with an appropriation of $25 million for grants and reimbursements, of which $15 million was allocated by NHDES to the rebate program.

The rebate program became active on July 25, 2022 with a total of $20 million to administer the program. New Hampshire Laws of 2023 Chapter 79 (House Bill 2) authorized using up to ten percent of the $25 million appropriation from House Bill 1547 (2022) for investigating, testing and monitoring for PFAS in soil, groundwater, surface water, wastewater, air, biota and other media.

NHDES exhausted the DWGTF portion of funding in June 2024 which was earlier than anticipated due to a change in eligibility criteria instituted in April 2024 that reflected the final

EPA MCLs in Table 3. NHDES initiated rulemaking for the rebate program (Env-Dw 1500) per RSA 485-H:9 in order to expend the remaining funding, and Env-Dw 1500 was adopted February 26, 2025.

The eligibility criteria for the program were adjusted once again in May 2025 to reflect the EPA's May 14, 2025 announcement that they plan to retain the current drinking water standards for PFOA and PFOS and rescind regulations for PFHxS, PFNA, HFPO-DA and PFBS. The eligibility criteria as of this report are set at the EPA MCLs for PFOA and PFOS at 4 ppt and the AGQS for PFHxS and PFNA at 18 ppt and 11 ppt, respectively.

In the first three years of operation, the rebate program processed over 1,900 applications totaling over $9 million across 60 communities. Table 9 summarizes the applications processed through December 31, 2025.

Table 9 – Summary of PFAS Removal Rebate Program Applications

City/Town	Number of Applications Processed (through December 31, 2025)	Total Rebate Dollars
Londonderry	743	$3,186,569.88
Bedford	310	$1,225,988.70
Amherst	235	$928,509.72
Windham	169	$689,472.98
Merrimack	121	$570,450.42
Hudson	86	$370,674.88
Hollis	57	$221,148.22
Stratham	50	$205,568.92
Derry	43	$205,005.50
Salem	48	$202,342.27
Hooksett	31	$134,220.16
Greenland	29	$131,342.00
Durham	29	$124,107.10
Nashua	28	$107,712.87
Plaistow	17	$93,802.50
Pelham	21	$88,569.00
Litchfield	20	$88,270.65
Hampstead	16	$71,022.00
Auburn	14	$58,840.00
Portsmouth	9	$43,450.00
Rindge	12	$37,800.00
Center Harbor	9	$36,756.00
Exeter	9	$34,652.06
Atkinson	5	$25,845.00
Brookline	6	$24,784.96
Fremont	5	$24,451.00
Goffstown	6	$23,550.00

City/Town	Number of Applications Processed (through December 31, 2025)	Total Rebate Dollars
Dover	6	$22,069.46
Hampton	4	$18,704.74
Moultonborough	4	$15,290.56
Rye	2	$15,000.00
Kingston	4	$14,700.50
Epping	3	$14,690.00
Manchester	3	$13,935.00
Chester	3	$12,975.00
Milford	3	$12,800.00
Hampton Falls	3	$12,695.00
Newfields	3	$12,584.64
Madbury	3	$10,533.02
New Boston	3	$10,356.00
Danville	2	$9,990.00
Barrington	2	$8,995.00
Mont Vernon	3	$8,888.82
Kensington	2	$8,375.00
North Hampton	2	$8,000.00
Candia	2	$7,700.50
Bow	2	$6,380.00
Weare	1	$5,000.00
Lebanon	1	$5,000.00
Lyndeborough	1	$5,000.00
Newton	1	$5,000.00
Sandown	1	$4,990.00
Mason	1	$4,850.00
New Ipswich	1	$4,835.00
Newington	1	$4,600.00
Alton	1	$3,865.00
Raymond	1	$3,450.00
Deerfield	1	$3,175.00
Hudson	1	$3,065.00
Hanover	1	$3,000.00
Brentwood	1	$2,625.00
Grand Total	**2201**	**$9,258,025.02**

Regional Water Infrastructure Projects

Nashua -Litchfield Water Main Interconnection

New Hampshire Laws of 2023 Chapter 79 (House Bill 2) appropriated $9.7 million for the purpose of funding a new drinking water transmission main between the existing Nashua Core

water distribution system and the existing Litchfield water distribution system to address public water systems and residents on private wells impacted by PFAS.

To date, two projects have been initiated towards this goal. The Town of Hudson received a grant in the amount of $128,000 to assess regional water supply capacities, develop a hydraulic model connecting individual area water systems and determine the impact to the Pennichuck Water Works, Inc. (Pennichuck) system as well as water systems in the Towns of Londonderry, Pelham and Windham. Pennichuck received a grant in the amount of $410,190 to assess Merrimack River crossing locations for potential future water main construction. Both of these projects have been completed and design is in progress.

Phase 2 of the Southern New Hampshire Regional Water Project

New Hampshire Laws of 2024 Chapter 288 (Senate Bill 393) appropriated $2,000,000 for the purpose of funding regional drinking water infrastructure as part of Phase 2 of the southern New Hampshire regional water project to increase water supply by over 2 million gallons per day to multiple towns impacted by PFAS contamination and growing water demands. The project shall include design of all ancillary projects needed, construction of chemical feed at existing water storage tanks in Derry and Salem and raising the water level of Lake Massabesic.

Phase 2 is intended to increase the total capacity of the Southern New Hampshire Regional Water Project from 1.0 to 3.13 million gallons per day. Preliminary design for Phase 2 is complete, and the estimated cost is $38.5 million, including engineering, construction, land/easement acquisition and contingency. To date, $9,630,000 has been awarded toward final design and construction through a combination of ARPA funds and legislative appropriation. Final design of the first component of Phase 2 is in progress, and construction is anticipated 2025-2026.

Increasing Water Storage Capacity of Lake Massabesic

In 2024 Manchester Water Works (MWW), with funding from NHDES, completed a study of the feasibility of raising the water level of Lake Massabesic, MWW's primary drinking water supply. An increase of one foot would add approximately one billion gallons of storage and enable MWW to supply regional water to additional customers while still meeting the needs of its franchise area. MWW has been awarded $3,000,000 of ARPA funds for final design, permitting and construction. Final design and permitting are in progress, and construction is anticipated late 2025 or 2026.

Products Control Program

New Hampshire Laws of 2024 Chapter 349 (House Bill 1649), RSA 149-M:64 established the PFAS products control program that will restrict the use of intentionally added PFAS in certain consumer products sold in New Hampshire. An appropriation was made to provide an additional position to administer and to fund the program. NHDES is in the process of staffing this position and drafting rules to govern the program.

PROGRAM PERFORMANCE

As outlined in this report, NHDES has made significant strides in addressing PFAS contamination in New Hampshire. NHDES has utilized the PFAS Response Fund most efficiently in these efforts by pairing grant and loan funds under the PFAS RLF and rebate funds with other applicable funding programs to assist the maximum number of New Hampshire citizens, water systems and municipalities as possible. We have also leveraged funding as matches or contributions toward larger research projects and studies, thereby increasing the value of the return versus the expenditure. Every initiative selected under the fund was chosen with the protection of human health in mind.

PROGRAM FINANCIAL STATUS

Through various legislation and funds provided by the Drinking Water and Groundwater Trust Fund, the PFAS Response Fund was provided a total of $12,000,000 for distribution of grants, $17,500,000 for residential rebates and $45,000,000 for public water system infrastructure loans. Funds available for grants have been exhausted, balance for rebates is approximately $7,956,693 and there remains $7,577,315 available for loans.

Funding specifically assigned to investigations and studies of PFAS, operational costs of the program and staffing are limited. Based on available funds, NHDES has sufficient funding to cover programmatic costs until the closure of FY27.

Table 10 – Summary of Remaining Legislative Funding

Funding Source	Studying, Investigation, Testing & Monitoring	PFAS RLF Loan	PFAS RLF Grant	PFAS Rebate Program	Nashua/ Litchfield Watermain Interconnection	PFAS Products Control Program	Phase 2 SONH Regional Water Project
HB 4	$0						
HB 1246		$9.7M					
HB 1547			$0	$5.3M			
HB 2 (2023)	$1.7M		$0		$9.1M		
HB 1649						$0.25M	
SB 393							$2M
HB 2 (2025)							$11.5M
Totals:	**$1.7M**	**$9.7M**	**$0**	**$5.3M**	**$9.1M**	**$0.25M**	**$13.5M**

RECOMMENDATIONS

While NHDES has made significant strides towards addressing PFAS contamination in the state, there is still much to be achieved moving forward. NHDES recommends the following potential additional tasks for which the fund could be used to address PFAS contamination:

- State law requires NHDES to report regularly to the general court on the agency's PFAS-related activities in three separate reports, required at different intervals. The Laws of New Hampshire, January Session of 2018 Chapter 306:2 (House Bill 1766) requires that NHDES produce PFAS occurrence reports every 6 months which document the results of monitoring, testing, and any other analysis or data relative to PFOS and PFOA levels at statewide sites that have been identified as sources of those compounds. RSA 485-H:8 II requires NHDES to report annually to the general court on the progress made relative to PFAS contamination and the PFAS Response program, and RSA 149-M:64 VIII requires NHDES to report triennially on the PFAS in Consumer Products Control program. **NHDES recommends amending the law to combine these reporting requirements into a single report produced every two years. Regarding PFAS occurrence, we also recommend amending the law to limit reporting to the specific entities outlined in HB 1766 and not requiring the report to include a compilation of PFOS and PFOA levels at all landfill, hazardous waste, and other sites statewide where NHDES currently requires testing.** Over recent years, the data reported in these occurrence reports has not changed significantly, and compiling the data for all sites is very time intensive and not cost effective as all of this data is already available and updated regularly online via NHDES' OneStop.

- Currently, the PFAS RLF provides grants and loans to publicly owned and non-profit wastewater and/or wastewater residual treatment or storage facilities that are required to treat effluent and residuals to achieve applicable PFAS standards prior to discharge or disposal. Treating the quantity of water that flows through a treatment facility prior to discharge poses significant economic feasibility challenges. **NHDES recommends modifying RSA 485-H to include publicly owned and non-profit landfills, and industrial facilities as eligible entities for grants and loans to pre-treat the discharges of these waste streams prior to entering a publicly owned and non-profit wastewater and/or wastewater residual treatment or storage facility.**

- Outside of the cost to remediate drinking water, the effects of PFAS contamination also significantly impact the cost of site investigations and the operation and maintenance (O&M) of PFAS treatment systems installed to remediate drinking water. These costs are unanticipated and a burden on many water systems and municipalities. **NHDES recommends developing financial assistance programs for site investigation and characterization as well as for the O&M of treatment systems installed for PFAS removal.**

- Based on product sampling results of boat washes, floor waxes, floor strippers and carpet cleaners associated with the groundwater discharge sampling efforts outlined above, **NHDES recommends adding cleaning and floor maintenance products to the PFAS Products Control Program established under RSA 149-M:64.** Future sampling and analysis of off-the-shelf consumer products may reveal additional products appropriate to be incorporated into the Product Control Program.

- The results of the analysis of loon eggs highlights a collection of lakes for which fish tissue sampling should be conducted to understand the risk to human health as well as a need to better understand the movement of PFAS through aquatic food webs. **NHDES recommends developing a program for analysis of PFAS in fish tissue modeled after NHDES' Fish Tissue Mercury Monitoring Program where members of the public are encouraged to donate legally harvested fish for processing and analysis.**