



New Mexico Environment Department Resource Recovery Bureau



Groundwater Monitoring Parameter List Update

Effective January 1, 2026

What's Changing?

Beginning **January 1, 2026**, New Mexico landfills must include the following **toxic pollutants** in groundwater monitoring plans:

Constituent	CAS No.	Maximum Contaminant Level (MCL)
Perfluorohexane sulfonic acid (PHHxS)	355-46-4	10 ppt
Perfluorooctane sulfonate (PFOS)	1763-23-1	4 ppt
Perfluorooctanoic acid (PFOA)	335-67-1	4 ppt

Why the Update?

- **Legal Authority:**
 - **20.9.9.8(A) NMAC** requires approved groundwater monitoring plans for municipal and special waste landfills.
 - **20.9.9.20 NMAC** incorporates toxic pollutants identified in **20.6.2.7 NMAC**, which includes PHHxS, PFOS, and PFOA.
 - **20.9.9.10(I) NMAC** requires the **more stringent standard** between EPA MCLs (**40 CFR 141**) and state standards under **20.6.2.3103 NMAC**.
 - In **April 2024**, EPA set enforceable drinking water MCLs of 4 ppt for PFOA, 4 ppt for PFOS, and 10 ppt for PHHxS.
- **Health Basis:**

PFAS chemicals are linked to:

 - Increased risks of prostate, kidney, and testicular cancers
 - Reproductive and developmental harm (low birth weight, pregnancy complications, fertility issues)
 - Elevated cholesterol and other systemic effects

(Source: [EPA – Human Health and Environmental Risks of PFAS](#))

What Landfill Operators Must Do

- Update groundwater monitoring to include testing for PHHxS, PFOS, and PFOA.
- Ensure sampling and analysis procedures meet **20.9.9 NMAC** requirements.
- Apply stricter EPA MCLs as groundwater protection standards.

Reference: 20.9.9 NMAC; 20.6.2 NMAC; 40 CFR 141 (EPA MCLs, April 2024).

Note: This fact sheet summarizes regulatory requirements. It does not replace the official regulations.

The updated list (including PHHxS, PFOS, and PFOA) will be posted on the **NMED website** effective **January 1, 2026**.