

PWS Monitoring Requirements Under the New PFAS Rule

The new PFAS Rule applies to Community and Non-transient non-community water systems. Consecutive systems that purchase all their water are not required to monitor for PFAS. However, the Public Notice requirements do apply based on the results of monitoring conducted by their supplier (i.e., wholesale system).

Analytical Requirements

- Analysis must be conducted using **EPA Method 533** or **EPA Method 537.1, version 2.0**.
- Analysis for the 6 new regulated PFAS contaminants must only be conducted by laboratories that have been certified by EPA or the State.

Initial Monitoring Requirements

The following systems must collect & submit analysis of initial monitoring samples to the State by April 26, 2027.

- All surface water/GWUDI systems and large groundwater systems (serving >10,000 customers) must collect 4 quarterly samples at each treatment plant within 12 months, spaced 2-4 months apart.
- Small groundwater systems (serving ≤10,000 customers) must collect 2 semi-annual samples at each treatment plant within 12 months, spaced 5-7 months apart.
- There is a provision in the Rule to allow the use of previously collected samples (collected on or after January 1, 2019) if they meet the analytical requirements.
- Systems may collect additional samples outside the 12-month period, if samples are spaced per requirement above (i.e., 2-4 or 5-7 months apart), depending on source water type and population served.
- Systems must report their most recent results to the State.

Compliance Monitoring Requirements

- Compliance (e.g. routine) monitoring begins April 26, 2027
- MDE's enforcement of MCLs will begin April 26, 2029.

Monitoring Schedules & Criteria

A treatment plant's testing frequency will be pre-determined by results from the PWS's initial monitoring period. Schedules are designated as either quarterly or triennially, based on the following criteria:

- *Quarterly Testing Schedule* – Treatment plants with any initial monitoring results ≥ the trigger levels (half of the MCLs).
- *Triennial Testing Schedule* – Treatment plants with all initial monitoring results < trigger levels.

MCLs & Trigger Levels

Regulated Compounds	Maximum Contaminant Levels (MCLs)	Trigger Levels
PFOA	4.0 ng/L	2.0 ng/L
PFOS	4.0 ng/L	2.0 ng/L
PFHxS	10 ng/L	5 ng/L
HFPO-DA	10 ng/L	5 ng/L
PFNA	10 ng/L	5 ng/L
Hazard Index (Mixture of 2 or more: PFHxS, HFPO-DA, PFNA and PFBS)	1 (unitless)	0.5 (unitless)

$$Hazard\ Index = \left(\frac{[HFPO - DA\ ppt]}{[10\ ppt]} \right) + \left(\frac{[PFBS\ ppt]}{[2000\ ppt]} \right) + \left(\frac{[PFNA\ ppt]}{[10\ ppt]} \right) + \left(\frac{[PFHxS\ ppt]}{[10\ ppt]} \right)$$