



# PFAS Monitoring Requirements for Public Water Systems

## What You Need to Know

The new PFAS Rule applies to **Community** and **Non-Transient Non-Community** water systems.

### Sampling Requirements

- Samples must be collected at the **Entry Point(s) to the Distribution System** (EPTDS) after all treatment has occurred during normal operating conditions.
- Schools that are water systems must collect their samples during the school year.
- Systems that purchase all their water from a regulated public water system are not required to monitor for PFAS.

### Analytical Requirements

- Analysis must be conducted using **EPA Method 533** or **EPA Method 537.1, version 2.0**. (**EPA Method 537.1, version 1.0** has been approved for initial monitoring.)
- Analysis for the 6 regulated PFAS contaminants must only be conducted by laboratories that have been certified by EPA ([link to EPA list of certified labs](#)) or the State ([link to MDE list of certified labs](#)). Your local laboratory may be able to contract with a national laboratory to analyze your PFAS samples.

### Initial Monitoring Requirements

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

- All surface water systems, systems that use groundwater under the direct influence of surface water (GWUDI) sources, and large groundwater systems (serving >10,000 customers) must collect 4 **quarterly** samples (each calendar quarter must be represented) 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.
  - [MDE's PFAS results](#) may be used if they were taken after all treatment.
  - [5th Unregulated Contaminant Monitoring Rule \(UCMR5\) results](#) may also be used. EPA is working on getting UCMR5 PFOA & PFOS results reprocessed down to the trigger levels for systems serving ≤10,000 people.
- If systems missed a quarterly or semi-annual sample, they may be eligible to collect additional samples outside the 12-month period as long as samples are spaced per the requirements above based on source water type and population served. If, for example, a small groundwater system has compliant PFAS samples from May 2022, they may collect another set of PFAS



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samples in October, November, or December of 2025 or 2026 for initial monitoring. Please contact MDE if you intend to pursue this option.

- **Systems must report their most recent results to the State.**

### Monitoring Schedules & Criteria

Routine monitoring frequency will be determined by results from the Public Water System's initial monitoring. **Routine monitoring begins April 26, 2027**, and will either be quarterly or triennial, based on the following criteria:

- *Quarterly Testing Schedule* – Treatment plants with any initial monitoring results  $\geq$  the trigger levels.
- *Triennial Testing Schedule* – Treatment plants with all initial monitoring results  $<$  trigger levels.

**MDE's enforcement of PFAS Maximum Contaminant Levels (MCLs) will begin April 26, 2029.**

### Maximum Contaminant Levels (MCLs) & Trigger Levels

Regulated Compounds	PFOA	PFOS	PFHxS	HFPO-DA (GenX)	PFNA	Hazard Index*
MCLs (ppt)	4.0	4.0	10	10	10	1 (unitless)
Trigger Levels (ppt)	2.0	2.0	5	5	5	0.5 (unitless)

\*A mixture of two or more compounds must be present for the Hazard Index to apply.

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

### Treatment & Funding

Systems installing treatment to remove PFAS or exploring new PFAS-free water sources should contact MDE at [water.supply@maryland.gov](mailto:water.supply@maryland.gov). Funding to address PFAS in drinking water, in the form of principal forgiveness loans, is available through Maryland's Water Infrastructure Financing Administration. The application period for this funding will be December 2025 through January 2026. For additional information, please visit this website:

<https://mde.maryland.gov/programs/water/wqfa/pages/index.aspx>

### Contact Information

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For more information about the PFAS Rule, visit: <https://www.epa.gov/dwreginfo/pfas-rule-implementation>