

**From:** Bureau of Safe Drinking Water <[ra-epsdwtechsupport@pa.gov](mailto:ra-epsdwtechsupport@pa.gov)>

**Sent:** Monday, July 15, 2024 2:07 PM

**Subject:** IMPORTANT INFORMATION re: the federal PFAS NPDWR

**Attention Public Water Supplier:**

The PFAS National Primary Drinking Water Regulation (federal PFAS NPDWR) was published by EPA in the Federal Register on April 26, 2024. Please note that the compliance monitoring and MCL requirements of the federal rule are **not** yet in effect. The federal PFAS NPDWR includes delayed implementation to allow sufficient time for state primacy agencies to adopt their own standards that are at least as stringent as those in the federal PFAS NPDWR.

However, ***the requirements of [Pennsylvania's PFAS MCL Rule](#) remain in effect***, so water systems need to continue to comply with the state regulation. The state MCLs of 14 ppt for PFOA and 18 ppt for PFOS will continue to be enforced, all required monitoring is still expected to be conducted, and all other provisions of the PA PFAS MCL Rule will continue to be implemented, according to the state regulations. Please visit [PA PFAS MCL Rule \(pa.gov\)](#) for more information.

DEP is in the process of reviewing the federal rule and will be developing a rulemaking to incorporate the federal provisions that are more stringent than the current PA PFAS MCL Rule. PADEP will also provide training on the new requirements, which PA is adopting from the federal Rule, closer to the publication date of Pennsylvania's revised rule.

**The purpose of this message is to inform you about some of the provisions of the *federal PFAS NPDWR* that you need to know about now. Understanding and considering this information now may help reduce your overall PFAS monitoring costs later.**

- There are only 2 EPA-approved methods for approved PFAS analysis: EPA 533 and EPA 537.1 version 2.0. (See Table 1)
- The PFAS NPDWR practical quantitation limits (PQL), which your accredited lab must meet, are lower than the associated minimum reporting level (MRL) requirements in PA's PFAS MCL Rule. (See Table 1)
- The federal PFAS NPDWR identifies Trigger Levels for each regulated PFAS, which are below the PQLs and will be used for determining the frequency for compliance monitoring, which begins April 26, 2027. (See Table 1)
- There are MCLs for 6 PFAS: PFOA, PFOS, PFHxS, PFNA, HFPO-DA (GenX) and PFBS. (See Table 2)
- The PFAS NPDWR allows states to accept data collected on/after Jan 1, 2019, for compliance with the initial monitoring provisions, *if the data meets the criteria specified in the PFAS NPDWR. PADEP will provide additional information regarding this provision in a separate communication.*

**What does this mean for water systems in Pennsylvania?**

Because implementation of the PA PFAS MCL Rule provisions will continue, public water systems (PWSs) in PA are expected to continue quarterly monitoring for PFAS as required by the PA PFAS MCL Rule, and

MCL and monitoring compliance determinations will continue according to the state rule.

However, with the publication of the PFAS NPDWR, water systems **may** choose to conduct monitoring now that both complies with the requirements of the PA PFAS MCL Rule **and** meets the initial monitoring requirements under the federal PFAS NPDWR. (See Table 3) Depending on the decisions you make, it may be possible for monitoring conducted for compliance with the state rule to satisfy the initial monitoring requirements of the federal PFAS NPDWR.

***If you plan to use the results of your initial monitoring for the PA PFAS MCL Rule to also satisfy the requirements of initial monitoring under the federal PFAS NPDWR, you will need to ensure the following actions are taken.***

**For PWSs already conducting initial monitoring in 2024:**

- Ensure that you are spacing the collection of your quarterly samples such that the initial monitoring requirements specified in Table 3 are met for **both** rules. Remember that ***the PA PFAS MCL Rule requires quarterly initial monitoring for all systems***, but initial monitoring under the federal PFAS NPDWR is based on system size and source water type.
  - The federal PFAS NPDWR requires groundwater systems serving more than 10,000 people and all surface water/GUDI systems (regardless of population) to collect 4 quarterly samples that evenly spaced 2-4 months apart.
  - The federal PFAS NPDWR requires groundwater systems serving less than or equal to 10,000 people to collect 2 samples 5-7 months apart.
- Starting with your Q3 samples, specifically request that the lab analyze the EP sample(s) for the 6 PFAS included in the PFAS NPDWR using either method 533 or 537.1 version 2.0.
- Indicate that all results for all 6 PFAS are reportable to PA DEP. When reporting the results to DEP, the lab should include their reporting limit. (A separate message is being sent to laboratories, but PWSs should also put this request on the chain of custody for each EP sample). The lab is also required to report data for concentrations as low as the trigger levels listed in Table 1.

**For PWSs (serving ≤ 350 customers) conducting initial monitoring in 2025:**

- Ensure that you space the collection of your quarterly samples such that the initial monitoring requirements specified in Table 3 are met for **both** rules. Remember that ***the PA PFAS MCL Rule requires quarterly initial monitoring for all systems***, but the federal PFAS NPDWR only requires 2 samples collected 5-7 months apart for groundwater systems serving less than or equal to 10,000 people.
- Specifically request that the lab analyze the quarterly EP sample(s) for the 6 PFAS included in the PFAS NPDWR using either method 533 or 537.1 version 2.0.
- Indicate that all results for all 6 PFAS are reportable to PA DEP. When reporting the results to DEP, the lab should include their reporting limit. (A separate message is being sent to laboratories, but PWSs should also put this request on the chain of custody for each EP sample). The lab is also required to report data for concentrations as low as the trigger levels listed in Table 1.

The following tables summarize the differences between the PA PFAS MCL Rule and the federal PFAS NPDWR.

Table 1: Comparison of PFAS Analysis Requirements

PFAS	PA Approved Analysis Methods	PA Minimum Reporting Limit (MRL)	Federal Approved Analysis Methods	Federal Practical Quantitation Limit (PQL)	Federal Trigger Level
PFOA	533, 537, 537.1 (v1.0 or v2.0)	5 ng/L	533, 537.1 v2.0	4.0 ng/L	2.0 ng/L
PFOS	533, 537, 537.1 (v1.0 or v2.0)	5 ng/L	533, 537.1 v 2.0	4.0 ng/L	2.0 ng/L
PFNA	Not specified	Not specified	533, 537.1 v 2.0	4.0 ng/L	5 ng/L
PFHxS	Not specified	Not specified	533, 537.1 v 2.0	3.0 ng/L	5 ng/L
HFPO-DA (GenX Chemicals)	Not specified	Not specified	533, 537.1 v 2.0	5.0 ng/L	5 ng/L
PFBS	Not specified	Not specified	533, 537.1 v 2.0	3.0 ng/L	N/A

Table 2: Comparison of MCLs

Contaminant Individual Standard	PA MCL	Federal MCL (*4)	
	Combined Standard		
PFOA	14 ng/L	4.0 ng/L	N/A
PFOS	18 ng/L	4.0 ng/L	N/A
PFNA	not regulated	10 ng/L	Hazard Index = 1 (unitless)*
PFHxS	not regulated	10 ng/L	
HFPO-DA (GenX Chemicals)	not regulated	10 ng/L	
PFBS	not regulated	N/A	

\* The Hazard Index (HI) is used to evaluate health risks from simultaneous exposure to a mixture of chemicals.

Table 3: Comparison of Initial Monitoring Requirements

PWS Category	PA Initial Monitoring	Federal Initial Monitoring
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SW/GUDI sources, all populations	4 consecutive quarters at each EP, collected under normal operating conditions in accordance with the comprehensive monitoring plan; beginning:	4 consecutive quarters within a 12- month period, collected under normal operating conditions where the samples are collected 2 to 4 months apart.
GW sources, population > 10,000		
GW Sources, population <= 10,000	<ul style="list-style-type: none"> <li>• Jan 1, 2024 if population &gt; 350</li> <li>• Jan 1, 2025 if population &lt;= 350</li> </ul>	2 samples collected 5 to 7 months apart under normal operating conditions within a 12-month period

We recognize this is a considerable amount of information. If you have questions about the information contained in this email, you are encouraged to please reach out to PA DEP Bureau of Safe Drinking Water staff using the following email account: [RA-EPDWTCHSUPPORT@pa.gov](mailto:RA-EPDWTCHSUPPORT@pa.gov).

For more information on the federal PFAS NPDWR, please visit EPA's website at [Per- and Polyfluoroalkyl Substances \(PFAS\) | US EPA](#). The federal PFAS NPDWR can be found at [Federal Register: PFAS National Primary Drinking Water Regulation](#).

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