
From: Bureau of Safe Drinking Water <ra-epsdwtechsupport@pa.gov>

Sent: Tuesday, August 20, 2024 3:23 PM

Subject: Important Follow Up Information re: federal PFAS Rule

Attention Accredited Laboratories:

You were previously notified of the publication of the PFAS National Primary Drinking Water Regulation (federal PFAS NPDWR) in an email sent to accredited labs on August 16, 2024. This email is a follow up to that communication.

The following text is a copy of the follow up email that was sent to public water systems (PWSs) with more information on the use of previous data for compliance with the initial monitoring requirements. You are being sent this information as an FYI because your PWS clients may contact you with questions.

The federal PFAS NPDWR allows states to accept data collected on or after January 1, 2019, for compliance with the initial monitoring provisions, *if the data meets the criteria specified in the federal PFAS NPDWR*. The purpose of this email is to provide additional details on the *potential* use of existing data for compliance with the initial monitoring provisions of the federal NPDWR. The federal PFAS NPDWR can be found at [Federal Register: PFAS National Primary Drinking Water Regulation](#).

IMPORTANT REMINDER: While this email is intended to provide information on compliance with the federal PFAS NPDWR, ***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 (continued on next page...)

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 \(pa.gov\)](https://www.pa.gov/pa-pfas-mcl-rule) for more information.

What constitutes existing data that may be applicable to the initial monitoring requirements of the federal NPDWR?

Existing PFAS data may include data that was analyzed for various reasons, including:

- Compliance with the PA PFAS MCL Rule initial monitoring requirements.
- Compliance with the monitoring requirements of the Fifth Unregulated Contaminant Monitoring Rule (UCMR5).
- PFAS monitoring required by the Department in 2023 under 25 Pa. Code § 109.302.
- Monitoring conducted in accordance with a permit special condition.
- Voluntary monitoring efforts.

If your PWS has any existing PFAS data, you may choose to review it to determine whether it meets the required criteria. Continue reading for more information on data requirements.

What requirements must be met for the data to be acceptable according to the federal PFAS NPDWR?

The data must meet the following requirements:

- Samples were collected on or after January 1, 2019. It is also important to note that the federal PFAS NPDWR requires that if multiple years of data exist, ***the most recent data must be used***.
- Contaminants: The federal PFAS NPDWR requires initial monitoring for 6 PFAS contaminants – PFOA, PFOS, PFHxS, PFNA, HFPO-DA (GenX) and PFBS.
- Analytical method: The federal PFAS NPDWR requires analysis of PFAS by one of 2 methods – EPA Method 533 and EPA Method 537.1 *version 2.0*.
- Laboratory: Analysis must be conducted by a state accredited lab for PFAS; the exception is that if the data was analyzed as part of the UCMR 5 program, the analysis must be conducted by an EPA approved lab for UCMR 5.
- Timing: The data must meet the timing requirements specified in the federal PFAS NPDWR.
- Reporting levels:
 - Labs must meet the PQLs specified in the federal PFAS NPDWR, with reporting limits at or below those levels.
 - For results analyzed prior to June 25, 2024, results must be reported to a concentration at least as low as the MCLs defined in the federal PFAS NPDWR. However, for the PWS to be eligible for triennial monitoring at the start of the compliance monitoring period (beginning April 26, 2027), results must be reported for concentrations as low as the trigger levels defined in the federal PFAS NPDWR.
 - For results analyzed on or after June 25, 2024, results must be reported for concentrations as low as the trigger levels defined in the federal PFAS NPDWR.

Please refer to Table 1 below for a summary of the analytical requirements under the federal PFAS NPDWR. Please refer to Table 2 for a summary of the timing requirements for initial monitoring under the federal PFAS NPDWR.

How should the data be submitted?

If you have existing PFAS data that meets the federal PFAS NPDWR requirements and that was not previously reported to the Department via the Drinking Water Electronic Laboratory Reporting System (DWELR), or was submitted to DWELR but not with all of the required information such as the reporting limit, you may submit that data, along with all of the required information listed in the next section below, to the Department in one of two ways:

1. Email:

Submit data to the Department using the following resource account: RA-EPDWTechSupport@pa.gov.

2. U.S. Mail:

PA DEP Safe Drinking Water

Attn: Technical Support Section

P.O. Box 8467

Harrisburg, PA 17105-8467

If you conducted initial monitoring beginning in 2024 for the PA PFAS MCL Rule, you may choose to review your lab reports for first and second quarter 2024 monitoring results to determine whether your laboratory conducted analysis for PFBS, PFHxS, PFNA, and HFPO-DA, in addition to PFOS and PFOA. You may also choose to review your lab reports to determine if the lab's reporting limits meet the requirements noted above. If you collected your third quarter samples before August 16, 2024, you should also review those results. If your data meets the initial monitoring requirements of the federal PFAS NPDWR, you may submit that data to the Department as noted above for review.

If you have UCMR 5 data that meets the requirements, you need to submit that data to DEP as noted above for review. EPA should be providing additional guidance on the use of UCMR 5 data.

If you have existing data that was previously submitted by your laboratory via DWELR containing all required information, no additional action is necessary. *Please do not submit duplicate records.* To verify whether your data was reported, please visit the Drinking Water Reporting System at [//www.drinkingwater.state.pa.us/dwrs/HTM/SelectionCriteria.html](https://www.drinkingwater.state.pa.us/dwrs/HTM/SelectionCriteria.html).

Please ensure your lab is submitting all required information starting with the third quarter 2024 data. This was specified in the email sent on July 15, 2024.

What do you need to submit to the Department for existing PFAS data review?

If you have existing PFAS data that was NOT previously reported via DWELR containing all required information, and you would like to have that existing PFAS data reviewed for compliance with the federal PFAS NPDWR initial monitoring requirements, submit the lab report along with all required information to the Department.

At a minimum, be sure to **submit the following details to the Department** for review:

- Public water supply ID number (PWSID) and name
- PWS contact name, address, phone number, and email address
- PWS Category, as applicable under the federal PFAS NPDWR (i.e. SW/GUDI sources, GW sources with population > 10,000, or GW sources with population ≤ 10,000)
- Entry Point (EP) ID/location ID
- Sample type

- Sample date
- Sampling reason (i.e. PA initial compliance monitoring, UCMR 5, voluntary monitoring, etc.)
- Lab report with the following information:
 - Name and contact information of laboratory
 - Lab ID
 - Contaminant names
 - Analytical results
 - Analysis method
 - Analysis date
 - Reporting limit

When should the data be submitted?

In order for the Department to conduct a timely review, we need data submitted to us as soon as possible but no later than **December 1, 2024**.

You will be notified in writing whether your data meets the requirements of the federal PFAS NPDWR and whether any additional monitoring is required.

What if a PWS does not have available PFAS data, or the available data does not meet the requirements of the federal PFAS NPDWR?

If available PFAS data that meets the requirements of the federal PFAS NPDWR does not exist, a PWS is required to conduct initial monitoring that meets the requirements of the federal PFAS NPDWR *before April 26, 2027*.

Table 1: PFAS Analytical Requirements under the federal PFAS NPDWR

PFAS	Federal Approved Analysis Methods	Federal Maximum Contaminant Level (MCL)	Federal Practical Quantitation Limit (PQL)	Federal Trigger Level
PFOA	533, 537.1 v 2.0	4.0 ng/L	4.0 ng/L	2.0 ng/L
PFOS	533, 537.1 v 2.0	4.0 ng/L	4.0 ng/L	2.0 ng/L
PFNA	533, 537.1 v 2.0	10 ng/L	4.0 ng/L	5 ng/L
PFHxS	533, 537.1 v 2.0	10 ng/L	3.0 ng/L	5 ng/L
HFPO-DA (GenX Chemicals)	533, 537.1 v 2.0	10 ng/L	5.0 ng/L	5 ng/L
PFBS	533, 537.1 v 2.0	N/A	3.0 ng/L	N/A

Table 2: Initial Monitoring Requirements of the federal PFAS NPDWR

PWS Category	Federal Initial Monitoring
SW/GUDI sources, all populations	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	2 samples collected 5 to 7 months apart under normal operating

	conditions within a 12-month period
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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-EPSDWTECHSUPPORT@pa.gov.

For more information on the 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](#).