

# PFAS NATIONAL PRIMARY DRINKING WATER RULE

## INITIAL MONITORING GUIDELINES

### BACKGROUND

On April 2024, EPA released the final National Primary Drinking Water Rule (NPDWR) for six per- and polyfluoroalkyl substances (PFAS). This rule establishes legally enforceable maximum contaminant levels (MCLs) and non-enforceable maximum contaminant level goals (MCLGs) for six PFAS: PFOA, PFOS, PFHxS, PFNA, HFPO-DA, and mixtures containing PFHxS, PFNA, HFPO-DA, or PFBS.

The new EPA established MCLs are not enforceable until April 26, 2027.

### EPA ESTABLISHED MCLs

This new standard will regulate PFOA and PFOS, the most common PFAS contaminants, with individual MCLs. PFHxS, PFNA, HFPO-DA, and PFBS will be regulated using a Hazard Index which accounts for co-occurring mixtures of these four PFAS.



Table 1. EPA established MCLs and MCLGs.

Compound	Trigger Level (TRL)	Final MCLG	Final MCL (enforceable levels)
PFOA	2.0 ng/L	Zero	4.0 ng/L (also expressed as ppt)
PFOS	2.0 ng/L	Zero	4.0 ng/L
PFHxS	5 ng/L	10 ng/L	10 ng/L
PFNA	5 ng/L	10 ng/L	10 ng/L
HFPO-DA (commonly known as GenX Chemicals)	5 ng/L	10 ng/L	10 ng/L
Mixtures containing PFHxS, PFNA, HFPO-DA, or PFBS	0.5 (unitless)	1 (unitless) Hazard Index	1 (unitless) Hazard Index

Compliance with the new EPA established MCLs will be based on a calculated running annual average (RAA) for each sampling point.



### Maine Drinking Water Program

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## WHO MUST SAMPLE FOR PFAS?

All Community Water Systems (CWS)

**AND**

All Non-Transient Non-Community (NTNC) Water Systems

## INITIAL MONITORING

Systems are required to complete and submit their initial monitoring results for each entry point location **no later than April 26, 2027**. Laboratories must be PFAS-accredited and use the required EPA methods (Method 533 or 537.1, version 2.0). Water systems must report all data received by their laboratory to the Drinking Water Program (DWP), regardless of the result. Sampling timelines under the new EPA rule are outlined in Table 2 below and in the Sampling Guidance Flowchart.

**Table 2. Sampling timelines.**

Source	Population Served	Number of Required Samples	Sampling Timeline
Groundwater (GW) without PFAS treatment	≤ 10,000	2	5-7 months apart*
Groundwater (GW)	> 10,000	4	2-4 months apart*
Surface Water (SW) OR GW under the influence of SW (GWUDI)	any	4	2-4 months apart*
GW, GWUDI, or SW with PFAS Treatment	any	4	2-4 months apart*

### Previously Obtained Supplemental Data

Previously obtained supplemental PFAS data collected on or after January 1, 2019, using laboratory methods 533 or 537.1 version 2.0, may be used to complete some or all initial monitoring requirements.

\*Previously collected data meeting PFAS Rule requirements can be supplemented with additional monitoring events so that all calendar periods are represented, regardless of the year, in order to account for seasonal variability. Water systems must ensure that all required quarterly or semiannual sampling periods are represented with sample calendar months appropriately spaced.

### ~ EXAMPLE ~

123 Water Department must collect four samples, each 2-4 months apart. If the system has data from February and August 2024, it needs two additional samples to comply with initial monitoring requirements. The system could take samples in the 2<sup>nd</sup> Quarter (April-June) and the 4<sup>th</sup> Quarter (October-December) 2026, provided that all samples are 2-4 months apart regardless of the year.



## ONGOING MONITORING

Based on initial monitoring results, systems with PFAS results above or equal to the trigger levels will be required to monitor quarterly. Water systems demonstrating results reliably and consistently below the MCLs for four consecutive quarters after April 26, 2027 may be eligible for annual monitoring. To be eligible for triennial monitoring, a water system must demonstrate that concentrations in all initial monitoring samples at each sample location are below the trigger levels. Since each entry point has its own initial monitoring requirement, water systems with multiple entry points may have different schedules.

Ongoing compliance monitoring will begin April 26, 2027. The DWP will notify water systems of their ongoing monitoring frequency in 2027.

Table 3. Ongoing monitoring frequencies.

Monitoring Frequency	Qualifying Initial Monitoring Results
Quarterly	≥ Trigger Level OR with PFAS treatment
Annual	Must sample 4 consecutive quarters with results < MCL
Triennial	< Trigger Level

## WHAT IF MY SYSTEM EXCEEDS A MCL?

Systems with sample results exceeding a MCL must provide public notice of their results within 30 days of receiving notification of the exceedance and address the contamination. Systems may be required to install PFAS treatment.

Systems are required to address PFAS contamination and be in full compliance by **April 26, 2029** unless an alternate deadline is given by the State.



## FUNDING

If your system anticipates the need to install PFAS treatment and you would like to learn about available funding, please visit the Financial Resources page on the Maine Drinking Water Program website: <https://www.maine.gov/dhhs/mecdc/healthy-living/health-and-safety/drinking-water-safety/resources/financial-resources>.



**QUESTIONS? CONTACT US:**

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# SAMPLING GUIDANCE FLOWCHART

PFAS National Primary Drinking Water Rule: Initial Monitoring

