Attention Accredited Laboratories:

The PFAS National Primary Drinking Water Regulation (federal PFAS NPDWR) was published by EPA in the Federal Register on April 26, 2024. 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.

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.

There are some of the provisions of the *federal PFAS NPDWR* that both labs and PWSs need to know about now because they may affect monitoring at PWSs. The purpose of this message is to inform laboratories accredited by PA for PFAS analysis about those provisions. All PA-accredited labs that are subcontracting samples for PFAS analysis should also be aware of these provisions.

- 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 accredited labs must meet, are lower than the associated minimum reporting level (MRL) requirements for PFOA & PFOS 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 in some cases 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*)

What does this mean for laboratories accredited for PFAS analysis by 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 and in the coming months 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 PWSs make, whether they accurately and effectively convey those decisions to the accredited laboratory, and the laboratory's understanding of the federal PFAS NPDWR requirements, it ***may*** be possible for monitoring conducted for compliance with the state rule to also satisfy the initial monitoring requirements of the federal PFAS NPDWR.

If your PWS clients are planning to use the results of their initial monitoring for the PA PFAS MCL Rule to also satisfy the requirements of initial monitoring under the federal PFAS NPDWR, then accredited laboratories need to be aware of the following key points.

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

- PWSs should space the collection of 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 are collected 2 to 4 months apart.
  - The federal PFAS NPDWR requires groundwater systems serving less than or equal to 10,000 people to collect 2 samples 5 to 7 months apart.

- Starting no later than Q3 of 2024, PWSs should request analysis of the EP sample(s) for the 6 PFAS included in the PFAS NPDWR using either EPA Method 533 or 537.1 version 2.0.
  - *IMPORTANT NOTE: A new method code was created for EPA Method 537 version 2.0; please use this link to obtain the revised reporting instructions:* SDWA Reporting Instructions for PFAS .
- PWSs should indicate that all results for all 6 PFAS are reportable to PA DEP.
  - When reporting the results to DEP, accredited labs need to use the SDWA-4 form and **include the reporting limit in the LLD field**; please see attached reporting instructions.
  - The lab is also required to report data for detections down to the trigger levels listed in Table 1.

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

- PWSs should space the collection of 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 to 7 months apart for groundwater systems serving less than or equal to 10,000 people.
- PWSs should specifically request analysis of the quarterly EP sample(s) for the 6 PFAS included in the PFAS NPDWR using either method 533 or 537.1 version 2.0.
  - IMPORTANT NOTE: A new method code was created for EPA Method 537 version 2.0; please see attached reporting instructions.
- PWSs should indicate that all results for all 6 PFAS are reportable to PA DEP.
  - When reporting the results to DEP, accredited labs need to use the SDWA-4 form and **include the reporting limit in the LLD field**; please see attached reporting instructions.
  - The lab is also required to report data for detections down to the trigger levels listed in Table 1.

The PFAS Laboratory Reporting Instructions have been updated to include the requirements to meet new federal provisions. The revised Reporting Instructions have been posted to the DEP eLibrary at this link: SDWA Reporting Instructions for PFAS***.***

In addition, please be aware that 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. PWSs that conducted initial monitoring for the PA PFAS MCL Rule in the 1st and 2nd quarters of 2024 may reach out to their laboratory to inquire about those monitoring results and whether they meet the federal requirements. PWSs may submit results to the Department that were not previously reported via DWELR, or, were reported via DWELR but did not contain all of the required elements, in order to be reviewed for compliance with the initial monitoring requirements of the federal PFAS NPDWR. More

information on this is being provided to PWSs via email communication, including the data requirements, how to submit the data to the Department, and what to submit. Accredited labs will receive a copy of that email as an FYI.

As a reminder, labs should NOT report data via DWELR for analytes that were not requested on the chain-of-custody from the PWS.

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	PA MCL	Federal MCL	
		Individual Standard	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
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	• Jan 1, 2024, if population > 350 • Jan 1, 2025, if population <= 350	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-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.