

PFAS in Drinking Water: Initial Monitoring

The federal Per- and Polyfluoroalkyl Substances (PFAS) drinking water rule, published on April 26, 2024, applies to **Community and Non-Transient Non-Community (NTNC) Public Water Systems (PWSs)**. The purpose of this document is to help PWSs complete **initial monitoring**, including sampling, reporting results to the Ohio Environmental Protection Agency (Ohio EPA), and including results in Consumer Confidence Reports (CCRs). Initial monitoring will determine 2027 compliance schedules. **This is subject to all changes at the federal level.**

Requirements of Initial Monitoring

Initial monitoring is a key stage of the new PFAS rule. **By April 26, 2027, Community and NTNC PWSs must collect required samples, report the results to Ohio EPA, and provide results in CCRs delivered by July 1, 2027.** Sampling frequency is determined by the source water of each Entry Point (EP) and PWS size. U.S. EPA refers to an EP as an Entry Point to the Distribution System (EPTDS). In some cases, existing results may be acceptable; see the “Acceptable Data for Substitution” section for details.

Ohio EPA encourages PWSs to sample early to ensure deadlines are met. Important considerations are laboratory analysis time, potential re-sampling needs, and reporting results to Ohio EPA. Timely results may also help with planning and funding applications. The required sampling frequencies are outlined in Table 1:

Table 1: This table provides the sampling frequencies for initial monitoring.

Source Water of EP	PWS Size	Minimum Sampling Frequency
Surface Water	Any	Collect 4 samples within a consecutive 12-month period, 2 to 4 months apart and in different calendar quarters.
Groundwater	> 10,000 served	Collect 4 samples within a consecutive 12-month period, 2 to 4 months apart and in different calendar quarters.
Groundwater	≤ 10,000 served	Collect 2 samples within a consecutive 12-month period, 5 to 7 months apart, during normal operating conditions.

PWSs with different water sources or EPs may have varying sample schedules, and samples must be collected during normal operating conditions. **To be eligible for triennial monitoring in 2027, all sample results must be below all trigger levels (with reporting levels ≤ trigger levels),** so verify reporting limits with your lab.

Trigger levels, set at one-half of the Maximum Contaminant Levels (MCLs), for each PFAS are:

- PFOA and PFOS: 2.0 parts per trillion (ppt)
- PFNA, PFHxS, and HFPO-DA: 5 ppt
- Hazard Index: 0.5

What is required of consecutive PWSs that purchase finished water?

Consecutive PWSs that solely purchase finished water do not need to collect samples. However, wholesale PWSs are responsible for sampling, reporting to Ohio EPA, and sharing results with consecutive PWSs. These results must be included in CCRs.

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Acceptable Data for Substitution

Instead of collecting new samples, PWSs may substitute existing Unregulated Contaminant Monitoring Rule 5 (UCMR5) sample results. Other sample results are acceptable if the following conditions are met:

Analytical Requirements

- EPA or state-certified lab using EPA Method 533 or 537.1, Version 1.0 or 2.0
- Samples collected before 6/25/24 must be reported at or below the MCLs (MRLs \leq MCLs)
 - Thereafter, and to qualify for reduced monitoring in 2027, samples must be reported at or below trigger levels (MRLs \leq trigger levels)

Timing Requirements

- Samples collected after January 1, 2019
- Samples meet minimum sampling frequency requirements per Table 1
- If multiple years are available, most recent data must be used

What if existing data is incomplete?

For PWSs with substitutable samples, new samples may be collected for unrepresented quarters/time periods. For example, if a PWS needs four quarterly samples spaced 2-4 months apart but only has two existing samples from January (Q1) and July (Q3) of 2023, the PWS can collect additional samples in April (Q2) and October (Q4) of 2024, 2025, or 2026. Sampling early allows time to address any issues before the deadline.

How do Labs Report Data: Electronic Drinking Water Reporting (eDWR)

New and substitutable data must be reported to Ohio EPA as routine samples. The process will generally be the same whether the PWS has previous samples to report or will collect new samples that need to be reported. To report sample results to Ohio EPA, the **lab needs access to the reporting portal (eDWR)**, which requires an eBiz account. **To create this account, labs may follow [these instructions](#).**

Table 2 below outlines the three ways to submit data:

Table 2: This table provides reporting options for PFAS sample results.

Reporting Option	Considerations
Use the spreadsheet (here) and follow the instructions (here) to generate an XML file, then upload to eDWR	This requires being able to enable macros in the spreadsheet. Either (1) enter samples manually or (2) pull the data from your LIMS to match the spreadsheet values and paste into the spreadsheet. Then generate the XML file and upload it to eDWR.
Use the online form in eDWR	Do this if (1) there are only a few samples or (2) macros cannot be enabled in the above spreadsheet. A copy/paste feature is available for faster data entry (see next page for details).
Create an XML file and upload to eDWR	This is the same XML that the provided spreadsheet creates.

Ohio EPA will periodically send status updates that list which systems have complete UCMR 5 data and which need other submissions. For small systems that participated in UCMR 5, U.S. EPA intends to forward updated data (to meet trigger-level reporting requirements) to affected systems and Ohio EPA.

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Common Questions About Initial Monitoring

How many total samples must a PWS collect for initial monitoring?

Initial monitoring requires a total of either 2 or 4 samples, depending on system size and water source (see Table 1). Systems with UCMR 5 or other qualifying samples may be able to fully or partially substitute those results. If no resampling is needed for initial monitoring, no additional PFAS samples will be required until compliance monitoring begins in 2027.

Is there a list of acceptable labs for PFAS analysis?

Ohio EPA provides a [list](#) of state-certified or accepted labs with PFAS capabilities. The acceptable labs for PFAS have “PFAS” listed in the “Other” column.

How does a PWS know if they have completed initial monitoring?

Ohio EPA will periodically send updates via email (mail@notify.onecallnow.com) that list each PWS’s monitoring status and whether additional information is needed.

How does initial monitoring affect compliance schedules?

Initial monitoring results will determine compliance monitoring schedules in 2027. Quarterly monitoring will be required if an EP sample result is at or above any trigger level. Triennial monitoring will only be allowed if all samples are below all trigger levels. Future compliance monitoring schedules may be reduced if results remain consistently low.

What happens if a PWS does not complete initial monitoring?

Failure to complete sampling, reporting, and CCR requirements by April 26, 2027, will result in a monitoring/reporting violation. Avoid violations by ensuring all requirements are met on time.

For Labs: How does the Copy/Paste feature in eDWR work?

Additional details are available in the spreadsheet instructions (see Table 2, first Reporting Option).

Contact Info

For further questions about the contents of this fact sheet, initial monitoring in general, or the PFAS drinking water rule, reach out to DDAGW_PFAS@epa.ohio.gov.