

**Guidance for Initial PFAS Sampling
Requirements for Groundwater Public Water
Systems Serving Over 10,000 Customers**

Office of Water Quality – Drinking Water Branch



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This document is designed to help public water systems prepare their systems for initial sampling requirements for the final drinking water standards for Per- and polyfluoroalkyl substances (PFAS). This guidance document will explain the initial sampling requirements for all groundwater systems serving more than 10,000 customers.

Initial Sampling Requirements

Within the first three years after the date of final rule promulgation (April 26, 2027), Community Water Supplies (CWSs) and non-transient non-community water system (NTNCWSs) must complete initial monitoring at all entry points to the distribution system. Based on system size and source water at an entry point, systems must conduct initial monitoring either twice or quarterly during a 12-month period as follows:

System Type	Number of Samples Required	Collection Times
Groundwater Systems Serving over 10,000 Customers	4 Samples Quarterly for 1 Year	2-4 Months Apart, but during separate quarters

To reduce costs for systems, primacy agencies can allow systems to use previously collected monitoring data to satisfy some or all the initial monitoring requirements, if the sampling was conducted using EPA Methods 533 or 537.1 as part of Unregulated Contaminant Monitoring Rule (UCMR) 5, state-level, or other appropriate monitoring campaigns. Therefore, UCMR results, as well as the Voluntary Drinking Water PFAS Project Sampling results, can be used to count towards initial sampling results, if they were collated after 2019. The systems would have to ensure the proper collection times of the samples they are still required to obtain.

Groundwater systems serving over 10,000 customers are required to collect two UCMR samples. Therefore, these systems will need to collect two additional samples in order to meet the initial sampling requirements by April 26, 2027. If the UCMR samples have already been collected, the two additional samples must be collected in the same year as each other, but not the same year as UCMR samples. If UCMR samples have not been collected yet, then the extra two samples can be collected during the quarters that are not designated for UCMR sampling.

Groundwater system serving >10,000 customers	UCMR5 collected	Extra Samples Required for Initial sampling	Collection Requirements
Yes	Yes (2 samples)	2	Collect samples that are not the quarters UCMR5 samples were collected. Collect the samples in the same year as each other.
Yes	No	2 (plus 2 UCMR5)	Extra sampling can be done with UCMR5 collections during all 4 quarters of the year.

UCMR5 Information and Public Notification

Public water systems who are required to sample under UCMR5 are also subject to submit public notification that the sampling was completed. Community systems may use their Consumer Confidence Report (CCR) to report UCMR5 monitoring results; or may use an individual Public Notice to inform the public of those results. Whether an individual public notice will be required will be dependent on when your sampling results were received and when your CCR is distributed.

Reporting- systems must provide this notification to customers when unregulated contaminants are tested and include that information either in the CCR (if issued within 12 months of samples results being known from the lab) or utilize a Public Notice to be delivered to all billing customers.

Timing for notifications- customers must be notified no later than 12 months after the results are made known to the system.

If there are no detections- systems need to provide a notification to their customers letting them know that you sampled and the results are available by contacting the PWS. You may utilize a link to a website, a phone number to call the PWS, or other methods of reaching the PWS. This information is also required to be in your CCR if you are a community water system, even if you have already provided a public notice to your customers.

If any of the unregulated contaminants were detected, you will need to prepare and send a public notice that advises that you have sampled and include information regarding those detections. Your CCR must include this information as well as a table that shows the highest detected level and the range of detections. (This table requirement is the same as any other contaminant that that was detected). NOTE- Since this is a separate federal requirement this will need to be added to your CCR as this is not included in the CCR Template.

Example language- “Our system collected samples under the U.S. EPA Unregulated Contaminants Monitoring Rule (UCMR) for 29 PFAS compounds and Lithium. This monitoring is being conducted so the EPA can receive occurrence data for these compounds to determine what additional compounds may need to be regulated in drinking water. We collected samples in _____ (*insert month(s) of sampling*) and detected the compounds shown in this table. These compounds are not regulated at this time. If you would like to view our results, contact our office at _____” (*insert phone number and/or email address.*

Example Table;

Unregulated Contaminants

	Collection Date	Highest Level	Range of Levels	Units
Compound Detected	Month and year for each year			

Other Resources

- [Per- and Polyfluoroalkyl Substances \(PFAS\) | US EPA](#)
- [IDEM: Per- and Polyfluoroalkyl Substances \(PFAS\) \(in.gov\)](#)