

Per- and Polyfluoroalkyl Substances (PFAS) Drinking Water Regulations Quick Reference Guide



MassDEP

Commonwealth of Massachusetts
Department of Environmental Protection

Overview of the Rule

Title	Per- and Polyfluoroalkyl Substances (PFAS) compliance requirements for Public Water Systems (PWS) - 310 CMR 22.07G
Purpose	Increase public health protection through the reduction of chemicals that have been linked to a variety of health risks, particularly for sensitive subgroups including pregnant women, nursing mothers and infants.
General Description	The amended Massachusetts Drinking Water Regulations establish a Maximum Contaminant Level (MCL) of 0.000020 milligrams per liter (mg/l) or 20 ng/l (also called parts per trillion or ppt) for the sum of six PFAS compounds (PFOS, PFOA, PFHxS, PFNA, PFHpA and PFDA), known as PFAS6. The regulations detail the sampling requirements and corrective actions that PWS must take when the MCL is exceeded, as well as the provisions for public education and notice of exceedances so that communities can be educated and proactive in protecting their drinking water quality.
Utilities Covered	The PFAS6 MCL applies to Community PWS and Non-transient, Non-community PWS. Transient Non-community PWS must collect a PFAS sample under the regulations and would be subject to a site-specific health assessment for elevated levels.

- This document provides a summary of MassDEP drinking water requirements; to ensure full compliance, please consult the regulations at 310 CMR 22.07G.

Public Health Benefits

Implementation of the PFAS regulations will result in:

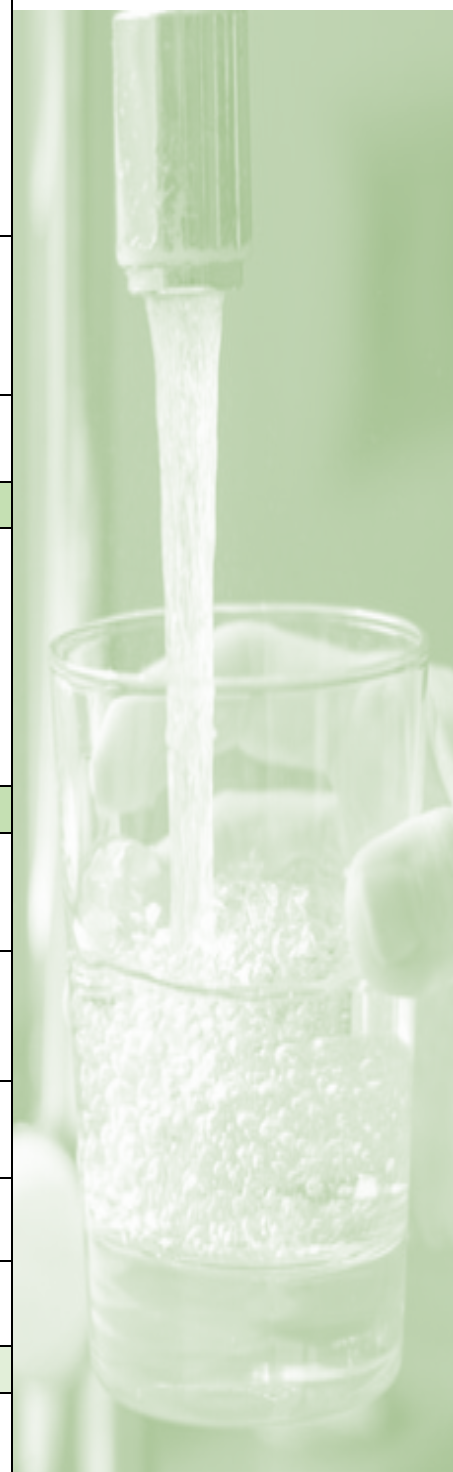
- Monitoring for and identifying any elevated PFAS levels in public drinking water.
- Corrective actions that reduce drinking water exposures to PFAS6 to below the levels that may cause a variety of health effects to sensitive subgroups, including developmental effects in fetuses and infants, effects on the liver, blood, immune system, thyroid, and may elevate the risk of certain cancers..

Critical Dates and Deadlines

October 2, 2020	MassDEP published its PFAS regulations establishing an MCL of 0.000020 milligrams per liter (mg/l) or 20 ng/l (also called parts per trillion or ppt) for the sum of PFAS6.
January 1, 2021	Large Community (COM) and Non-transient Non-community PWS (NTNC) (schools, workplaces, etc.) serving more than 50,000 people will begin regulatory compliance monitoring.
April 1, 2021	COM and NTNC PWS serving between 10,000 and 50,000 people will begin regulatory compliance monitoring.
October 1, 2021	Small COM and NTNC PWS serving 10,000 or fewer people will begin regulatory compliance monitoring.
September 30, 2022	Transient Non-community PWS (such as hotels and restaurants) must collect, analyze and report sampling results by this date.

Federal Drinking Water Standards

There are currently no federal PFAS drinking water standards. However, USEPA has a health advisory of 70 ppt for the sum of PFOA and PFOS.



What are the Major Provisions?	
Sampling Locations	
<ul style="list-style-type: none"> • PWS must sample at every entry point to the distribution system. • PWS that draw water from more than one source, where the sources are combined before distribution, must collect samples that are representative of all such combined sources after treatment during periods of normal operating conditions. • Consecutive PWS are exempt from conducting compliance monitoring for PFAS for the purchased portion of water when the PWS from which the water is obtained has conducted the required monitoring. 	
Initial Monitoring (First Year)	
<ul style="list-style-type: none"> • Four consecutive quarterly samples must be collected. • Each sample shall be collected in the first month of every quarter during initial monitoring. • The PWS may ask MassDEP to substitute previously conducted quarterly sampling. • If no PFAS is detected in the first two quarters of monitoring, the PWS may request to have MassDEP waive the third and fourth quarters of monitoring. 	
Routine Monitoring	
<ul style="list-style-type: none"> • If initial monitoring does not identify any PFAS a PWS may monitor during one year of each subsequent three-year Compliance Period. • PWS serving more than 3,300 individuals must collect two quarterly samples in that year. • PWS serving fewer than or equal to 3,300 individuals must collect one sample in that year. 	
Monitoring Waivers	
<ul style="list-style-type: none"> • After January 1, 2023, a PWS on routine monitoring may request a monitoring waiver from MassDEP. • Waivers cover a single three-year Compliance Period and must be renewed each Compliance Period. • Sampling under an approved waiver shall occur at least once during the first Compliance Period of each successive nine-year Compliance Cycle. 	
Confirmatory Sampling Requirements	
<ul style="list-style-type: none"> • Initial Monitoring: The first detection of PFAS during initial monitoring, not just the detection of PFAS6, triggers confirmation sampling. • Initial Monitoring: After first detection, subsequent PFAS6 detection greater than 10 ppt triggers confirmation sampling. • Routine Monitoring: Confirmatory sampling is required when PFAS6 is detected greater than 10 ppt during routine monitoring unless MassDEP determines that the location is Reliably and Consistently below the MCL. • The confirmatory sample must be collected as soon as possible after receipt of result requiring confirmation and no later than two weeks from receipt of such result (unless granted a MassDEP extension). • A detection is defined as any PFAS contaminant level greater than the lab's minimum reporting level (MRL). All certified labs must achieve an MRL of 2 ppt or lower for the six PFAS covered by the MCL. 	
Increased Monitoring if PFAS is detected	
Monthly monitoring	<ul style="list-style-type: none"> • If the average of a PFAS6 result and its associated confirmatory sample is greater than 10 ppt, the sampling location must be sampled monthly. • Monthly sampling continues until the source is shown to be Reliably and Consistently Below the MCL.



Quarterly monitoring	<ul style="list-style-type: none"> • A PWS that has installed PFAS treatment and is thereby Reliably and Consistently Below the MCL will be put on quarterly monitoring.
Annual monitoring	<ul style="list-style-type: none"> • If the initial monitoring is complete and PFAS is detected but PFAS6 is confirmed less than 10 ppt, the location must be sampled annually. • A PWS that is determined by MassDEP to be Reliably and Consistently Below the MCL without having to install PFAS treatment may be put on annual monitoring.

Public Education

- Any PWS where there has been a PFAS6 detection, and the average of such detection and an associated confirmatory sample exceeds the PFAS6 MCL, shall provide public education materials regarding the exceedance, as described by MassDEP. These should be provided as soon as possible, but within 30 days.
- Until the PWS obtains a monitoring result at or below the PFAS6 MCL at such locations, public education should be updated quarterly.

Compliance and Violations

- MCL compliance is calculated using the average of the monthly samples over a quarter.
- If any one sampling point location is in violation, then the PWS shall be considered in violation.
- If any sample result would cause the quarterly average to exceed the PFAS6 MCL, the PWS is immediately in violation and begins compliance actions.

Public Notice

- A violation of the MCL requires a Tier 2 Public Notice.
- Monitoring & testing procedure violations require Tier 3 Public Notice.

Seasonal System Provisions

If a PWS reactivates an existing source or opens a seasonal system after the applicable commencement date of this regulation, it shall commence initial monitoring of such locations within the first month of delivering water to the public.

MassDEP Technical Assistance and Grants

- Free testing is available until June 30, 2021 for PWS to sample drinking water for PFAS.
- The Commonwealth provided grant funding in October 2020 to assist PWS in the planning and design of treatment systems to remove PFAS. Another round of grant funding is anticipated.
- MassDEP has made PFAS-reducing drinking water projects a priority in the 2021 State Revolving Fund (SRF) Loan Program. PFAS mitigation projects may be eligible to receive an additional subsidy in the form of a 0% interest rate loan. The additional subsidy is contingent on the availability of funds and approval of the Massachusetts Clean Water Trust Board of Trustees. For more information: <https://www.mass.gov/doc/drinking-water-program-updates-2-13-2020/download>

Key Point for PWS to Remember

- All confirmed detections of PFAS6 > 20 ppt require public education.

For additional information on the PFAS6: Visit the MassDEP website at <https://www.mass.gov/info-details/per-and-polyfluoroalkyl-substances-pfas>; email the MassDEP Drinking Water Program at program.director-dwp@mass.gov; or call the MassDEP Drinking Water Program at 617-292-5770.

THIS DOCUMENT CONTAINS IMPORTANT INFORMATION FOR YOUR SYSTEM. HAVE SOMEONE TRANSLATE IT FOR YOU OR SPEAK WITH SOMEONE WHO UNDERSTANDS IT.

If you need this document translated, please contact MassDEP's Diversity Director, Michelle Waters-Ekanem, Diversity Director/Civil Rights: 617-292-5751 TTY# MassRelay Service 1-800-439-2370. You may also contact the Drinking Water Program at program.director-dwp@mass.gov.

