2024 General Order for Per- and Polyfluoroalkyl Substances (PFAS) Monitoring in Public Water Systems- Frequently Asked Questions (FAQ)

State Water Resources Control Board
Division of Drinking Water

March 2024

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List of Acronyms & Abbreviations

Acronyms/Abbreviations	Definitions
DDW	Division of Drinking Water
2024 Order	General Order DW 2024-0002-DDW
OWP	California State University, Sacramento's Office of Water Programs
PFAS	Per- and polyfluoroalkyl substances
State Water Board	State Water Resources Control Board
US EPA	The U.S. Environmental Protection Agency

Overview

The State Water Resources Control Board (State Water Board) issued General Order DW 2024-0002-DDW (2024 Order) to public water systems for monitoring per- and polyfluoroalkyl substances (PFAS) in community public water systems serving disadvantaged and severely disadvantaged communities. The purpose of this monitoring is to understand PFAS impacts on drinking water in these communities not necessarily near a known industrial source.

The information contained in this Frequently Asked Questions (FAQ) is for general guidance purposes only and may be revised to answer new questions.

2024 Order

1. **What is the 2024 Order and how does it affect my water system?**

   Order DW 2024-0002-DDW (2024 Order) requires certain public water systems to test for PFAS. If you have received this letter, it means one or more of your water sources must be tested for PFAS.

2. **Why did I receive the 2024 Order?**

   As part of a comprehensive effort to investigate the nature and scope of the issue of PFAS contamination in drinking water supplies, your public water system is identified as one needing to monitor for PFAS in California to ensure safe drinking water. Figure 1 shows the public water systems selected for PFAS sampling (California Code of Regulations Title 22, section 64300).

3. **What is the definition of a disadvantaged community?**

   A disadvantaged community is a community with a median annual household income of less than eighty percent (80%) of the statewide median annual household income (California Code of Regulations Title 22, section 64300).

4. **What should I do after receiving the 2024 Order?**

   - Review the Order and Exhibits A and B: Exhibit A lists the sources that need PFAS testing, and Exhibit B lists the specific PFAS chemicals to monitor and their minimum detection levels.
   - On the Order's cover letter is a weblink to the California State University, Sacramento's Office of Water Programs (OWP) PFAS website (https://pfas.owp.csus.edu/). OWP is the State Water Board's sampling contractor and will be your primary point of contact. The public water system representative on the cover letter must access this weblink and register by April 1, 2024. Some items to perform on the OWP website after registering are as follows:
     - Review the information associated with your public water system and update any incorrect information.
     - Identify the certified Treatment or Distribution Operator that will assist the sampling team with site access and aid in pump and valve operations.

- Review the minimum qualifications for the "Self-Sampling" requirements and acknowledge whether the public water system has the staff available to perform the PFAS sampling or not.

- If the water system voluntary samples the well and performs the analytical testing and the results of a PFAS detection are confirmed to exceed its respective notification level (see Table 2), the water system must report the detection within 30 days after the water system is first informed by the laboratory of a confirmed detection of the contaminant that exceeds the notification level.

5. Who will collect and analyze the PFAS samples?

A contractor to OWP will collect, and a state-contracted laboratory will analyze the samples from your drinking water source **at no cost to your water system**.

6. Will there be any cost for the monitoring?

The initial monitoring under this Order will be conducted by OWP at no cost to your water system for the sources listed in Exhibit A of the 2024 Order.

However, if PFAS is detected in your water system, you may consider voluntary monitoring which will be at the expense of the water system, including confirmation samples. Also, additional sampling might be required under another sampling order.

7. What if my water source is no longer in service?

Please notify your Division of Drinking Water (DDW) District office immediately if the listed source(s) are inactive. Also, sign in to OWP's website and update the information for each inactive well so that sampling for that well is not scheduled. A map of the district offices with a point of contact for your water system's area of service is available at the following weblink: (https://www.waterboards.ca.gov/drinking_water/programs/documents/ddwem/DDWdistrictofficesmap.pdf).

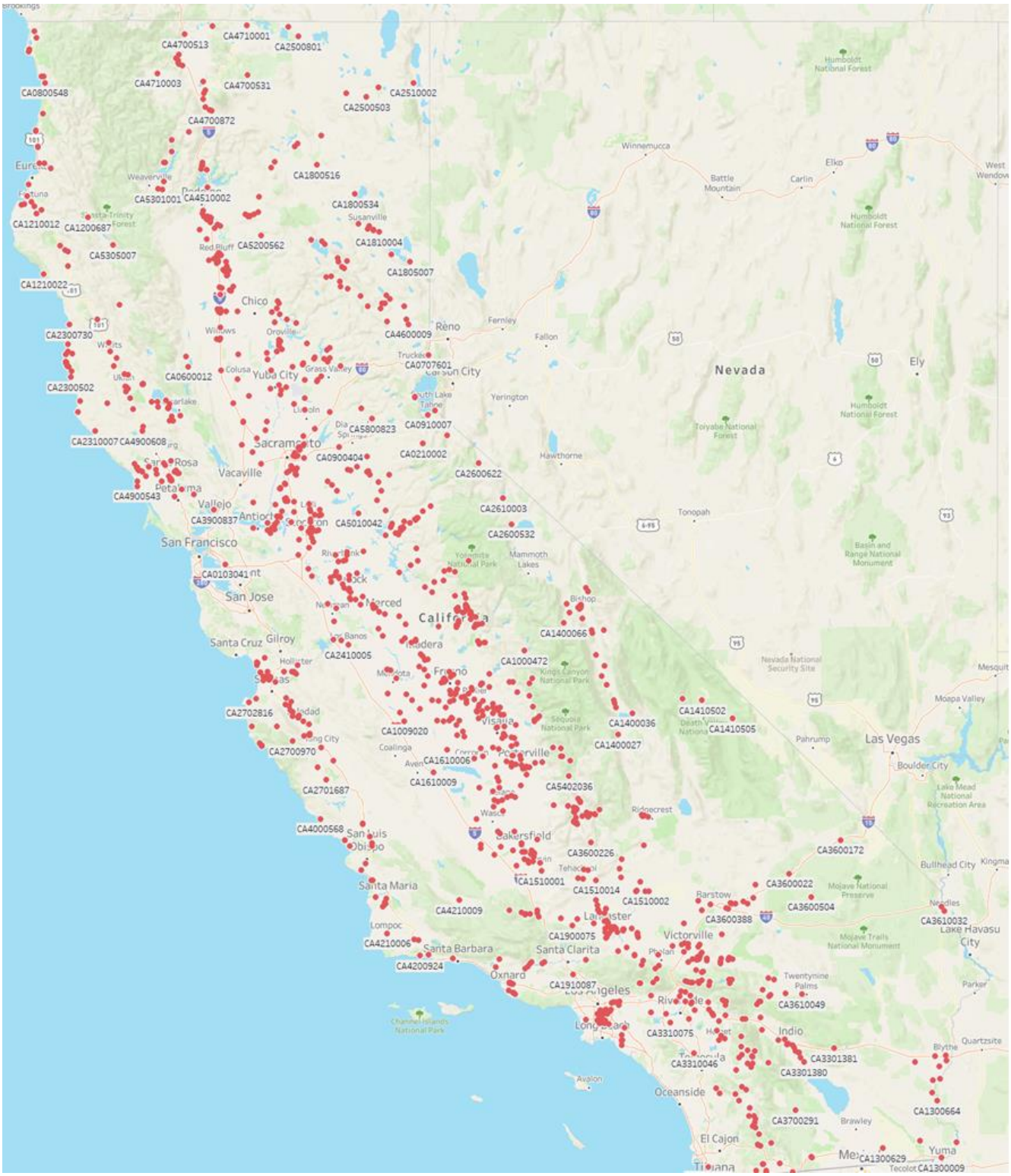

Figure 1. Drinking water wells and the associated public water systems selected for PFAS sampling in 2024 Order. The wells are represented by red dots.

8. Where will the PFAS samples be collected from?

The PFAS samples will be collected from your drinking water supply well from a sampling point as close to the well head as possible (primary option) before any treatment. If sample collection from the well head is not feasible, the sampling contractor may collect the sample from a cold-water spigot located before any filters or water treatment systems (secondary option). The following diagram (see Figure 2) illustrates the options for the sampling locations.

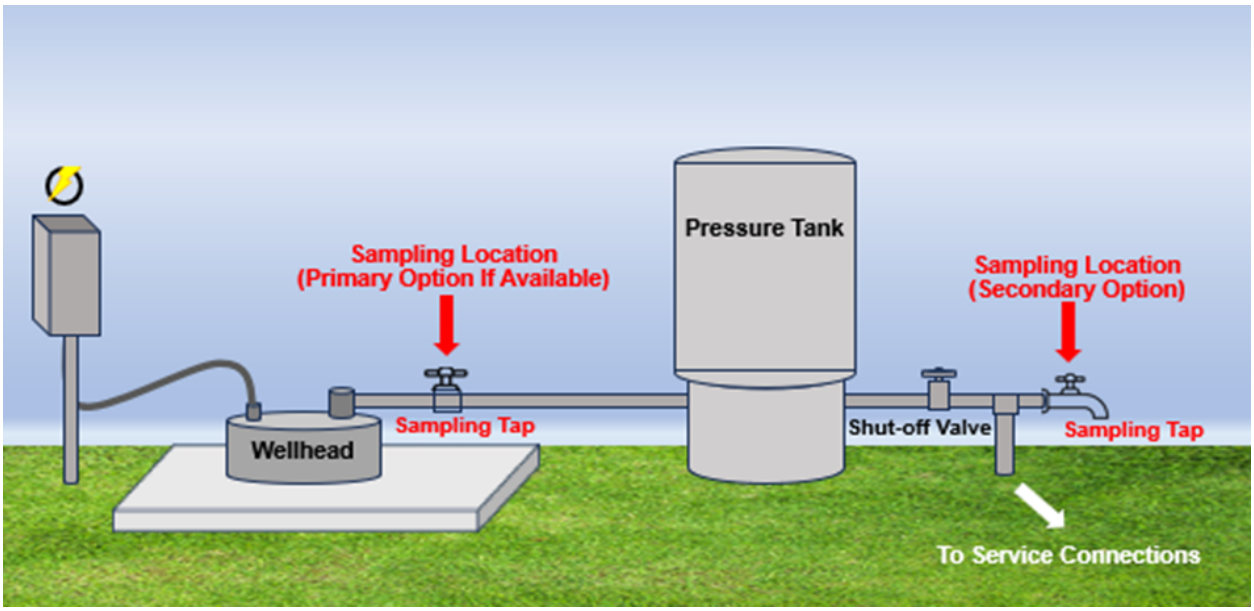

Figure 2. PFAS sampling location alternatives.

9. What methods are used for sample analysis?

Samples will be analyzed using two different analytical methods: EPA Method 533 and a state-selected method. Samples collected for EPA Method 533 will be tested by a laboratory accredited by the California Environmental Laboratory Accreditation Program (ELAP). The state-selected method will be conducted by the same laboratory performing the EPA Method 533 analysis.

10. What is the deadline for collecting samples under the Order?

Samples must be collected on or before June 30th, 2026.

11. How do I get the results?

OWP will provide your water system with the laboratory results, public health information, opportunities for funding if PFAS is detected, and guidance on any additional actions your water system may need to take.

12. What is a PFAS detection?

A PFAS detection means that the testing has found an amount of any PFAS constituent that is higher than the minimum amount we can measure, as set out in Exhibit B in the 2024 Order and is also referred to as the Consumer Confidence Report Detection Level (CCRDL). A listing of the PFAS constituents and their respective CCRDL is provided in Table 1.

13. What are CCRDLs?

The levels at which there is a positive detection of PFAS. Table 1 presents the list of CCRDLs that are based on the US EPA UCMR 5 minimum reporting levels (MRLs) for 25 EPA Method 533 constituents.

14. What actions are required if the PFAS constituent exceeds the CCRDL?

For the 2024 Order, if the results of a PFAS detection are confirmed to exceed its respective notification level (see Table 2), the State Water Board will already have been notified of the results since the State Water Board's contractor is performing the analytical testing. Therefore, the water system does not need to report the exceedance to the State Water Board.

If the results of a PFAS exceeds a response level, the water system must either (1) take the source out of service immediately; (2) utilize treatment or blending; or (3) provide public notification of the response level exceedance. Additionally, the exceedance of the response level must be reported in the annual consumer confidence report.

For more information about PFAS, you may refer to the DDW-PFAS-Fact Sheet-2024 located at (https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/pfas.html).

Table 1. Consumer Confidence Report Detection Levels (CCRDL) for PFAS constituents listed on EPA Method 533. CCRDLs are in nanograms per liter or in parts per trillion

	PFAS Constituent (acronym)	**CCRDL, ng/L**
1	11-chloroeicosafluoro-3-oxaundecane-1-sulfonic acid (11Cl-PF3OUdS)	5
2	1*H*,1*H*, 2*H*, 2*H*-perfluorodecane sulfonic acid (8:2FTS)	5
3	1*H*,1*H*, 2*H*, 2*H*-perfluorohexane sulfonic acid (4:2FTS)	3
4	1*H*,1*H*, 2*H*, 2*H*-perfluorooctane sulfonic acid (6:2FTS)	5
5	4,8-dioxa-3H-perfluorononanoic acid (ADONA)	3
6	9-chlorohexadecafluoro-3-oxanonane-1-sulfonic acid (9Cl-PF3ONS)	2
7	hexafluoropropylene oxide dimer acid (HFPO-DA) (GenX)	5
8	nonafluoro-3,6-dioxaheptanoic acid (NFDHA)	20
9	perfluoro (2-ethoxyethane) sulfonic acid (PFEESA)	3
10	perfluoro-3-methoxypropanoic acid (PFMPA)	4
11	perfluoro-4-methoxybutanoic acid (PFMBA)	3
12	perfluorobutanesulfonic acid (PFBS)	3
13	perfluorobutanoic acid (PFBA)	5
14	perfluorodecanoic acid (PFDA)	3
15	perfluorododecanoic acid (PFDoA)	3
16	perfluoroheptanesulfonic acid (PFHpS)	3
17	perfluoroheptanoic acid (PFHpA)	3
18	perfluorohexanesulfonic acid (PFHxS)	3
19	perfluorohexanoic acid (PFHxA)	3
20	perfluorononanoic acid (PFNA)	4
21	perfluorooctanesulfonic acid (PFOS)	4
22	perfluorooctanoic acid (PFOA)	4
23	perfluoropentanesulfonic acid (PFPeS)	4
24	perfluoropentanoic acid (PFPeA)	3
25	perfluoroundecanoic acid (PFUnA)	2

Table 2. Four PFAS constituents with Notification and Response levels in nanograms per liter or parts per trillion.

PFAS Constituent	Notification Level (ng/L or ppt)	Response Level (ng/L or ppt)
Perfluorobutanesulfonic acid (PFBS)	500	5,000
Perfluorohexanesulfonic acid (PFHxS)	3	20
Perfluorooctanesulfonic acid (PFOS)	6.5	40
Perfluorooctanoic acid (PFOA)	5.1	10

15. What happens after PFAS is detected in my water?

OWP will provide your water system with the laboratory results, public health information associated with the results, opportunities for funding and guidance on any additional actions your water system may need to take. The state, however, will not pay for the additional monitoring.

16. How is a confirmed detection reported?

If the PFAS detection is confirmed, it must be reported in the water system's annual consumer confidence report.

17. What kind of notification is required if PFAS is detected?

The type of notification will vary depending on the PFAS levels detected. OWP will guide you in preparing the necessary notification.

18. Does the 2024 Order supersede the 2022 Order?

No. The 2024 Order doesn't replace the 2022 Order.

19. Do I need to continue collecting quarterly samples under the 2022 Order?

Yes, if you collect quarterly samples under the 2022 Order, after the sampling for the 2024 Order, you still need to keep collecting samples each quarter for the 2022 Order.

20. Can samples for the 2024 Order be used for the 2022 Order compliance?

Yes, samples collected under the 2024 Order will also satisfy the requirements for the 2022 Order for the corresponding quarter.

21. Can I use the 2022 Order samples to comply with the 2024 Order?

No, you cannot use the samples collected for the 2022 Order to fulfill the 2024 Order completely. However, you can use the samples collected for the 2024 Order to replace one quarterly sample under the 2022 Order.

22. If I choose to collect my own sample, do I have to notify the DDW's district engineer?

Yes. You need to inform the State and OWP about your desire to collect your own samples through the program's website at: pfas.owp.csus.edu.

23. If I choose not to use OWP services for systems that are not disadvantaged communities, do I have to use only DDW's contracted laboratory for this 2024 General Order?

Yes. You must use only the laboratory contracted with the State for the 2024 Order, even if you are not using OWP services for non-disadvantaged communities.

24. What if I disagree with this Order?

If you disagree with this Order, you may file a petition with the State Water Board for reconsideration. Information regarding filing petitions may be found at:

http://www.waterboards.ca.gov/drinking_water/programs/petitions/index.shtml

25. How will DDW know for what Order a water system is sampling?

For the 2024 Order, water systems must use the chain of custody provided by OWP.

26. Where can I find additional resources?

The cover letter to the 2024 Order provides links to the PFAS investigation page and other resources for your reference. You may also contact OWP at pfas@owp.csus.edu, if you have any questions regarding this required monitoring.

For general information about PFAS, you may refer to the DDW-PFAS-Fact Sheet-2024 (https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/pfas.html), or the State Water Board's PFAS website at https://www.waterboards.ca.gov/pfas/, and DDW's PFAS website at https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/pfas.html.