

**STATE OF CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD
DIVISION OF DRINKING WATER**

ORDER DW 2025-00XX-DDW

**GENERAL ORDER REQUIRING INITIAL MONITORING FOR
PER- AND POLYFLUOROALKYL SUBSTANCES
CALIFORNIA HEALTH AND SAFETY CODE SECTIONS 116378 AND 116530**

The State Water Resources Control Board (“State Water Board” or “Board”), acting by and through its Division of Drinking Water (“Division”), hereby issues General Order No. DW 2025-00XX-DDW (hereinafter “Order”) pursuant to sections 116378 and 116530 of the Health and Safety Code, as set forth below:

Authorities

1. WHEREAS, [Health and Safety Code section 116530](#) provides that a public water system (PWS) shall submit a technical report to the State Water Board as part of the permit application or when otherwise required by the Board. This report may include, but not be limited to, water quality information, and shall be submitted in the form and format and at intervals specified by the State Water Board; and
2. WHEREAS, all PWS are subject to regulations adopted by the United States Environmental Protection Agency (U.S. EPA) under the federal Safe Drinking Water Act of 1974, as amended ([42 U.S.C. § 300f et seq.](#)); and
3. WHEREAS, [Health and Safety Code section 116270](#), subdivision (h), states that California’s Safe Drinking Water Act shall be construed to ensure consistency with the requirements for states to obtain and maintain primary enforcement responsibility for public water systems under the federal Safe Drinking Water Act and acts amendatory thereof or supplementary thereto; and
4. WHEREAS, [Health and Safety Code section 116350](#), subdivision (b), establishes the State Water Board’s responsibility to enforce provisions of the federal Safe Drinking Water Act and regulations adopted pursuant thereto; and
5. WHEREAS, [Health and Safety Code section 116378](#) authorizes the State Water Board to require public water systems to monitor for per- and polyfluoroalkyl substances (“PFAS”), in accordance with provisions set by the Board; and

6. WHEREAS, [Health and Safety Code section 116378](#), subdivision (a), requires a laboratory that has accreditation or certification pursuant to article 3 (commencing with section 100825) of chapter 4 of part 1 of division 101 of the Health and Safety Code to perform the analysis of any material required by an order issued pursuant to Health and Safety Code section 116378; and
7. WHEREAS, an order issued pursuant to [Health and Safety Code section 116378](#) may apply to an individual public water system, specific groups of water systems, or to all public water systems; and
8. WHEREAS, chapter 3.5 (commencing with section 11340) of part 1 of division 3 of title 2 of the Government Code does not apply to this Order pursuant to [Health and Safety Code section 116378](#), subdivision (b) and [Government Code section 11352](#), subdivision (f); and

PFAS National Primary Drinking Water Regulation

9. WHEREAS, on April 26, 2024, U.S. EPA promulgated the PFAS National Primary Drinking Water Regulation ([89 Fed. Reg. 32532](#)), which took effect June 25, 2024, with corrections published on June 11, 2024 ([89 Fed. Reg. 49101](#)); and
10. WHEREAS, [40 C.F.R. section 141.900\(b\)\(1\)](#), requires that each community water system (CWS) and nontransient-noncommunity water system (NTNCWS) meet the analytical requirements set forth in [40 C.F.R. section 141.901](#) by June 25, 2024; and
11. WHEREAS, [40 C.F.R. section 141.900\(b\)\(2\)](#), requires that each CWS and NTNCWS report the results of initial monitoring set forth in [40 C.F.R. section 141.902\(b\)\(1\)](#) to the State by April 26, 2027; and
12. WHEREAS, [40 C.F.R. section 141.900\(b\)\(3\)](#), requires that each CWS and NTNCWS meet the compliance monitoring requirements set forth in [40 C.F.R. section 141.902\(b\)\(2\)](#) by April 26, 2027; and
13. WHEREAS, [40 C.F.R. section 141.902\(a\)](#) contains general requirements associated with monitoring; and
14. WHEREAS, [40 C.F.R. section 141.61\(c\)\(2\)](#) contains national primary drinking water standards in the form of maximum contaminant levels (MCLs) for

perfluorooctanesulfonate (PFOS), perfluorooctanoate (PFOA), perfluorohexanesulfonic acid (PFHxS), perfluorononanoic acid (PFNA), 2,3,3,3-tetrafluoro-2-(heptafluoropropoxy)propanoate (HFPO-DA), and a mixture of PFHxS, PFNA, HFPO-DA, and perfluorobutane sulfonate (PFBS); and

15. WHEREAS, [40 C.F.R. section 141.902\(b\)\(1\)\(ii\)](#) requires that groundwater CWS and NTNCWS serving 10,000 or fewer persons shall take two samples for each regulated PFAS five to seven months apart within a 12-month period for initial monitoring; and
16. WHEREAS, [40 C.F.R. section 141.902\(b\)\(1\)\(i\)](#) and [\(iii\)](#) requires that all other CWS and NTNCWS shall take four consecutive samples 2 to 4 months apart within a 12-month period (quarterly samples) for initial monitoring; and
17. WHEREAS, [40 C.F.R. section 141.902\(b\)\(1\)\(vi\)](#) allows previously acquired data to count toward initial monitoring requirements if the data meet the requirements of [40 C.F.R. section 141.902\(b\)\(1\)](#), the samples were collected on or after January 1, 2019, otherwise meet the timing requirements specified in [Table 2 to 40 C.F.R. section 141.902\(b\)\(1\)\(v\)](#), and are reported to concentrations no greater than the respective MCL; and
18. WHEREAS, [Appendix A to Subpart Q in 40 C.F.R. part 141](#) requires Tier 3 public notification for PFAS chemical monitoring and testing procedure violations; and
19. WHEREAS, [Appendix B to Subpart Q in 40 C.F.R. part 141](#) contains health effects language to be used in public notifications; and
20. WHEREAS, [40 C.F.R. section 141.902\(b\)\(1\)\(vi\)](#) establishes that a public water system is eligible for triennial monitoring at the start of the compliance period (*i.e.*, following April 26, 2027 conclusion of initial monitoring period) only if the system demonstrates that concentrations in all samples it uses to satisfy the initial monitoring requirements are below the trigger levels defined in [40 C.F.R. section 141.902\(a\)\(5\)](#) (*i.e.*, one half the MCL); and
21. WHEREAS, [40 C.F.R. section 141.901\(b\)\(2\)\(iii\)](#) requires, beginning June 25, 2024, that for all samples analyzed for regulated PFAS in compliance with [40 C.F.R. section 141.902](#), data must be reported for concentrations as low as the corresponding trigger levels; and

22. WHEREAS, [40 C.F.R. section 141.904\(a\)](#) requires each CWS and NTNCWS to report (1) all PFAS sample results, including the locations, number of samples taken at each location, dates, and concentrations reported; and (2) whether a trigger level was met or exceeded in any samples; and
23. WHEREAS, [40 C.F.R. section 142.16\(r\)\(1\)](#), requires that an application for approval of a State program revision that adopts the PFAS National Primary Drinking Water Regulation either meet the requirements of [40 C.F.R. section 142.16\(e\)](#) or include the State's procedures for reviewing use of previously acquired data to meet initial monitoring requirements, including the criteria that will be used to determine if the data are acceptable; and
24. WHEREAS, [40 C.F.R. section 142.16\(r\)\(2\)](#) requires that an application for approval of a State program revision that adopts the PFAS National Primary Drinking Water Regulation either meet the requirements of [40 C.F.R. section 142.16\(e\)](#) or include the State's procedures for ensuring CWS and NTNCWS complete the initial monitoring period requirements that will result in a high degree of monitoring compliance by the regulatory deadlines; and

Requirements for Confirmed Detections

25. WHEREAS, [Health and Safety Code section 116378](#), subdivision (c)(1), states that if monitoring results in a confirmed detection, then CWS or NTNCWS shall report that detection in the annual consumer confidence report. Section 116378, subdivision (c)(1), further states that unless the water source is taken out of use or new data becomes available to show that the applicable response level is no longer being exceeded, CWS or NTNCWS will provide notice of the exceedance of the response level in their consumer confidence report; and
26. WHEREAS, [Health and Safety Code section 116378](#), subdivision (c)(2), states that in addition to the notice required by subdivision (c)(1), for PFAS with notification levels, CWS or NTNCWS shall report a detection which exceeds the notification level as required by [Health and Safety Code section 116455](#); and
27. WHEREAS, [Health and Safety Code section 116378](#), subdivision (c)(3), requires that for PFAS with response levels where a detected level of a PFAS exceeds the response level, CWS or NTNCWS shall take the water source out of use or provide public notification as specified therein; and

28. WHEREAS, among other provisions, [Health and Safety Code section 116455](#) requires that within 30 days of a confirmed detection of a contaminant found in drinking water delivered by CWS or NTNCWS for human consumption that is in excess of a notification level set by the State Water Board, CWS or NTNCWS which supply water directly to the end user shall notify the CWS or NTNCWS's governing body, the governing body of any local agency whose jurisdiction includes areas supplied with drinking water by the CWS or NTNCWS, and, if applicable, the California Public Utilities Commission; and
29. WHEREAS, the State Water Board has established [notification and response levels](#) for PFOA, PFOS, PFBS, PFHxS, and perfluorohexanoic acid (PFHxA), and plans to establish notification and response levels for perfluoroheptanoic acid (PFHpA) following receipt of a recommendation from the Office of Environmental Health Hazard Assessment (OEHHA). These notification and response levels can be found in a [summary table on the State Water Board's PFAS webpage](#); and

General

30. WHEREAS, the State Water Board intends to pursue regulation of PFAS chemicals in drinking water in a multi-staged approach, with an initial stage to incorporate, implement, and enforce federal regulations and a subsequent stage to more comprehensively regulate PFAS chemicals on a chemical subclass-based or similar approach; and
31. WHEREAS, on April 5, 2024, OEHHA [announced adoption of public health goals for PFOA and PFOS](#) of 0.007 ng/L and 1 ng/L, respectively; and
32. WHEREAS, on May 27, 2025, [the Division requested that OEHHA develop a public health goal for PFHxS](#); and
33. WHEREAS, this Order is intended to fulfill federal regulation requirements for initial monitoring of PFAS as described in [40 C.F.R. section 141.902\(b\)\(1\)](#); and
34. WHEREAS, [EPA Method 533](#): Determination of Per- and Polyfluoroalkyl Substances in Drinking Water by Isotope Dilution Anion Exchange Solid Phase Extraction and Liquid Chromatography/Tandem Mass Spectrometry (815-B-19-020, November 2019) lists more target analytes than [EPA Method 537.1](#); and

35. WHEREAS, California PWS water quality data submitted by laboratories from January 1, 2019 to August 7, 2025 indicated that at least 95% of nondetect samples analyzed using U.S. EPA Method 533 have a reporting level of 2.0 ng/L or below for all PFAS analytes except for 1H,1H, 2H, 2H-Perfluorooctane sulfonic acid (6:2FTS) and 1H,1H, 2H, 2H-Perfluorodecane sulfonic acid (8:2FTS), for which at least 98% of nondetect results have a reporting level of 5.0 ng/L or below; and
36. WHEREAS, by and through this Order, the State Water Board is exercising its authority under Health and Safety Code sections 116378 and 116530 to require CWS and NTNCWS to monitor for PFAS in accordance with the provisions set forth below.

THEREFORE, the State Water Board, by and through its Division of Drinking Water, hereby orders CWS and NTNCWS to monitor for PFAS as follows:

Initial Monitoring Provisions

1. CWS and NTNCWS shall monitor for PFAS at all active sources to fulfill initial monitoring requirements pursuant to U.S. EPA National Primary Drinking Water Regulations (89 Federal Register 32532; amended June 11, 2024, 89 Federal Register 49101). CWS and NTNCWS shall collect all samples during normal operating conditions. All sampling shall be completed by March 31, 2027, and reporting of results, as specified in this Order, shall be completed by April 26, 2027. CWS and NTNCWS shall monitor four consecutive quarters per source for each surface water source, each groundwater under the direct influence of surface water source, and, if serving greater than 10,000 persons, each groundwater source. Samples shall be taken two to four months apart. If serving 10,000 or fewer persons, CWS and NTNCWS shall monitor each groundwater source twice, five to seven months apart. Previously acquired, submitted, and eligible monitoring data that otherwise fulfills the timing requirements may satisfy these requirements. To assist CWS and NTNCWS in understanding their compliance status with these initial monitoring requirements, **Exhibit A** to this Order lists: (1) active sources as of November 13, 2025, (2) the extent to which previously reported monitoring results may satisfy federal requirements, and (3) outstanding monitoring still required.
2. Samples collected shall be analyzed by a laboratory accredited by the California Environmental Laboratory Accreditation Program (ELAP) for analysis of PFAS

using [EPA Method 533](#): Determination of Per- and Polyfluoroalkyl Substances in Drinking Water by Isotope Dilution Anion Exchange Solid Phase Extraction and Liquid Chromatography/Tandem Mass Spectrometry (815-B-19-020, November 2019). Analytical results for all analytes in the EPA Method 533 Analyte List shall be reported electronically to the California Laboratory Intake Portal (CLIP).

3. A PFAS detection is a positive finding of a quantifiable amount above the laboratory's reporting level. CWS or NTNCWS shall ensure laboratory reporting levels are at least as low as the Consumer Confidence Report Detection Level (CCRDL) for each PFAS analyte tested pursuant to this Order. For the purposes of meeting the requirements in Health and Safety Code section 116378 and the PFAS National Primary Drinking Water Regulation, the CCRDLs are 5.0 ng/L for 6:2FTS and 8:2FTS and 2.0 ng/L for all other analytes, as specified in **Exhibit B** to this Order. CWS or NTNCWS shall ensure the laboratory reports all findings of PFAS, even analytical results at levels below the CCRDLs; zero shall not be used in place of reported values.
4. If PFAS is detected, CWS or NTNCWS shall report the detection in their annual consumer confidence report using the CCRDLs, health effects language, and major origins in drinking water language as specified in **Exhibit B**.
5. CWS and NTNCWS shall report all sample results, locations, number of samples taken at each location, dates, and concentrations reported. CWS and NTNCWS shall also report whether reported concentrations of a PFAS with an MCL, as specified in **Exhibit B**, met or exceeded one half the MCL in any sample, expressed in the same number of significant figures as the MCL.
6. Failure to comply with the monitoring and testing procedures pursuant to this Order, including a failure to collect the required number of samples, constitutes a violation of this Order. CWS or NTNCWS incurring such violations shall provide Tier 3 public notification pursuant to [California Code of Regulations, title 22, section 64463 et seq.](#)

Health and Safety Code Sections 116378 and 116455 Provisions

7. For the purposes of determining an exceedance of notification or response levels, if a laboratory reports a PFAS result in any sample at a concentration greater than the notification level, CWS or NTNCWS may collect up to two confirmation samples within 30 days of being notified of the initial result by the

laboratory. The initial result is considered to have exceeded the notification or response level if one or both confirmation samples show a result above the respective CCRDL. If fewer than two confirmation samples are collected, the initial result shall be presumed to be confirmed. If the initial PFAS result is confirmed in one or two confirmation samples, the original and the confirmation sample(s) results will be averaged to determine if the confirmed result is greater than the applicable notification level and/or response level. For calculation purposes, a result below the CCRDL will be assigned a value of zero when averaging.

8. If PFAS results are confirmed to exceed a notification level, CWS and NTNCWS shall report the detection as required by [Health and Safety Code section 116455](#).
9. For the purposes of determining an exceedance of a response level for any PFAS analyte except PFBS (for which the exceedance is determined by a single or confirmed sample), CWS and NTNCWS shall calculate a quarterly running annual average (QRAA). The QRAA means the average of sample results taken at an individual source, treatment effluent, or delivered water locations for the identified source during four calendar quarters. The QRAA is re-calculated each quarter using the most recent four quarters of results. A single sample may result in the exceedance of the response level; if any sample would cause the QRAA to exceed a response level, the water source will be deemed to have exceeded the response level. If a CWS or NTNCWS collects and analyzes more than one sample in a quarter, the average of all the results for that quarter shall be used when calculating the QRAA. If fewer than four quarters of data are available (the case when monitoring has just started and when samples have been missed), the running annual average shall be based on an average of the available data by dividing by the number of quarters for which data is available.
10. If any monitoring undertaken pursuant to this Order results in a concentration of PFAS in the water entering the distribution system that exceeds a response level, CWS and NTNCWS shall take the source out of service immediately or provide public notification pursuant to [Health and Safety Code 116378](#). The water system shall provide quarterly public notification for as long as PFAS is present at a concentration greater than its response level.
11. If a CWS or NTNCWS provides treatment for PFAS (for example, blending, granular activated carbon, ion exchange, or reverse osmosis treatment), the

CWS or NTNCWS may also sample the treated or delivered water to determine an exceedance of a notification or response level. If treated water or delivered water samples are proposed to be collected, the CWS or NTNCWS shall first contact the local Division district office for written approval of sampling location and configuration.

The State Water Board reserves the right to make modifications to this Order as it may deem necessary to protect public health and safety.

SEVERABILITY

The requirements of this Order are severable, and each CWS and NTNCWS shall comply with each and every provision thereof notwithstanding the effectiveness of any provision.

FURTHER ENFORCEMENT ACTION

The California Safe Drinking Water Act, [Health and Safety Code section 116650](#), authorizes the State Water Board to issue a citation or order with the assessment of administrative penalties to a public water system for violation or continued violation of the requirements of the California Safe Drinking Water Act or any regulation, permit, standard, citation, or order issued or adopted thereunder. The California Safe Drinking Water Act also authorizes the State Water Board to take action to suspend or revoke a permit that has been issued to a public water system if the public water system has violated applicable law or regulations or has failed to comply with an order of the State Water Board, and to petition the superior court to take various enforcement measures against a public water system that has failed to comply with an order of the State Water Board.

Darrin Polhemus, Deputy Director
State Water Resources Control Board
Division of Drinking Water

December XX, 2025
Date

Exhibit A and Exhibit A-Supplement – List of Sources and Required Monitoring Frequency Under General Order DW 2025-00XX-DDW

Exhibit B – Consumer Confidence Report Language, CCRDLs, and Notification and Response Levels