



Frequently Asked Questions

Per- and Polyfluoroalkyl Substances (PFAS) Monitoring in Public Water Systems

Frequently Asked Questions (FAQ)

Topics include:

General Questions

General Order DW 2022-0001-DDW

General Order DW 2024-0002-DDW

General Order DW 2025-0002-DDW

National Primary Drinking Water Regulations

**State Water Resources Control Board
Division of Drinking Water**

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List of Acronyms & Abbreviations

Acronyms/Abbreviations	Definitions
CCRD	Consumer Confidence Report Detection Level
CWS	Community Water System
DDW	Division of Drinking Water
GO 2022	General Order DW 2022-0001-DDW
GO 2024	General Order DW 2024-0002-DDW
GO 2025	General Order DW 2025-0002-DDW
NL	Notification Level
NPDWR	National Primary Drinking Water Standards
NTNCWS	Non-Transient Non-Community Water System
OWP	California State University, Sacramento's Office of Water Programs
PFAS	Per- and Polyfluoroalkyl Substances
PWS	Public Water System
QRAA	Quarterly Running Annual Average
RL	Response Level
State Water Board	State Water Resources Control Board
TNCWS	Transient Non-Community Water System
U.S. EPA	U.S. Environmental Protection Agency
U.S. EPA PFAS Rule	Subpart Z, Title 40, Part 141, of the Code of Federal Regulations

Overview

Public water systems must comply with both Federal (United States Environmental Protection Agency (U.S. EPA)) and State (State Water Resources Control Board Division of Drinking Water (DDW)) per and poly-fluoroalkyl substances (PFAS) monitoring requirements. PFAS is a class of substances and can be referred to as PFAS substances, PFAS analytes, and/or PFAS contaminants. These frequently asked questions (FAQs) have been developed to assist with the understanding of the requirements for public water systems.

On April 10, 2024, the U.S. EPA established Maximum Contaminant Levels (MCLs) for six PFAS contaminants via Subpart Z, Title 40, Part 141, of the Code of Federal Regulations (U.S. EPA PFAS Rule). Public water systems must monitor for the six PFAS and must complete initial monitoring by March 31, 2027. Public water systems have until 2029 to implement solutions to reduce PFAS by 2029 if monitoring shows that drinking water levels exceed the MCLs. For the latest information on the U.S. EPA plans to regulate PFAS, visit their website (<https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas>).

DDW has established notification and response levels (NL and RL) for five PFAS and required periodic monitoring for PFAS via the following general orders: General Orders DDW-2022-0001-DDW, DDW-2024-0002-DDW, and DDW-2025-0002-DDW.

On October 29, 2025, DDW issued new and revised notification and response levels for PFOA, PFOS, PFHxS, and perfluorohexanoic acid (PFHxA). [Table 1](#) shows the current NLs and RLs.

The FAQs are organized to answer general questions, explain the differences between the U.S. EPA PFAS Rule and DDW General Orders, answer questions about the U.S. EPA PFAS Rule, and answer questions about DDW's General Orders.

The information contained in the FAQs is for general guidance purposes only and may be revised at any time. FAQs are not binding authority and to the extent the FAQs and GOs conflict, the GOs supersede the FAQs. Questions that are not answered by these FAQs should be directed to your local DDW District office.

Table 1 - Notification and Response Level Changes on October 29, 2025

Constituent	CCRD ¹ (ng/L)	Notification Level ² (ng/L)	Response Level (ng/L)	Response Level Exceedance Methodology ³
perfluorobutanesulfonic acid (PFBS)	2.0	500	5,000	Single, confirmed sample
perfluorohexanesulfonic acid (PFHxS)	2.0	3.0	10	QRAA
perfluorohexanoic acid (PFHxA)	2.0	1,000	10,000	QRAA
perfluorooctanesulfonic acid (PFOS)	2.0	4.0	40	QRAA
perfluorooctanoic acid (PFOA)	2.0	4.0	10	QRAA

- 1) Consumer Confidence Report Detection Level (CCRD)
- 2) An NL exceedance is based on a single confirmed finding.
- 3) QRAA means quarterly running annual average. Response level exceedance determination is as described in the Notification Level Issuance documents available at:

https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/NotificationLevels.html.

Section 1 - PFAS Sampling and Monitoring Questions

1.1 Which water systems must test for PFAS?

Community Water Systems and Non-transient Non-Community Water Systems must monitor for PFAS in accordance with the U.S. EPA PFAS Rule and the DDW GOs.

1.2 Are statewide PFAS sampling results publicly available?

Yes, monitoring results can be found on Public Drinking Water Watch (<https://sdwis.waterboards.ca.gov/PDWW/>), PFAS sampling results (<https://sdwis.waterboards.ca.gov/PDWW/JSP/ResultsBySampleIDForm.jsp>), and using the State Water Board PFAS Mapping tool (https://geotracker.waterboards.ca.gov/map/pfas_map).

Also, all constituents that are detected in drinking water are required to be included in the public water system's annual Consumer Confidence Report.

1.3 If I monitor in accordance with the U.S. EPA PFAS Rule, will my water system be compliant with DDW General Order monitoring requirements?

Not necessarily. For water systems subject to GO 2022, DDW requires quarterly monitoring for 25 PFAS analyzed by a California Environmental Laboratory Accreditation Program (ELAP) certified laboratory using EPA Method 533. The U.S. EPA allows for the use of Method 537.1, Version 2.0, and only requires monitoring for six PFAS. Also, groundwater systems with a population of less than 10,000 are only required by the U.S. EPA PFAS Rule to monitor twice in one year, which is less than what GO 2022 requires.

Consult your local DDW District office for more information.

1.4 If I monitor in accordance with GO 2022 and GO 2025, will my water system be compliant with the U.S. EPA PFAS Rule?

If your water system is currently being monitored in accordance with GO 2022 then it is likely that no additional monitoring is needed. If you complete the monitoring required by GO 2025, as currently drafted, your water system will be compliant with U.S. EPA PFAS Rule, as currently drafted. Please verify you have met initial monitoring requirements for all sources with your local DDW District office.

- 1.5 If my water system was monitored for PFAS at the distribution system entry point in accordance with the U.S. EPA PFAS Rule, can the monitoring results be used to meet the monitoring requirements of DDW? And vice versa, can DDW results (source water sampling) be used to satisfy U.S. EPA PFAS Rule requirements?**

Yes, regardless of where the sample was taken, the source or the distribution system entry point, DDW will accept monitoring results taken from either location and use them for compliance determination for both the U.S. EPA PFAS Rule and DDW GOs. The Water System must notify their District office which location they are proposing to use.

- 1.6 If I monitored in accordance with GO 2022, and was allowed to reduce or cease monitoring, what monitoring do I need to do to meet U.S. EPA PFAS Rule compliance?**

Depending on your system size, when you sampled, and the number of samples that you have taken, you may need to take additional samples to meet U.S. EPA PFAS Rule initial monitoring requirements. Please refer to the U.S. EPA factsheet for initial monitoring requirements and GO 2025 for more information.

<https://www.epa.gov/dwreginfo/pfas-rule-implementation>

- 1.7 If I am monitoring in accordance with GO 2022 and GO 2025 and exceed the U.S. EPA PFAS Rule MCL, will I receive an enforcement action?**

DDW will not be issuing enforcement on the U.S. EPA PFAS Rule prior to the deadlines in the U.S. EPA PFAS Rule.

- 1.8 Can I use UCMR5 PFAS results to account for the required monitoring?**

Yes, UCMR5 results can be used to meet the monitoring requirements. Check with your District office for more information.

- 1.9 How are NL exceedances calculated?**

An NL exceedance is based on a single confirmed finding.

- 1.10 Are sampling instructions available for PFAS sampling?**

Obtaining representative samples and maintaining their integrity are critical elements of any monitoring program. DDW recommends you carefully read your ELAP-accredited laboratory instructions prior to sampling. If your laboratory does

not have special instructions, DDW has some recommended planning and instructions located here:

https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/documents/pfos_and_pfoa/ddw-pfas-sampling-guidance-nov-2022.pdf

The guidance recommends the collection of both a Field Sample and Field Duplicate. If the laboratory analyzes the Field Duplicate for any reason, the results must be reported via Electronic Data Transfer (EDT).

1.11 How many significant figures are there for each PFAS?

The table below shows the significant figure requirement for PFAS.

Table 2 - PFAS Significant Figures

Analyte	Abbreviation	U.S. EPA PFAS Rule		State Water Board DDW GOs			
		MCL (ng/L)	Significant Figure Requirement	CCRDL (ng/L)	NL (ng/L)	RL (ng/L)	NL and RL Significant Figure Requirement
Hexafluoropropylene oxide	HFPO-DA	10	1				
Perfluorobutanesulfonic acid	PFBS			2.0	500	5,000	1
Perfluorohexanoic acid	PFHxA			2.0	1,000	10,000	2
Perfluorohexanesulfonic acid	PFHxS	10	1	2.0	3.0	10	2
Perfluorononanoic acid	PFNA	10	1				
Perfluorooctanoic acid	PFOA	4.0	2	2.0	4.0	10	2
Perfluorooctanesulfonic acid	PFOS	4.0	2	2.0	4.0	40	2

Section 2 - State Water Board-issued General Orders – General Questions

2.1 If a public water system received a GO to conduct water quality monitoring for PFAS, what is the public water system required to do?

The GOs require different water quality monitoring efforts as explained below.

GO 2022, which repeals and rescinds General Orders 2020-003-DDW and 2021-0001-DDW, requires quarterly water quality monitoring for each drinking water source listed in the GO. The first quarter result was due by March 31, 2023.

GO 2024 requires at least one PFAS water quality sample. More information on each order can be found below.

GO 2025 requires either quarterly or twice per year water (depending on your water system size) quality monitoring for each drinking water source listed in the exhibits to the GOs.

2.2 Are the GOs available on the DDW website?

Yes, the GOs are available here:

https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/pfas_ddw_general_order/

2.3 Will there be financial assistance from the State Water Board for a water system that has PFAS?

PFAS projects may be eligible for financial assistance through the State Water Resources Control Board Division of Financial Assistance, depending on the availability of funding.

https://www.waterboards.ca.gov/water_issues/programs/grants_loans/

2.4 I received a Notice of Applicability (NOA) to monitor my water system in accordance with GO 2022. What is an NOA and why did I receive it?

A Notice of Applicability (NOA) is a directive that requires a drinking water source, or public water system, to comply with an existing GO.

Public water systems may be subject to an NOA if PFAS is detected in their drinking water source(s). At the discretion of DDW, if drinking water source(s) are adjacent to PFAS contamination, a NOA may be issued for the public water system.

2.5 The notification and response levels for some PFAS were lowered on October 29, 2025, how does that impact my monitoring for GO 2022?

Monitoring conducted after October 29, 2025, is subject to the revised NLs and RLs. It is anticipated that an amendment to GO 2022 will be issued to reflect the changes to the NLs and RLs.

2.6 For PFHxA, in order to determine an RL exceedance, is the QRAA calculated using historical data (if available)?

No, the QRAA is calculated based on sampling conducted in accordance with GO 2025.

2.7 For PFHxS, in order to determine an RL exceedance, is the QRAA calculated using historical data (if available)?

No, the QRAA is calculated based on sampling conducted in accordance with GO 2025. An RL exceedance for PFHxS is based on a single or confirmed sample in accordance with GO 2022; however, DDW plans to issue an amendment to the order to reflect the changes to the NLs and RLs that occurred on October 29, 2025. Please contact your local DDW office for more information.

2.8 The Consumer Confidence Report Detection Levels (CCRDLs) are different in each GO, is that correct?

Yes, each GO has specific CCRDL values. See each GO for the CCRDL values.

Section 3 - PFAS Testing Methods Questions

3.1 What are the acceptable testing methods for PFAS?

Your ELAP-accredited laboratory should use U.S. EPA Method 533 or U.S. EPA 537.1, Version 2.0. Monitoring conducted in accordance with GO 2022 requires the use of Method 533 only. Monitoring conducted in accordance with GO 2025 requires the use of either method (but not both. See Section 6 for more information).

3.2 Can I use any laboratory to test for PFAS?

Laboratories accredited by the California Environmental Laboratory Accreditation Program (ELAP) for EPA Method 533 and/or U.S. EPA 537.1, Version 2.0 must be used. The laboratories can be found at the following link:

<https://www.waterboards.ca.gov/pfas/docs/pfas-laboratories.pdf>

3.3 How do I find an accredited lab or how do I encourage my lab to become accredited?

The list of accredited laboratories for PFAS analysis can be found at:

<https://www.waterboards.ca.gov/pfas/docs/pfas-laboratories.pdf>.

ELAP has an application process in which laboratories can apply to become accredited:

https://www.waterboards.ca.gov/drinking_water/certlic/labs/apply.html.

3.4 What is a field reagent blank and a field duplicate sample, and how are they used?

A field reagent blank (FRB) is a sample of clean water, or a reagent-free solution, that is handled in the field in the same way as a real sample to assess potential contamination during sampling and handling. It helps determine if the sampling process itself, rather than the sample source, introduced any contaminants.

A field reagent blank (FRB) is a required separate sample collected at the same time and sampling location, shipped and stored under identical conditions using EPA Method 533.

An FRB is required for one sample set. So, if there are multiple drinking water sources on one site, only one FRB is required.

If there is a detection of PFAS in a field sample, then the FRB must be analyzed and submitted to DDW at the same time as the field sample result. If there is no detection, the FRB does not need to be analyzed.

A field duplicate can be used to acquire a confirmation result as long as it meets the preparation methodology approved in EPA Method 533.

Section 4 - General Order DW 2022-0001-DW Questions

4.1 If I received GO 2022, do I still need to monitor in accordance with Order DW 2021-0001 and/or Order DW 2020-0003?

No, GO 2022 completely rescinds Order DW 2021-0001 and Order DW 2020-0003 in their entirety.

4.2 Which sample method is allowed in GO 2022?

Only Method 533 is allowed when sampling in accordance with GO 2022.

4.3 Will GO 2022 be rescinded or does it expire?

It is anticipated that GO 2022 will be amended to reflect the revisions in NLs and RLs that took place on October 29, 2025.

4.4 What are the monitoring requirements of GO 2022?

On or before March 31st, 2023, a water sample must be collected from the sources listed in Exhibit A of GO 2022 to be analyzed by EPA Method 533 for PFAS. Samples must be collected at least once each calendar quarter thereafter.

4.5 If seasonal systems or sources are not operable during part of the year (i.e. beyond one quarter) and are not able to complete initial monitoring due to availability of sources, what should they do?

All systems are required to complete initial monitoring quarterly at each source identified in GO 2022. Contact your local DDW office for more guidance.

4.6 Is the list of public water systems in Exhibit A of GO 2022, the latest and most complete list of water systems subject to the order?

No, Exhibit A provided at the link below, does not contain all the water systems subject to GO 2022. If a NOA was issued after GO 2022 was issued, a water system may also be subject to the requirements of GO 2022. Systems subject to GO 2022, via an NOA, are being tracked at the District level.

[2022 PFAS Order Exhibit A -List of Sources](#)

4.7 What are the ongoing monitoring requirements for PFAS?

Drinking water sources must be monitored quarterly. Sampling modifications or reductions in sampling may be requested after two consecutive quarters of testing when results are below the CCRDL. The approval of the monitoring modification is dependent on DDW review.

4.8 Can I use composite sampling for monitoring compliance?

No, monitoring in accordance with GO 2022 is specific to individual drinking water sources.

4.9 What happens if PFAS levels are above the Consumer Confidence Report Detection Level (CCRDL)?

A PFAS detection is a positive finding of a quantifiable amount above the established detection level requirement for any PFAS analyte. The established detection level requirement for each PFAS analyte is the CCRDL. The detection must be reported in the water system's annual consumer confidence report.

Table 3 - GO 2022 PFAS CCRDLs

	PFAS Constituent (acronym)	CCRDL, ng/L
1	11-chloroeicosafluoro-3-oxaundecane-1-sulfonic acid (11Cl-PF3OUdS)	5
2	1H,1H, 2H, 2H-perfluorodecane sulfonic acid (8:2FTS)	5
3	1H,1H, 2H, 2H-perfluorohexane sulfonic acid (4:2FTS)	3
4	1H,1H, 2H, 2H-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 (PFEEESA)	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

4.10 What do I do if the PFAS detections are confirmed to exceed an NL?

Notification (per [Health and Safety Code section 116455](#)) is required within 30 days after the water system is first informed by the laboratory of a confirmed detection of the contaminant that exceeds the NL. Retail and wholesale water systems must notify the PWS's governing body and the governing body of any local agency whose jurisdiction includes areas supplied with drinking water.

4.11 What do I do if the PFAS detections are confirmed to exceed an RL?

As required by Assembly Bill 756 (2020), 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 RL must be reported in the annual consumer confidence report.

4.12 How do I determine a PFAS exceedance?

The specific methodology to determine response level exceedance is dependent on the PFAS analyte. An exceedance may be determined by calculating a quarterly running annual average (QRAA), a single or confirmed sample, or as prescribed in the PFAS analytes NL Issuance by DDW. To determine whether monitoring shows an exceedance of a RL, refer to the appropriate methodology of the PFAS analyte. Exhibit B provides a summary of this information but may not be inclusive as new advisory levels are issued.

4.13 If I monitored for the GO 2022, and was allowed reduced monitoring, what monitoring do I need to do to meet U.S. EPA PFAS Rule compliance?

Monitoring for PFAS is required under Subpart Z, Title 40, Part 141, of the Code of Federal Regulations (C.F.R.). Your water system may be required to have additional monitoring depending on how much monitoring was previously done in accordance with the order. Contact the DDW office for additional guidance.

4.14 The PFAS levels in my drinking water source(s) are below the CCRDL, can I reduce my monitoring frequency?

GO 2022 monitoring frequencies may be adjusted by DDW based on the monitoring results. You should consult with your local DDW office.

<https://www.epa.gov/system/files/documents/2025-01/pfas-compliance-monitoring-grg-jan25.pdf>

Section 5 - General Order DW-2024-0002-DW Questions

5.1 What is GO 2024 and how does it affect my water system?

Order [DW 2024-0002-DDW \(GO 2024\)](#) requires certain public water systems to test for PFAS. If you received the order, it means one or more of your water sources must be tested for PFAS.

5.2 Why did I receive GO 2024?

As part of a comprehensive effort to investigate the nature and scope 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.

5.3 What is the definition of a disadvantaged community?

A disadvantaged community is a community with a median annual household income (MHI) of less than eighty percent (80%) of the statewide median annual household income ([Cal. Code Regs., tit. 22, § 64300](#)).

5.4 What should I do after receiving GO 2024?

- Review GO 2024 and Exhibits A and B: Exhibit A lists the sources that need PFAS monitoring, and Exhibit B lists the specific PFAS chemicals to monitor and their minimum detection levels.
- On GO 2024'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/) (<https://pfas.owp.csus.edu/>). OWP is the State Water Board's sampling contractor and will be your primary point of contact. 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 results of a PFAS detection are confirmed to exceed its respective notification level (see Table 2), the water system detection must be reported within 30 days after being informed by the laboratory of a confirmed detection of the contaminant that exceeds the notification level.

5.5 Who will collect and analyze the PFAS samples?

A contractor to OWP will collect the samples. DDW has identified an authorized state-contracted laboratory to analyze the samples, and other laboratories cannot be used.

5.6 Will there be any cost for the monitoring?

The initial monitoring under the GO 2024 will be conducted by OWP **at no cost to you** for the sources listed in Exhibit A.

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

5.7 What if my water source is no longer in service?

Please notify your 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

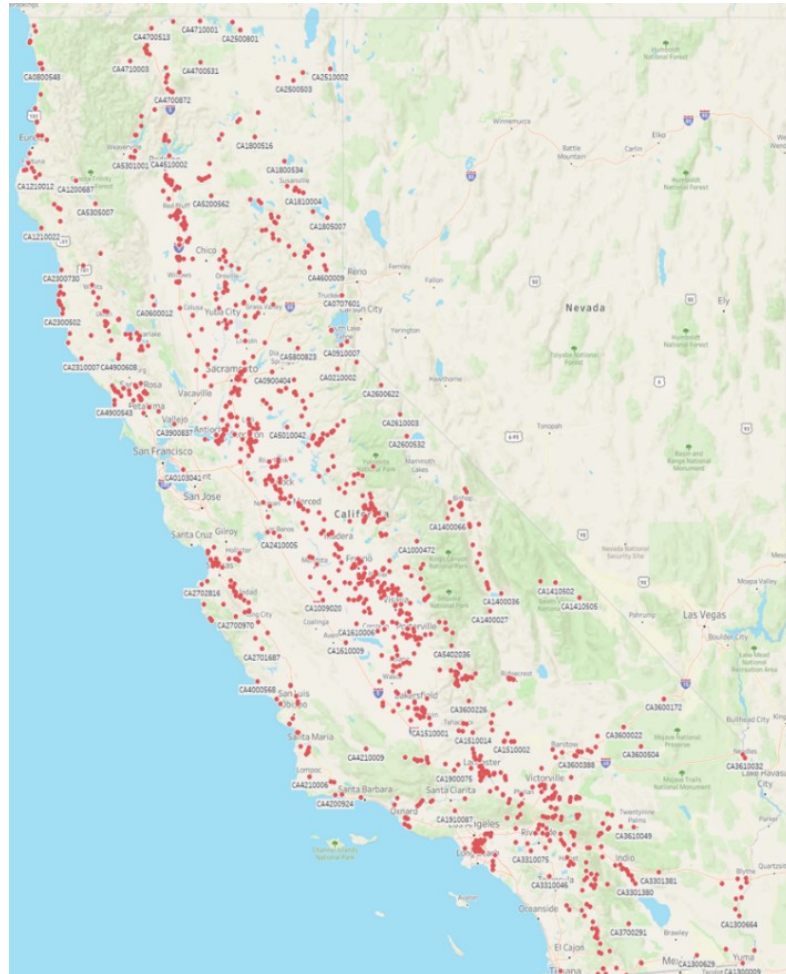


Figure 1 - Drinking water wells and the associated public water systems selected for PFAS sampling in 2024 Order. The wells are represented by red dots.

5.8 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 (Figure 2) illustrates the options for the sampling locations.

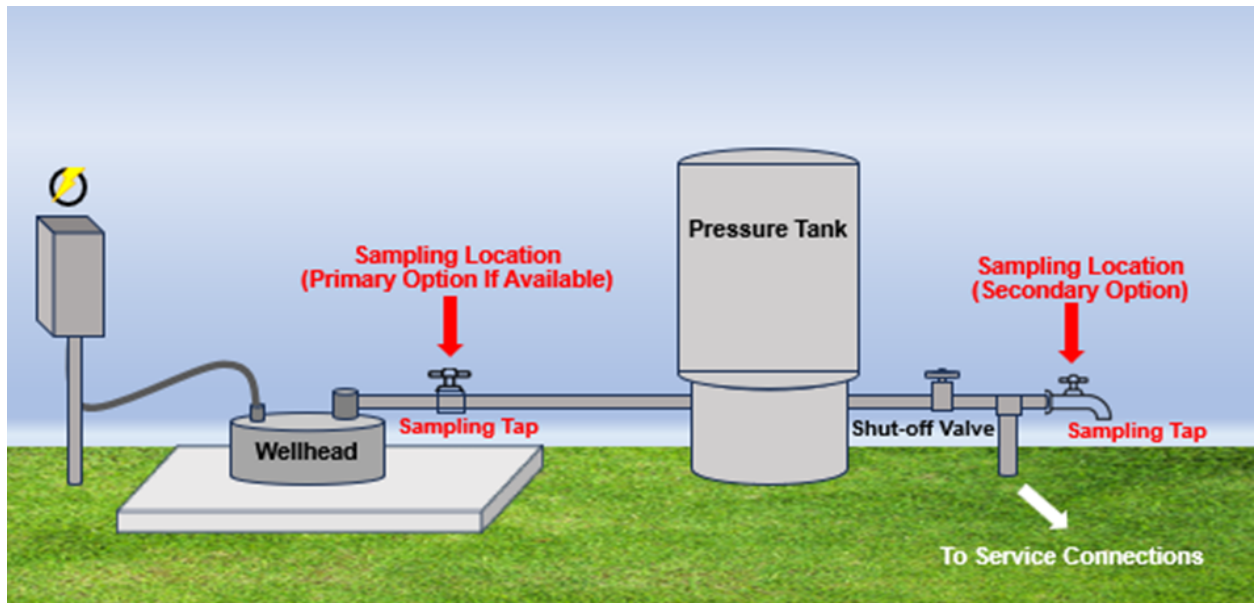


Figure 2 - PFAS sampling location alternatives

5.9 What methods are used for sample analysis?

EPA Method 533 is used for PFAS sample analysis. EPA Method 1621 is used for Adsorbable Organic Fluorine. Both methods must be tested by a laboratory accredited by the California Environmental Laboratory Accreditation Program (ELAP).

5.10 What is the deadline for collecting samples for GO 2024?

Samples must be collected on or before August 31, 2026.

5.11 How do I get the results?

OWP will provide you with the laboratory results, public health information, and guidance on any additional actions you may need for your water system.

5.12 What actions are required if the PFAS constituent exceeds the CCRDL?

For GO 2024, the water system should report the finding in their CCR if the result exceeds the CCRDL but is lower than the NL. If the results of a PFAS detection are confirmed to exceed its respective NL DDW would have been notified of the results since the DDW's contractor is performing the analytical testing. Therefore, the water system does not need to report the exceedance to DDW.

If the results of a PFAS exceed an RL, the action should be to either (1) take the source out of service immediately; (2) utilize treatment or blending; or (3) provide public notification of the RL exceedance. Additionally, the exceedance of the RL 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/docs/translations/PFAS-fact-sheet-english.pdf

The English fact sheet at the link above is located on DDW's PFAS page along with fact sheets in other languages. These can be found at the link below.

https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/pfas.html

5.13 What happens after PFAS is detected in my water?

OWP will provide your water system with the laboratory results and public health information associated with the results. DDW will not pay for additional monitoring.

5.14 Does GO 2024 supersede the 2022 Order?

No, GO 2024 does not replace GO 2022.

5.15 Do I need to continue collecting quarterly samples under GO 2022?

Yes, if your water system collects quarterly samples under GO 2022, after the sampling for GO 2024 is completed, your water system will still need to keep collecting samples each quarter for GO 2022.

5.16 Can samples for GO 2024 be used for GO 2022 compliance?

Yes, the one sample collected under GO 2024 will also satisfy the requirements for GO 2022 for the corresponding quarter.

5.17 Can I use GO 2022 samples to comply with GO 2024?

No, you cannot use the samples collected for GO 2022 to fulfill the GO 2024 required sampling.

5.18 If I choose to collect my own sample using the self-sampling option in GO 2024, do I have to notify the DDW's district engineer?

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

5.19 If I choose to self-sample under GO 2024, do I have to use DDW's contracted laboratory?

Yes. You must use the laboratory contracted with DDW for GO 2024.

Section 6 - General Order DW-2025-0002-DW Questions

6.1 How is GO 2025 different from GO 2022 and GO 2024?

GO 2025 requires CWS and NTNCWS to 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).

GO 2025 incorporates the changes that took place on October 29, 2025, with regards to the revised NLs and RLs and the methodology for calculating an exceedance.

6.2 Does GO 2025 replace GO 2022 and GO 2024?

No, GO 2025 is not a replacement to GO 2022 and GO 2024. Those Orders are still in effect.

6.3 If a well is taken out of service when PFAS exceeds the RL, is quarterly public notification still required?

No, quarterly public notification is not required if a well is removed from service.

6.4 If water treatment is used to remove PFAS from the drinking water, is quarterly public notification still required?

No, quarterly public notification is not required if PFAS is removed from the drinking water.

6.5 My public water system uses treatment to remove PFAS from the source water prior to delivery to the distribution system. Do I need to report the source water PFAS in my CCR, or can I use the results of the treated drinking water monitoring for CCR reporting purposes? In other words, if my public

water system completely removes PFAS from the drinking water, do I need to report the presence of PFAS in the raw water source in my CCR?

Your public water system should comply with the terms of the water treatment plant permit conditions. Generally, the CCR reflects the water quality of the drinking water entering the distribution system. DDW recommends providing as much information as possible on the CCR with a description of the water system's efforts to manage the water quality. Check with your local DDW office for further clarification on what needs to be reported in the CCR.

6.6 The U.S. EPA announced, in part, on May 14, 2025, “*To allow drinking water systems more time to develop plans for addressing PFOA and PFOS where they are found and implement solutions, EPA plans to develop a rulemaking to provide additional time for compliance, including a proposal to extend the compliance date to 2031. EPA plans to issue a proposed rule this fall and finalize this rule in the Spring of 2026.*” Although a proposed rule has not yet been issued, will DDW consider granting compliance extensions when the U.S. EPA finalizes the rule?

DDW will consider the U.S. EPA extensions when and if a revised rule is adopted.

6.7 My public water system blends water from multiple wells (wellfield) prior to delivery to the distribution system. Do I need to monitor each source, or can I just monitor the entry point to the distribution system?

Monitoring shall be conducted in accordance with your water supply permit. Contact your local DDW office for more information.

6.8 I believe I have met the water quality monitoring requirements already, but my source is listed in Exhibit A as requiring additional monitoring. What should I do?

Please check that any previously acquired data your PWS is proposing to use to satisfy the provisions of the monitoring order and the initial monitoring requirements meets the timing and analytical requirements of the NPDWR. UCMR5 results do satisfy this order and the initial monitoring requirements so long as the requisite number of samples were collected, the timing of the samples are correct, and all sources are represented at the entry points that were sampled. Please contact your local DDW office to review the existing water quality monitoring data and make a determination based on the existing water quality records.

6.9 If I have met the initial monitoring requirements, how will I determine my monitoring frequency going forward?

Consult with your local DDW office regarding the new monitoring frequency.

6.10 Will Exhibit A be updated?

Yes, Exhibit A is posted on DDW's web page for PFAS monitoring orders (https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/pfas_ddw_general_order/) and it will be updated monthly to reflect new drinking water sources that become active over time.

6.11 If a drinking water source becomes active after GO 2025 was issued, is it subject to the monitoring required in GO 2025?

Yes, drinking water sources that are activated after GO 2025 was issued will be subject to the monitoring required by GO 2025 and will be included in regular updates to Exhibit A, posted on DDW's webpage for PFAS monitoring orders.

6.12 Is it correct that the CCRDLs were lowered in GO 2025 compared to previous GOs?

Yes, the CCRDLs were lowered as shown below.

Table 4 - GO 2025 PFAS CCRDLs

PFAS Constituent (acronym)	CCRDL, ng/L
11-chloroeicosafluoro-3-oxaundecane-1-sulfonic acid (11Cl-PF3OUdS)	2.0
1H,1H, 2H, 2H-perfluorodecane sulfonic acid (8:2FTS)	5.0
1H,1H, 2H, 2H-perfluorohexane sulfonic acid (4:2FTS)	2.0
1H,1H, 2H, 2H-perfluorooctane sulfonic acid (6:2FTS)	5.0
4,8-dioxa-3H-perfluorononanoic acid (ADONA)	2.0
9-chlorohexadecafluoro-3-oxanonane-1-sulfonic acid (9Cl-PF3ONS)	2.0
hexafluoropropylene oxide dimer acid (HFPO-DA) (GenX)	2.0
nonafluoro-3,6-dioxaheptanoic acid (NFDHA)	2.0
perfluoro (2-ethoxyethane) sulfonic acid (PFEESA)	2.0
perfluoro-3-methoxypropanoic acid (PFMPA)	2.0
perfluoro-4-methoxybutanoic acid (PFMBA)	2.0
perfluorobutanesulfonic acid (PFBS)	2.0
perfluorobutanoic acid (PFBA)	2.0

PFAS Constituent (acronym)	CCRD, ng/L
perfluorodecanoic acid (PFDA)	2.0
perfluorododecanoic acid (PFDoA)	2.0
perfluoroheptanesulfonic acid (PFHpS)	2.0
perfluoroheptanoic acid (PFHpA)	2.0
perfluorohexanesulfonic acid (PFHxS)	2.0
perfluorohexanoic acid (PFHxA)	2.0
perfluorononanoic acid (PFNA)	2.0
perfluorooctanesulfonic acid (PFOS)	2.0
perfluorooctanoic acid (PFOA)	2.0
perfluoropentanesulfonic acid (PFPeS)	2.0
perfluoropentanoic acid (PFPeA)	2.0
perfluoroundecanoic acid (PFUnA)	2.0
n-ethyl perfluorooctanesulfonamidoacetic acid (NEtFOSSA)	5.0
n-methyl perfluorooctanesulfonamidoacetic acid (NMeFOSSA)	5.0
perfluorotetradecanoic acid (PFTA)	2.0
perfluorotridecanoic acid (PFTTrDA)	2.0

6.13 Do I have to use both Methods 533 and 537.1 to sample for PFAS?

No, for GO 2025, water systems may choose which test method to use. Method 533 includes 25 analytes and Method 537.1 includes 18 analytes as shown below. All analytes in the chosen method must be reported. There is some overlap in both methods and, most importantly, both methods include the six analytes required by the U.S. EPA PFAS Rule as bolded in the table.

Table 5 - Comparison of PFAS Analytes between Method 533 and 537.1

Analyte	Abbreviation	CASRN	Method 533	Method 537.1
11-Chloroeicosafluoro-3-oxaundecane-1-sulfonic acid	11Cl-PF3OUdS	763051-92-9	x	x
9-Chlorohexadecafluoro-3-oxanonane-1-sulfonic acid	9Cl-PF3ONS	756426-58-1	x	x
4,8-Dioxa-3H-perfluorononanoic acid	ADONA	919005-14-4	x	x
Hexafluoropropylene oxide dimer acid	HFPO-DA	13252-13-6	x	x
Perfluorobutanesulfonic acid	PFBS	375-73-5	x	x

Analyte	Abbreviation	CASRN	Method 533	Method 537.1
Perfluorodecanoic acid	PFDA	335-76-2	x	x
Perfluorododecanoic acid	PFDaA	307-55-1	x	x
Perfluoroheptanoic acid	PFHpA	375-85-9	x	x
Perfluorohexanoic acid	PFHxA	307-24-4	x	x
Perfluorohexanesulfonic acid	PFHxS	355-46-4	x	x
Perfluorononanoic acid	PFNA	375-95-1	x	x
Perfluorooctanoic acid	PFOA	335-67-1	x	x
Perfluorooctanesulfonic acid	PFOS	1763-23-1	x	x
Perfluoroundecanoic acid	PFUnA	2058-94-8	x	x
1H,1H, 2H, 2H-Perfluorohexane sulfonic acid	4:2FTS	757124-72-4	x	
1H,1H, 2H, 2H-Perfluorooctane sulfonic acid	6:2FTS	27619-97-2	x	
1H,1H, 2H, 2H-Perfluorodecane sulfonic acid	8:2FTS	39108-34-4	x	
Nonafluoro-3,6-dioxaheptanoic acid	NFDHA	151772-58-6	x	
Perfluorobutanoic acid	PFBA	375-22-4	x	
Perfluoro(2-ethoxyethane)sulfonic acid	PFEESA	113507-82-7	x	
Perfluoroheptanesulfonic acid	PFHpS	375-92-8	x	
Perfluoro-4-methoxybutanoic acid	PFMBA	863090-89-5	x	
Perfluoro-3-methoxypropanoic acid	PFMPA	377-73-1	x	
Perfluoropentanoic acid	PFPeA	2706-90-3	x	
Perfluoropentanesulfonic acid	PFPeS	2706-91-4	x	
N-ethyl perfluorooctanesulfonamidoacetic acid	NEtFOSAA	2991-50-6		x
N-methyl perfluorooctanesulfonamidoacetic acid	NMeFOSAA	2355-31-9		x
Perfluorotetradecanoic acid	PFTA	376-06-7		x
Perfluorotridecanoic acid	PFTTrDA	72629-94-8		x

6.14 My public water system currently serves drinking water with a PFAS concentration QRAA greater than the U.S. EPA PFAS Rule MCL; however, DDW has not issued an enforcement action yet. I'm reporting the PFAS concentrations in the appropriate section of my CCR in accordance with DDW directives, but do I need to state the water system is in violation of the MCL in my CCR?

No, in accordance with the U.S. EPA PFAS Rule, MCL violations may be assessed beginning on April 26, 2029. If your water system is serving water that has PFAS QRAA concentrations more than the MCL, you may provide a statement in your CCR that indicates the water system is not in violation yet and that violations may be assessed beginning on April 26, 2029.

Section 7 - U.S. EPA PFAS National Primary Drinking Water Regulation

7.1 Where can I find information on the U.S. EPA PFAS National Primary Drinking Water Regulation?

The U.S. EPA has developed a website that provides information on the PFAS NPDWR.

<https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas>

7.2 How does the U.S. EPA PFAS Rule relate to DDW's PFAS monitoring efforts?

The U.S. EPA has developed the NPDWR, which include MCLs for two PFAS in drinking water.

DDW has developed NL and RLs for some PFAS and has issued several monitoring orders.

In some instances, the two agency requirements overlap, and monitoring conducted for one agency may be used for the other. However, each agency, and each order, has its own unique requirements.

Contact your local District office for more information.

7.3 How can I learn more about the U.S. EPA regulations?

More information can be found on the U.S. EPA website:

<https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas>

This page links to numerous U.S. EPA fact sheets, reference guides, FAQs, webinars, and Federal Register notices related to the federal PFAS regulation.

7.4 Is California working to adopt the U.S. EPA PFAS Rule MCLs or more restrictive MCLs for PFAS?

DDW is considering all available information in addition to adopting U.S. EPA PFAS MCLs.

7.5 What happens if PFAS contaminants are reported in the water sample above the U.S. EPA MCL?

Determinations of U.S. EPA PFAS MCL violations are based on a QRAA. Public waters system can achieve compliance with the U.S. EPA MCL several ways including adding treatment to a drinking water source, removing the drinking water source, adding a new drinking water source, or another alternative. Also, water systems must also provide the public with information on the levels of these PFAS in their drinking water.

The U.S. EPA developed a quick reference guide regarding PFAS MCL compliance determination:

<https://www.epa.gov/system/files/documents/2025-01/pfas-compliance-determination-qrg-jan25.pdf>

Section 8 - PFAS Treatment Questions

8.1 What are common treatment processes for PFAS removal?

The most common treatment processes are: 1) Granular Active Carbon (GAC), 2) Membrane Separation (nanofiltration or reverse osmosis), and 3) Ion Exchange.

8.2 Is there a list of media that has been previously permitted for use in PFAS treatment?

Yes, please contact your local DDW District office for more information.

8.3 If I want to use treatment media that is not already approved, what do I need to do to get it approved? Would DDW require pilot studies?

New media approval will require an investigatory process. Contact your local DDW office for more information.