



PFAS Monitoring Requirements for Public Water Systems

What is PFAS?

Per- and Polyfluoroalkyl Substances (PFAS) are a group of several thousand human-made chemicals that are manufactured for their oil and water-resistant properties. Since the 1940s, PFAS have been used in a wide range of consumer products, industrial processes, and in some fire-fighting foams (called aqueous film-forming foam or AFFF). This has resulted in PFAS being released into the air, water and soil.

More information can be found at: <https://epa.illinois.gov/topics/water-quality/pfas.html>

Why are we monitoring PFAS now?

The Illinois Pollution Control Board (IPCB) adopted the national primary drinking water regulations for PFAS in February 2026. 35 Ill. Adm Code 611 Subpart AZ. This rule establishes Maximum Contaminant Levels (MCL) for five PFAS compounds in drinking water: PFOA, PFOS, PFNA, PFHxS, HFPO-DA, and a Hazard Index comprised of one or more of the following PFAS compounds: PFHxS, PFNA, HFPO-DA and PFBS.

Who does this rule apply to?

All Community Water Systems (CWS) must monitor for PFAS. Consecutive CWS that purchase all their water from a regulated public water system are not required to monitor for PFAS.

What do I need to do now?

Initial Monitoring:

Initial monitoring samples must be collected and analysis submitted to the Illinois Environmental Protection Agency (Illinois EPA) by **April 26, 2027**. Samples must be taken during normal operating conditions at **ALL** entry points to the distribution system, after all treatment has occurred in accordance with 35 Ill Adm. Code 611.7902(a)(1). CCR requirements and public notice requirements associated with monitoring violations and reporting and recordkeeping requirements take effect **April 26, 2027**.



Samples must be collected either on a **quarterly** or **semiannual** basis during a **12-month period** depending on the system size and the source water at each entry point to the distribution system.

Initial Monitoring 35 Ill. Adm. Code 611.7902 (b)(1)(E)		
CWS Type	Initial Monitoring Frequency	Initial Monitoring Requirements
Ground water serving 10,000 or fewer persons	Semiannual	Two consecutive samples per entry point within a 12-month period, samples must be taken 5-7 months apart
<u>All other CWSs and NTNCWSs including:</u> -All surface water systems -All groundwater under direct influence (GWUDI) systems -Groundwater systems serving more than 10,000 persons -Any entry point that blends surface water and ground water	Quarterly	Four consecutive quarters of samples per entry point within a 12-month period. Samples must be taken 2-4 months apart

Can previously collected data be used?

CWS may use previously acquired PFAS monitoring data to satisfy some or all the initial monitoring requirements only if:

- Samples were collected on or after **January 1, 2019**. 35 Ill. Adm. Code 611.7902 (b)(1)(F).
- Samples were analyzed using **EPA Method 533** or **EPA Method 537.1**, version 2.0. 35 Ill Adm. Code 611.7901(b)(1).
- Samples collected on or after **June 25, 2024**, must have been conducted by laboratories that have been certified by USEPA or the Illinois EPA.
- To be eligible for reduced monitoring in 2027, results must be reported using minimum reporting levels (MRL) that are at or below the “trigger levels” (1/2 the MCL). 35 Ill. Adm. Code 611.7901 (b)(2)(C).
- If a CWS has previously collected results that meet initial monitoring criteria, but fewer than necessary, the system may collect outside the 12-month period to achieve initial monitoring, if all the required calendar periods are represented. 35 Ill. Adm. Code 611.7902 (b)(1)(H).
- If a CWS has multiple years of data, the most recent data must be used. 35 Ill Adm. Code 611.7902(b)(1)(G).



Regulatory Thresholds		
Compound	MCL	Trigger Level
PFOA	4.0	2.0
PFOS	4.0	2.0
PFHxS	10	5
PFNA	10	5
HFPO-DA	10	5
PFBS	N/A	N/A
Hazard Index (mixtures containing two or more of PFHxS, PFNA, HFPO-DA, and PFBS)	1 (unitless)	0.5 (unitless)

35 Ill. Adm. Code 611.311(c)(2), 611.7902 (a)(5), and Section 611.7903 (f)(1)(D), 40 CFR 141.61(c)(2)

$$\text{Hazard Index (1 unitless)} = \left(\frac{[\text{HFPO-DA}_{\text{ppt}}]}{[10 \text{ ppt}]} \right) + \left(\frac{[\text{PFBS}_{\text{ppt}}]}{[2000 \text{ ppt}]} \right) + \left(\frac{[\text{PFNA}_{\text{ppt}}]}{[10 \text{ ppt}]} \right) + \left(\frac{[\text{PFHxS}_{\text{ppt}}]}{[10 \text{ ppt}]} \right)$$

How does my CWS submit results for initial monitoring?

Previously Collected Data: Submit to IEPA (via email or mail), include the following:

- A copy of the laboratory results
- The *PFAS Initial Monitoring Compliance Worksheet for Previously Collected Data*

Newly Collected Data: Ensure the certified laboratory conducting your analysis uploads, and submits a copy of the laboratory results (via email or mail) to the Illinois EPA. Verify your data has been uploaded on Drinking Water Watch:

<https://water.epa.state.il.us/dww/index.jsp>

When does compliance monitoring start?

Compliance monitoring begins **April 26, 2027**. Compliance monitoring frequency is determined by initial monitoring results pursuant to 35 Ill. Adm. Code 611.7902 (b)(2)(A):

- **Quarterly** if any initial monitoring results are at or above the trigger level listed in the above table.
- **Triennially** (every three years) if all initial monitoring results are below the trigger levels.



Systems with multiple entry points may have different compliance monitoring schedules for each entry point depending on initial monitoring results.

CWS must comply with the PFAS MCLs and begin to issue public notice for MCL violations starting **April 26, 2029** (35 Ill. Adm. Code 611.7900 (b)).

Who to contact with questions?

For questions regarding compliance monitoring, contact:

EPA.PFAS@illinois.gov

For questions regarding treatment, including pilot studies, contact:

EPA.PWSpermits@illinois.gov

