

PFAS Regulatory Update

Ohio EPA Adopts PFAS Monitoring Requirements for Public Water Systems

March 2026



WHAT YOU NEED TO KNOW

The Ohio Environmental Protection Agency adopted new PFAS monitoring requirements aligned with the U.S. EPA's National Primary Drinking Water Regulation. All Community Water Systems and Non-Transient Non-Community Water Systems must complete initial PFAS sampling by April 26, 2027, with results informing compliance requirements ahead of the April 2029 federal PFAS MCL deadline.

The Ohio Environmental Protection Agency (EPA) has implemented updated PFAS initial monitoring requirements in alignment with the U.S. EPA's National Primary Drinking Water Regulation (NPDWR). Ohio's adoption of this regulation introduces immediate monitoring obligations for all public water systems, and early action will be critical to meeting upcoming federal deadlines. These requirements apply to all Ohio Community Water Systems (CWSs) and Non-Transient Non-Community Water Systems (NTNCWSs) and will determine future compliance obligations. Key takeaways of this newly adopted rule are detailed below.

Langan is ready to guide your team through the monitoring and compliance process and ensure a clear path toward meeting Ohio's updated PFAS requirements.

Key Takeaways:

- Who is affected: All Ohio CWSs and NTNCWSs with active entry points to the distribution system.

What is a required?

- Mandatory PFAS sampling at each entry point for six regulated PFAS (including PFOA, PFOS, PFNA, PFHxS, HFPO-DA (GenX), and PFAS Hazard Index (mixture of PFHxS, PFNA, HFPO-DA, and PFBS). These 6 compounds have federally enforceable Maximum Contaminant Levels (MCLs), with Ohio implementing the federal rule through primacy authority.

Sampling timeline:

- Initial monitoring must be completed by April 26, 2027, with results reported to Ohio EPA and included in Consumer Confidence Reports by July 1, 2027.

Sampling frequency:

- Surface water systems and large groundwater systems: Quarterly sampling (4 samples/year)
- Small groundwater systems: Semi-annual sampling (2 samples/year)

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Why it matters?

- Initial results will set ongoing monitoring frequency and inform treatment, funding, and compliance planning ahead of the April 2029 enforceable PFAS MCL deadline.

Recommended action:

- Begin planning and sampling early to manage laboratory capacity, avoid schedule risk, and support proactive compliance decisions. The Ohio EPA emphasizes verifying laboratory reporting limits in advance to ensure trigger level sensitivity. PFAS drinking water samples must be analyzed using EPA-approved methods, including:
 - EPA Method 533 – short-chain PFAS
 - EPA Method 537.1 (Version 1.0) – long chain PFAS
 - Laboratories must meet Ohio EPA certification and reporting requirements

To discuss how these findings may impact your projects, please contact your Langan Project Manager or:



Jamie Sobonya
Project Manager
jsobonya@langan.com
440.547.3352



Jason Hanna, CHMM
Senior Principal
jhanna@langan.com
267.688.2484