PFAS Rule Information Webinar

August 25, 2025

Office of Drinking Water
Safe Drinking Water for a Healthy Virginia

VDH Virginia Department of Health
Protecting You and Your Environment

Housekeeping

- Please keep your microphone muted and camera off
- This session will be recorded. We will send you a link to the recording and handouts within a week after the webinar.
- Zoom In/Out on Slides: Use the +/- buttons at the top of the screen to zoom in or out on the slides for better visibility.
- All questions will be handled via the chat function:
  - Look for the thought bubble in the bottom right of your screen.
  - Send any questions to “Everyone”

Webinar Agenda

- **2:00** Overview/Introduction – Bailey Davis
- **2:05** Regulations Overview – Diana Magner
- **2:15** EPA Updates - Bailey Davis
- **2:20** Results Interpretation – Bailey Davis
- **2:25** UCMR 5 and Data Submission – Bob Edelman
- **2:30** Sample Collection – Robert Kieffer
- **2:45** Previously Collected Data – Lisa Crabtree
- **2:50** Questions

Introduction

Bailey Davis

Chief of Field Operations

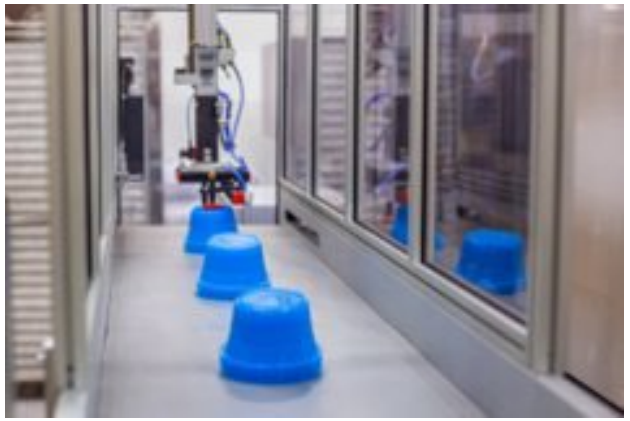
Office of Drinking Water
Safe Drinking Water for a Healthy Virginia

VDH Virginia Department of Health
Protecting You and Your Environment

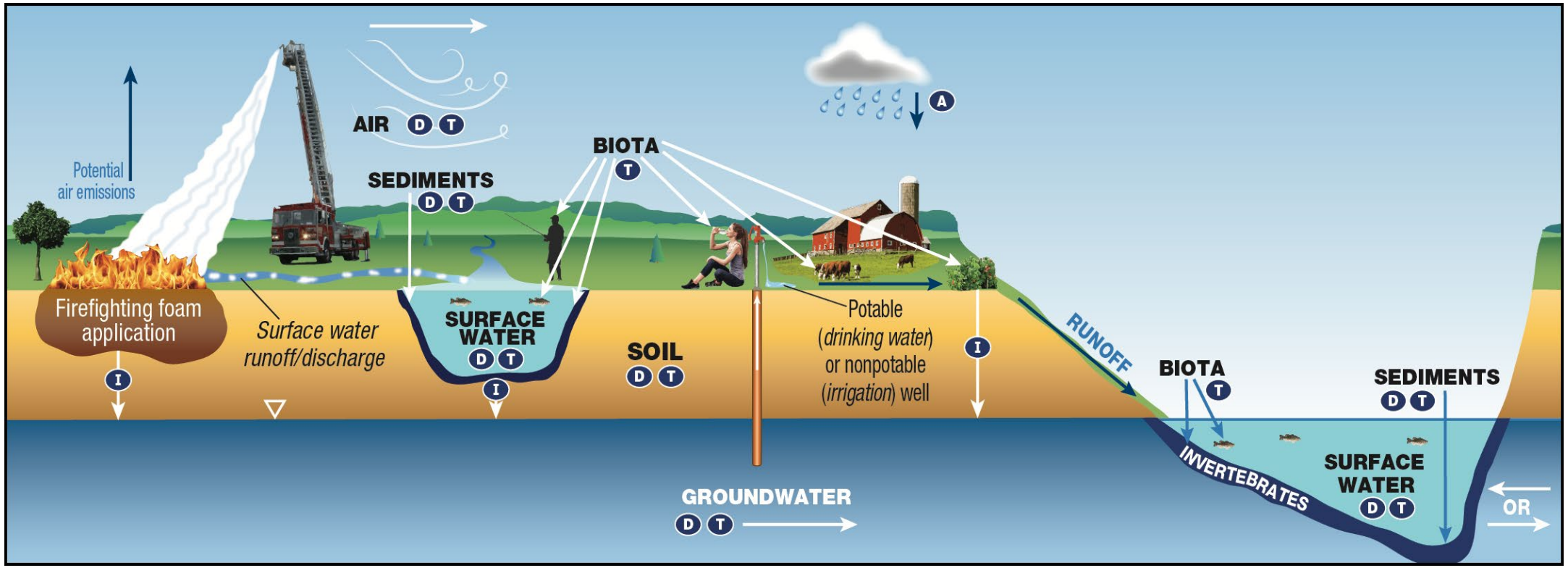
Per- and Polyfluoroalkyl Substances (PFAS)

- **What are they?**
  - A group of man-made chemicals created for household and industrial resources
  - Water-, grease-, and stain-resistant properties
  - Named “Forever Chemicals” because of their slow breakdown

- **Where are they?**
  - Industrial Products: Firefighting foams, food packaging, nonstick cookware, wire insulation, and more
  - Environmental accumulation: blood of humans and animals globally, and present at low levels our water, air, fish, and soil

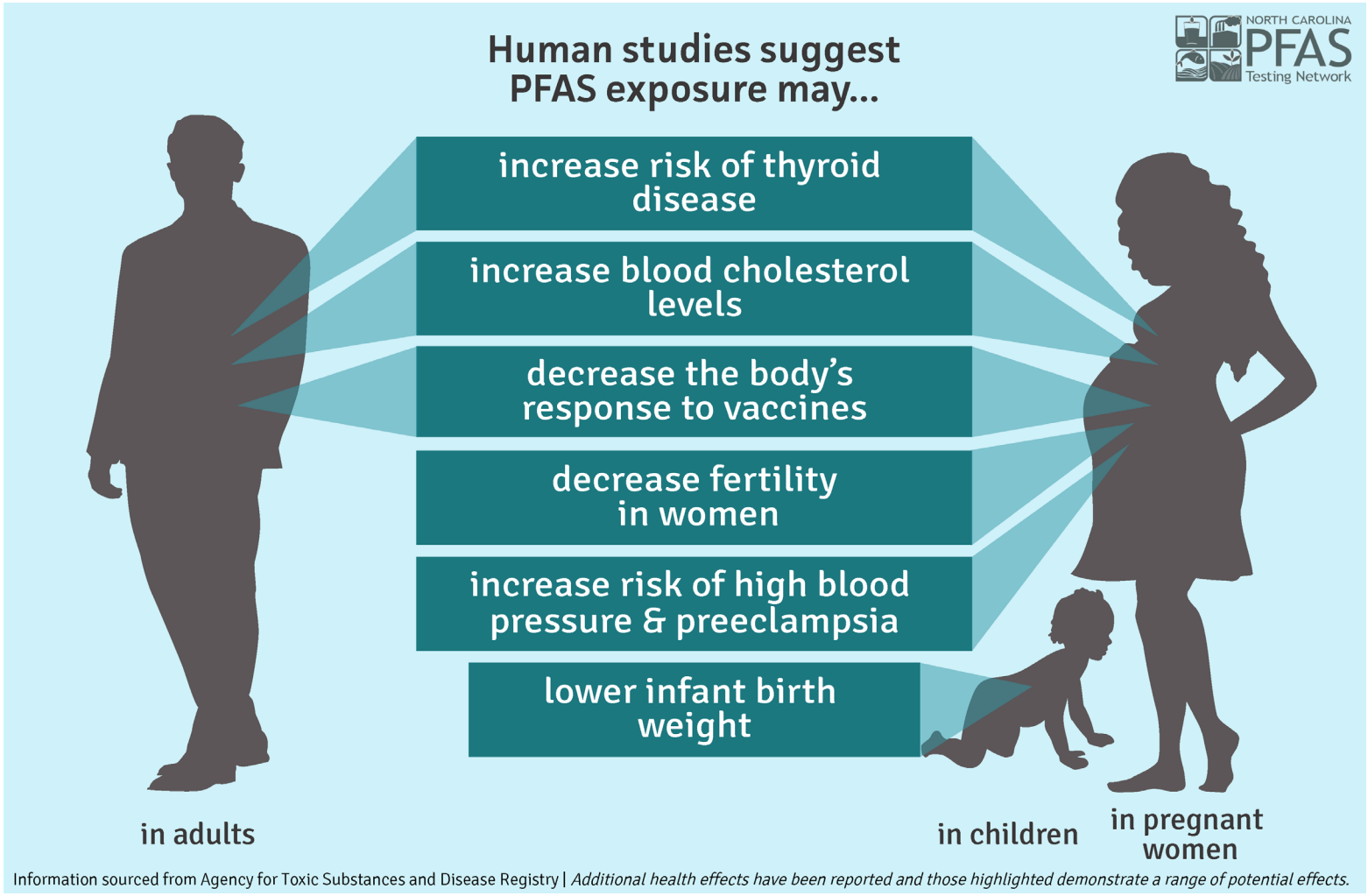


Drinking Water:
A Closer Look



Credit: www.Toxicfreefuture.org

What are the health effects?



Information sourced from Agency for Toxic Substances and Disease Registry | *Additional health effects have been reported and those highlighted demonstrate a range of potential effects.*

Regulations Overview and EPA Updates

Diana Magner

Sample Verification Specialist

Bailey Davis

Chief of Field Operations

Office of Drinking Water
Safe Drinking Water for a Healthy Virginia

VDH VIRGINIA DEPARTMENT OF HEALTH
Protecting You and Your Environment

PFAS Regulations Overview

Rule Title	Per- and Polyfluoroalkyl Substances (PFAS) National Primary Drinking Water Regulation (NPDWR), 89 FR 32532, April 26, 2024, Vol. 89, No. 82
Utilities Covered	The PFAS Rule applies to **all community water systems** (CWSs) **and non-transient noncommunity water systems** (NTNCs).
Key Milestones	**April 26, 2027**: Initial monitoring ends and compliance monitoring begins. **April 26, 2029**: Deadline for compliance with Maximum Contaminant Levels (MCLs).

EPA Final PFAS National Drinking Water Regulation – April 27, 2024

Maximum Contaminant Level: Compliance is determined by calculating a running annual average at each entry point
Trigger Level: Determines monitoring frequency, after initial monitoring is complete

Chemical	Maximum Contaminant Level (MCL)	Trigger Level (TL)
PFOA	4.0 ppt	2.0 ppt
PFOS	4.0 ppt	2.0 ppt
PFHxS	10 ppt	5 ppt
HFPO-DA (GenX chemicals)	10 ppt	5 ppt
PFNA	10 ppt	5 ppt
Mixture of two or more: PFHxS, PFNA, HFPO-DA, and PFBS	Hazard Index of 1.0	0.5

Initial Monitoring Frequency

Surface Water Sources

all populations sizes

- Quarterly within 12-month period
- Samples collected 2-4 months apart

Groundwater Sources

Serving > 10,000 persons

- Quarterly within 12-month period
- Samples collected 2-4 months apart

Groundwater Sources

Serving ≤10,000 persons

- Twice within 12-month period
- Samples collected 5-7 months apart

Each entry point has its own initial monitoring requirements

- Systems with multiple entry points may have different schedules based on water source and system size.

Initial Monitoring – Sampling

- Laboratories must use an EPA-approved method.
  - EPA Method **533, 537.1, version 1.0*, or 537.1, version 2.0**.
    - *The EPA amended the PFAS Rule to allow EPA Method 537.1, Version 1.0, as an approved alternative testing method to support initial PFAS monitoring (for monitoring-frequency determinations) until April 26, 2027.
- A Field Reagent Blank (FRB) must be collected at *each* entry point sample site.
  - FRB is filled at the sample location using reagent water that has been tested and certified as PFAS-free, meeting laboratory reagent blank requirements. These should be a part of the laboratory sample kit.

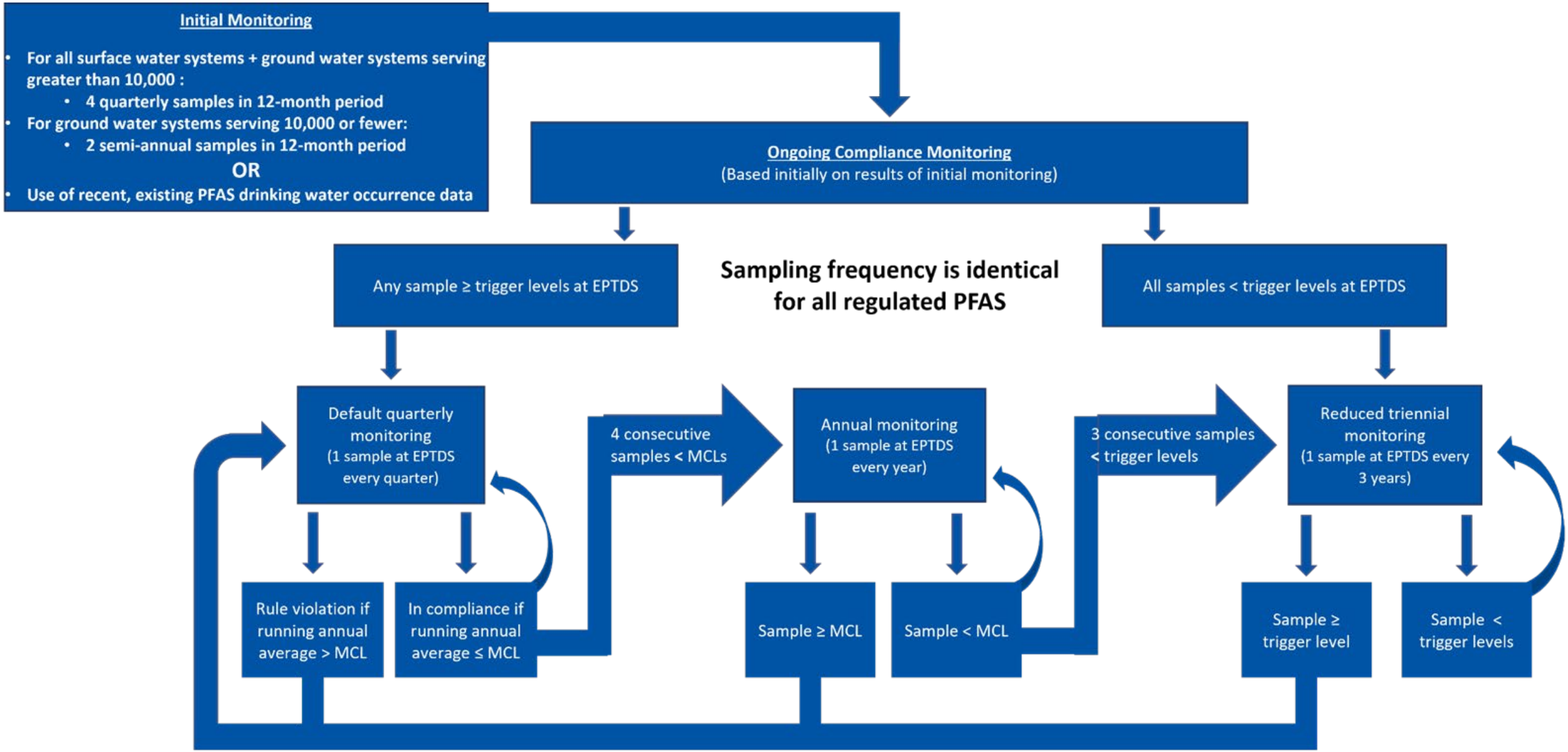
TIP: Talk to your laboratory about only testing FRBs if the sample has a "hit" for PFAS.

After the Initial Monitoring Period

- **Compliance Sampling Begins**
  - Water systems must begin quarterly or triennial monitoring during the 2027–2029 compliance period.

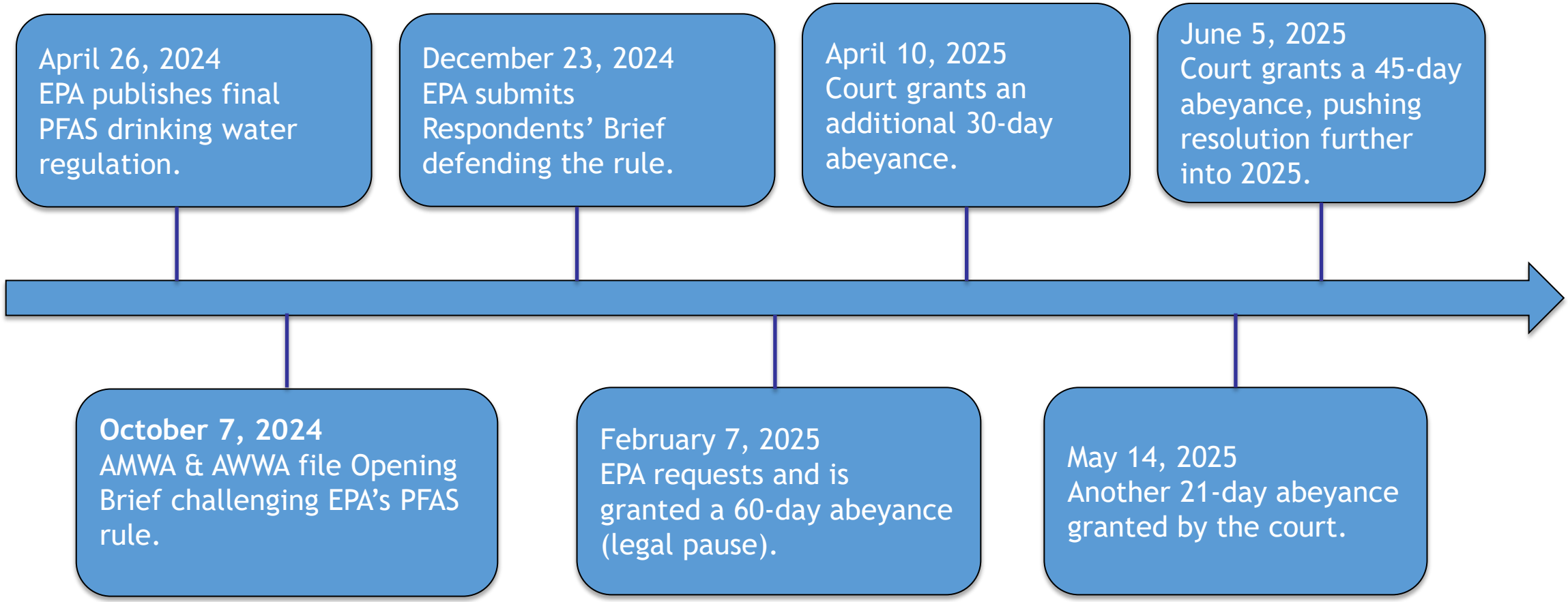
- **Triennial Monitoring Eligibility**
  - All initial sample results are below trigger levels.

- **Quarterly Monitoring**
  - Required if any initial result meets or exceeds a trigger level.
  - Systems may be eligible for **annual monitoring** if they collect **4 consecutive quarterly samples that are all below the MCL**.



EPTDS: entry point to the distribution system

Federal PFAS Litigation & Timeline



AWWA - American Water/Wastewater Works Association
AMWA – Association of Metropolitan Water Agencies
EPA – US Environmental Protection Agency

EPA Announces Changes in the PFAS Rule 5/14/25

- **What has changed or is being added?**

- EPA intends to **rescind** regulations for PFHxS, PFNA, HFPO-DA (Gen-X), and the Hazard Index which includes PFBS
- Extended Compliance Deadline – **From 2029 to 2031**
- Establishment of a federal exemption framework
- EPA will launch PFAS OUTreach initiative (PFAS OUT) to support water systems in small and rural communities
- Polluter accountability measures
- Enhancement of the Water Technical Assistance (WaterTA) program

Results Interpretation and Data Submission

Robert Edelman, PE

Director of Technical Services

Bailey Davis

Chief of Field Operations

Office of Drinking Water

Safe Drinking Water for a Healthy Virginia

VDH Virginia Department of Health

Protecting You and Your Environment

Results Interpretation

ANALYTICAL RESULTS

Sample: HJ02625-01
Name: VA6061114 - FSCC - EP001
Matrix: Drinking Water - Regular Sample

Sampled: 10/08/24 11:25
Received: 10/10/24 10:10

Parameter	Result	Unit	Qualifier	Dilution	MDL	MRL	Analyzed	Analyst	Method
Semivolatile Organics - PFAS - PIA									
PFBA	< 1.0	ng/L	U	1	1.0	2.0	10/21/24 12:41	PSB	EPA 533
PFMPA	< 0.4	ng/L	U	1	0.4	2.0	10/21/24 12:41	PSB	EPA 533
PFPeA	< 0.5	ng/L	U	1	0.5	2.0	10/21/24 12:41	PSB	EPA 533
PFBS	< 0.5	ng/L	U	1	0.5	2.0	10/21/24 12:41	PSB	EPA 533
PFMBA	< 0.4	ng/L	U	1	0.4	2.0	10/21/24 12:41	PSB	EPA 533
PFEESA	< 0.5	ng/L	U	1	0.5	2.0	10/21/24 12:41	PSB	EPA 533
HFPO-DA	< 0.4	ng/L	U	1	0.4	2.0	10/21/24 12:41	PSB	EPA 533
NFDHA	< 0.5	ng/L	U	1	0.5	2.0	10/21/24 12:41	PSB	EPA 533
4:2 FTS	0.8	ng/L	J	1	0.4	2.0	10/21/24 12:41	PSB	EPA 533
PFHxS	< 0.4	ng/L	U	1	0.4	2.0	10/21/24 12:41	PSB	EPA 533
PFHpA	< 0.6	ng/L	U	1	0.6	2.0	10/21/24 12:41	PSB	EPA 533
PFHxA	< 0.5	ng/L	U	1	0.5	2.0	10/21/24 12:41	PSB	EPA 533
ADONA	< 0.5	ng/L	U	1	0.5	2.0	10/21/24 12:41	PSB	EPA 533
PFPeS	< 0.6	ng/L	U	1	0.6	2.0	10/21/24 12:41	PSB	EPA 533
6:2 FTS	< 0.5	ng/L	U	1	0.5	2.0	10/21/24 12:41	PSB	EPA 533
PFOA	< 0.7	ng/L	U	1	0.7	2.0	10/21/24 12:41	PSB	EPA 533
PFHpS	< 0.6	ng/L	U	1	0.6	2.0	10/21/24 12:41	PSB	EPA 533
PFOS	0.6	ng/L	J	1	0.5	2.0	10/21/24 12:41	PSB	EPA 533
PFNA	< 0.5	ng/L	U	1	0.5	2.0	10/21/24 12:41	PSB	EPA 533
9Cl-PF3ONS	< 0.7	ng/L	U	1	0.7	2.0	10/21/24 12:41	PSB	EPA 533
8:2 FTS	< 0.5	ng/L	U	1	0.5	2.0	10/21/24 12:41	PSB	EPA 533
PFDA	< 0.5	ng/L	U	1	0.5	2.0	10/21/24 12:41	PSB	EPA 533
PFUnA	< 0.5	ng/L	U	1	0.5	2.0	10/21/24 12:41	PSB	EPA 533
11Cl-PF3OUdS	< 0.6	ng/L	U	1	0.6	2.0	10/21/24 12:41	PSB	EPA 533
PFDoA	< 0.5	ng/L	U	1	0.5	2.0	10/21/24 12:41	PSB	EPA 533
Surrogate: 13C4-PFBA-SURR	*97 %*	*50-200*					*10/21/24 12:41*	*PSB*	*EPA 533*
Surrogate: 13C5-PFPeA-SURR	*151 %*	*50-200*					*10/21/24 12:41*	*PSB*	*EPA 533*

Results Interpretation

Project/Site: LS - Town of Round Hill

Client Sample ID: WL002 Well 719 — **Lab Sample ID: 320-110408-1**
Date Collected: 04/09/24 09:38 — **Matrix: Water**
Date Received: 04/12/24 09:10 — **PWSID Number: VA6107650**

Method: Lab SOP 537 (Modified) - PFAS by WS-LC-0025

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Perfluorobutanoic acid (PFBA)	**3.7**	**J**	4.7	2.3	ng/L		04/15/24 04:31	04/19/24 16:37	1
Perfluoropentanoic acid (PFPeA)	**6.1**		1.9	0.93	ng/L		04/15/24 04:31	04/19/24 16:37	1
Perfluorohexanoic acid (PFHxA)	**5.4**		1.9	0.93	ng/L		04/15/24 04:31	04/19/24 16:37	1
Perfluoroheptanoic acid (PFHpA)	**2.5**		1.9	0.93	ng/L		04/15/24 04:31	04/19/24 16:37	1
Perfluorooctanoic acid (PFOA)	**6.9**		1.9	0.93	ng/L		04/15/24 04:31	04/19/24 16:37	1
Perfluorononanoic acid (PFNA)	ND		1.9	0.93	ng/L		04/15/24 04:31	04/19/24 16:37	1
Perfluorodecanoic acid (PFDA)	ND		1.9	0.93	ng/L		04/15/24 04:31	04/19/24 16:37	1
Perfluoroundecanoic acid (PFUnA)	ND		1.9	1.0	ng/L		04/15/24 04:31	04/19/24 16:37	1
Perfluorododecanoic acid (PFDoA)	ND		1.9	0.93	ng/L		04/15/24 04:31	04/19/24 16:37	1
Perfluorotridecanoic acid (PFTriA)	ND		1.9	1.2	ng/L		04/15/24 04:31	04/19/24 16:37	1
Perfluorotetradecanoic acid (PFTeA)	ND		1.9	0.93	ng/L		04/15/24 04:31	04/19/24 16:37	1
Perfluorobutanesulfonic acid (PFBS)	**8.3**		1.9	0.93	ng/L		04/15/24 04:31	04/19/24 16:37	1
Perfluoropentanesulfonic acid (PFPeS)	ND		1.9	0.93	ng/L		04/15/24 04:31	04/19/24 16:37	1
Perfluorohexanesulfonic acid (PFHxS)	**2.6**		1.9	0.93	ng/L		04/15/24 04:31	04/19/24 16:37	1
Perfluoroheptanesulfonic acid (PFHpS)	ND		1.9	0.93	ng/L		04/15/24 04:31	04/19/24 16:37	1
Perfluorooctanesulfonic acid (PFOS)	**9.6**		1.9	0.93	ng/L		04/15/24 04:31	04/19/24 16:37	1
4:2 FTS	ND		1.9	0.93	ng/L		04/15/24 04:31	04/19/24 16:37	1
6:2 FTS	ND		4.7	2.3	ng/L		04/15/24 04:31	04/19/24 16:37	1
8:2 FTS	ND		1.9	0.93	ng/L		04/15/24 04:31	04/19/24 16:37	1
NMeFOSAA	ND		1.9	1.1	ng/L		04/15/24 04:31	04/19/24 16:37	1
NEtFOSAA	ND		1.9	1.2	ng/L		04/15/24 04:31	04/19/24 16:37	1
HFPO-DA (GenX)	ND		1.9	1.4	ng/L		04/15/24 04:31	04/19/24 16:37	1
11Cl-PF3OUdS	ND		1.9	0.93	ng/L		04/15/24 04:31	04/19/24 16:37	1
9Cl-PF3ONS	ND		1.9	0.93	ng/L		04/15/24 04:31	04/19/24 16:37	1
4,8-Dioxa-3H-perfluorononanoic acid (ADONA)	ND		1.9	0.93	ng/L		04/15/24 04:31	04/19/24 16:37	1
PFMPA	ND		1.9	0.93	ng/L		04/15/24 04:31	04/19/24 16:37	1
PFMBA	ND		1.9	0.93	ng/L		04/15/24 04:31	04/19/24 16:37	1
NFDHA	ND		1.9	0.93	ng/L		04/15/24 04:31	04/19/24 16:37	1
PFEESA	ND		1.9	0.93	ng/L		04/15/24 04:31	04/19/24 16:37	1

Isotope Dilution	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
13C4 PFBA	*91*		*10 - 200*	*04/15/24 04:31*	*04/19/24 16:37*	*1*

Sample Results

PFBS	< 0.5	ng/L
PFMBA	< 0.4	ng/L
PFEESA	< 0.5	ng/L
HFPO-DA	< 0.4	ng/L
NFDHA	< 0.5	ng/L
4:2 FTS	0.8	ng/L
PFHxS	< 0.4	ng/L
PFHpA	< 0.6	ng/L
PFHxA	< 0.5	ng/L
ADONA	< 0.5	ng/L
PFPeS	< 0.6	ng/L
6:2 FTS	< 0.5	ng/L
PFOA	< 0.7	ng/L
PFHpS	< 0.6	ng/L
PFOS	0.6	ng/L
PFNA	< 0.5	ng/L

- Focus on regulated PFAS
  - PFOA
  - PFOS
  - PFHxS
  - HFPO-DA
  - PFNA
  - PFBS

Quality Control Results

- Lab may report QC/QA data for spike results, blank results, and lab control results

QC SAMPLE RESULTS

Parameter	Result	Unit	Qual	Spike Level	Source Result	%REC	%REC Limits
Matrix Spike (B445181-MS1)	**Sample: HJ01040-01**			Prepared: 10/07/24 Analyzed: 10/10/24			
ADONA	109	ng/L	Q1	83.47	ND	130	70-130
PFPeS	111	ng/L	Q1	83.47	ND	133	70-130
6:2 FTS	108	ng/L		83.47	ND	129	70-130
PFOA	99	ng/L		83.47	ND	119	70-130

Quality Control Results

- Lab may report QC/QA data for spike results, blank results, and lab control results

Parameter	Result	Unit	Qual	Spike Level	Source Result	%REC	%REC Limits
Batch B445181 - EPA 533 - EPA 533							
Blank (B445181-BLK1)				Prepared: 10/07/24 Analyzed: 10/10/24			
PFBA	< 1.0	ng/L	U				
PFMPA	< 0.4	ng/L	U				
PFPeA	< 0.5	ng/L	U				
PFBS	< 0.5	ng/L	U				
PFMBA	< 0.4	ng/L	U				

Quality Control Results

- Lab may report QC/QA data for spike results, blank results, and lab control results

QC SAMPLE RESULTS

Parameter	Result	Unit	Qual	Spike Level	Source Result	%REC	%REC Limits
LCS (B445181-BS1)				Prepared: 10/07/24 Analyzed: 10/10/24			
PFPeA	90	ng/L		80.00		112	70-130
PFBS	95	ng/L		80.00		119	70-130
PFMBA	83	ng/L		80.00		103	70-130
PFEESA	88	ng/L		80.00		110	70-130
NFDHA	89	ng/L		80.00		111	70-130

Blank Contamination

Entry Point Sample (EPS)

Parameter	Result	Unit
Semivolatile Organics - PFAS - PIA		
PFBA	2.6	ng/L
PFMPA	< 0.4	ng/L
PFPeA	8.3	ng/L
PFBS	3.6	ng/L
PFMBA	< 0.2	ng/L
PFEESA	< 0.09	ng/L
HFPO-DA	< 0.4	ng/L
NFDHA	< 0.4	ng/L
4:2 FTS	< 0.4	ng/L
PFHxS	3.1	ng/L
PFHpA	2.8	ng/L
PFHxA	9.1	ng/L
ADONA	< 0.2	ng/L
PFPeS	0.7	ng/L
6:2 FTS	< 0.7	ng/L
PFOA	7.2	ng/L
PFHpS	< 0.4	ng/L
PFOS	6.7	ng/L
PFNA	0.3	ng/L
9Cl-PF3ONS	< 0.2	ng/L

	EPS	FRB	
PFHxS	3.1	3.1	ng/L
PFHpA	2.8	2.8	ng/L
PFHxA	8.7	9.1	ng/L
ADONA	< 0.2	< 0.2	ng/L
PFPeS	0.7	0.7	ng/L
6:2 FTS	< 0.7	< 0.7	ng/L
PFOA	6.9	7.2	ng/L
PFHpS	< 0.4	< 0.4	ng/L
PFOS	6.4	6.7	ng/L
PFNA	0.3	0.3	ng/L

Field Reagent Blank (FRB)

Parameter	Result	Unit
Semivolatile Organics - PFAS - PIA		
PFBA	2.9	ng/L
PFMPA	< 0.4	ng/L
PFPeA	8.1	ng/L
PFBS	3.7	ng/L
PFMBA	< 0.2	ng/L
PFEESA	< 0.09	ng/L
HFPO-DA	< 0.4	ng/L
NFDHA	< 0.4	ng/L
4:2 FTS	< 0.4	ng/L
PFHxS	3.1	ng/L
PFHpA	2.8	ng/L
PFHxA	8.7	ng/L
ADONA	< 0.2	ng/L
PFPeS	0.7	ng/L
6:2 FTS	< 0.7	ng/L
PFOA	6.9	ng/L
PFHpS	< 0.4	ng/L
PFOS	6.4	ng/L
PFNA	0.3	ng/L
9Cl-PF3ONS	< 0.2	ng/L

UCMR5 Data

Problem:

- UCMR5 Minimum Reporting Level (MRL) is at or above the trigger level for 4 of 5 compounds
- UCMR5 data as originally reported down to the MRL is unsatisfactory because it does not report down to the trigger level.

Solution:

- Laboratories need to “reprocess” their data to a new lower MRL.
- Medium and Large waterworks (≥10,000) need to contact their laboratory.
- EPA is requesting laboratories to reprocess data for Small waterworks.

Compound	UCMR5 Minimum Reporting Level (ppt)	Trigger Level (ppt)	MCL (ppt)
PFOA	4	2.0	4.0
PFOS	4	2.0	4.0
PFHxS	3	5	10
HFPDO-DA	5	5	10
PFNA	4	5	10

UCMR5 Data

Recalculated Data:

- Small Systems:
  - EPA is working to reprocess small system data
  - EPA will communicate with the water systems and states about how to access the reprocessed data
  - ODW expects to migrate small system UCMR5 data into SDWIS/State

- Medium and large systems (≥10,000 persons)
  - Must request their lab to reprocess the data (may cost extra)
  - Labs must submit reprocessed data through CMDP

Keep in mind that UCMR5 data collection goes through December 2025.

ODW now accepting data through CMDP

- Laboratory FAQs developed and posted on the ODW website here
- Require the use of method codes EPA 533, EPA 537.1.V2, or EPA 537.1
- Require the six regulated analytes but prefer full method lists
- Reporting limits to 1/3 of the PQL of each regulated analyte
- Report FRB results associated with samples that have quantitative or qualitative results as sample type Field Blank or FB
- Contact Laboratory Technical Liaison Leslie Fleury

  Leslie.Holt@vdh.virginia.gov for more info

Analyte	PQL (ppt)	Reporting Limit (ppt)
PFOA	4.0	1.3
PFOS	4.0	1.3
PFHxS	3.0	1.0
HFPDO-DA	5.0	1.7
PFNA	4.0	1.3
PFBS	3.0	1.0

Sample Collection

Robert Kieffer

SDWIS Administrator

Office of Drinking Water
Safe Drinking Water for a Healthy Virginia

VDH VIRGINIA DEPARTMENT OF HEALTH
Protecting You and Your Environment

What makes PFAS sampling different?

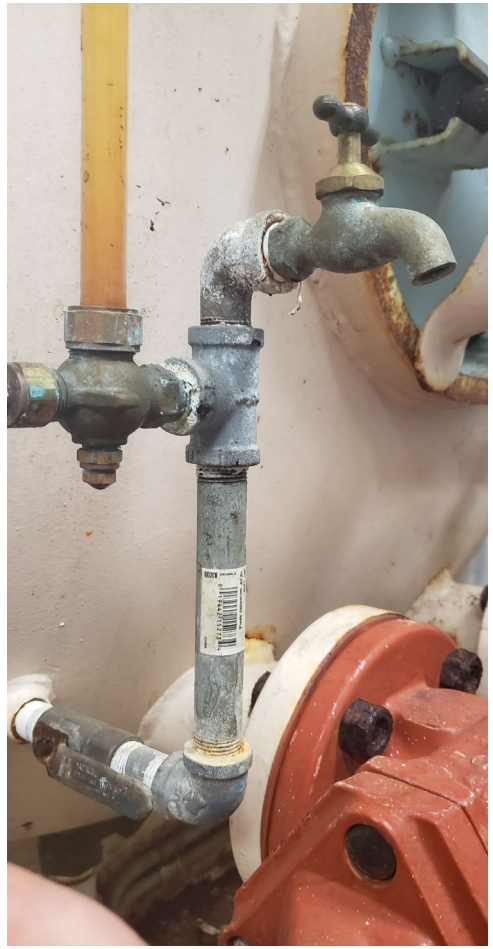
Contaminant	Primary Maximum Contaminant Level (ng/L or ppt)
Barium	2,000,000
Cyanide	200,000
Diquat	20,000
Mercury	2,000
Lindane	200
PFOA	**4**

Accidental sample contamination will make a difference!

Sample set includes field blank

Sources of PFAS sample contamination

Products that can contain PFAS
Food packaging
Cosmetics, deodorant, sunscreen
Water resistant materials
Watch straps
Water proofing sprays
Clothes
Teflon/PTFE
PVDF
Viton
And many more!



You will need

- Well-laundered short-sleeve cotton shirt
- Well-laundered cotton pants
  - No dryer sheets or fabric softener!
- Soap
- Ballpoint pen
- Powder-free nitrile gloves
- Cooler with regular water ice
- Plastic bag for sample containers
- Sample containers, blank containers, and blank water
- Sample paperwork

Read sample instructions, all the way through, twice

Laboratories

- DCLS is not yet an option
- Must use a lab on DCLS' list of certified labs
- No labs in Virginia – overnight shipping
- Some Virginia labs will subcontract samples to a certified lab and handle shipping for you
- Sample cost: $300-$700

LAB NAME	CITY	STATE
ALS Environmental- Middletown	Middletown	PA
Advanced Environmental Laboratories, Inc.	Jacksonville	FL
American Water Central Laboratory	Belleville	IL
E M S L Analytical, Inc.	Cinnaminson	NJ
Enthalpy Analytical LLC	El Dorado Hills	CA
Eurofins Eaton Analytical, LLC	South Bend	IN
Eurofins Eaton Analytical, LLC - Pomona	Pomona	CA
Eurofins Lancaster Laboratories Environment Testing, LLC	Lancaster	PA
GEL Laboratories, LLC	Charleston	SC
Microbac Laboratories, Inc. - Marietta OH	Marietta	OH
Pace Analytical Services, LLC - East Longmeadow, MA	East Longmeadow	MA
Pace Analytical Services, LLC - Mansfield MA (320 Forbes)	Mansfield	MA
Pace Analytical Services, LLC - Ormond Beach FL	Ormond Beach	FL
Pace Analytical Services, LLC - Peoria	Peoria	IL
SGS - Dayton	Dayton	NJ
SGS - Orlando	Orlando	FL
SGS North America, Inc.	Wilmington	NC

Preservation and shipping notes

- Keep samples at or below 6°C (fridge temp) between collection and delivery to lab
- Samples must be shipped overnight
- Bottles have preservative
- Method hold time between collection and analysis:
  - EPA 533: 28 days
  - EPA 537.1: 14 days
- If stored in fridge before delivery to lab, ensure bottles remain in sealed plastic bags

Refer to lab instructions

Day-of-Sampling Precautions

- Shower
- No cosmetics, deodorant, sunscreen, lotion, bug spray, etc.
- Well-laundered short-sleeve cotton shirt
- Well-laundered cotton pants
- No waterproof materials!
- No fabric softener or dryer sheets!

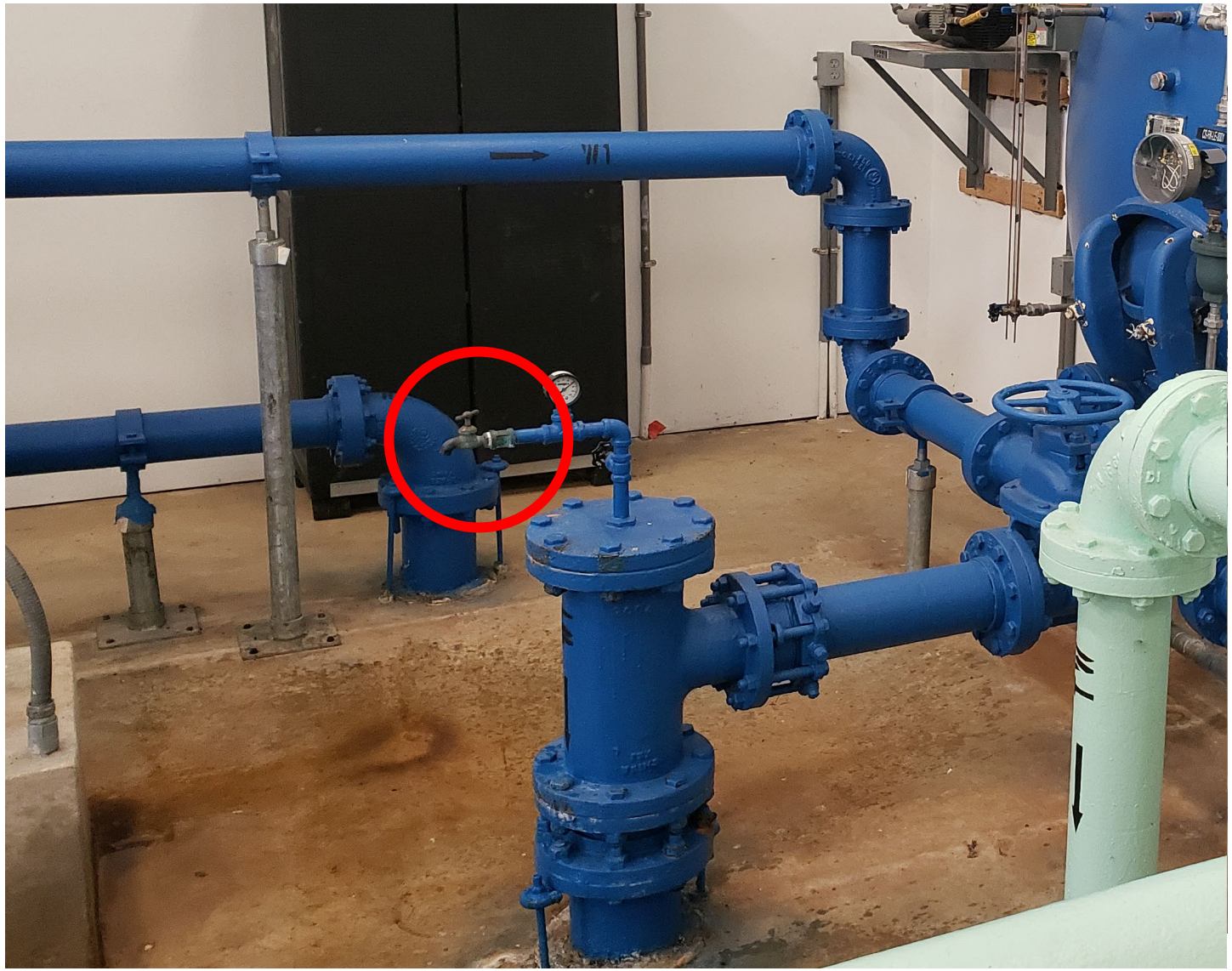
Sample location

Collect from the entry point to distribution

After treatment and storage, if applicable

Contact your ODW field office if you need help!

Sample location



Do not
use hoses for
sampling

If spigot outside, do not sample on a rainy day!

Contact your ODW field office if you need help

Before sampling

- Normal operation with all sources and treatment operable.
- Turn off fans, A/C, and heaters.
- If system is offline, run for at least 15 minutes prior to sampling.
- Remove aerator.
- Put sample bottles in handy location. Do not remove caps.
- Remove watch and jewelry from hands and wrists.
- Non-sampler personnel stand back.

Sampling

1. Flush sample tap for five minutes
2. Reduce flow to a trickle
3. Wash up to forearms with soap, rinse, and dry
4. Put on gloves
5. Fill first sample bottle and cap
6. Fill other sample bottles and cap, one at a time
7. Transfer blank water to blank bottles and cap, one at a time
   - **Do not lean over bottles!**
   - **Do not set caps down!**

If something happens while sampling...

- If you drop the cap...
- If you drop the bottle...
- If you touch the inside or rim of bottle or cap...
- If you sneeze on the sample...

DO NOT ANALYZE. Contact lab for advice.

After sampling

- Complete sample paperwork and labeling
- Put samples in plastic bag, seal, and place in cooler
- Record sample collection notes in log
- Pack with regular water ice to ensure samples are received by lab <6°C
- Deliver or overnight ship to lab
- Wait for results (2-3 weeks)

When you receive results

- **Review results for accuracy** – contact lab immediately if corrections needed
- **Confirm that your lab has reported** to ODW
  - You can review results ODW has received in Drinking Water Viewer
- **If a result exceeds a PMCL**, contact ODW to discuss next steps

Previously Collected Data

Lisa Crabtree

Deputy Field Director

Office of Drinking Water

Safe Drinking Water for a Healthy Virginia

VDH Virginia Department of Health

Protecting You and Your Environment

EPA guidance on previously collected data
EPA Memorandum dated November 21, 2024

Initial Monitoring Requirements

- Collected later than January 1, 2019
- Analyzed by EPA Methods 533 or 537.1 with no modifications
- Part of UCMR 5, state-level, or other appropriate monitoring effort
- Data from different calendar years can be used as long as the number of samples and timing requirements are satisfied
- Results with obvious sampling errors (such as PFAS detection in Field reagent blanks) can be deleted and replaced with a new collection as long as timing requirements are satisfied
- Samples collected after June 24, 2024 must be from an EPA or Virginia certified laboratory

EPA guidance on previously collected data
Memorandum received November 21, 2024

UCMR 5 monitoring data

- UCMR laboratories only report values at or above UCMR 5 MRLs to the EPA
- EPA working with EPA-contracted laboratories to reprocess data for small systems (10,000 or fewer customers)
- Large systems will need to work with laboratories to reprocess data for use for initial monitoring

Data reporting

- ODW encourages waterworks to produce a plan to meet initial monitoring requirements that will allow for repeat data collection if necessary
- ODW will be posting information on submission of initial monitoring data

Previously Acquired Data

- If multiple years of data are available, the **most recent data are to be used** for determining compliance monitoring frequency.
- Systems must ensure **all required quarterly or semi-annual sampling periods are represented**, with sample calendar months appropriately spaced.
  - Supplemental data can be collected in one calendar year such that, when coupled with the previous monitoring, it meets the timing requirements of this rule (see General Initial Monitoring Requirements section and description in 40 CFR 141.902(b)(1)(viii)).

Previously Acquired Data-Examples

Surface Water

- Four quarterly samples are required.
- The waterworks already collected samples in February (first quarter) and August (third quarter) of 2024.
- Two additional samples are needed to satisfy initial monitoring requirements.
- The remaining samples can be taken in April-June (second quarter)and October-December (fourth quarter) of 2025 **OR** April-June and October-December of 2026.

Groundwater serving <10,000

- Two samples 5-7 months apart are required.
- The waterworks collected one sample in April 2024.
- One more sample is needed to satisfy initial monitoring requirements.
- The second sample can be taken in September – November during the following years: 2024, 2025, or 2026.

46

Questions?

Additional information and updates can be found here:
www.vdh.virginia.gov/drinking-water/pfas/