

2026 Regulatory Update

April 21, 2026

Robert D. Edelman, PE
Director, Division of Technical Services



Outline

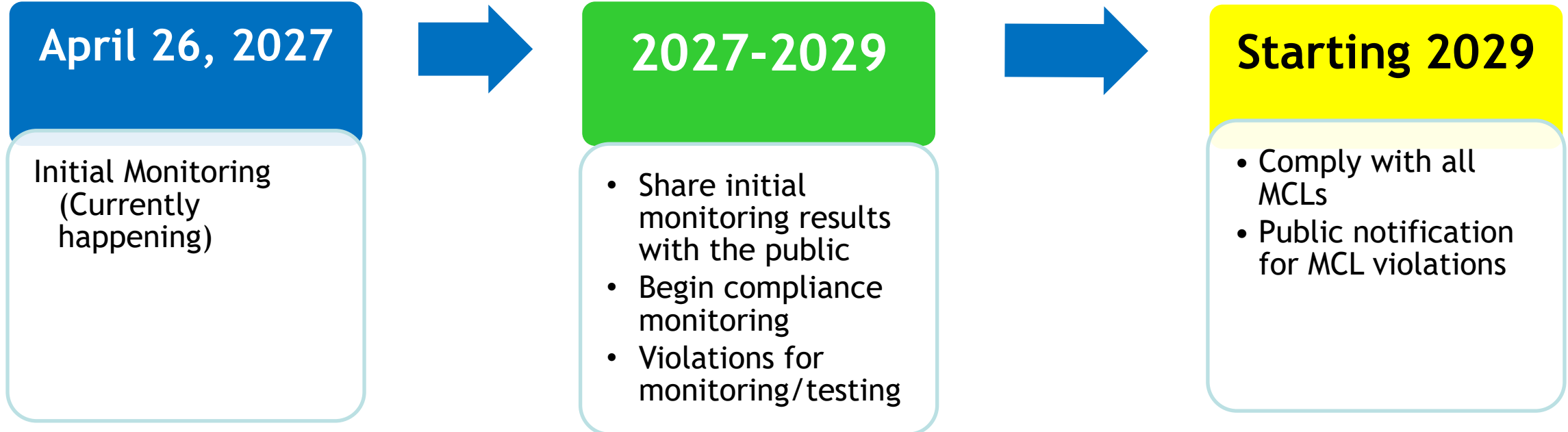
1. PFAS Rule
2. Lead & Copper Rule Revisions - Lead & Copper Rule Improvements
3. Consumer Confidence Rule
4. 2-Hour Reporting Rule
5. Fluoride
6. Other Rules

PFAS Rule:

What Should Waterworks do by April 26, 2027?

1. Collect existing PFAS data
2. Identify gaps in data
3. Complete initial monitoring
4. Evaluate initial monitoring data using the Initial Data Monitoring Tool
5. Submit initial monitoring data through CMDP to VDH ODW
6. Plan for PFAS compliance monitoring
7. Plan for complying with PFOA and PFOS PMCLs

Implementation: Timeframes for Water Systems



Initial Monitoring & Reporting – Due April 26, 2027

Surface Water Systems

serving all population sizes

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

Groundwater Systems

serving > 10,000 customers

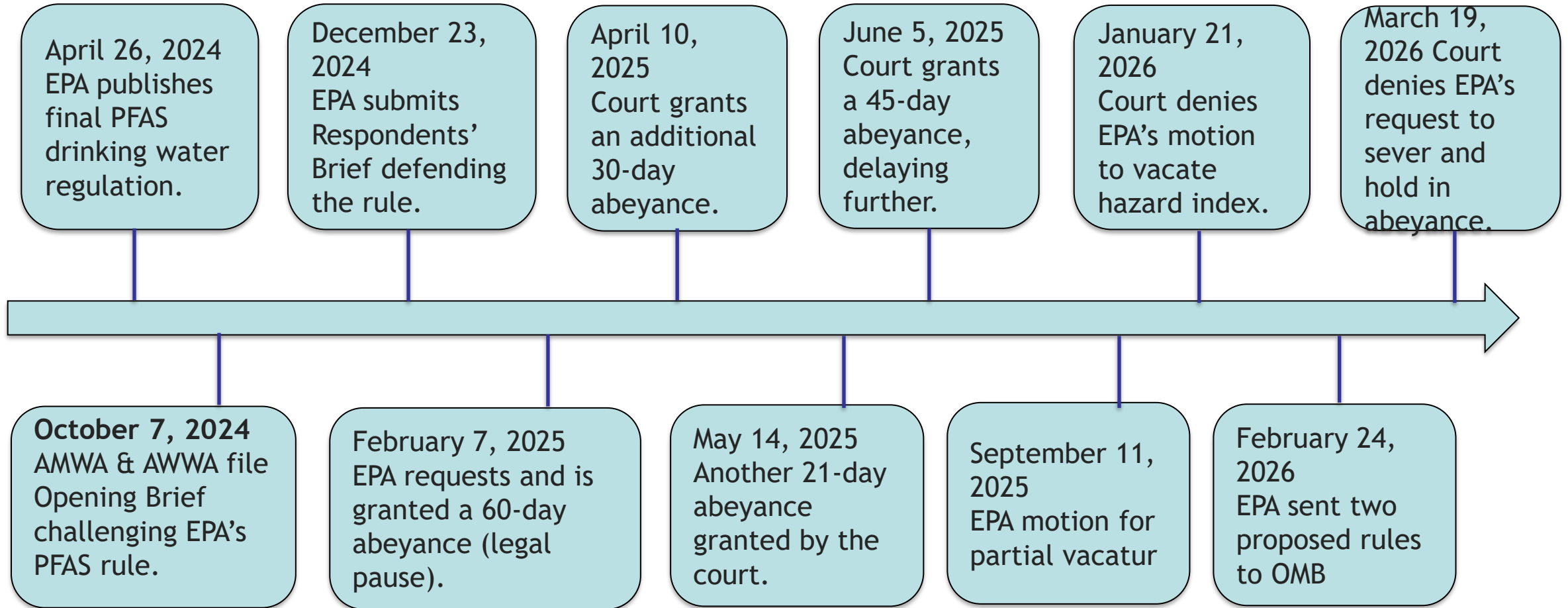
- Quarterly within 12-month period
- Samples collected 2 to 4 months apart.

Groundwater Systems

serving \leq 10,000 customers

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

Federal PFAS Litigation & Timeline



AWWA - American Water/Wastewater Works Association

AMWA - Association of Metropolitan Water Agencies

EPA - US Environmental Protection Agency

PFAS Litigation - The Bottom Line

Regardless of Litigation status:

1. Initial Monitoring deadline will not change
2. Compliance monitoring will begin 4/26/27 for all community and NTNC waterworks

“The Rule is the Rule until such time as it changes.”

EPA aims to:

1. Keep the MCLs for PFAS and PFOA
2. Repeal the Hazard Index and other MCLs
3. Push back the deadline for compliance with the MCLs to 2031

Impact of PFAS Litigation Uncertainty

Waterworks owners - “In denial” - Hope that PFAS Rule will “Go away”

- Initial monitoring
- Compliance monitoring
- Work to meet MCLs

Data collection and tracking tool development - Delayed

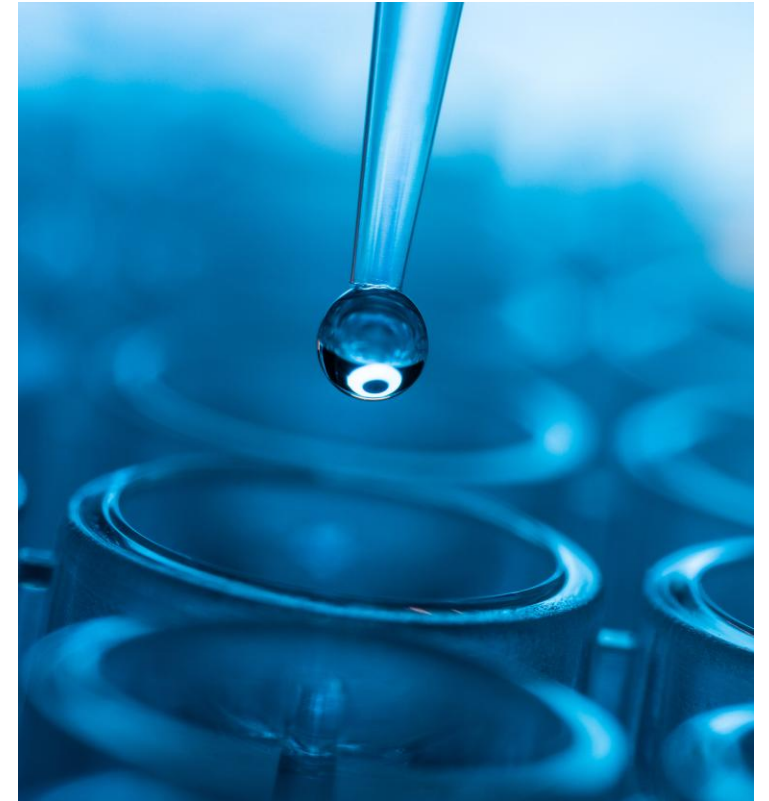
Division of Consolidated Laboratory Service Laboratory Certification Status Update

The Division of Consolidated Laboratory Services (DCLS) obtained accreditation for PFAS Analysis

- DCLS has been accredited to The NELAC Institute (TNI) standards for PFAS analysis in drinking water utilizing EPA method 533 and EPA method 537.1
- Call 804-648-4480 ext. 171 or email to initiate an order request
DCLS_DW_Repeats@dgs.virginia.gov

PFAS Monitoring for Small Systems at No Cost

- Contractor, TruePani, will collect samples
- Pace Analytical will analyze samples
- Groundwater sources
- Systems serving $\leq 10,000$ persons
- Data can be used for initial monitoring compliance
- EPA Method 533
- VDH is reaching out to systems



PFAS MONITORING

DUE SOON

FREE SAMPLING & LAB ANALYSIS AVAILABLE

VDH Office of Drinking Water has partnered with TruePani Inc. to help groundwater systems serving 10,000 persons or fewer meet federal PFAS monitoring requirements — **at no cost to you.**



SCAN HERE
TO SIGN UP:



truepani.com/vapfas

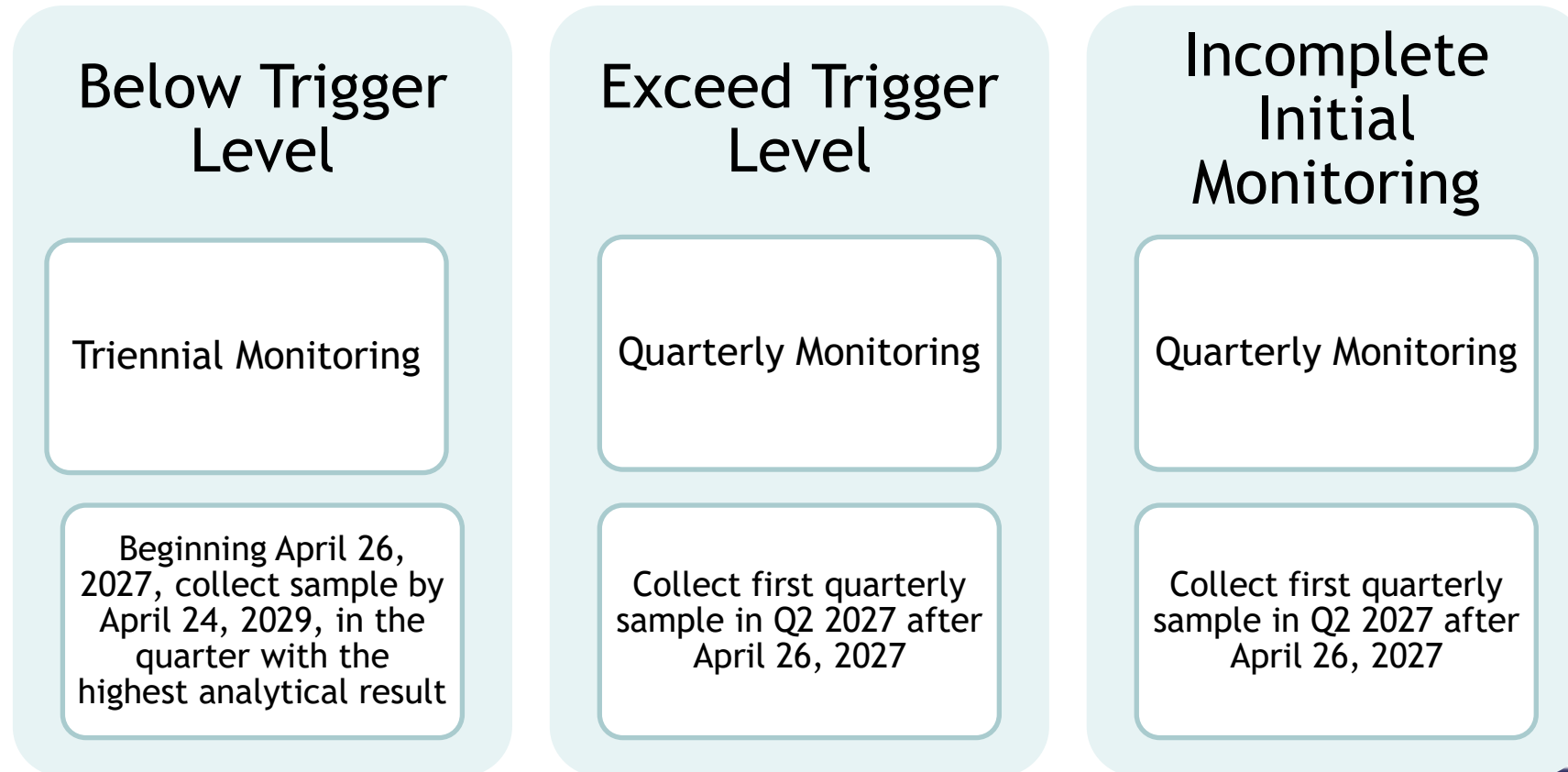
VDH VIRGINIA
DEPARTMENT
OF HEALTH

 TRUEPANI

Questions: (804) 522-0173

PFAS Rule: Compliance Monitoring

Results of Initial Monitoring:



Consequences of Incomplete Initial Monitoring

Includes no initial monitoring

If you don't collect all of the required samples, you WILL have to collect 4 quarters of samples regardless of result



PFAS Initial Monitoring Data Tool

PWSID:	6000000						
Waterworks Name:	Ankh-Morpork						
Waterworks population served:	99						
Facility Sampled:	A-M WTF Entry Point						
Entry Point Source Water Type	Ground Water						
Initial Monitoring Requirement	2 samples collected 5 to 7 months apart.						
Your results (ng/L-ppt)		(if not detected, enter ND, or <Detection Limit, or 0)					
Sample Date	PFOA	PFOS	PFNA	PFBS	PFHxS	HFPO-DA	Hazard Index*
1/1/2023	ND	22	0	4	0	<2	0
8/25/2025	0	20	<4	<2	15	<2	1.5
Average of your results	0.0	21.0	0.0	2.0	7.5	0.0	0.8
PMCL (ng/L-ppt)	4.0	4.0	10	-	10	10	1
Trigger Level (ng/L-ppt)	2.0	2.0	5	-	5	5	0.5
Health Based Water Concentration (HBWC) (ng/L-ppt)	-	-	10	2000	10	10	-
*Hazard Index is a dimensionless calculated value representing the aggregate health risk presented by PFNA, PFBS, PFHxS, and HFPO-DA, based on the HBWC factors above.							
PFAS Result Compliance Punchline	PFOA	PFOS	PFNA	PFBS	PFHxS	HFPO-DA	Hazard Index
Possible MCL Violation starting 2029?	N	Y	N	N	N	N	N
Any Result Exceeds MCL?	N	Y	N	N	Y	N	Y
Any Result Exceeds Trigger Level?	N	Y	N	N	Y	N	Y
You could be out of compliance starting 2029. Contact your ODW Field Office to discuss options for							

< > Sheet1 +

- Tool for waterworks to self-evaluate initial monitoring data
- Tool is posted on the ODW PFAS webpage



Planning for next steps

Compliance Monitoring

- Schedule/Frequency
- Locations
- Budget

Comply with PMCLs

- Calculate RAA
- Compare against PMCLs
- Exceedance?
- Additional sampling
- Identify compliance strategy
 - Treatment
 - New source
 - Regionalization
 - Blending

PFAS Rule:

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Lead and Copper Rule Revisions

Lead and Copper Rule Improvements



Upcoming Requirements and Deadlines

November 1, 2027
Submit

- Baseline Inventory
- Service Line Replacement Plan
- List of Schools and Licensed Child Day Centers

November 1, 2027
Begin

- Notify Schools and Licensed Child Day Centers
- Sample at Schools and Licensed Child Day Centers
- Service Line Disturbances: Notify customers with LSL, GRR, or unknown SLs
- Offer to sample for customers who request lead testing

Before LCR
Monitoring

- Submit updated LCR Sampling Plan

Baseline Service Line Inventory

Due November 1, 2027

- Applies to all Community and NTNC Waterworks
- Submit through SWIFT Submittals beginning January 1, 2027
- Update to Initial Service Line Inventory (LCRR)

New Requirements

Connector material documentation

- Document material when a connector is present
- Connectors updated as encountered in the field or identified in records

Street address must be used when available

Connectors

EPA defines as “a short segment of piping **not exceeding three feet that can be bent** and is used for connections between service piping”

- “pigtail” or a “gooseneck”
- Not: corporation or curb stops, pipe joints, couplings

Typically connecting the service line to the main

- Not considered to be part of the service line
- Lead connectors do not make service lines lead or GRR



Connectors - Records Review Required (LCRI)

- (i) All **construction and plumbing codes, permits, and records** or other documentation that indicate the service line and connector materials used to connect structures to the distribution system.
- (ii) All **water system records on service lines and connectors**, including distribution system maps and drawings, recent or historical records on each service connection and connector, meter installation records, historical capital improvement or master plans, and standard operating procedures.
- (iii) All **records of inspections in the distribution system** that indicate the material composition of the service connections and connectors that connect a structure to the distribution system.



Connectors Classifications

Lead

Connector is made of lead

Unknown

Connector exists but material is not known

Non-Lead

Connector determined through an evidence-based record, method, or technique not to be made of lead

No Connector

No connector at the location

Service Line Replacement Plan

- Due November 1, 2027
- Required for any waterworks with any lead, GRR or unknown service lines.
- Template is available on the LCRR/LCRI Guidance webpage

Service Line Replacement Plan Elements

1. Identify Unknowns
2. SL Replacement SOP
3. A communication strategy for customers with LSLs or GRRs
4. Customer flushing procedure
5. SL replacement prioritization strategy
6. Funding strategy
7. A communication strategy to inform about the SL replacement program.
8. Identify laws & regulations
9. Identify any lead-lined galvanized service lines

Systems that must conduct standard monitoring

Beginning **January 1, 2028**, the following must conduct standard monitoring:

- Systems with lead service lines
- Systems with GRR service lines
- Systems that exceed the revised lead action level of 0.010 mg/L
- Systems that exceed the copper action level of 1.3 mg/L

Exception: Waterworks that follow the LCRI tap sampling protocols prior to November 1, 2027.

Preparing for Tap Sampling

By the start of the first lead and copper monitoring period under LCRI, submit an updated sampling plan.

- A pool of tap sampling sites from the highest tier available
- A list of water quality parameter (WQP) entry point and distribution system sampling locations

Sample Site Tier	Description
Tier 1	Single-family structures (SFS) with premise plumbing made of lead and/or served by an LSL.
Tier 2	Buildings, including multiple-family residences, with premise plumbing made of lead and/or served by an LSL.
Tier 3	SFS served by a lead connector. SFS served by a galvanized service line or containing galvanized premise plumbing identified as ever having been downstream of an LSL.
Tier 4	SFS that contain copper premise plumbing with lead solder installed before the effective date of the State's applicable lead ban.
Tier 5	SFS or a building in which the plumbing materials used at that site would be commonly found at other sites served by the water system (i.e., representative of sites throughout the distribution system).

List of Schools and Child Care Facilities

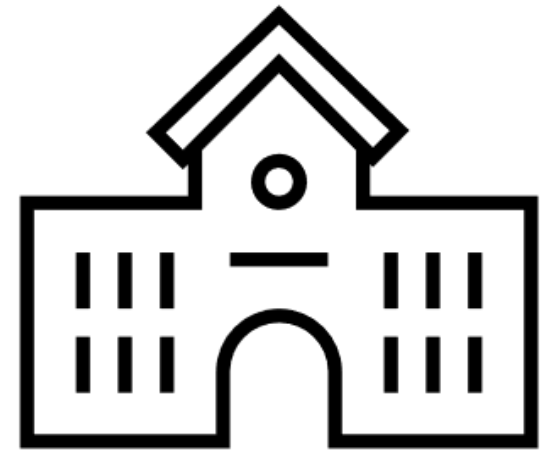
Due by November 1, 2027

“Annual Period” begins November 1, 2027

Applies to all **Community Waterworks**

Develop and maintain a list of schools and child care facilities

Public Education and lead monitoring requirements applicable to:



System Type	Applicability	Schools and child care facilities served by the water system:
CWS	YES	Were constructed and did not have full plumbing replacement <i>before</i> January 1, 2014*
CWS	YES	Are served by a lead, GRR, or an unknown service line
CWS	NO	Were constructed or had full plumbing replacement on or after January 1, 2014, <u>and</u> are not served by a lead, GRR, or an unknown service line
NTNCWS	NO	N/A

	Schools	Child Care Facilities
Frequency	<p><u>Elementary Schools</u>: 20 percent minimum each year for first 5 years starting on November 1, 2027</p> <p><u>Secondary Schools</u>: On request only</p>	20 percent minimum each year for the first 5 years starting on November 1, 2027, then on request
Number of Samples	5 samples	2 samples
Location	<ul style="list-style-type: none"> • 2 samples at drinking water fountains, • 1 sample at kitchen faucet used for food or drink preparation, • 1 classroom faucet or other outlet used for drinking, and • 1 nurse's office faucet, as available 	<ul style="list-style-type: none"> • 1 at drinking water fountain and • 1 at kitchen faucet used for food or drink preparation, or 1 classroom faucet or other outlet used for drinking
Protocol	250-mL first-draw samples from a cold water tap after an 8- to 18-hours stagnation period	250-mL first-draw samples from a cold water tap after an 8- to 18-hours stagnation period

Schools and Child Care Facilities: Public Education



Annually contact all schools and child care facilities on list:

- Provide information about health risks from lead in drinking water
- Steps consumer can take to reduce their exposure.

Schools and Child Care Facilities: Notification about Sampling

Facility Type	Timing	Notification Description
Elementary schools Child care facilities	During the first five years after November 1, 2027	<ul style="list-style-type: none"> Inform facilities that they are eligible to be sampled for lead by the water system Include a proposed schedule for sampling at the facility; and information about sampling for lead in schools and child care facilities
Elementary schools Child care facilities	Starting in the sixth year after November 1, 2027	<ul style="list-style-type: none"> Inform facilities that they are eligible to be sampled for lead by the water system on request
Secondary schools	At least once per year starting November 1, 2027	<ul style="list-style-type: none"> Provide information on how to request sampling for lead at the facility and information about sampling for lead in schools and child care facilities

Consumer Notifications



Notification of Service Line Disturbances

Customers with GRR, or lead status unknown potentially affected during water-related work.

- Shut off or bypass, reconnecting a SL, vibration
 - Provide public education materials
 - Instructions for flushing
- Replacement of a meter, meter setter or connector, or replacement of a water main where the service line is cut
 - Provide public education materials
 - Instructions for flushing
 - Provide a pitcher filter or POU device certified to meet an ANSI standard to remove lead.

Customer-Requested Sampling



Waterworks must offer to sample for lead in the tap water of any person who requests it if:

- The waterworks has a lead ALE, or
- The consumer is served by a lead, GRR, or lead status unknown SLs.

At homes with lead, GRR, or unknown SLs, use first-and fifth-liter samples.

Consumer Notice of Tap Sampling Results

We recently collected drinking water samples to find the amount of lead in our water. The result of this test was within limits.

Our water is safe to drink!

Lead result from your test:

Water System	Anytown
Sample Point	123 Main Street
Sample Collection Date	7/1/2025
Sample Result for Lead	0.001 mg/L
Sample Result for Copper	0.1 mg/L

However, there are steps to reduce exposure to lead in drinking water, including:

- **Run your water before use.** If water hasn't been used for several hours, allow the water to run at the tap for 30 seconds to 2 minutes or until it becomes cold or reaches a steady temperature before using it for drinking or cooking.
- **Use cold water for cooking and preparing baby formula.** Do not cook with or drink water from the hot water tap as lead dissolves more easily into hot water. Do not use water from the hot water tap to make baby formula.
- **Clean your aerator.** Regularly clean your faucet's screen (also known as an aerator). Sediment, debris, and lead particles can collect in your aerator. If lead particles are caught in the aerator, lead can get into your water.

- Provide the Consumer Notice of lead or copper tap sampling results as soon as practicable but no later than **three business days** of learning of the results.
- Applies to both compliance samples and customer-requested samples.

Consumer Confidence Report Rule Revisions (CCR3)



Big Changes Coming in 2027: Community Waterworks Deliver Two Per Year

Community Water Systems (CWSs) \geq 10,000 people:

- **Two Consumer Confidence Reports (CCRs) per year:**
 - **First CCR:** Due by July 1st - covers full previous calendar year.
 - **Second CCR:** Due by December 31st - provides updated annual summary.
 - **Must include an update on the January-June 6-month period if:**
 - There were violations,
 - Lead action level exceedances, or
 - UCMR results were received.

More Changes (Starting in 2027)

Certification

- CCR and Certification due **10 days after** the CWS is required to distribute the reports to customers. (July 11, 2027, January 10, 2028)

CCRs on the Web

- All CWSs posting their CCR on a website must keep it online for at least 3 years.
- CWSs \geq 50,000 people: online CCR required.

Definitions: Updated by CCR3

Additional Health Information: Statements Updated by CCR3 (Nitrate, Arsenic, Lead)

Still More Changes in 2027

Summary Now Required

- CCRs begin with a summary of key information, including contact information and, when applicable, brief descriptions of violations and notes about included public notices.

Translation Access

- CWSs serving $\geq 100,000$ people
 - Required to develop language access plans.
- Communities with many consumers who have limited English proficiency must include information on how to obtain a translated report or language assistance.

Other CCR Changes (Starting in 2027)

Accessibility

- CWSs must make a reasonable effort to provide the reports in an accessible format to anyone who requests an accommodation.

LCRR information is available and how to access it:

- Lead tap sampling data
- Service line inventory

Information about corrosion control treatment



Annual Water Quality Report

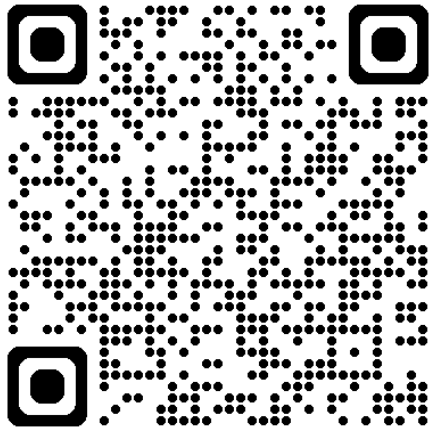
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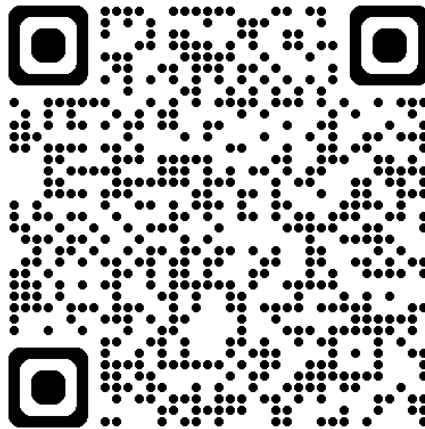
The Fairfax Water Annual Water Quality Report is available at the link below.

[2025 Annual Water Quality Report](#)

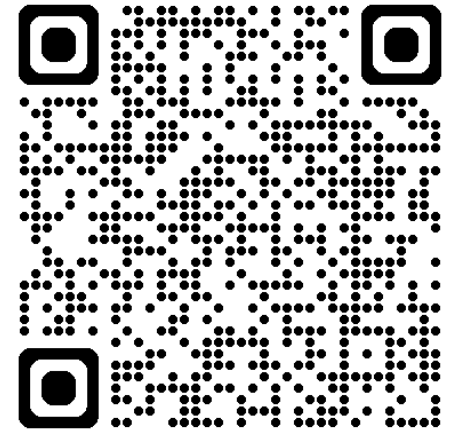
CCR Resources



EPA CCR3 Webpage



EPA CCR Tools

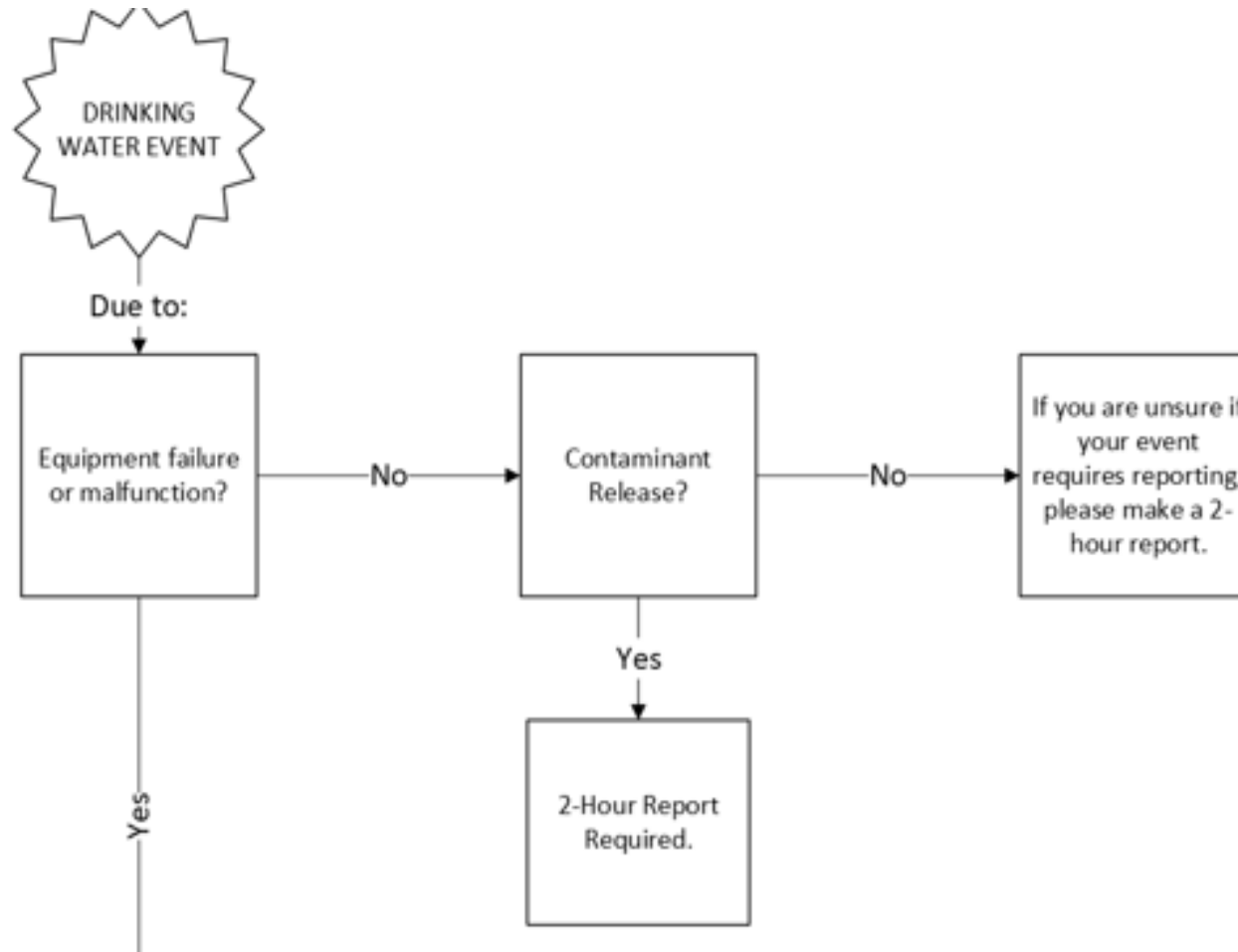


ODW Field
Offices -
Contact Us

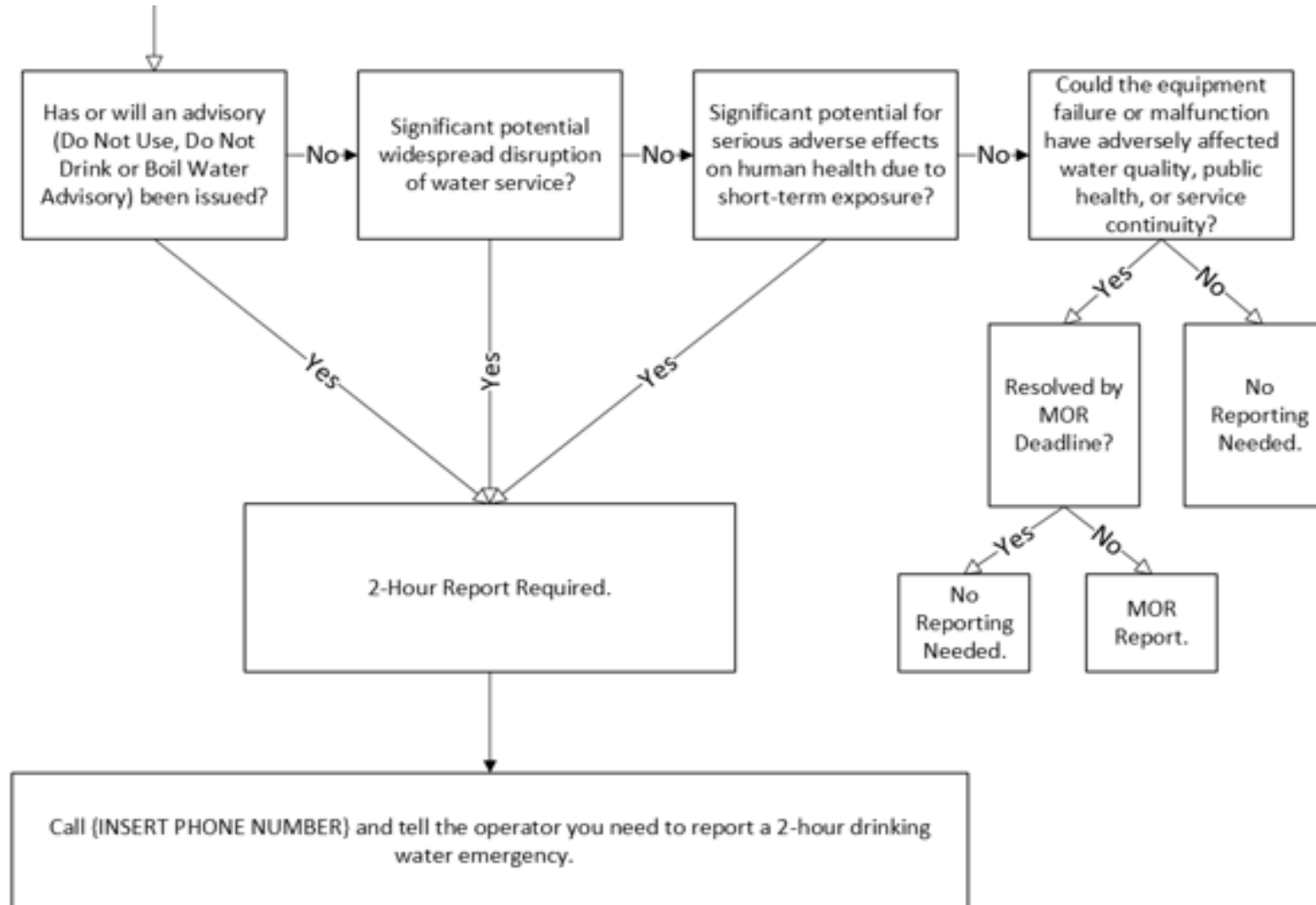
Mandatory Reporting of Failures and Malfunctions - 2 Hour Reporting Requirement



Two-Hour Reporting Law



Two-Hour Reporting Law Flowchart Details 2



Widespread disruption of water service

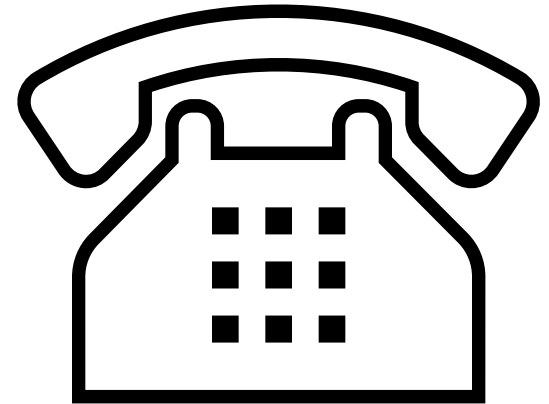
is a loss of water service affecting any one of the following:

- (1) 500 or more service connections for waterworks with 5,000 or more connections;
- (2) 10% or more of the waterworks' service connections for waterworks with 500 to 4,999 service connections;
- (3) 50 or more service connections for waterworks with fewer than 500 service connections;
- (4) a congregate care living facility (for example, a hospital, long-term care facility, correctional center, or prison); or
- (5) a loss of service to one or more connections provided by a wholesale waterworks.



Notification to ODW

- ✓ Preferred approach: the waterworks calls the VDH Call Center and reports a drinking water emergency. **1-866-531-3068**
- ✓ This contact will be the official time contact was made for satisfying the two-hour reporting obligation.
- ✓ A waterworks can also call ODW directly, but they must speak with someone to satisfy the reporting obligation.



Two-Hour Reporting Law - Final Thoughts

- Waterworks Regulations were updated, effective November 19, 2025.
- If unsure if two-hour reporting is applicable, best to report the event.
- If the two-hour reporting requirement does not apply, a waterworks must still comply with the Waterworks Regulations' reporting requirement for that event.
- Advice: Even if the two-hour reporting requirement does not apply, determine whether another reporting requirement in the Waterworks Regulations applies.

Fluoride



Fluoride - EPA's Role

- EPA's role is to protect public health by regulating drinking water quality
- EPA set the MCL for fluoride at 4.0 mg/L in 1986, based on health effects
- EPA's Fourth Six-Year Review - June 2024 - EPA decided not to revise any regulations, including fluoride
- Next Six-Year Review due in 2030

Fluoride - NTP Report

- August 2024 - National Toxicology Program Report: Fluoride in drinking water at more than twice the recommended limit is associated with lower IQ in children.
- September 2024 - Court ruled fluoridation is an “unreasonable risk” to children’s health
- April 2025 - EPA announced review of fluoride health effects
- January 22, 2026 - EPA released **Fluoride Human Health Toxicity Assessment: Preliminary Assessment Plan and Literature Survey** for public comment
- **JADA Study** (April 2026) - No association between fluoride concentrations relevant to community water fluoridation and IQ scores.

Fluoride: EPA's Role

- When final, the toxicity assessment will be used to inform:
 - Future decisions about the fluoride drinking water standards
 - Whole-of-government approach, including CDC recommendations regarding adding fluoride to drinking water
- EPA prohibited from requiring addition of any substance to drinking water for any preventative health care purpose
- Health benefits of fluoride are not within the scope of EPA's toxicity assessment
- The decision on if to add fluoride to drinking water is made on a state or local basis. EPA does not make recommendations on adding fluoride to drinking water

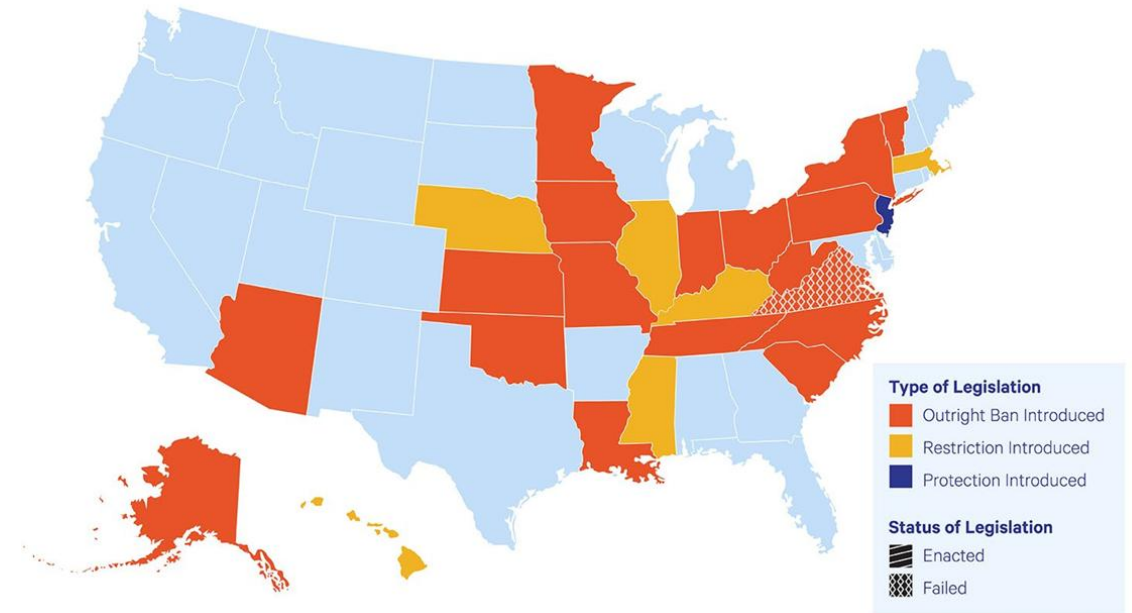
Fluoride - State Legislation

2026 General Assembly

HB 537 Board of Health; regulations governing waterworks; prohibition on fluoridation of water.

- Prohibition on fluoridation of water
- Testing for fluoridation

Left in Health and Human Services



Source: Fluoride in Drinking Water Treatment: A History of Practices and Perception, VA AWWA March 2026

Virginia General Assembly 2026

HB1149 Water distribution systems; lead status inspection for water service lines

- Allows entry on to property
- Limited to inspection for SL material identification
- Applies only to Cities, Towns, Counties, and Water Authorities
- Effective 7/1/2026. Expires 7/1/2028.

SB683 Appointment of receiver for waterworks; public waterworks.

- Extends receivership scope to include publicly owned waterworks
- Effective 7/1/2026

Other Rules

EPA is working on:

- Microbial and Disinfection Byproducts Rule - Draft due in 2027
- Chromium (Total/Hexavalent Chromium) - Next steps
 - Final human health assessment for chromium-6
 - Determine if a new drinking water regulation or revision to current standard is warranted
- Perchlorate
 - Proposed National Primary Drinking Water Regulation - 1/2/2026
 - MCLG of 0.02 mg/L
 - MCL of 0.02 mg/L, 0.04 mg/L, or 0.08 mg/L
 - Final Regulation - 5/21/2027 - required by consent decree

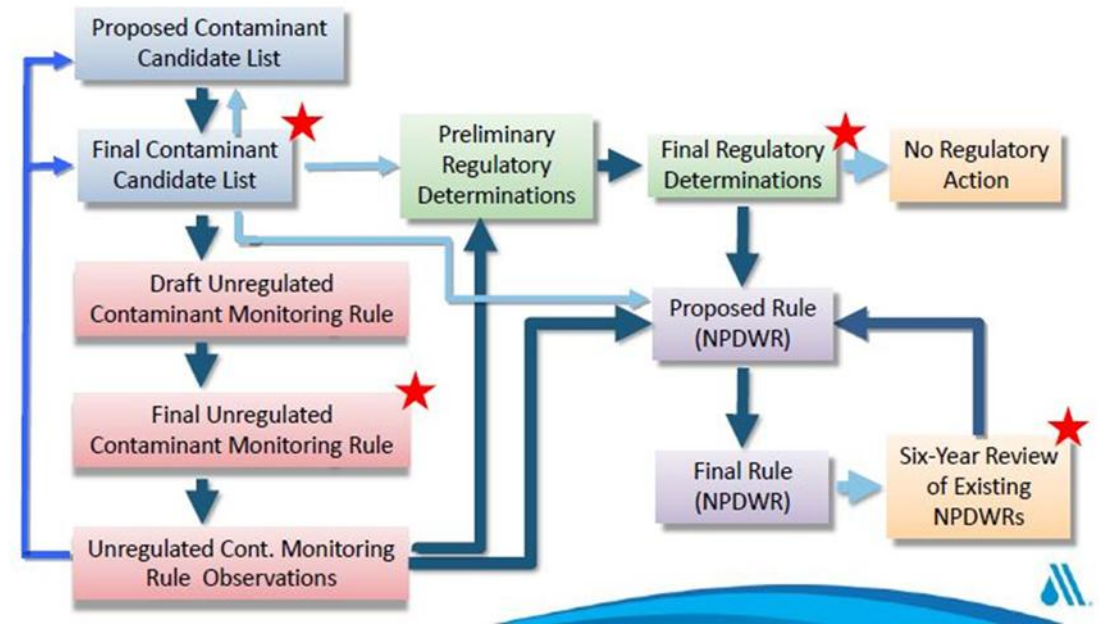
Proposed Drinking Water Contaminant Candidate List 6

Draft list signed on April 2, 2026

Publication in Federal Register opens a
60-day public comment period

Final list signed by November 17, 2026

1. Microplastics
2. Pharmaceuticals
3. PFAS
4. Disinfection Byproducts
5. Chemicals - 75
6. Microbes - 9

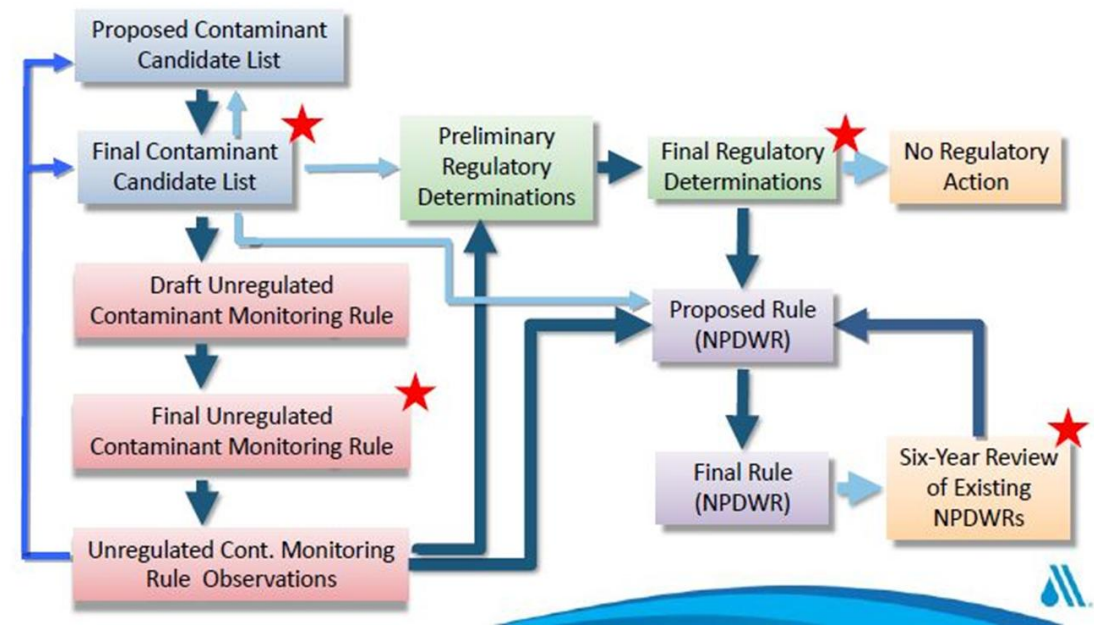


EPA RELEASES REGULATORY DETERMINATIONS FOR CCL 5 CONTAMINANTS

March 17th, Regulatory determination for CCL 5 Contaminants

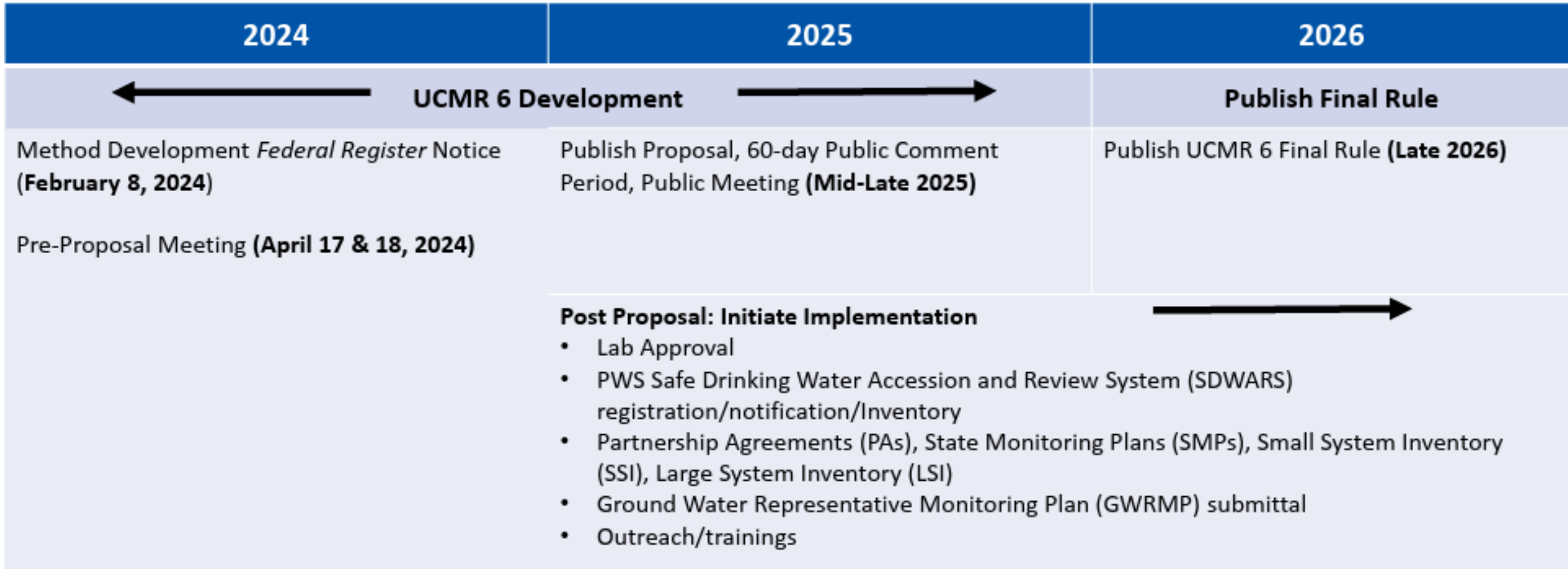
Not Regulate	Silent
2-aminotoluene	1,2,3-Trichloropropane
cylindrospermopsin	1,4-Dioxane
ethoprop	Manganese
microcystins	Quinoline
molybdenum	Strontium
permethrin	
profenofos	
tebuconazole	
tribufos	

EPA's reasoning being that the contaminants listed above do not occur at levels or frequency of public health concern.



From Steve Via, "Regulatory Update", AWWA webinar, Dec 2016

Draft Timeline of UCMR 6 Development



Source: Discuss Potential Approaches to the Sixth Unregulated Contaminant Monitoring Rule (UCMR 6), held April 17 and 18, 2024, USEPA.

Draft Timeline of UCMR 6 Activities

2027	2028	2029	2030	2031
Pre-monitoring Implementation				Post-monitoring Phase
Continuation of: <ul style="list-style-type: none"> • Lab Approval • PWS SDWARS registration/notification/Inventory • PAs, SMPs, SSIs, LSIs • GWRMP submittal¹ • Outreach/trainings • Implementation public meetings 	Implementation Activities <ul style="list-style-type: none"> • Assist PWSs with compliance • Implement small PWS monitoring • Post data quarterly to NCOD 			<ul style="list-style-type: none"> • Complete resampling, as needed • Conclude data reporting • Finalize NCOD • Compliance assistance/enforcement, as needed
	Reporting and Analysis of Data <ul style="list-style-type: none"> • All PWSs serving 3,300 or more people² • Representative sample of small PWSs serving fewer than 3,300 people 			

Source: Discuss Potential Approaches to the Sixth Unregulated Contaminant Monitoring Rule (UCMR 6), held April 17 and 18, 2024, USEPA.

Slides will be posted at:



QUESTIONS ?

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