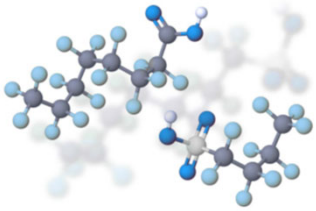
May 20, 2025

PFAS Rule Initial Monitoring Requirements:
Less than 3,300 population



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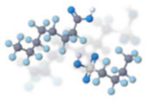
Per- and polyfluoroalkyl substances (PFAS)



- A group of man-made chemicals that persist in the environment for long periods of time - often referred to as “forever chemicals”
- Used for decades in industry and consumer products such as nonstick cookware, waterproof clothing, and stain resistant furniture
- Historically a component of aqueous film-forming foam (AFFF), a highly effective firefighting product intended for fighting high-hazard flammable liquid fires

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Rule Overview

EPA released final drinking water regulation on **April 10, 2024** for 6 PFAS chemicals**:**

- **Individual MCLs** for PFOA, PFOS, PFHxS, PFNA, and HFPO-DA (GenX)
- **Hazard Index MCL for mixture** of PFHxS, PFNA, HFPO-DA (GenX), and PFBS

- OHA has **2 years** to adopt regulations & apply for primacy (**April 2026**)
- PWSs have **3 years** to complete initial monitoring for PFAS (**April 2027**)
- PWSs have **5 years** to comply with the PFAS MCLs (**April 2029**)

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PFAS Regulatory Levels (MCLs)

Chemical	Maximum Contaminant Level Goal (MCLG)	Maximum Contaminant Level (MCL)
PFOA	0	4.0 ppt
PFOS	0	4.0 ppt
PFHxS	10 ppt	10 ppt
HFPO-DA (GenX chemicals)	10 ppt	10 ppt
PFNA	10 ppt	10 ppt
Mixture of two or more: PFHxS, PFNA, HFPO-DA, and PFBS	Hazard Index of 1	Hazard Index of 1

- Adverse health effects: increased risk of certain cancers, liver damage, compromised immunity, developmental and reproductive effects.

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EPA announced planned changes to PFAS rule on Wed. 5/14/25:

1. **Maintain** the MCLs for PFOA and PFOS of 4.0 ppt
2. **Rescind** the regulations and **reconsider** the regulatory determinations for PFHxS, PFNA, HFPO-DA (GenX), and the Hazard Index mixture of these three plus PFBS.
3. Extend compliance date to 2031 (and establish a federal exemption process for possibly going beyond 2031)

EPA plans to propose a rule this fall 2025 for the above changes and finalize the rule in spring 2026

➢ ***No change to monitoring requirements/timelines***

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Initial Monitoring Requirements for PFAS

All* **CWS** & **NTNC** water systems must complete initial monitoring at all entry points (EPs) to the distribution system and report the results to OHA (or submit previously collected monitoring data) by **April 26, 2027**.

- GW ≤10,000: **2 consecutive samples** within a 12-month period, with samples collected 5 to 7 months apart.

**Monitoring not required by purchasing PWSs / purchased-water EPs*

After April 26, 2027, ongoing compliance monitoring schedules will be either:

1) **Triennial** (every-3-years) if all initial monitoring results below "trigger levels" (½ MCLs), **or**
2) **Quarterly** (if do not qualify for triennial)

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Labs for PFAS Analysis in Drinking Water

Must use a lab approved by the EPA or the state (ORELAP) to analyze PFAS samples needed to meet the initial monitoring requirements.

Samples for initial monitoring must be analyzed using EPA method 533 or 537.1 (Version 1 or 2).

- Both methods include all the regulated PFAS so either method can be used.

List of ORELAP-accredited labs for PFAS analysis in drinking water: https://www.oregon.gov/oha/PH/HEALTHYENVIRONMENTS/DRINKINGWATER/OPERATIONS/Documents/PFAS-lab-list.pdf

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Previously acquired PFAS data

Water systems can use previous PFAS monitoring data to satisfy some or all of the initial monitoring requirements (for example, UCMR5 data) if it meets **all** the following criteria:

1. Samples were collected on or after January 1, 2019
2. Samples were collected from the entry point
3. Samples analyzed using EPA method 533 or 537.1 (version 1 or 2)
4. Results were reported using minimum reporting levels (MRLs) that were at or below the MCLs
   - ***Note:*** *Results from the 2021/2022 OHA PFAS sampling project currently in Data Online do not meet criteria #4 so cannot be used to help meet the initial monitoring requirements.*

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Previously acquired PFAS data (cont.)

For samples collected on or after **June 25, 2024**:

1. Labs performing the analysis must be accredited by EPA or the state (ORELAP)
2. Results must be reported using minimum reporting levels (MRLs) that are at or below the "trigger levels" in the rule (½ the MCLs)

If PWS has some previously collected data but less than needed to meet initial monitoring requirements, they can supplement with additional monitoring.

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OHA PFAS Sampling Project

OHA-DWS is sampling for PFAS at all CWS and *non-profit* NTNC PWSs serving <3,300 population: **1061 EP samples at 912 PWSs**

Purpose:

- More quickly identify PWSs with PFAS contamination and get them in line for Emerging Contaminant (EC) funding to address the issue
- Help small or disadvantaged communities meet part of the initial monitoring requirements under the new rule

DEQ lab will collect & analyze these samples at no cost to the PWSs

- Sample collection: late-summer 2025 through spring 2026

➢ ***Recommend PWS wait to hear from DEQ about when they will be sampling, then PWS can collect their second sample 5 to 7 months later (and prior to April 26, 2027).***

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OHA-DWS implementation outreach activities

Completed so far:

- OHA PFAS Rule webpage updates
- ePipeline April 2025: New PFAS Rule and Initial Monitoring Requirements
- ePipeline April 2025: OHA PFAS Sampling Project
- OHA PFAS Sampling Project notification letters sent: 4/10/25
- AWWA/PNWS Cascade to Coast Short School - PFAS rule overview presentation (Albany, 5/13/25)

OHA-DWS implementation outreach activities (Cont.)

Future planned activities:

- Enter PFAS initial monitoring schedules in SDWIS (Data Online)
- Letters to PWSs notifying them of their initial monitoring requirements
- Govdelivery article on PFAS rule & initial monitoring requirements
- AWWA/PNWS Short School - PFAS rule overview presentation (Clackamas Comm. College, 7/15/25)

Rule Resources

- OHA-DWS PFAS rule
- EPA PFAS Rule Monitoring and Reporting Fact Sheet
- EPA PFAS Initial Monitoring Quick Reference Guide
- EPA PFAS rule
- EPA PFAS rule implementation

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Emerging Contaminants Funding

- Provides **100% forgivable loans/grants** for reducing exposure to **PFAS** or other emerging contaminants (EC) in drinking water (cyanotoxins, manganese)
- ~$100M total - Funding allotments over 5 years (2022 to 2026)
- Primary purpose of project must be to address ECs in drinking water
  - Examples: install treatment for EC, develop a new source, or connect to another public water system
  - Covers planning, design, and construction costs

17 of 24 PWSs with PFAS results >MCL engaged in EC funding process

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Questions / Discussion

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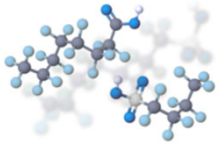

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Photo credit (PFAS, title/closing slides): US Environmental Protection Agency. SDWA Regulatory Process and PFAS Presentation. 6/29/20.