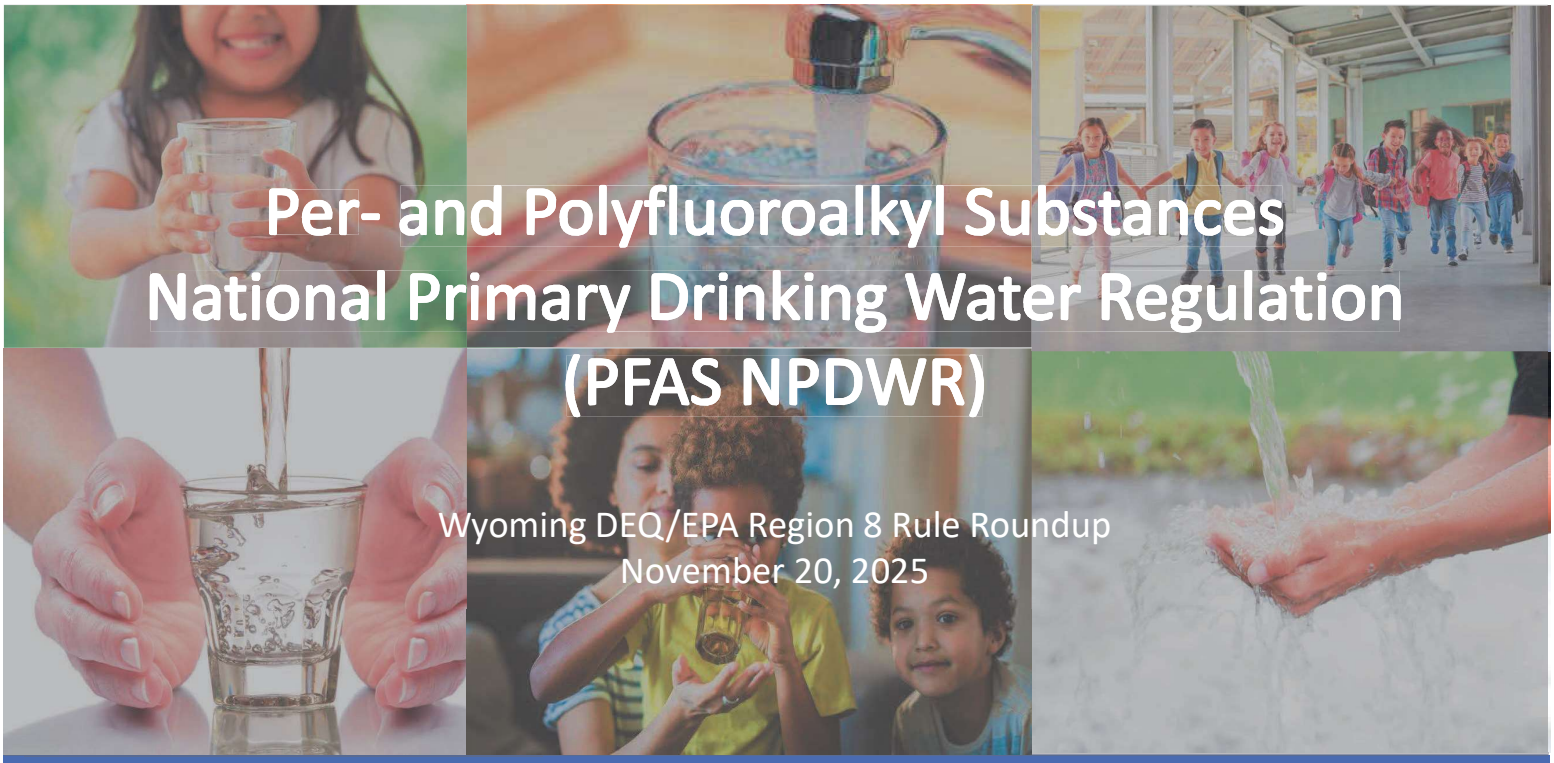


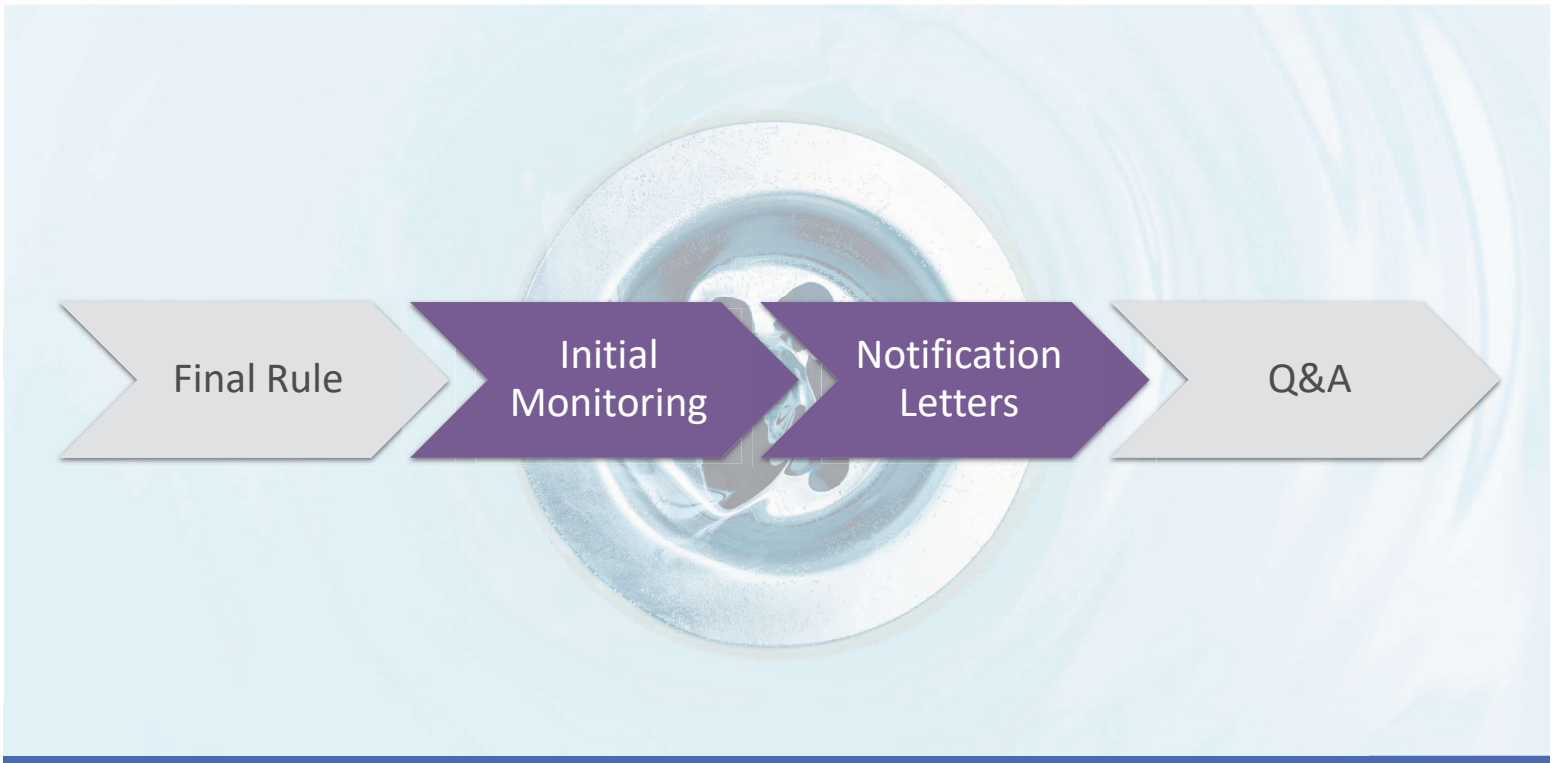
Per- and Polyfluoroalkyl Substances National Primary Drinking Water Regulation (PFAS NPDWR)

Wyoming DEQ/EPA Region 8 Rule Roundup
November 20, 2025

EPA United States Environmental Protection Agency

Disclaimer: The examples included in this presentation are intended for discussion purposes only. The statutory provisions and the EPA regulations described in this document contain legally binding requirements. This presentation is not a regulation itself, nor does it change or substitute for those provisions and regulations. Thus, it does not impose legally binding requirements on the EPA, states, or public water systems. This guidance does not confer legal rights or impose legal obligations upon any member of the public. While the EPA has made every effort to ensure the accuracy of the discussion in this presentation, the obligations of the regulated community are determined by statutes, regulations, or other legally binding requirements. In the event of a conflict between the discussion in this presentation and any statute or regulation, this presentation would not be controlling.

EPA United States Environmental Protection Agency



What are PFAS?

- Per- and poly-fluoroalkyl substances (PFAS) are manmade/synthetic organic chemicals that have been manufactured for commercial, consumer, and industrial uses since the 1940s.
- Can cause serious health problems if you are exposed to them over a long period of time, or at certain critical life stages like pregnancy and early childhood.
- PFAS break down extremely slowly in the environment and can build up in people, animals, and the environment over time.

EPA's Final Rule

- Promulgated in April 2024
- Maximum contaminant levels (MCLs) for six PFAS*
- Requires community water systems (CWS) and non-transient non-community water systems (NTNCWS) to conduct monitoring
- Includes important public notification provisions
- Available in 40 CFR 141 Subpart Z.

*EPA released a memo on 05/14/25 announcing the intention to rescind the regulation for four PFAS.

EPA Administrator Zeldin's Announcement May 14, 2025

- Keep EPA's nationwide standards to protect Americans from PFOA and PFOS
- Extend the MCL compliance deadline for PFOA and PFOS (to 2031)
- Establish a Federal exemption framework
- Initiate enhanced outreach to water systems – PFAS OUTreach Initiative (PFAS OUT)
- Intent to rescind/reconsider regulations with respect to the regulatory determinations for PFHxS, PFNA, HFPO-DA (commonly known as GenX), and the Hazard Index mixture of these three plus PFBS

https://www.epa.gov/newsreleases/epa-announces-it-will-keep-maximum-contaminant-levels-pfoa-pfos

Regulated PFAS - PFOA, PFOS, PFHxS, PFNA, HFPO-DA, and PFBS

Chemical Name	MCL (ng/L = ppt)
PFOA (perfluorooctanoic acid)*	4.0
PFOS (perfluorooctane sulfonic acid)*	4.0
PFHxS (perfluorohexane sulfonic acid)	10
PFNA (perfluorononanoic acid)	10
HFPO-DA (hexafluoropropylene oxide dimer acid, or GenX chemicals)	10
Mixtures of two or more: **PFHxS, PFNA, HFPO-DA, and PFBS** (perfluorobutane sulfonic acid)	Hazard Index of 1 (unitless)

*Note EPA announcement on May 14, 2025

40 CFR 141.61(c)(2)

*Compliance is determined by running annual averages (RAA) at the sampling point.

Implementation Timeline

June 25, 2024

- ✓ Regulations are effective
- ✓ Analytical requirements must be met

April 26, 2027

- ✓ **Initial monitoring deadline and results reported to primacy agencies**
- ✓ Compliance (routine) monitoring begins
- ✓ Reporting and recordkeeping requirements must be met
- ✓ Monitoring and reporting compliance determinations begin
- ✓ Public notices issued for monitoring and testing procedure violations
- ✓ Each CWS must report on PFAS in its CCR

April 26, 2029*

- ✓ MCL compliance deadline
- ✓ MCL compliance determinations begin
- ✓ Public Notices issued for MCL violations
- ✓ * Note EPA announcement on May 14th 2025

40 CFR 141.900(b), 40 CFR 141.6(l)

40 CFR Subpart O and Q

General Monitoring Requirements

- Each CWS and NTNCWS must comply with the PFAS NPDWR
  - Transient non-community water systems, such as a gas stations or campgrounds, are not required to comply with the PFAS NPDWR.
- Monitoring is required at all entry points to the distribution systems (same as IOCs, SOCs, VOCs, nitrate, radionuclides)
- Must take all samples during normal and representative operating conditions
- Consecutive interconnections are not considered entry points

Initial Monitoring Requirements

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 ≤ 10,000 customers

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

- Entry points supplied by **groundwater under the direct influence of surface water (GWUDI)** follow the surface water monitoring schedule.
- If an entry point to the distribution system provides a blend of surface and groundwater, or seasonally changes source type, the surface water requirements apply.

Initial Monitoring Requirements for Multiple Entry Points

- **Monitoring requirements are based on the entry point facility's water type**.
- Systems with multiple entry points with different water types:
  - Such as one surface water treatment plant and one groundwater treatment plant, then the monitoring requirements are based on the respective entry point's water type.
- Purchasing system that also has their own sources
  - The wholesaler will provide the sampling results for the consecutive connection and the purchaser (consecutive) is responsible for monitoring and reporting at all entry points supplied by its own sources.

40 CFR 141.902(b)(1); 141.201(c)(1); 141.152(d)

Use of Previously Acquired Data to Satisfy Initial Monitoring Requirements

- Conditions for using previously collected PFAS results:
  - Samples collected in accordance with the Fifth Unregulated Contaminant Monitoring Rule (UCMR5), collected on or after January 1, 2023 [40 CFR 141.40].
  - Samples collected in accordance with State-based or other monitoring campaigns, collected on or after January 1, 2019
  - Most recent data from multiple years of data must be used
  - Approved EPA analytical methods were used
  - Acceptable data must be reported to the rule trigger levels by labs
  - Otherwise meet the timing requirements for initial monitoring.

40 CFR 141.902(b)(1)(vi)-(viii)

Requirements for Filling in Gaps in Previously Acquired Data

Sampling is required where fewer samples are available than the number required for initial monitoring.

System Type	Requirement
All surface water systems, GWUDI systems, and groundwater systems serving greater than 10,000 persons	Must collect one sample in each quarter of a calendar year that was not represented, two to four months apart from the months with available data
All groundwater systems serving 10,000 or fewer persons	Must collect one sample in the month that is five to seven months apart from a month in which the previous sample was taken

EPA Region 8 Notification Letters – September 30, 2025

- Consecutive Systems
- Large Fifth Unregulated Contaminant Monitoring Rule (UCMR5) Systems
- Small UCMR5 Systems
- All remaining CWS and NTNC Water Systems

REGION 8
1595 Wynkoop Street
Denver, CO 80202-1129

9/30/2025

Ref: 8WD-SDB

SENT VIA EMAIL

Re: **Notice of Initial Monitoring Requirements (UCMR5 small/medium systems) PFAS Rule**

Dear Administrative Contact and Operator(s):

This letter provides (1) notification that the drinking water system you manage and operate is subject to the Per- and Polyfluoroalkyl Substances (PFAS) National Primary Drinking Water Regulation (PFAS Rule), and (2) the requirements for sample collection to meet the April 26, 2027, initial monitoring deadline. The regulation, promulgated in 40 CFR § 141 Subpart Z, establishes maximum contaminant levels (MCLs) for six PFAS, and requires monitoring, reporting, and compliance to protect consumers from these chemicals. An article about the key provisions of the PFAS Rule, including funding and technical assistance resources, is enclosed.

Provided notification that the drinking water system you manage and operate is subject to the PFAS Rule.

Consecutive Systems Notification Letter

1. The PFAS Rule does not require any monitoring be conducted at a system interconnection point.
2. The supplying wholesale system will be responsible for conducting the monitoring requirements at their entry point that transmits across this interconnection.
3. The wholesale system shares information with consecutive systems for reporting in Consumer Confidence Reports (CCRs) and Public Notices (PNs).

Large and Small UCMR5 Systems Notification Letters

1. Initial monitoring is required and the requirements by water type and system size.
2. UCMR5 results may partially or completely satisfy the initial monitoring requirements.
3. Large systems – To seek EPA approval for reduced triennial compliance monitoring in early 2027, the lab should reprocess the UCMR5 results to lower reporting levels (EPA memo has recommendation for labs).

   Small systems – EPA has reprocessed the UCMR5 results.
4. EPA assigned initial monitoring schedules in 2026 to meet sample collection timing requirements according to source water supplied and system size.
5. Schedules can be reviewed in Drinking Water Watch (w/instructions).

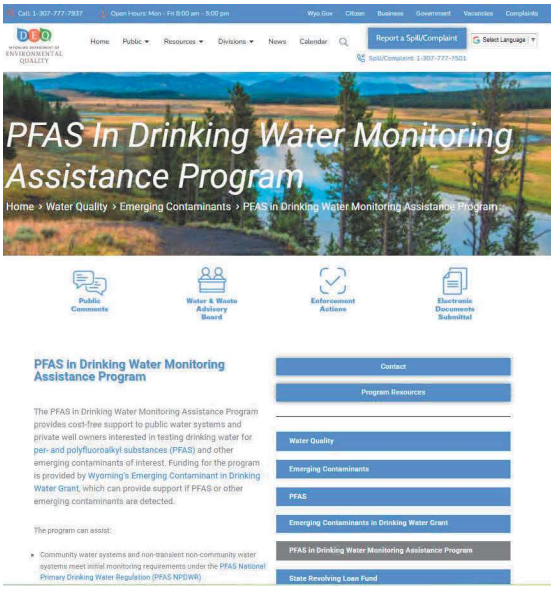
Remaining CWS and NTNCWS Notification Letter

1. Initial monitoring is required and the requirements by water type and system size
2. Previously collected PFAS samples may partially or completely satisfy the initial monitoring requirements and EPA has evaluated those received
3. EPA assigned initial monitoring schedules in 2026 to meet sample collection timing requirements according to source water supplied and system size
4. Schedules can be reviewed in Drinking Water Watch (w/instructions)

Drinking Water Watch Demonstration

Wyoming DEQ PFAS in Drinking Water Monitoring Assistance Program

- Cost free program to assist public water systems test for PFAS and other emerging contaminants
- WDEQ contractor, HGL, can:
  - Visit each system
  - Inspect for PFAS-containing tapes, gaskets, other materials
  - Collect samples
  - Send samples to certified laboratory
  - Evaluate quality of the data
  - Report results
  - Assist with public notifications
  - Provide hands on and online PFAS sample collection training for operators
- Sign up by December 5 and complete the access agreement
- DEQ program lead is Lindsay Patterson
- Call (703) 326-7823 or email WDEQPFAS@hgl.com



Laboratories and Analytical Methods

- Labs used for **initial monitoring** can include:
  - Laboratories EPA approved for the Fifth Unregulated Contaminant Monitoring Rule (UCMR5)
  - Laboratories certified by a State laboratory certification program
  - National Environmental Laboratory Accreditation Program (NELAP) State accreditation programs that use the TNI standard
- Labs can use EPA method 533, or EPA method 537.1 version 1 or version 2
- Systems must report all results provided by a lab to EPA so compliance monitoring frequency for the public water system can be determined (40 CFR 141.902(a)(7))

Approved EPA Analytical Methods for PFAS

- **Method 533**:
  - Ammonium acetate preservative
  - 28-day hold time
  - Samples must be stored ≤ 10° C, not frozen
- **Method 537.1, version 2.0**
  - Trizma preservative
  - 14-day sample hold time
  - Samples must be stored ≤ 10° C, not frozen

- Both require preparation of a Field Reagent Blank (FRB) to determine if method analytes or other interferences are introduced into the sample from shipping, storage, and the field environment.

https://www.epa.gov/water-research/pfas-analytical-methods-development-and-sampling-research

Best Practices for PFAS Sampling

- Resource: "Requirements and Best Practices for the Collection and Analysis of Samples for the PFAS NPDWR" (September 2025)

Samplers should NOT
▶ Apply personal care products, sunscreen, or insect repellant prior to sample collection.
▶ Use anti-fog sprays or wipes prior to sample collection.
▶ Handle or use water-, oil- or stain-resistant materials prior to sample collection (i.e., water-repellant face masks, food packaging and wrappers, Gore-Tex or Tyvek clothing, plastic clipboards).
▶ Use permanent markers (i.e., Sharpies) to label sample bottles.
▶ Touch the inside of the cap or bottle.
▶ Touch the bottle to the faucet.
▶ Place the lids in a pocket (set bottle lids face up on a clean surface while sampling).
▶ Rinse out or overfill sampling bottles. Sampling bottles contain preservatives that need to be dissolved into the sample.

Most Important Practices:

- #1 Wash your hands thoroughly before sampling
- #2 Use nitrile gloves
- 1 pair for managing the FRB
- 1 pair for collecting the sample

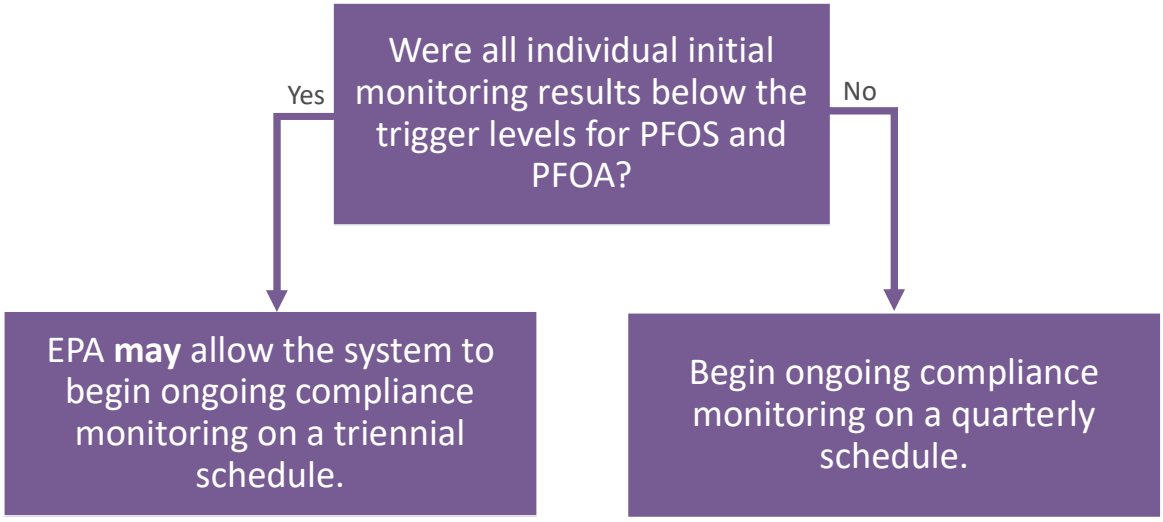
Samplers MUST

- Wash their hands before handling sample bottles.
- Wear nitrile gloves when filling and sealing sample bottles.
- Collect a FRB at each sampling site.
  - Put on a new pair of gloves.
  - Samplers are to pour the bottle containing reagent water into the FRB blank bottle, cap and shake for 15 seconds.
  - Record sampling information as directed by the laboratory, including date, time and sampling location.
  - Dispose of gloves.
- Collect a Field Sample (FS) at each sampling site.
  - If present, remove any aerators, hoses, tubing and/or Teflon tape from the faucet.
  - Open and flush the valve to obtain a sample representative of the water entering the distribution system.
  - Reduce the stream to pencil thickness.
  - Put on a new pair of nitrile gloves.
  - Uncap the FS bottle, fill to just below the neck, and recap the bottle.
  - Record sampling information as directed by the laboratory, including date, time and sampling location.
- FRB and FS must be stored at ≤10°C (or, for Method 533, on ice) before shipment, but not frozen.
- Arrange for sampling kits to arrive at the laboratory within 2 days/48 hours of collection or with ice remaining in the cooler (required under Method 533).

Compliance (Routine) Monitoring

- Compliance monitoring will begin April 26, 2027
- Your sample results during initial monitoring will be compared to **trigger levels** to establish your compliance monitoring frequency.
- The **trigger levels are one-half of the MCLs** (e.g. 2.0 ppt for PFOA and PFOS).
- Monitoring frequency is the same for *all* regulated PFAS.

How Compliance Monitoring Frequency will be Determined



Get Ready

- Become knowledgeable by reviewing the regulation, fact sheets, and quick reference guides
- Call EPA and ask questions
- Prepare for logistics and establish a budget
- Each sample set is approximately $309
  - See 89 Federal Register 32532 (April 26, 2024): Page 32662, Table 36
- Review your 2026 PFAS schedules in Drinking Water Watch

Resources for the PFAS NPDWR

Final PFAS Rule Homepage:

- Fact sheets, FAQs, the Federal Register Notice, a general overview presentation, implementation products, memos, webinar recordings and materials for utility professionals and small systems
- See **PFAS Final Rule webpage** at https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas
- See **PFAS implementation webpage** at https://www.epa.gov/dwreginfo/pfas-rule-implementation

Technical Assistance Opportunities

- **WaterTA** supports communities to identify water challenges, develop plans, improve resiliency, build technical, managerial and financial capacity, and develop application materials to access water infrastructure funding: https://www.epa.gov/water-infrastructure/water-technical-assistance-waterta
- All programs offering technical assistance: https://www.epa.gov/water-infrastructure/water-technical-assistance-programs

Questions?

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This presentation is posted at https://www.epa.gov/region8-waterops under the "Training Presentations" link following the conference.