

Legionella, Lead, & PFAS

Navigating Federal Requirements for Facility Water Safety



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Presented by the



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Federal drinking water rules are generally written for water systems, not buildings

Only a few federal requirements reach inside a facility, and knowing which ones apply to yours is the first step in managing *Legionella*, lead, and PFAS

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Learning Objectives

Explain the health significance of Legionella, lead, and PFAS and **understand** why certain occupant populations may face greater risk.

Describe how each contaminant can enter, persist, or proliferate within facility water systems and create exposure at the point of use.

Distinguish public water system obligations from facility-level responsibilities and decisions.

Identify the principal federal laws, regulations, and agency directives governing covered facilities and public water systems.

Assess the roles and limitations of monitoring, corrective action, and appropriately selected filtration within a layered water-management strategy.

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Why This Conversation Matters

PFAS deadlines are approaching, and the rules are still changing

Lead rules are tightening

Building conditions have changed

Legionnaires' disease is rising and preventable

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The Safe Drinking Water Act is the federal law behind the lead and PFAS limits, and both rules have major deadlines in 2027.

But those rules apply to public water systems. So the first question for your facility is: are you one?

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Is Your Facility A Public Water System?



Source: 40 CFR 141.2 (definitions); 40 CFR 141.3 (coverage). Status as of September 2026.

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Legionella

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Legionella

Risks and Impact on Human Health

- *Legionella* can cause Legionnaires' disease, a severe pneumonia, when people inhale contaminated water droplets or aspirate contaminated water
- About 1 in 10 people who get Legionnaires' disease die; about 1 in 4 when it is acquired in a healthcare facility
- Adults 50 and older, current or former smokers, and people with chronic lung disease or weakened immune systems face greater risk
- Reported incidence rose about 5.7-fold from 1992–2002 to 2018, and reported cases understate the true burden

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Legionella

Facility Challenges

- A facility can receive compliant water and still develop a *Legionella* hazard inside its plumbing
- Warm temperatures, stagnation, loss of disinfectant, biofilm, scale, and sediment let small numbers of bacteria entering the building multiply
- Exposure comes from devices that create droplets or aerosols: showerheads, faucets, cooling towers, hot tubs, decorative fountains, and ice machines

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Legionella

Facility Requirements

CONDITION OF PARTICIPATION

CMS *Legionella* requirement (QSO-17-30)

Purpose: Requires a water management program to reduce *Legionella* and other waterborne pathogen risk.

Applies to: Medicare/Medicaid-certified hospitals, critical access hospitals, and long-term care

AGENCY POLICY

VHA Directive 1061

Purpose: Prevents healthcare-associated *Legionella* disease and scald injury from VA water systems.

Applies to: VA-owned buildings with overnight stays; VA cooling towers and outdoor aerosol systems

AGENCY POLICY

GSA Order PBS 1000.7B

Purpose: Sets drinking water quality requirements for GSA buildings, including *Legionella* control.

Applies to: GSA-owned and GSA-delegated buildings; leased space only as the lease specifies

LAW / REGULATION

Surface Water Treatment Rules (40 CFR 141, Subpart H)

Purpose: Requires disinfection, and filtration unless the system qualifies to avoid it, which controls *Legionella* at the source.

Applies to: Facilities that are their own public water system using surface water (or groundwater influenced by surface water).

Outside these settings,
no federal *Legionella*
requirement applies to
facilities

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Legionella

No federal numeric limit applies to *Legionella* in building water in general

Limits and Required Actions

Requirement	Defined limits	Required actions
CMS QSO-17-30	None set by CMS; the facility sets its own control limits.	Risk assessment; water management program that considers ASHRAE 188 and the CDC toolkit; monitor controls and document corrective actions. <i>Legionella</i> testing not required.
VHA 1061	Hot water: storage $\geq 140^{\circ}\text{F}$, piping $\geq 124^{\circ}\text{F}$. Cold $\leq 67^{\circ}\text{F}$ where practicable. Outlets $\leq 110^{\circ}\text{F}$. Remediate at <i>L. pneumophila</i> ≥ 1 CFU/mL.	Written plan per building, recertified yearly; continuous temperature monitoring; flush low-use fixtures twice weekly; test ≥ 20 outlets per building quarterly.
GSA PBS 1000.7B	Response required when results are "uncontrolled" under CDC guidance (≥ 10 CFU/mL).	ASHRAE 188 program where the CDC worksheet shows it applies. Childcare: flush weekly; test drinking outlets before reopening after a closure of 30+ days.
Surface Water Treatment Rules	Achieving 99.9% removal or inactivation of <i>Giardia</i> and 99.99% of viruses is considered control of <i>Legionella</i> (<i>Legionella</i> goal = zero); ie, no numeric limit.	Disinfect at point of entry and maintain a disinfectant residual in distribution; utilize filtration unless system qualifies to avoid it.

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Lead

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Lead

Risks and Impact on Human Health

- In children, lead exposure is associated with nervous-system damage, lower IQ, learning and behavior problems, impaired hearing, slowed growth, and anemia
- No safe blood lead level in children has been identified
- In adults, lead can affect kidney function, blood pressure, cardiovascular health, and fertility; during pregnancy it can cross the placenta and affect fetal development
- EPA estimates about 4 million lead service lines remain in the U.S. (November 2025)

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Lead

Facility Challenges

- Lead enters water when lead-containing service lines, solder, pipes, fittings, faucets, fountains, and valves corrode or release particles
- Release increases with corrosive water, warmer temperatures, stagnation, and disturbances such as construction or pipe replacement
- Water can meet standards at the meter and still pick up lead in the facility's service line or plumbing, and lead cannot be seen, tasted, or smelled

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Lead

Facility Requirements

LAW / REGULATION

Lead-free plumbing (SDWA §1417; 40 CFR 143, Subpart B)

Purpose: Limits the lead content of pipes, fittings, fixtures, solder, and flux.

Applies to: Any facility installing or repairing drinking water plumbing

LAW / REGULATION

Lead and Copper Rule, as revised by the LCRI (40 CFR 141, Subpart I)

Purpose: Requires sampling, corrosion control, and lead service line replacement.

Applies to: Facilities that are community or non-transient non-community water systems

CONDITION OF FUNDING

Head Start Performance Standards (45 CFR 1302.47(b)(9))

Purpose: Requires a plan to prevent children's exposure to lead in water and paint.

Applies to: Head Start and Early Head Start program facilities

AGENCY POLICY

GSA Order PBS 1000.7B

Purpose: Requires lead and copper testing at GSA childcare centers and new drinking water outlets.

Applies to: GSA-owned and GSA-delegated buildings; leased space only as the lease specifies

Lead-free plumbing is the only federal lead requirement that reaches every facility

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Lead

Limits and Required Actions

Requirement	Defined limits	Required actions
Lead-free plumbing	≤0.25% lead on wetted surfaces (weighted average); ≤0.2% in solder and flux.	Use lead-free products for all new installation and repair. Existing plumbing does not have to be replaced.
LCR / LCRI	Lead action level 15 ppb (90th percentile), 10 ppb from Nov. 1, 2027. Copper 1.3 mg/L.	Tap sampling; service line inventory and lead line replacement; corrosion control; public education after an exceedance. NTNC systems may use certified POU devices instead (state approval).
Head Start	None specified.	Written lead-prevention plan; test and inspect at least every 2 years where lead may exist; remediate as needed.
GSA PBS 1000.7B	The applicable action level (the order sets no number of its own).	Childcare: test lead and copper yearly and before reopening after a 30+ day closure. Test new outlets before use. Respond and retest when exceeded.

The LCRI is being challenged in court (oral argument expected fall 2026), but remains in effect unless the court acts

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PFAS

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PFAS

Risks and Impact on Human Health

- Studies associate exposure to certain PFAS with higher cholesterol, lower vaccine antibody response, liver enzyme changes, pregnancy-induced hypertension, and small decreases in birth weight
- PFOA is associated with kidney and testicular cancer
- Nearly everyone in the U.S. has measurable levels of certain PFAS in their blood
- EPA estimates 7.8% of public water systems would exceed the PFOA or PFOS limit (final UCMR 5 data, August 2026)

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PFAS

Facility Challenges

- PFAS enter facilities with source water contaminated by manufacturing, waste disposal, wastewater discharges, or past use of firefighting foam
- PFAS do not break down: flushing, heat, and disinfection do not remove them, and they build up in the body over time
- A facility on utility water cannot control its source, and utility treatment may not be in place until 2029 (2031 if the extension is finalized)

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PFAS

Facility Requirements

Outside these settings,
no federal PFAS
drinking water
requirement applies to
facilities

LAW / REGULATION

PFAS National Primary Drinking Water Regulation (40 CFR 141, Subpart Z)

Purpose: Sets enforceable PFAS limits in drinking water, with monitoring and public notice.

Applies to: Facilities that are community or non-transient non-community water systems

AGENCY POLICY

DoD PFAS policy for DoD-owned drinking water systems (Dec. 10, 2024)

Purpose: Applies the PFAS rule's monitoring and reporting framework across DoD-owned systems.

Applies to: DoD-owned drinking water systems in the U.S., regulated or not

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PFAS

Proposed, not final (Sept. 2026); optional extension to 2031 for PFOA/PFOS, and removal of the PFHxS, PFNA, HFPO-DA, and Hazard Index limits

Limits and Required Actions

Requirement	Defined limits	Required actions
PFAS NPDWR	PFOA and PFOS: 4.0 ppt each. PFHxS, PFNA, HFPO-DA: 10 ppt each. Hazard Index of 1 for mixtures.	Initial monitoring by Apr. 26, 2027; ongoing monitoring; meet MCLs by Apr. 26, 2029; public notice and consumer reports.
DoD PFAS policy	PFAS rule MCLs are the benchmark for reporting.	Monitor per the PFAS rule with EPA Method 533 and accredited labs; report MCL exceedances to DoD within 30 days.

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Execution & Recommendations

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Decision Framework

1. Identify the facility's controlling authority and applicable requirements
2. Determine whether the facility operates the water system or receives water from another provider
3. Identify where the contaminant originates and how occupants may be exposed
4. Separate water-provider obligations from facility-level responsibilities
5. Define monitoring, escalation, communication, and corrective-action procedures
6. Evaluate filtration or other controls based on the contaminant, intended use, and verified performance
7. Document the response and verify that the selected control is working

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Risks & Pathways

	Legionella	Lead	PFAS
Where does the risk originate?	Grows inside building water systems	Released from service lines, plumbing, and fixtures	Arrives with the source water
How are people exposed?	Inhaling or aspirating contaminated droplets	Drinking and cooking	Drinking and cooking
Where in the building is risk highest?	Hot water systems, low-use outlets, showers, cooling towers, and other aerosol sources	Older fixtures, drinking fountains, brass fittings, and outlets where water sits	Equal at every drinking and cooking outlet, because it comes from the source
How is it detected?	Culture testing takes days to return results, and one negative sample doesn't rule out growth	Tap samples, especially first-draw after water sits; results vary by outlet and day	Parts-per-trillion lab methods; utility or entry-point results represent the building
Do building controls help?	Yes. Temperature, disinfectant, and flushing are the primary defense	Partly. Flushing lowers levels temporarily; replacing lead-bearing parts fixes the source	No. Flushing, heat, and disinfection do not remove PFAS
What role can filtration play?	0.2-micron microbial filters as a barrier at high-risk outlets	Certified lead reduction at drinking and cooking taps	Certified PFAS reduction at drinking and cooking taps; the main facility-level option short of central

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Public Water System Obligations vs. Facility Responsibilities

	Utility (up to the service connection)	Facility (building plumbing and outlets)
Legionella	Delivers treated water with a disinfectant residual.	Residual declines with water age and warm temperatures in the building. Growth happens here, so this is where nearly all prevention happens.
Lead	Corrosion control, service line inventory and replacement, school testing programs.	Fixtures, internal piping, lead-free compliance for new work, acting on test results. The customer-owned part of the service line may need owner cooperation.
PFAS	Monitoring, treatment, compliance with MCLs.	Little control over the source. Decisions about interim protection, and full compliance duties if the facility has its own well.

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Multi-Control Strategies

Layer	Legionella	Lead	PFAS
Source and supply	Utility disinfectant residual arriving at the building	Utility corrosion control; lead service line replacement	Utility treatment to meet the MCLs; the source water itself
System design and materials	Eliminate dead legs; appropriate storage and circulation temperatures; mixing valves at the outlet	Lead-free materials; replacing lead-bearing fixtures and plumbing	Facility-level central treatment (GAC, ion exchange, RO) where the facility is its own water system
Operational control	Temperature and disinfectant control limits; flushing low-use outlets; aerator and device maintenance	Flushing; aerator cleaning	Operation and media change-out of any treatment the facility runs
Monitoring and verification	Monitor control measures (temperature, residual) against limits; <i>Legionella</i> testing to confirm control	Tap sampling, first-draw after stagnation	Entry-point monitoring by certified labs
Corrective action and remediation	Restore control limits; thermal or chemical remediation; retesting	Remove or replace outlets; take outlets out of service; retesting	Alternate supply; added or upgraded treatment
Point-of-use barrier	0.2-micron microbial filters at high-risk outlets, often during remediation	Certified POU filters at consumption taps (also an approved LCRI compliance alternative for NTNC systems)	Certified POU devices at consumption taps

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Why Layer Controls?

Effective programs **combine system-level controls** with **targeted controls** at high-priority locations

SAMPLE PAIRING



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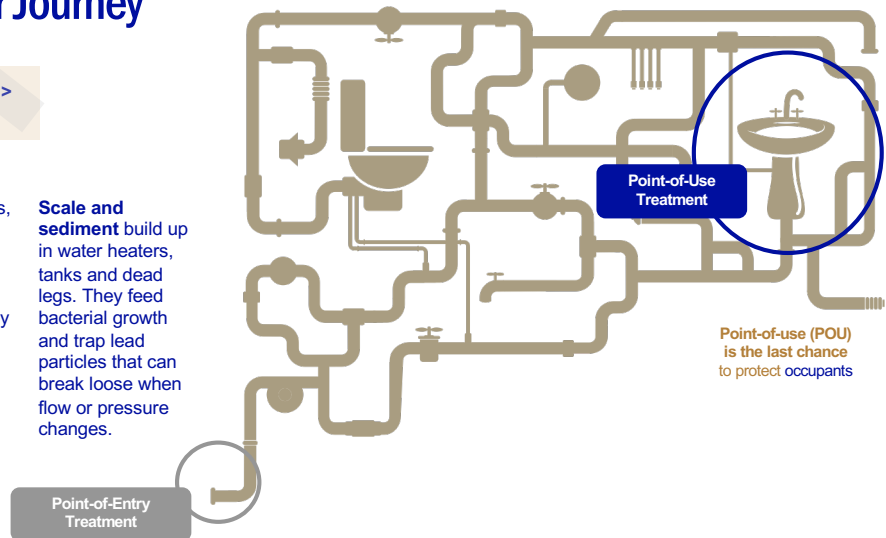
Consider the “Water Journey”

Water travels far from entry to use > through complex, aging plumbing

Biofilm shields *Legionella* and other pathogens from disinfectant, and can keep releasing bacteria into the water after the system has been treated.

Corrosion of pipes, solder, fittings and fixtures release lead and copper into the water. The rough surfaces they leave behind give bacteria places to attach.

Scale and sediment build up in water heaters, tanks and dead legs. They feed bacterial growth and trap lead particles that can break loose when flow or pressure changes.



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Where POU Filtration Fits

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POU Filtration Is Not All the Same

	CHEMICAL / PHYSICAL	MICROBIOLOGICAL
MECHANISM OF CONTROL	Binding or stripping of dissolved materials	Physical retention
EXAMPLES OF TARGETED CONTAMINANTS	Chlorine, Taste, Odor Scale Chloramines Sediment / Particulate Soluble Lead PFAS	[MICROFILTRATION] Bacteria [ULTRAFILTRATION] Bacteria Viruses Endotoxins*

*Nephros ultrafiltration retains endotoxins via size exclusion (consistent performance regardless of chemistry) but most endotoxin filters on the market rely on charged membranes as method of control.

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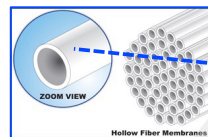
Legionella

Microbiological Filtration Works By Physical Retention

If a microorganism is larger than the membrane pore, it cannot physically pass through the membrane

Legionella is ~2.0 micron long x 0.3-0.9 micron wide

Zoom view of hollow fiber membranes



Graphic presented for visualization only

To effectively block *Legionella*, the Centers for Disease Control and Prevention (CDC) recommends using filters with an absolute pore size rating of **0.2 microns or less**

The Nephros **microfiltration** pore size is **0.1 micron**

The Nephros **ultrafiltration** pore size is **0.005 micron**

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Legionella

POU Microbiological Filters for Bacteria Retention

Support Fixture and In-Line Applications

Microfiltration with a **0.1 micron** pore size for **bacteria retention**

Ultrafiltration with a **0.005 micron** pore size for **bacteria, virus, and endotoxin retention**

- Fixture applications (**microfiltration**)
 - Quick and easy installation at sink or shower fixtures
 - Ideal solution for bacteria-based water emergencies and outbreak response
 - Filter life up to 90 days
- In-line applications (**microfiltration / ultrafiltration**)
 - Suitable for sensor sinks and ligature-free environments
 - Water-dependent equipment including:
 - Sinks, eyewash stations, bottle fillers, ice machines and more
 - Filter life up to 90 or 180 days



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Lead**PFAS**

POU Commercial Filters for Lead and PFAS

Effective enhancement for equipment performance and reduced maintenance

Protect against persistent, bioaccumulative contaminants that threaten human health and environmental safety

180-day changeout cycle or when gallon capacity is reached →

34-Series
9.5K gallon
capacity

19-Series
3.1K gallon
capacity

34-Series

Ideal for the reduction of

- **Lead**
- Chlorine, taste, & odor
- Cysts
- Class 1 Particulates



19-Series

Ideal for the reduction of

- **Total PFAS***
- **Lead**
- Asbestos
- Chlorine, taste, & odor
- Cysts
- Class 1 Particulates

Configurations



*Total PFAS reduction as a mixture of seven PFAS compounds including PFOA, PFOS, PFHxS, PFNA, PFHpA, PFBS, and PFDA.

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Takeaways & Summary

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Common Misconceptions

These are often presented as facility requirements, but they are not:

- **Lead testing in schools and childcare under the Lead and Copper Rule.** This obligation falls on the community water system. EPA states it lacks authority to require schools and childcare facilities to act on results. (Head Start programs and GSA childcare centers have separate federal requirements.)
- **Childcare and Development Fund (CCDF) rules.** They contain no federal lead-in-water testing requirement.
- **Joint Commission standards, ASHRAE 188, and the CDC toolkit.** These are not federal law. CMS requires a program that considers ASHRAE 188 and the CDC toolkit; only GSA directly requires ASHRAE 188, where it applies.
- **EPA's revisions to the Microbial and Disinfection Byproducts Rules.** Not yet proposed. EPA expects to propose them by summer 2027, and pathogens in building plumbing, such as *Legionella*, are under consideration.

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Which Federal Requirements Apply to You?

Facility Type	Legionella	Lead	PFAS
Any facility	—	Lead-free plumbing: for any new installation or repair LAW / REGULATION	—
Your facility is its own public water system (community or NTNC)	Surface Water Treatment Rules: only if your source is surface water LAW / REGULATION	Lead and Copper Rule (LCRI): sampling, action level, treatment LAW / REGULATION	PFAS rule: monitoring by 2027; limits by 2029 LAW / REGULATION
Medicare/Medicaid-certified hospital, CAH, or LTC facility	CMS QSO-17-30: water management program CONDITION OF PARTICIPATION	—	—
VA building with overnight stays, or VA cooling tower	VHA Directive 1061: plan, temperature limits, quarterly testing AGENCY POLICY	—	—
GSA-owned or GSA-delegated building	GSA PBS 1000.7B: ASHRAE 188 program where it applies AGENCY POLICY	GSA PBS 1000.7B: child care and new-outlet testing AGENCY POLICY	—
Head Start program facility	—	Head Start standards: lead plan; test at least every 2 years CONDITION OF FUNDING	—
DoD-owned drinking water system	—	—	DoD PFAS policy: monitoring and reporting AGENCY POLICY

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Key Points

- **Start with one question:** is your facility a public water system? Federal drinking water rules are written for water systems, not buildings
 - **If it isn't, only a few federal requirements reach inside:** lead-free plumbing everywhere, plus requirements tied to CMS certification, Head Start funding, or VA, GSA, or DoD ownership
- **Legionella:** no federal numeric limit in building water. Water management programs are required only in CMS-certified healthcare, VA, and GSA facilities
- **Lead:** sampling and action levels apply only to facilities that are their own water system, Head Start programs, and GSA childcare centers
- **PFAS:** compliance rests with the water system. Monitoring is due April 2027 and MCL compliance April 2029 (2031 proposed)
- **Compliant water at the meter does not guarantee safe water at the tap.** Monitoring, corrective action, and appropriately selected filtration fill the gap

Know which requirements apply to you, then manage beyond them where your risk calls for it

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Whether in healthcare, hospitality, education, and government, **our technologies make water better**

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Q&A

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Thank you



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Sources

GENERAL

[Safe Drinking Water Act, 42 U.S.C. §300f et seq.](#)
[40 CFR 141.2 and 141.3: Definitions and coverage](#)
[45 CFR 98.41: CCDF health and safety requirements](#)

LEGIONELLA

[CMS QSO-17-30 \(revised July 2018\)](#)
[VHA Directive 1061\(4\) \(amended Oct. 2024\)](#)
[GSA Order PBS 1000.7B and Desk Guide \(Mar. 2026\)](#)
[40 CFR 141, Subpart H: Surface Water Treatment Rules](#)
[CDC: About Legionnaires' disease](#)
[EID: Rising Incidence of Legionnaires' Disease, 1992–2018](#)
[CDC: Water Management Program toolkit and worksheet](#)

LEAD

[SDWA §1417 \(42 U.S.C. §300g-6\); 40 CFR 143, Subpart B](#)
[Lead and Copper Rule Improvements, final rule \(Oct. 30, 2024\)](#)
[EPA: LCRI small system flexibilities fact sheet](#)
[EPA: 2025 update to the 7th DWINSA \(lead service lines\)](#)
[CDC: Childhood lead poisoning prevention](#)
[45 CFR 1302.47: Head Start safety practices](#)
[NRDC: AWWA v. EPA \(LCRI litigation\)](#)

PFAS

[PFAS NPDWR, final rule \(Apr. 26, 2024\), 40 CFR 141, Subpart Z](#)
[Proposed PFOA/PFOS compliance extension \(May 20, 2026\)](#)
[Proposed rescission of four PFAS limits \(May 20, 2026\)](#)
[EPA: UCMR 5 data \(final release Aug. 2026\)](#)
[CDC: National Report on Human Exposure to Environmental Chemicals](#)
[DoD: PFAS policy for DoD-owned drinking water systems \(Dec. 10, 2024\)](#)

3Ts	EPA's "Training, Testing, and Taking Action" program for reducing lead in drinking water in schools and childcare
510(k)	FDA premarket notification: the clearance pathway showing a medical device is substantially equivalent to one already legally marketed
ANSI	American National Standards Institute
ASHRAE	American Society of Heating, Refrigerating and Air-Conditioning Engineers (publisher of Standard 188)
AWWA	American Water Works Association (as in AWWA v. EPA, the LCRI lawsuit)
CAH	Critical Access Hospital
CCDF	Childcare and Development Fund
CDC	Centers for Disease Control and Prevention
CFR	Code of Federal Regulations
CFU/mL	Colony-forming units per milliliter (the unit for Legionella culture results)
CMS	Centers for Medicare & Medicaid Services
DI/RO	Deionization / reverse osmosis (water treatment used for dialysis)
DoD	U.S. Department of Defense
DWINSA	Drinking Water Infrastructure Needs Survey and Assessment (the EPA survey behind the lead service line estimate)
EID	Emerging Infectious Diseases, CDC's peer-reviewed journal
EPA	U.S. Environmental Protection Agency
FDA	U.S. Food and Drug Administration
GAC	Granular activated carbon
GenX / HFPO-DA	Hexafluoropropylene oxide dimer acid; "GenX" is the trade name for the chemical and its ammonium salt
GSA	U.S. General Services Administration
LCR	Lead and Copper Rule
LCRI	Lead and Copper Rule Improvements (2024 revision of the LCR)

LTC	Long-term care (facility)
MCL	Maximum Contaminant Level: the enforceable limit for a contaminant in drinking water
mg/L	Milligrams per liter (equal to parts per million)
NPDWR	National Primary Drinking Water Regulation
NRDC	Natural Resources Defense Council
NSF	NSF International, the certification body (formerly the National Sanitation Foundation)
NTNC	Non-transient non-community (water system): serves the same 25+ people for more than 6 months a year without being their home
PBS	GSA's Public Buildings Service (as in Order PBS 1000.7B)
PFAS	Per- and polyfluoroalkyl substances
PFHxS	Perfluorohexane sulfonic acid
PFNA	Perfluorononanoic acid
PFOA	Perfluorooctanoic acid
PFOS	Perfluorooctane sulfonic acid
POU	Point of use (treatment at a single outlet or fixture)
ppb	Parts per billion (µg/L)
ppt	Parts per trillion (ng/L)
QSO	CMS Quality, Safety & Oversight Group (as in memo QSO-17-30)
RO	Reverse osmosis
SDWA	Safe Drinking Water Act
UCMR 5	Fifth Unregulated Contaminant Monitoring Rule (EPA's national sampling for PFAS and lithium)
U.S.C.	United States Code
VA	U.S. Department of Veterans Affairs
VHA	Veterans Health Administration