



ASSISTANT SECRETARY OF DEFENSE

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WASHINGTON, DC 20301-3400

ENERGY, INSTALLATIONS,
AND ENVIRONMENT

8/7/23

MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY (INSTALLATIONS,
ENERGY AND ENVIRONMENT)
ASSISTANT SECRETARY OF THE NAVY (ENERGY,
INSTALLATIONS AND ENVIRONMENT)
ASSISTANT SECRETARY OF THE AIR FORCE
(INSTALLATIONS, ENVIRONMENT AND ENERGY)
DIRECTOR, NATIONAL GUARD BUREAU (JOINT STAFF, J3/4/7)
DIRECTOR, DEFENSE LOGISTICS AGENCY (INSTALLATION
MANAGEMENT)

SUBJECT: Establishing a Consistent Methodology for the Analysis of Per- and Polyfluoroalkyl Substances in Matrices Other than Drinking Water

This policy identifies requirements for sampling of Per- and Polyfluoroalkyl Substances (PFAS) in environmental matrices other than drinking water. This memorandum supersedes and cancels the Assistant Secretary of Defense for Sustainment (ASD(S)) memorandum, *Update for Establishing a Consistent Methodology for the Analysis of Per- and Polyfluoroalkyl Substances in Media Other than Drinking Water*, December 7, 2021.

For definitive analysis of matrices other than drinking water, the DoD Components will use Draft Method 1633 *Analysis of Per- and Polyfluoroalkyl Substances (PFAS) in Aqueous, Solid, Biosolids, and Tissue Samples by LC-MS/MS*. The U.S. Environmental Protection Agency (EPA), in partnership with DoD's Strategic Environmental Research and Development Program, has published Draft Method 1633, a single-laboratory validated method to test for 40 PFAS in media, such as wastewater, surface water, groundwater, soil, biosolids, sediment, landfill leachate, and fish tissue. Other methods for analysis may be considered for screening samples to determine the presence or magnitude of PFAS concentration, but not to confirm absence. The use of alternative screening methods for a location must be approved by a DoD project representative (e.g., chemist). Methods other than Draft Method 1633 shall not be used to analyze samples for regulatory compliance, risk assessment, or comparison to a project screening or action level.¹

The DoD Environmental Data Quality Workgroup (EDQW) has determined that Draft Method 1633 meets the precision, accuracy, and limits of quantitation needed to support decision-making. Contracts and task orders awarded after the signature date of this memorandum will require the use of Draft Method 1633 for the definitive analysis of PFAS in matrices other than drinking water using a DoD Environmental Laboratory Accreditation program (ELAP) accredited laboratory certified for the method/matrix/analyte.

¹ The DoD Components may still use sample results generated from the use of modified Method 537.1 and Table B-15 for regulatory compliance, risk assessment, or comparison to a project screening or action level, where the samples were taken prior to the signature date of this memorandum.

Laboratories capable of meeting the DoD ELAP requirements applicable to EPA Method 1633 can be found at www.denix.osd.mil/edqw/accreditation/accreditedlabs, under “Draft EPA Method 1633” in the Method dropdown box. DoD Components will only use DoD ELAP laboratories included on the accredited list. For Method 1633, the PFAS analyte lists for each laboratory may differ for a given matrix and it should not be assumed that a laboratory will be capable of detecting all 40 analytes in Method 1633 in every matrix of interest. Therefore, project-specific analyte lists shall include all PFAS analytes in EPA Method 1633 that the chosen laboratory is capable of detecting for the matrix to be evaluated.

The point of contact for this matter is Mr. Brian Jordan at 703-409-8657 or brian.d.jordan6.civ@mail.mil.

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For Brendan M. Owens