



## ASSISTANT SECRETARY OF DEFENSE

3400 DEFENSE PENTAGON  
WASHINGTON, DC 20301-3400

ENERGY, INSTALLATIONS,  
AND ENVIRONMENT

7/11/23

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, J8)  
DIRECTOR, DEFENSE LOGISTICS AGENCY (INSTALLATION  
MANAGEMENT)

SUBJECT: Memorandum for Sampling of Per- and Polyfluoroalkyl Substances in DoD-Owned Drinking Water Systems

This memorandum updates requirements for Per- and Polyfluoroalkyl Substances (PFAS) sampling frequency and analysis of drinking water and provides guidance in reevaluating PFAS analytical results in response to improved testing methodologies and in preparation for future regulatory requirements. This memorandum applies to DoD-owned drinking water systems worldwide including non-regulated systems and cancels the Assistant Secretary of Defense for Sustainability (ASD(S)) memorandum, *Per- and Polyfluoroalkyl Substances Sampling of Department of Defense Drinking Water Systems*, March 2, 2020. Where state or local regulations for PFAS have been fully promulgated and are more stringent than the guidance provided in this memorandum, the more stringent regulations will apply.

In anticipation of Environmental Protection Agency (EPA) establishing drinking water standards for certain PFAS and to ensure that the Department makes decisions based on drinking water samples that have been collected and analyzed using the most current methods, the DoD Components will review existing data and collect additional samples of finished drinking water from DoD-owned drinking water systems in accordance with this memorandum. The DoD Components will use this information to develop plans for implementation of the EPA's National Primary Drinking Water Regulation, once final. These plans should consider future funding, infrastructure, and other applicable requirements.

For facilities where the most recent samples were taken prior to January 1, 2022, the DoD Components will conduct sampling and analysis of finished drinking water for PFAS using both EPA Methods 533 and 537.1 by December 31, 2023. When using both methods to analyze for PFAS, DoD Components will use EPA Method 537.1 to analyze for and report perfluorotetradecanoic acid (PFTeDA<sup>1</sup>), perfluorotridecanoic acid (PFTTrDA), N-methylperfluorooctanesulfonamidoacetic acid (NMeFOSAA), and N-ethylperfluorooctanesulfonamidoacetic acid (NEtFOSAA) only and will use EPA Method 533 to

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<sup>1</sup>The U.S Environmental Protection Agency (EPA) abbreviation for perfluorotetradecanoic acid (CAS 376-06-7) is PFTA and DoD data systems use PFTeDA.

analyze for and report all analytes included in the EPA Method 533 analyte list. This will ensure consistency across DoD in how PFAS samples are collected and analyzed for DoD-owned drinking water systems.

For facilities where the most recent sampling was performed after January 1, 2022, the DoD Components will conduct periodic sampling and analysis for PFAS based on the following schedule:

- a. Systems with results indicating PFAS analytes are below the Minimum Reporting Level (MRL) will sample at least once every two years. Both EPA Methods 533 and 537.1 will be used when reporting on a two-year cycle.
- b. Systems with results showing any of the PFAS analytes above the MRL will sample semi-annually until results are below the MRL for two consecutive sampling events. Then sampling may proceed as described in paragraph (a) above. Only EPA Method 533 will be required for semi-annual sampling of PFAS, unless the exceedance involves one of the four analytes in Method 537.1.<sup>2</sup>

DoD Components will not be required to sample systems that have been removed from service after providing notification, by memorandum, from the DoD Component Deputy Assistant Secretary to the Deputy Assistant Secretary of Defense for Environment and Energy Resilience, documenting that the system is no longer in service and that appropriate steps have been taken to ensure no one is drinking the water from the system.

The DoD Components will analyze PFAS in drinking water using a DoD Environmental Laboratory Accreditation Program (ELAP)<sup>3</sup> accredited laboratory, when available. If a DoD ELAP accredited laboratory is unavailable, the DoD Components may use an EPA or state-accredited laboratory.<sup>4</sup>

If DoD owned systems detect levels of PFOA, PFOS, or PFOS + PFOA in finished drinking water exceeding 70 parts per trillion, DoD Components will provide alternative drinking water and take actions to lower PFOS/PFOA concentrations to below 70 ppt.

To effectively track and report PFAS data, final testing results for PFAS in finished drinking water collected from DoD-owned drinking water systems will be reported to the Office of the Deputy Assistant Secretary of Defense for Environment and Energy Resilience (ODASD(E&ER)) using the attached template. Results will be submitted to ODASD(E&ER)

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<sup>2</sup> Both test methods are required for semi-annual sampling if any of the analytes that exceed the MRL are one of the four sampled using Method 537.1.

<sup>3</sup> Laboratories capable of meeting the DoD ELAP requirements applicable to these methods can be found at [www.denix.osd.mil/edqw/accreditation/accreditedlabs](http://www.denix.osd.mil/edqw/accreditation/accreditedlabs).

<sup>4</sup> Analytical services provided by outside the United States laboratories are required to be accredited to ISO 17025 by a signatory to the ILAC Mutual Recognition Arrangement (MRA) with Methods 533 and 537.1 on their scopes of accreditation. Laboratories must participate in the EPA proficiency testing studies performed as part of the UCMR 5 laboratory approval process.

within 30 days of receipt of final validated results. DoD will make results available on [defense.gov/pfas](https://defense.gov/pfas). In addition, DoD Components will continue to provide PFAS drinking water sampling results in the Defense Occupational and Environmental Health Readiness System (DOEHRS) through Fiscal Year 2024.

DoD Components will post sampling results of detected PFAS on the installation's public webpage within 30 days of receipt of final validated results, and if a Consumer Confidence Report is published for the system, the DoD Components will include the results in the CCR.

The point of contact for this matter is Ms. Alexandria Long, at 703-571-9061 or [alexandria.d.long.civ@mail.mil](mailto:alexandria.d.long.civ@mail.mil).

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