



SUSTAINMENT

ASSISTANT SECRETARY OF DEFENSE

3500 DEFENSE PENTAGON
WASHINGTON, DC 20301-3500

NOV 22 2019

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
SUPPORT)

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

The Secretary of Defense created the Per- and Polyfluoroalkyl Substances (PFAS) Task Force to manage growing health concerns over releases of these substances and the effects on military installations and their surrounding communities. To support the PFAS Task Force's efforts, we need to ensure appropriate levels of quality assurance and quality control (QA/QC) are incorporated into the sampling and analysis for PFAS in various media. The Department of Defense (DoD) will need to conduct sampling and analysis of environmental media to meet requirements under various laws such as the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Clean Water Act (CWA), and Resource Conservation and Recovery Act (RCRA).

To date, the Environmental Protection Agency (EPA) has not published methods for analyzing media other than drinking water that are capable of achieving the precision, accuracy, and limits of quantitation needed to support decision making. Therefore, the DoD Components will test media other than drinking water using the PFAS analytical methods that meet the preparation and analysis criteria contained in the DoD/Department of Energy Quality Systems Manual (QSM) for Environmental Laboratories (current version 5.3), Appendix B, Table B-15 (www.denix.osd.mil/edqw/documents/). Laboratories capable of meeting the Table B-15 criteria can be found at www.denix.osd.mil/edqw/accreditation/accreditedlabs, and by choosing "PFAS by LCMSMS Compliant with Table B-15 of QSM Version 5.1 or Latest Version" from the Method dropdown box.

The DoD Environmental Data Quality Workgroup (EDQW) has determined that EPA Draft Method 8327 will not meet DoD's needs to support decision making for the DoD's PFAS efforts. The DoD is currently working with the EPA on the development of a different method for the analysis of PFAS in various media. Once this method has been published, updated guidance will be issued.

My point of contact for this matter is Dr. Jordan Adelson, chair of the EDQW, at 843-794-7270 or jordan.adelson@navy.mil.

A handwritten signature in black ink, appearing to read 'RHM', with a long horizontal line extending to the right.

Robert H. McMahon