



## ASSISTANT SECRETARY OF DEFENSE

3500 DEFENSE PENTAGON  
WASHINGTON, DC 20301-3500

MAR 02 2020

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, DEFENSE LOGISTICS AGENCY (INSTALLATION  
SUPPORT)

SUBJECT: Per- and Polyfluoroalkyl Substances Sampling of Department of Defense Drinking  
Water Systems

### 1. Purpose

This policy identifies requirements for Per- and Polyfluoroalkyl Substances (PFAS) drinking water sampling on Department of Defense (DoD) installations where DoD is the drinking water purveyor and supersedes the Deputy Assistant Secretary of Defense for Installation and Environment memorandum dated June 10, 2016, subject "Testing DoD Drinking Water for Perfluorooctane Sulfonate (PFOS) and Perfluorooctanoic Acid (PFOA)," and the Deputy Assistant Secretary of Defense for Environment (DASD(E)) memorandum dated May 22, 2019, subject "Policy for Centralized Management of Per- and Polyfluoroalkyl Substances Drinking Water Data."

### 2. Applicability

- a. This policy shall apply to all DoD-owned drinking water systems where DoD is the water purveyor, (i.e., supplies the drinking water on the installation) at installations worldwide.
- b. Where state, local, or federal regulations for PFAS are more stringent than the guidance provided in this memorandum, the more stringent regulations will apply.

### 3. Initial Monitoring

- a. Systems that did not previously sample for all PFAS analytes specified in the Environmental Protection Agency (EPA) Method 537.1, or where the most recent PFAS drinking water sample results are more than one year old as of the date of this memorandum will collect at least one finished drinking water sample at each entry point to the distribution system by December 31, 2020.
- b. Systems where the most recent PFAS drinking water sample results are less than one year old as of the date of this memorandum, and where those sample results were obtained following the laboratory methods described in paragraph 6.a., will consider the most recent results as the initial monitoring.

#### **4. Routine Monitoring**

After initial monitoring in paragraph 3 is complete, all systems will sample finished drinking water for the PFAS analytes specified in EPA Method 537.1, according to the schedule outlined below.

- a. Systems with initial monitoring results indicating PFAS analytes are below the method reporting limit will sample once every three years.
- b. Systems with initial monitoring results showing any of the PFAS analytes exceed the method reporting limit; and PFOA, PFOS, or PFOS + PFOA results are below the United States EPA lifetime health advisory (HA) level of 70 parts per trillion, will sample quarterly for one year and once every two years thereafter until results are below the method reporting limit. Then, sampling may proceed as described in paragraph 4.a.
- c. Systems with initial monitoring results indicating PFOA, PFOS, or PFOS + PFOA results exceed the LHA level will sample quarterly until results are below the HA. Then, sampling may proceed as described in paragraph 4.b.

#### **5. Results Exceeding PFOA, PFOS, or PFOA + PFOS HA Level**

Systems with PFOA, PFOS, or PFOS + PFOA results exceeding the HA level will follow the EPA recommended actions, which include retesting, communication with state drinking water officials, proper notification to consumers, and evaluation of options to lower PFOS/PFOA concentrations, including the provision of alternative drinking water.<sup>1</sup>

#### **6. Laboratory Method and Record Keeping**

- a. For drinking water analysis, submit samples to an EPA, State, or DoD Environmental Laboratory Accreditation Program (DoD ELAP) approved laboratory certified to use EPA Method 537.1 for PFAS analysis.
- b. To effectively track and report PFAS finished drinking water data, all PFAS data collected from drinking water systems where DoD is the purveyor will be documented in the Defense Occupational and Environmental Health Readiness System- Industrial Hygiene, Environmental Health module (DOEHRS-IH EH). DOEHRS-IH EH will serve as the system of record to document all reported past, present, and future finished drinking water results.

#### **7. Notification of Results**

- a. Systems with PFOA, PFOS, or PFOS + PFOA results exceeding the HA level will post a public notice on the installation's public webpage as soon as practical but no

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<sup>1</sup> [https://www.epa.gov/sites/production/files/2016-06/documents/drinkingwaterhealthadvisories\\_pfoa\\_pfos\\_updated\\_5.31.16.pdf](https://www.epa.gov/sites/production/files/2016-06/documents/drinkingwaterhealthadvisories_pfoa_pfos_updated_5.31.16.pdf)

later than 30 days from receipt of sampling results. Systems will repeat this notice every three months until results are below the HA. Additionally, these results will be included in systems' Consumer Confidence Reports.

- b. Systems with PFOA, PFOS, or PFOS + PFOA results less than the HA, including results less than the method reporting level, will include the public notice in the Consumer Confidence report posted on the installation's public webpage.


## **8. Timeline**

Each DoD Component will begin to implement this memorandum immediately and will continue until it is superseded or rescinded.

## **9. Additional Requirements and Waivers**

- a. The DoD Components may exercise reasonable discretion to go beyond these requirements.
- b. Any waivers to this policy will be approved by the DASD(E).

My point of contact for this matter is Mr. Terry Bowers, at 703-693-9447 or [terry.l.bowers14.civ@mail.mil](mailto:terry.l.bowers14.civ@mail.mil).



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