



**DEPARTMENT OF THE AIR FORCE
HEADQUARTERS UNITED STATES AIR FORCE
WASHINGTON, DC**

31 March 2020

MEMORANDUM FOR ALL MAJCOM/SGPB

FROM: AFMRA/SG3PB
7700 Arlington Boulevard
Falls Church, VA 22042

SUBJECT: Implementation Guidance, Testing of Air Force Owned Drinking Water System for PFAS

1. BACKGROUND: This guidance implements SAF/IE direction and applies to all AF installations with DOD owned drinking water systems where the AF is the drinking water purveyor in and outside of the United States. These installations shall establish a routine monitoring program to conduct PFAS sampling and analysis in accordance with the attached SAF/IE memorandum (Attachment 1) and ASD(AS) memorandum (Attachment 2). Where final governing standards (FGS), state or local regulations for PFAS are more stringent than this guidance, the more stringent standards shall apply.

2. DISCUSSION: Use the attached flowchart at Attachment 3 to determine course of action for initial and routine monitoring and reporting.

a. If the most recent PFAS sample results are less than one year old and meet the following criteria, then consider initial monitoring requirement complete and proceed with routine monitoring:

- i. The sample was collected from a DOD-owned system (DOD is the purveyor)
- ii. The sample was finished water collected at the entry point of the distribution system
- iii. The lab used EPA Method 537.1 to analyze the samples

b. If the most recent PFAS sample results are more than one year old as of 2 March 2020, then initial monitoring is required. Follow-up actions are dependent on laboratory results and threshold levels as described in attachments.

c. Collect drinking water samples at the entry point to the distribution system. Installation may utilize any local EPA or State-certified laboratories using the EPA Method 537.1 for drinking water analysis.

d. Track and record the PFAS (all analytes) drinking water data results and location info (building number and GPS coordinates) in DOEHS and ensure all notification requirements are met.

e. Refer to paragraph 5 of the ASD(AS) memo. DOD-owned systems that exceed the EPA Lifetime Health Advisory (HA) limit will follow EPA recommended actions for retesting, communication, notification, and lowering concentrations.

f. Post public notification of results exceeding the HA on the installation web page and in the consumer confidence report.

3. RECOMMENDATION: All actions in the SAF/IE memorandum must be completed by 31 Dec 20 with a recommended target date of 31 Oct 20, if feasible.

a. Determine MAJCOM sampling requirements and shortfalls and communicate them to AFMRA/SG3PB NLT 30 Apr 2020.

b. Report MAJCOM interim status to AFMRA/SG3PB NLT 30 Sep 20. Communicate any unforeseen issues or shortfalls at any time.

c. If you have specific questions regarding this guidance, my POC is Mr. Jack Jeter at 703-681-7626, jack.h.jeter.civ@mail.mil. If you have laboratory or sample analysis questions, please contact the ESOH Service center at Toll Free 1-888-232-ESOH (3764), ESOH.Service.Center@us.af.mil.

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M. BRIAN PEAKE, Colonel, USAF, BSC
Associate Corps Chief, Bioenvironmental Engineering
Office of the Air Force Surgeon General

Attachments:

1. SAF IE Memo on Per and Polyfluoralkyl Substances Sampling of Department of Defense Drinking Water Systems_FINAL
2. ASD(AS) Memo Per- and Polyfluoroalkyl Substances Sampling of Department of Defense Drinking Water Systems, 02 Mar 2020
3. AFMRA/SG3PB Sampling Flowchart



DEPARTMENT OF THE AIR FORCE

WASHINGTON, DC 20330-1000

OFFICE OF THE ASSISTANT SECRETARY

17 Mar 2020

MEMORANDUM FOR AF/A4, AF/SG

FROM: SAF/IE

1665 Air Force Pentagon
Washington, DC 20330-1665

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

This letter supersedes the Assistant Secretary of the Air Force (Installations, Environment, and Energy) (SAF/IE) memorandum dated 12 Aug 2016, "Testing DoD Drinking Water for Perfluorooctane Sulfonate (PFOS) and Perfluorooctanoic Acid (PFOA)." Therefore, AF/SG and AF/A4 will issue updated implementation guidance for all AF-owned drinking water systems where the AF is the water purveyor in and outside the United States in accordance with the attached memorandum and aligned with the following:

a. AF systems that did not previously complete sampling for all PFAS analytes or AF systems with sample results that are more than one year old must complete initial monitoring requirements as outlined in the attachment by 31 Dec 2020

b. Establish a routine monitoring program to sample finished drinking water for PFAS analytes as outlined in the attachment


c. Submit PFAS samples for drinking water analysis to an approved laboratory certified to use Environmental Protection Agency (EPA) Method 537.1

d. Track and report all PFAS finished drinking water data in Defense Occupational and Environmental Health System – Industrial Hygiene, Environmental Health module

e. Post public notification of results exceeding the Health Advisory (HA) level on the installation's public web page no later than 30 days after receiving results and include all PFAS drinking water results in the system's next consumer confidence report

Additionally, AF drinking water systems must comply with the most stringent of state, local, or federal PFAS regulations. AF drinking water systems that exceed the HA 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 below the HA.

Our point of contact for this matter is Col Freeman Holifield, DSN 223-2055, freeman.holifield.mil@mail.mil.



JOHN W. HENDERSON, P.E.
Assistant Secretary of the Air Force (Installations,
Environment, and Energy)

Attachment: ASD(AS) Memo, Per- and Polyfluoroalkyl Substances Sampling of Department of Defense Drinking Water Systems, 02 Mar 2020

cc:
NGB/CR
AFIMSC/CC
AFCEC/CZ
AFCEC/CX
NGB/SG
NGB/A4
AFRC/SG
AFRC/A4



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.¹

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

¹ https://www.epa.gov/sites/production/files/2016-06/documents/drinkingwaterhealthadvisories_pfoa_pfes_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.



Peter J. Potochney
Acting

Attachment 3 – AFRMA/SG3PB Sampling Flowchart

AIR FORCE BASE

2020 PFAS Sample Criteria.

1. The sample was collected from a DOD-owned (where DOD is the drinking water purveyor)
2. The sample was finished water collected at the entry point of the distribution system
3. The lab used EPA Method 537.1 to analyze the samples

Milestones:

- 30 Apr 20: MAJCOMS report requirements and shortfalls to AFMRA/SG3PB
- 30 Sep 20: MAJCOMS report interim status
- 31 Oct 20: Target completion date
- 31 Dec 20: Mission Complete (Firm date)

Definitions:

- MRL – Method Reporting Limit
- HA – Health Advisory (Lifetime HA = 70 ppt)

