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**Bureau of Water Resources
Drinking Water Program
Policy on PFAS Public Drinking Water Testing
Using EPA Method 533 and EPA Method 537.1, v. 2**

Effective Date: 06-21-2024
Supersedes Policy #: N/A

Policy #: BWR/DWP 2024-01

Approved by:

Kathleen Baskin, Assistant Commissioner, Bureau of Water Resources

- I. Purpose.** This policy is adopted by the Massachusetts Department of Environmental Protection (MassDEP) Drinking Water Program (DWP) to afford Massachusetts suppliers of water two additional methods of analysis—EPA Method 533 and EPA Method 537.1, v. 2—to satisfy PFAS analytical requirements set forth in 310 CMR 22.07G.

The Department has reviewed EPA Method 533 and EPA Method 537.1, v. 2, and determined that these alternative techniques are substantially equivalent to the prescribed methods in both precision and accuracy as they relate to the determination of compliance with the Massachusetts maximum contaminant level for PFAS6. MassDEP has further determined that the use of these techniques will not alter the frequency of monitoring otherwise required by 310 CMR 22.07G.

On April 10, 2024, USEPA announced new federal PFAS regulations. USEPA stated:

In order to reduce costs for systems, systems would be allowed to use previously collected monitoring data to satisfy the initial monitoring requirements, if the sampling was conducted using EPA Methods 533 or 537.1 as part of UCMR 5 or other state-level or other appropriate monitoring campaigns.

As of July 2023, there were 48 laboratories approved by the EPA to submit UCMR5 PFAS results by both Methods 533 and 537.1. These approved laboratories have submitted PFAS drinking water results by these methods for 144 Massachusetts PWSs under the UCMR5.

As per 310 CMR 22.11A(1), no laboratory may conduct a required drinking water analysis or report such an analysis to a supplier of water or to the Department for purposes of compliance, unless the Department has certified the laboratory, pursuant to 310 CMR 42.00. 310 CMR

22.11A(1). However, the Department may accept results of analyses performed by EPA certified labs, as provided in 310 CMR 22.11A(2):

The Department may accept results of analyses performed by laboratories which are certified by the EPA or any other certification authority approved by the Department. Such laboratories must continue to participate in performance evaluation studies and in laboratory intercomparison cross check studies which include the analyses for which the laboratory is certified or seeking certification.

By allowing the two additional EPA Methods pending the addition of those methods of analysis to 310 CMR 22.07G(12)(a) as approved methods of analysis, this policy is intended to reduce duplicative sampling and/or analysis that PWSs may otherwise be required to undertake in order to satisfy both State and federal requirements.

- II. Applicability.** This policy applies to all public water suppliers subject to regulation under 310 CMR 22.00 that are required to submit PFAS analytical results pursuant to 310 CMR 22.07G.
- III. Conditions for Acceptance.** MassDEP will accept PFAS drinking water testing results for samples using [EPA Method 533 or EPA Method 537.1, v. 2](#), if the following requirements are met:
- A. Labs must be EPA approved for the applicable analytic method. The analysis laboratory is currently approved by EPA for Method 533 and/or Method 537.1, v. 2, as applicable, under UCMR5. The list of approved labs is [here](#). The laboratory must have an “X” in the EPA 533 column and/or in the EPA 537.1, Rev. 2.0 column. PFAS drinking water testing results analyzed using EPA Method 533 or EPA Method 537.1, v.2, as applicable, will no longer be accepted from laboratories that withdraw from EPA’s Laboratory Approval Program or are removed from the approved labs list, with respect to the applicable EPA method. (NOTE: Accreditation by the National Environmental Laboratory Accreditation Program (NELAP) or any other accreditation body would not be an acceptable alternative to participating in EPA’s UCMR5 Laboratory Approval Program.)
- B. Labs must comply with MassDEP’s Laboratory Certification Program. The analysis laboratory must comply with the MassDEP’s Laboratory Certification Program regulations in 310 CMR 42.00 for reporting requirements (310 CMR 42.13) and maintenance of records (310 CMR 42.14).
- C. Analysis must satisfy MassDEP Drinking Water Program Requirements. The analysis laboratory will comply with MassDEP’s Drinking Water Program requirements in 310 CMR 22.00, with the exception of approved laboratory methods listed in 22.07G(12)(a), to allow the reporting of test results using EPA Method 533 and/or EPA Method 537.1, v. 2. **No PFAS drinking water testing results using either EPA Method 533 or EPA Method**

537.1, v.2 that fail to satisfy all conditions set forth in this policy shall be accepted for purposes of complying with 310 CMR 22.07G.

1. The analysis laboratory will follow EPA [Method 533](#) and/or EPA [Method 537.1, v. 2](#) as written.
2. The laboratory will report field samples and field reagent blank results for all Method 533 and/or Method 537.1, v. 2, as applicable, PFAS compounds, including Method Detection Limits (MDLs) and Minimum Reporting Limits (MRLs). MRLs for the PFAS6 compounds (PFOS, PFOA, PFHxS, PFNA, PFHpA, and PFDA) must be no greater than 2.0 ng/L. Detects below the MRL must be reported as estimated values (J-qualified) for concentrations down to the greater of 1/3 the MRL or the MDL. Detected concentrations of these six PFAS compounds at or above the MRL are summed to comprise the PFAS6 sum.
3. The laboratory will follow the MassDEP PFAS Report Guidance document for their required PDF laboratory reports.
4. The laboratory will produce and upload a data file of PFAS drinking water results to MassDEP's electronic reporting portal, eDEP, and comply with the upload requirements¹. The data file must include results for all target analytes (18 for 537.1 and 25 for 533), the PFAS6 sum, and an attached laboratory report PDF.

IV. Expiration. This policy will expire when MassDEP promulgates new PFAS regulations and adds EPA Method 533 and Method 537.1 v. 2 to 310 CMR 22.07G(12)(a). Provided, however, expiration of this policy shall not affect the acceptability of testing results submitted pursuant to and in accordance with this policy prior to its expiration.

¹ Until MassDEP's electronic portal, eDEP, is ready to accept these results, laboratories may use the Laboratory Analytical Form available here: <https://www.mass.gov/lists/laboratory-analytical-forms>. This form will not be accepted for any other analytical methods. When eDEP is ready to accept Method 533 and Method 537.1 v.2 results, public water suppliers and labs will be notified and required to report these results electronically.