



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Kathleen A. Theoharides
Secretary

Martin Suuberg
Commissioner

September 3, 2020

Re: Free PFAS Lab Analyses Program and Upcoming PFAS Regulations

Dear Public Water Suppliers:

To address emerging concerns about health impacts associated with per- and polyfluoroalkyl substances (PFAS), the Massachusetts Department of Environmental Protection (MassDEP) in January 2020 revised its Office of Research and Standards Guideline (ORSG) for drinking water to 20 parts per trillion (ppt) for the sum of six PFAS compounds: perfluorooctanesulfonic acid (PFOS), perfluorooctanoic acid (PFOA), perfluorohexane sulfonic acid (PFHxS), perfluorononanoic acid (PFNA), perfluoroheptanoic acid (PFHpA), and perfluorodecanoic acid (PFDA). In addition, the MassDEP Drinking Water Program proposed a drinking water standard, or a Maximum Contaminant Level (MCL) for the same six PFAS - with the intention to promulgate final regulations in 2020. For more information about the establishment of an MCL, please see: <https://www.mass.gov/lists/development-of-a-pfas-drinking-water-standard-mcl>.

To assist public water suppliers (PWS) in preparing for the new PFAS MCL, the Baker-Polito Administration provided funding to MassDEP in the FY 2020 Supplemental Budget for testing for PFAS. ***I am writing to encourage all Public Water Suppliers (PWS) to take full advantage of the Commonwealth's Free PFAS Lab Analyses Program (described below) and to conduct sampling and analyses for PFAS in your public water system now, before the regulations are finalized and while there is funding available for analysis.*** Timely PFAS analyses and reporting help all of us with identifying potential sources of PFAS and designing and implementing protective public health measures as we move forward. In MassDEP's experience, early sampling is helpful in determining if issues exist and will give communities valuable time to work with us on designing and financing solutions. Early testing for PFAS may also enable communities to take advantage of limited funding programs providing grants for remediation design and zero percent loans for construction.

More than 100 public water suppliers have already signed up to take advantage of the Free PFAS Lab Analyses Program. If your system has already participated in the free lab analyses program, we thank you for early efforts to identify PFAS levels in your system and the Commonwealth. Public water suppliers of all sizes, including smaller community systems; Non-Transient, Non-Community systems; and Transient Non-Community systems are encouraged to sign up for free PFAS lab analyses as early as possible to ensure that they receive testing before the end of the Free PFAS Lab Analyses Program on June 30th, 2021.

This information is available in alternate format. Contact Michelle Waters-Ekanem, Director of Diversity/Civil Rights at 617-292-5751.

TTY# MassRelay Service 1-800-439-2370

MassDEP Website: www.mass.gov/dep

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For specific information on what happens when you test and receive laboratory results, please see the attached Frequently Asked Questions on this Free PFAS Lab Analyses Program.

The FY 2020 Supplemental Budget also included funding for testing of sufficient private wells to characterize PFAS presences in the Commonwealth. MassDEP is developing a program to identify specific private wells to characterize the presence of PFAS and will work with its UMass contractor, local Boards of Health, and other local partners to target and identify specific private wells for testing.

For more information about PFAS and the Department's efforts to address these contaminants, please see: <https://www.mass.gov/info-details/per-and-polyfluoroalkyl-substances-pfas> or contact MassDEP's Drinking Water Program at program.director-dwp@mass.gov.

For a PWS to indicate interest in free PFAS laboratory analyses and available funding for design and treatment, please complete a brief survey at <https://www.surveymonkey.com/r/S7QHNF2> or send a request with the information described in the survey (e.g. PWS name, PWS ID#, # of sources already tested, number of sources to be tested, and system population) to program.director-dwp@mass.gov, Subject: "PFAS free lab analyses."

I urge you to take full advantage of the **free PFAS testing** the Department is offering as we work together to address this emerging contaminant as well as preparing for final regulations this year.

Sincerely,



Yvette DePeiza
Director, Drinking Water Program
MassDEP/BWR

Attachment: PWS PFAS Free Analyses Program FAQ

cc: EPA, DPH, SDWAAC, S70, BOH, Other interested parties

THIS DOCUMENT CONTAINS IMPORTANT INFORMATION FOR YOUR SYSTEM. HAVE SOMEONE TRANSLATE IT FOR YOU OR SPEAK WITH SOMEONE WHO UNDERSTANDS IT.

If you need this document translated, please contact MassDEP's Diversity Director, Michelle Waters-Ekanem, Diversity Director/Civil Rights: 617-292-5751 TTY# MassRelay Service 1-800-439-2370. You may also contact the Drinking Water Program at program.director-dwp@mass.gov.

Frequently Asked Questions about the MassDEP Free PFAS Lab Analyses Program for Public Water Suppliers (PWS)

1. What are PFAS and why are they a concern?

PFAS are a group of chemicals that have been found in some firefighting foams, spills, landfills, food packaging, outdoor clothing, carpets, leather goods, ski waxes, and more. PFAS have been found to seep into surface soils, groundwater or surface water, and thereby contaminate drinking water. PFAS exposures have been linked to a variety of health risks, particularly in women who are pregnant or nursing, and in infants. Six PFAS were proposed for regulation in public drinking water in Massachusetts: perfluorooctanesulfonic acid (PFOS), perfluorooctanoic acid (PFOA), perfluorohexane sulfonic acid (PFHxS), perfluorononanoic acid (PFNA), perfluoroheptanoic acid (PFHpA), and perfluorodecanoic acid (PFDA). MassDEP will abbreviate this set of six PFAS as “PFAS6.” MassDEP’s Office of Research and Standards has established a guideline (ORSG) of 20 parts per trillion (ppt) for the total (sum) of PFAS6 levels in drinking water. The proposed change to the Massachusetts drinking water regulations would establish a Maximum Contaminant Level (MCL) for PFAS6 at the same level and require that Public Water Suppliers (PWS) sample for PFAS in their drinking water. For information on the proposed MCL see: <https://www.mass.gov/lists/development-of-a-pfas-drinking-water-standard-mcl>.

2. Why should a PWS sign up for free PFAS lab analyses?

A PWS can use the Free PFAS Lab Analyses Program to evaluate its finished and source waters and initiate early fiscal and technical assistance from MassDEP, saving money, preparing for upcoming changes and initiating early public health protection measures, if warranted.

3. When will PWS be required to sample for PFAS?

The drinking water PFAS regulations propose a staggered implementation schedule:

- Large PWS (those serving > 50,000 population) will likely start sampling in early 2021.
- Medium-sized PWS (between 10,000 and 50,000 population served) will start sampling next year, likely in early to mid 2021.
- Small PWS (<10,000 population) will likely start sampling in late 2021. Most non-transient non community (NTNC) PWS will fall into this category.
- Transient Non-Community (TNC) systems will likely be expected to collect one sample by September 30th, 2022.
- Fully Consecutive Public Water Systems will be exempt from conducting PFAS compliance monitoring for purchased water, unless required by MassDEP.

By taking full advantage of the Free PFAS Lab Analyses Program, all PWS will have the opportunity to receive initial free PFAS lab analysis in advance of the proposed PFAS regulation. This is a savings of approximately \$300.00 per sample and includes the associated field blank analyses.

4. Do the proposed PFAS regulations require all PWS to sample for PFAS?

Yes, all PWS, including Community (COM) systems, Non-Transient Non-Community (NTNC) systems, and Transient Non-Community (TNC) systems, are required to sample for PFAS. All systems will have to collect at least one sample for PFAS analyses. To get ready for the proposed MCL and to save money on lab analyses, ***all PWS should take advantage of the Free PFAS Lab Analyses Program before the funding opportunity ends on June 30, 2021.***

5. Can the samples collected under the Free PFAS Lab Analyses Program be used toward regulatory compliance sampling?

Yes. Analyses conducted under the Free PFAS Lab Analyses Program which pass QA/QC may be used toward regulatory baseline testing requirements. *Note: As the free funding is scheduled to expire by June 30, 2021, small systems are encouraged to register for sampling under the Free PFAS Lab Analyses Program and collect samples **as soon as possible** so that they can reduce their implementation costs.*

6. How does a PWS sign up for free PFAS lab analyses?

Visit <https://www.surveymonkey.com/r/S7QHNF2> to sign up for the Free PFAS Lab Analyses Program, or send a request with the information described in the survey (e.g. PWS name, PWS ID#, number of sources already tested, number of sources to be tested, and system population) to program.director-dwp@mass.gov, Subject: "Free PFAS Lab Analyses Program - Sampling questions".

7. How does the PWS get the water sample bottles for the Free PFAS Lab Analyses Program?

Once the system signs up for the Free PFAS Lab Analyses Program:

- 1) The MassDEP Drinking Water Program or its UMass contractor will contact the PWS to verify the locations of raw and finished water sources to be sampled and arrange for a sample collection timeframe.
- 2) The MassDEP Contracted Laboratory will send a sampling kit to the PWS containing the Chain-of-Custody form and the sample bottles. Return postage will be included.

Note: MassDEP has contracted with five labs to provide the Free PFAS Lab Analyses. Your contacts for any questions regarding the status of your Free PFAS Lab Analyses will be:

- The UMass contractor Technical Assistance Providers at pfas-testing@umass.edu.
- The MassDEP Drinking Water Program at program.director-dwp@mass.gov. Subject: "Free PFAS Lab Analyses Program - Sampling questions".

8. Who collects the water samples for the Free PFAS Lab Analyses Program?

The PWS are responsible for collecting the water samples. *Please note: The costs incurred by utilizing contracted certified operators to collect the Free PFAS Lab Analyses samples ARE NOT covered by this program and are the responsibility of the PWS.* There is a training video available at

<https://www.youtube.com/watch?v=zrwhwSI-R9M> to demonstrate how to collect drinking water samples for PFAS. The following technical assistance is also available:

- MassDEP UMass contractors at pfas-testing@umass.edu.
- MassDEP technical assistance providers at program-director-dwp@mass.gov, Subject: "Free PFAS Lab Analyses - Sampling questions".

9. Will the Free PFAS Lab Analyses Program cover the costs of confirmation sampling?

MassDEP strongly encourages PWS to confirm all initial PFAS results greater than 2 ppt, the Minimum Reporting Level (MRL). MassDEP will cover lab analysis costs to confirm all initial results over 2 ppt during the Free PFAS Lab Analyses Program. Lab analysis of the confirmatory sample is part of the free analyses. **Please note: confirmation sampling is required for finished water PFAS6 results greater than 20 ppt.**

10. How are PWS informed of the PFAS lab analysis results?

Prior to the availability of eDEP for electronic data reporting (Tentative date for completion of eDEP data reporting capability - December 2020):

- Labs will email copies of the lab reports to the PWS for notification and to MassDEP/UMass (MassDEP's contractor for this initiative) for notification and QA/QC of the results. *The PWS may contact MassDEP/the UMass Contractor at pfas-testing@umass.edu with any questions regarding the lab reports.*
- MassDEP/UMass will contact the lab and the PWS to resolve any reporting and/or analysis issues identified during QA/QC. If corrections or clarifications are needed, the lab will email corrected lab reports to the PWS and MassDEP/UMass.
- If no corrections or clarifications are needed, MassDEP will accept the data and enter it into the MassDEP Drinking Water database.
- Once data entry of the results is completed the data will be accessible to the general public via the EEA Data Portal.

When eDEP is available for electronic data reporting:

- The laboratory performing the analysis will report the results through eDEP, MassDEP's online reporting system.
- The lab will share the data with the PWS in eDEP. The lab is responsible for notifying the PWS that the results are available in eDEP for viewing.
- MassDEP will conduct QA/QC on the data submission in eDEP. If any reporting and/or analytical issues are identified during QA/QC, MassDEP/UMass Contractors will discuss with the lab, MassDEP and the PWS to correct any errors. If any corrections or clarifications are needed the laboratory will resubmit the data via eDEP.
- The lab will share the resubmitted data with the PWS and notify the PWS when data is available to view in eDEP.
- If no corrections or clarifications are needed, MassDEP will accept the data and it will be accessible to the general public via the EEA Data Portal.

11. What if PFAS6 is not detected in the drinking water samples (this means each of the six PFAS in PFAS6 is at a level below 2 ppt)?

If none of the PFAS6 compounds are detected in the initial samples (**all of the 6 PFAS compounds are below the minimum reporting level of 2 ppt**), and the lab report passes MassDEP's QA/QC protocol, no further action is required of the PWS under the Free PFAS Lab Analyses Program.

12. What if PFAS6 is detected in the samples at a level greater than the 2 ppt?

If PFAS6 is detected in the initial sample (that is, any of the 6 PFAS compounds is reported as a value at or above 2 ppt) and the lab report passes QA/QC:

- MassDEP strongly encourages that confirmatory samples be collected for initial samples >2 ppt during this Free PFAS Lab Analyses Program. The confirmatory samples are part of the free analyses. Please note: PWS with finished water PFAS6 results greater than 20 ppt are required to conduct confirmatory sampling.
- MassDEP or UMass will contact the PWS to arrange a second round of sampling (confirmatory sampling). Sampling locations will include any finished water source where PFAS was detected as well as raw water sources if blended at the finished entry point.
- The results of the initial and confirmatory analysis will be averaged.

13. What if the PFAS6 level is confirmed above the ORSG/proposed MCL of 20 ppt?

If the average PFAS6 level in the initial and confirmatory samples is **above 20 ppt** and the lab report passes MassDEP's QA/QC protocol, the PWS will be contacted by telephone and email by MassDEP. Upon receipt of the data, the PWS must do the following:

- Contact and inform the chief elected local official(s) or Town administrative leader(s) (e.g. Select Board Members, Town Administrator, etc.) and public health official(s) in their community/communities of the PFAS6 results, as soon as possible but no later than thirty (30) days from the date of the MassDEP notification of the confirmed results.
- Notify the PWS consumers of the PFAS6 results as soon as possible but no later than thirty (30) days from the date of MassDEP's notification of the confirmed results. *MassDEP will provide a template public notice/health advisory to inform your customers about the potential health concerns of exposure to elevated concentrations of PFAS6 in drinking water. If you choose to use a different notice or add any system specific information to the template public notice/health advisory you must receive written approval from your MassDEP regional office.*
- Certify to MassDEP that you have issued the consumer public notice/health advisory no later than ten days after completing the notification requirements. *MassDEP provides a standard public notice certification form at <https://www.mass.gov/lists/public-notification-forms-and-templates>.*
- Work with the MassDEP Regional Office to develop and implement a plan to reduce the level of PFAS6 at the location(s) specified to a level reliably and consistently below 10 ppt. The plan may include blending of sources, source removal, use of interconnections, treatment, etc.
- Depending on the plan of action to address the PFAS6 levels, the MassDEP may require the system to conduct additional monitoring for PFAS until results are reliably and consistently below 10 ppt. *Please note additional monitoring could be monthly.*

14. Does the PWS have to include PFAS results in its Consumer Confidence Report?

Yes. Community (COM) PWS are required to report any detection of any PFAS in its consumer confidence report (CCR). If the PFAS6 detected is over the MCL or proposed MCL, the CCR must also include potential adverse health effects language. MassDEP will provide PWSs with template CCR information including adverse health effects language. If you choose to use different CCR information or add any system-specific information to the template notice, you must receive written approval from your MassDEP regional office. TNC or NTNC systems must post the CCR information when provided by MassDEP. A PWS with no detections of PFAS may choose to report the results in its CCR to inform its consumers that testing has occurred.

15. Does the PWS have to provide public notice of PFAS6 results?

Yes. Public notice is required for confirmed PFAS6 results greater than 20 ppt for COMs and NTNCs or as otherwise specified by the Department based on a health risk determination. TNCs may be required to provide public notice if so specified by the Department based on a health risk determination.

16. Is there free PFAS testing for private wells?

MassDEP will also be testing select private wells in communities where the majority of the population are not served by PWS to enable MassDEP to assess PFAS levels in groundwater across the Commonwealth. The information collected from both PWS and select private wells will inform MassDEP's strategy for treatment and mitigation of this emerging contaminant. While the Massachusetts Department of Public Health (DPH) regulates private wells, MassDEP will work with its UMass Contractor, DPH, local Boards of Health, and other local partners to select and provide free lab

analyses for specific private wells. MassDEP will also provide technical assistance information on PFAS for all private well owners as part of its private well guidance and outreach program that will engage Boards of Health and other local partners. For more information about PFAS and the Department's efforts to address PFAS contaminants, please see: <https://www.mass.gov/info-details/per-and-polyfluoroalkyl-substances-pfas> or contact MassDEP's Drinking Water Program at program.director-dwp@mass.gov with the Subject: "Free PFAS Lab Analyses Program - Sampling questions".

17. Where can I find out more about PFAS?

Visit the MassDEP PFAS Page:

<https://www.mass.gov/info-details/per-and-polyfluoroalkyl-substances-pfas>

MassDEP Fact Sheet - PFAS in Public Drinking Water Supplies - Questions and Answers for Public Water Systems:

<https://www.mass.gov/doc/per-and-polyfluoroalkyl-substances-pfas-in-public-drinking-water-supplies-questions-and-answers/download>

MassDEP Factsheet - PFAS in Private Wells:

<https://www.mass.gov/info-details/per-and-polyfluoroalkyl-substances-pfas-in-private-well-drinking-water-supplies-faq>

Massachusetts Department of Public Health PFAS Information:

<https://www.mass.gov/service-details/per-and-polyfluoroalkyl-substances-pfas-in-drinking-water>

18. Who can I contact for information or technical assistance on free PFAS samples?

Send an email with your questions to pfas-testing@umass.edu or to Program.director-DWP@mass.gov with the Subject: "Free PFAS Lab Analyses Program - Sampling questions".

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