



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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June 12, 2019

Subject: UCMR3 Sampling Data for Per- and
Polyfluoroalkyl Substances (PFAS)
with Lower Reporting Levels

IMPORTANT NOTICE

Dear Public Water Supplier who participated in USEPA UCMR 3 (2013-2015) PFAS monitoring:

The purpose of this letter is to notify you that the laboratory you used for the USEPA third round of the Unregulated Contaminant Monitoring Rule (UCMR3) during the period of 2013-2015 may have lower reporting level data for your Per- and Polyfluoroalkyl substances (PFAS) samples, and we are writing to encourage you to contact the laboratory to obtain any such data.

As described in our recent April 17, 2019 communication, located at <https://www.mass.gov/doc/letter-to-pws-about-important-updated-information-regarding-pfas/download>, MassDEP is re-evaluating recommended limits for PFAS in drinking water and has proposed lowering them because new analysis of studies have identified public health risks associated with ingestion of lower levels of PFAS. MassDEP's activities include a recently-proposed groundwater cleanup standard for PFAS currently out for public comment, consideration of revisions to the current Office of Research and Standards Guideline (ORSG) for PFAS, and initiation of the process to establish a PFAS Maximum Contaminant Level (MCL). MassDEP's proposed groundwater cleanup Method 1 GW-1 Standard, which will be applicable to groundwater protected for its current and/or future use as drinking water, is 20 part-per trillion (ppt) for the sum of six PFAS compounds (PFOA, PFOS, PFNA, PFHxS, PFHpA, and PFDA). Public comments received on the proposed GW-1 Standard will be considered by the Department in any revision to the ORSG and during MCL development.

Your UCMR3 PFAS Results

One hundred and seventy-nine (179) Massachusetts public water systems participated in the USEPA's UCMR3 monitoring program between 2013 and 2015. Your public water system was one of the participants and previously sampled your drinking water sources at each entrance point to the distribution system for six PFAS compounds

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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(note that the UCMR3 PFAS list included perfluorobutanesulfonic acid, PFBS, and did not include PFDA). For more information on the UCMR3 see <https://www.epa.gov/dwucmr>.

At the time of the UCMR3 monitoring, the laboratory minimum reporting levels required by EPA for the six PFAS compounds varied from 10 ppt to 90 ppt (equivalent to 0.01 to 0.09 micrograms-per-liter (ug/L)). MassDEP is aware that some of the laboratories that analyzed the samples taken during UCMR3 achieved lower reporting limits than those required by EPA, but only reported concentrations greater than EPA's required reporting limits. Therefore, there may be lower level PFAS data available for your UCMR3 drinking water samples. For your UCMR3 testing results and laboratory contact information see the attached summary. These results are also located at <https://www.mass.gov/files/documents/2017/11/15/ucmr3-2017-02.xlsx>. Results from UCMR3 were reported in micrograms-per-liter (ug/L).

What should you do about your UCMR3 PFAS results?

Given the changes in PFAS information, including MassDEP's proposed groundwater cleanup standard, reevaluation of the ORSG, the development of a drinking water MCL, and the possible availability of lower level UCMR3 results, MassDEP is recommending that you do the following:

- **Contact your UCMR3 (2013-2015) laboratory** to see if your data was generated with lower reporting limits than was reported. Please be aware that only you, the client of the UCMR3 laboratory, can request this data.
Please note:
 1. *MassDEP contacted one UCMR3 laboratory and they indicated that there may be a cost associated with obtaining a summary report of this data. If the laboratory already stored the results as a value below the UCMR3 MRL in their laboratory Information Management system (LIMS), it was estimated that a copy of the database summary could cost approximately \$75.00 and that a formal new full report could cost approximately \$150.00 – \$200.00. However, if the laboratory only stored results in their LIMS as a value above the UCMR3 MRL and stored all others as non-detects then the cost of re-examining/retrieving the results could be higher. For comparison, please note current PFAS analysis cost is approximately \$300.00 per sample.*
 2. *Much more is known now than when UCMR3 testing occurred about the importance of using appropriate sample protocols when collecting PFAS samples. If you are concerned that appropriate sample protocols may not have been followed during your UCMR3 sampling, you might consider resampling.*
- **If you can obtain results with lower reporting levels from your UCMR3 laboratory, please share them with MassDEP/DWP** by sending a copy of the data to program.director-dwp@mass.gov, Subject "PFAS". This additional data will inform follow up activities for any PWS that has PFAS values of concern, and it will help guide MassDEP in the future analysis and policy-making regarding PFAS in drinking water. For more information on detection limits and PFAS, see this presentation by the Eurofins Eaton Analytical laboratory at https://greensciencepolicy.org/wp-content/uploads/2017/12/Andy_Eaton_UCMR3_PFAS_data.pdf.
- **If your laboratory does not have or is unable to provide data with lower detection limits, and you are concerned about potential PFAS in your water, you may want to proactively retest your drinking water** at the entrance points to your distribution system and provide us with your analytical results.
- **If you retest, MassDEP strongly recommends that you do the following:**
 - Collect a sample at each entrance point to your distribution system.
 - Collect all samples following the Sample Collection procedures located at <https://www.mass.gov/doc/field-sampling-guide-for-pfas/download>.
 - Use EPA Method 537 or 537.1
 - Until MassDEP establishes a regulation and/or certification program for PFAS the MassDEP Drinking Water Program (DWP) will accept results of analyses performed by laboratories:

- ✓ Previously [Approved by EPA for UCMR3 monitoring](#) using EPA Method 537 and also approved by the MassDEP DWP;
Or
- ✓ Certified by another state or certification authority for EPA Method 537 or 537.1 **and approved by the MassDEP Drinking Water Program in accordance with 310 CMR 22.11A (2)**. See list of MassDEP Drinking Water Program approved laboratories at: <https://www.mass.gov/info-details/per-and-polyfluoroalkyl-substances-pfas#laboratories-and-testing-for-pfas->
- Report all contaminants in the scope of either method (537 or 537.1) and report PFOA, PFOS, PFNA, PFHxS and PFHpA at a Minimum Reporting Level (MRL) of 5 parts per trillion (ppt) or lower and all other contaminants at the same level or, if not achievable, at the lowest feasible MRL.
- Report all results to your MassDEP regional office using the laboratory reporting form located at <https://www.mass.gov/doc/per-and-polyfluoroalkyl-substances-pfas-report/download>.
- **For a factsheet on Questions and Answers for Public Water Systems regarding PFAS** see <https://www.mass.gov/media/1995511>

What happens if PFAS is detected in your water at the entrance point(s) to the distribution system?

If PFAS is found in your finished water, another sample should be collected from the same location(s). This sample will be used to confirm the initial result(s). If the initial result was greater than 5 ppt, it may be prudent to also collect raw water samples from each source or manifold source(s) to determine which source(s) the PFAS came from. See the MassDEP Fact Sheet: PFAS in Public Drinking Water Supplies – Q&A for PWS for an explanation of how to interpret estimated values in a lab report.

- If the confirmed PFAS level (average of initial and confirmatory sample) is above the ORSG of 70 ppt, you will be encouraged to notify your elected officials and consumers of the results and updated information on PFAS and to reduce the level of PFAS in the finished water by using alternative sources, blending sources or installing treatment.
- If the confirmed PFAS level is between the ORSG of 70 ppt and the proposed Massachusetts Contingency Plan (MCP) groundwater cleanup standard of 20 ppt, MassDEP will encourage you to notify your elected officials and consumers to make them aware of the results and updated information on PFAS. You will be required to monitor quarterly for PFAS and MassDEP will also recommend that you consider what options are available to you to lower the PFAS level in the finished water.
- If the confirmed PFAS level is below the proposed MCP groundwater cleanup standard of 20 ppt but at or above 10 ppt, MassDEP will recommend that you evaluate your operations, review source protection practices, monitor at a frequency recommended by the Department and continue routine operations.
- If the confirmed PFAS level is below 10 ppt, MassDEP will recommend continuance of routine operations.

MassDEP must approve all required Public Notices and will work with you on all steps to address PFAS in drinking water. You are also reminded that you will have to include all detected unregulated contaminants in your Consumer Confidence Reports.

For more information about PFAS in drinking water see:

- MassDEP webpage <https://www.mass.gov/info-details/per-and-polyfluoroalkyl-substances-pfas>
- MassDEP Fact Sheet – PFAS in Public Drinking Water Supplies – Q&A for PWS <https://www.mass.gov/media/1995511>
- MassDEP Fact Sheet – PFAS in Drinking Water: Questions and Answers for Consumers. <https://www.mass.gov/doc/massdep-fact-sheet-pfas-in-drinking-water-questions-and-answers-for-consumers>
- USEPA's Drinking Water Health Advisories can be found at: <https://www.epa.gov/ground-water-and-drinking-water/drinking-water-health-advisories-pfoa-and-pfos>

- The Centers for Disease Control and Prevention’s Public Health Statement for PFOS and PFOA can be found at: <https://www.atsdr.cdc.gov/pfas/index.html>
- For additional information on possible health effects, you may contact the Massachusetts Department Environmental Protection, Office of Research and Standards, at 617-556-1165.

MassDEP Drinking Water Program contacts:

Region	Name	Phone #	Email
Western	Catherine Wanat	413-755-2216	Catherine.wanat@mass.gov
Central	Robert Bostwick	508-849-4036	Robert.Bostwick@mass.gov
Northeast	Amy LaPusata	978-694-3291	Amy.lapusata@mass.gov
Southeast	William Schwartz	508-946-2818	William.schwartz@mass.gov
Boston: Program.director-dwp@mass.gov or Margaret Finn 617-292-5746			

If you have any additional questions about what to do about your UCMR3 (2013-2015) PFAS results, please contact the Drinking Water Program at program.director-dwp@mass.gov, and use the subject line “PFAS.”

We look forward to working with you on this important public health protection issue and will work with you on all steps to address PFAS in drinking water.

Sincerely,



A.M. Yvette DePeiza
Director, Drinking Water Program
MassDEP/BWR

ecc: MassDEP/DWP Regional Chief, ORS, MDPH, EPA