



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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Governor

Kimberley Driscoll
Lieutenant Governor

Rebecca L. Tepper
Secretary

Bonnie Heiple
Commissioner

August 29, 2024

RE: MassDEP Announces Policy on Public Drinking Water UCMR5 PFAS Testing Using EPA Method 533 and EPA Method 537.1, v. 2

Dear UCMR5 Public Water Supplier:

The MassDEP drinking water PFAS regulation at 310 CMR 22.07G went into effect in 2020, setting a Maximum Contaminant Level (MCL) for the sum of six PFAS compounds at 20 ng/L. This regulation requires the use of either of two laboratory methods: 537 and 537.1 (version 1). The U.S. EPA finalized a drinking water PFAS regulation in 2024, which requires either method 537.1 (version 2) or 533 for compliance monitoring. These methods are also required in EPA's UCMR5 program.

MassDEP is in the process of revising its regulation to be at least as stringent as the EPA regulation. Until that revision is finalized, MassDEP has issued Policy #: BWR/DWP 2024-01, "Policy on PFAS Public Drinking Water Testing Using EPA Method 533 and EPA Method 537.1, v. 2" to allow PWS **participating in UCMR5 testing** to use EPA Method 533 and EPA Method 537.1, v. 2 for compliance with 310 CMR 22.07G, as applicable. This policy allows PWS to have their PFAS compliance testing performed and report by laboratories approved by EPA in the UCMR5 program. The policy is posted here: <https://www.mass.gov/doc/drinking-water-policy-bwrddwp-2024-01-policy-on-pfas-public-drinking-water-testing-using-epa-method-533-and-epa-method-5371-v2/download>.

Until MassDEP revises its regulations to include the two new laboratory methods and Wall Experiment Station begins issuing Massachusetts laboratory certification for the methods, laboratories complying with Policy #: BWR/DWP 2024-01 can report Method 533 and Method 537.1 v.2 results to MassDEP using 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 MassDEP's electronic reporting portal (eDEP) is ready to accept Method 533 and Method 537.1 v.2 results, Public Water Systems (PWS) and labs will be notified and

required to report these results electronically. Please Note: PFAS results obtained using method 537 ver. 1.1 or 537.1 ver. 1 must continue to be reported electronically.

MassDEP Drinking Water Program has estimated that approximately 65% of systems participating in UCMR5 may benefit from the cost saving opportunity provided by Policy #: BWR/DWP 2024-01.

Benefits of using Policy #: BWR/DWP 2024-01 for dual Purpose Federal UCMR5 and MassDEP 310 CMR 22.07G monitoring compliance

PWS who are currently participating in the monitoring required by EPA's UCMR5 may reduce their PFAS testing costs by having their UCMR5 laboratory also do their MassDEP 310 CMR 22.07G compliance analysis and reporting. However, UCMR5 results can't be used to comply with MassDEP 310 CMR 22.07G monitoring unless the samples were collected after the issuance of this policy and all the analytical requirements of the policy were met by the laboratory, including meeting the reporting requirements (e.g. $MRL \leq 2.0 \text{ ng/L}$). All data requirements detailed in the Policy must be met to satisfy MassDEP compliance monitoring and reporting.

Benefits of using Policy #: BWR/DWP 2024-01 in Preparing for the Upcoming Federal PFAS Rule

This policy may also reduce costs for systems, because PWS participating in UCMR5 testing would be allowed to use previously collected monitoring data to satisfy EPA's final PFAS National Primary Drinking Water Regulation initial monitoring requirements, if the sampling was conducted using EPA Methods 533 or 537.1.

According to the EPA, "...a system with appropriate historical monitoring data for each EP (*entry point*), collected using EPA Methods 533 or 537.1 as part of UCMR 5 or a state-level or other appropriate monitoring campaign, could use that monitoring data to satisfy initial monitoring requirements."

The new EPA regulations require that PWS conduct initial monitoring for PFAS using Methods 533 or 537.1 over a 12-month period and complete the initial monitoring by 2027. For additional information on the final EPA PFAS National Primary Drinking Water Regulation, please visit EPA's webpage here: [Per- and Polyfluoroalkyl Substances \(PFAS\) | US EPA](#).

PWS that are interested in using Method 533 and EPA Method 537.1, v. 2 under this policy should at a minimum ask the following questions of their current UCMR5 approved laboratory:

- Can your lab achieve Minimum Reporting Levels (MRLs) of 2.0 ng/L?
 - **The UCMR5 approved laboratory must be able to achieve MRLs below 2.05 ng/L to avoid rounding to 2.1 ng/L.** Any results for MassDEP's regulated PFAS compounds with MRLs that round to 2.1 ng/L (or greater) are not acceptable for state compliance purposes.
- Is your lab willing to meet UCMR5 and MassDEP requirements for dual purpose PFAS testing?
 - The UCMR5 approved laboratory must meet all the items in the Policy's Conditions for Acceptance (Section III: A, B, C).
- What would be the cost of dual purpose PFAS testing to satisfy federal and state requirements?

- Are you able to submit the required MassDEP Laboratory Analytical form for this testing until such time as eDEP reporting is allowed, and will there be any additional cost associated with doing so?

For additional PFAS information, please visit the MassDEP PFAS webpage here: <https://www.mass.gov/info-details/per-and-polyfluoroalkyl-substances-pfas>.

If you have any questions on this information, please contact the MassDEP/Drinking Water Program at program.director-dwp@mass.gov, Subject PFAS Analytical Methods- Policy #: BWR/DWP 2024-01 or 617-292-5770.

Sincerely,



Yvette DePeiza, Director
Drinking Water Program



MassDEP Boston moved offices on November 28, 2022.

**Please note our new address: 100 Cambridge Street –
Suite 900, Boston, MA 02114**



The main Drinking Water Program number will continue to be 617-292-5770
To contact the Drinking Water Program email Program.Director-DWP@mass.gov
For Information on public drinking water visit <https://www.mass.gov/topics/drinking-water>