



**DEPARTMENT OF THE NAVY**  
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From: Commander, Navy Installations Command

Subj: UPDATES TO PER- AND POLYFLUOROALKYL SUBSTANCES DRINKING WATER SAMPLING REQUIREMENTS

Ref: (a) ASD Memo, Sampling of Per- and Polyfluoroalkyl in Department of Defense-Owned Drinking Water Systems, dtd 11 Jul 2023  
(b) NAVSEA 04Q Laboratory Quality & Accreditation Office (LQAO), Standard Operating Procedure for Per- and Polyfluoroalkyl Substances Sampling, dtd 6 Jul 2023  
(c) U.S. Environmental Protection Agency, The Fifth Unregulated Contaminant Monitoring Rule (UCMR 5) Data Summary, July 2023

Encl: (1) PFAS Results Reporting and Notification Template for Installation Webpages  
(2) Standardized PFAS Sample Point Names for DOEHS-IH EH

1. In accordance with reference (a), all Navy-owned drinking water systems where the Navy is the drinking water purveyor are required to sample for Per- and Polyfluoroalkyl Substances (PFAS) in finished drinking water, using Environmental Protection Agency's (EPA) Methods 537.1 and 533 by December 31, 2023. This information will be used to develop plans for the implementation of the forthcoming EPA's National Primary Drinking Water Regulation on PFAS. Commander, Navy Installations Command (CNIC) is promulgating this policy to support implementation of reference (a).

2. This policy applies to all Navy-owned drinking water systems where the Navy is the drinking water purveyor (i.e., supplies the drinking water) at Navy installations worldwide, including non-regulated systems. It does not apply to consecutive systems where the Navy purchases water from a local purveyor.

3. All Navy-owned drinking water systems will conduct sampling and analysis of finished water for PFAS using both EPA Methods 533 and 537.1 by December 31, 2023, regardless of when the last PFAS sampling event was conducted, to establish baseline results for all Navy-owned systems under both methods. Navy-owned drinking water systems will use EPA Method 537.1 to analyze for and report perfluorotetradecanoic acid (PFTeDA), perfluorotridecanoic acid (PFTrDA), N-methylperfluorooctanesulfonamidoacetic acid (NMeFOSAA), and N-ethylperfluorooctanesulfonamidoacetic acid (NEtFOSAA) only, and will use EPA Method

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533 to analyze for and report all analytes included in the EPA Method 533 analyte list.<sup>1,2</sup> Reference (b) outlines the Standard Operating Procedures for PFAS sampling including processes for shipping, quality control, equipment, etc. Systems must sample at the entry points of the distribution system. PFAS samples must be analyzed using a Department of Defense (DoD) Environmental Laboratory Accreditation Program (ELAP) accredited laboratory or, if a DoD ELAP accredited laboratory is unavailable, an EPA or state-accredited laboratory. For Navy Overseas Drinking Water (ODW) systems, an ISO-17025 accredited laboratory with EPA Methods 537.1 and 533 on the scope of accreditation and approved by the WQOC Laboratory Authority may be used.<sup>3</sup> To comply with paragraph 4 below, systems must reference the Minimum Reporting Levels (MRL) per PFAS analyte detailed in Table 2 of reference (c) when reporting PFAS results.

4. Navy-owned systems will conduct periodic sampling and analysis for PFAS based on the following schedule:

a. Systems with results indicating PFAS analytes are below the MRL will sample at least once every two years. Both EPA Methods 533 and 537.1 will be used when reporting on a two-year cycle.

b. Systems with results showing any of the PFAS analytes above the MRL will sample semi-annually until results are below the MRL for two consecutive sampling events. Then sampling may proceed as described in paragraph 4a above. Only EPA Method 533 will be required for semi-annual sampling of PFAS, unless the exceedance involves one of the four analytes in Method 537.1.

5. If Navy-owned systems detect levels of PFOA, PFOS, or PFOS and PFOA in finished drinking water exceeding 70 parts per trillion (ppt), alternative water for internal consumptive use such as drinking, cooking, and oral hygiene must be provided, and actions taken to lower PFOS/PFOA concentrations to below 70 ppt. Systems must continue to sample semi-annually to monitor any changes in detected levels and install additional treatment or permanently remove the system from service if it is determined that installation of additional treatment is not feasible at the affected location.

6. Navy installations will post all PFAS sampling results on the installation's public webpage within 30 days of receipt of final validated results. Installations must use the standard language developed by CNIC in enclosure (1) to report results on the installation webpage. For results exceeding 70 ppt, additional distribution of enclosure (1) beyond the installation webpage is required to ensure public notification is received by all impacted consumers. Examples of additional distribution methods include email, installation bulletins, installation newspapers, and

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<sup>1</sup>One field reagent blank (FRB) per sample location is required for both methods. At minimum, one set of matrix spike/matrix spike duplicates (MS/MSD) or MS and field duplicates (FD) are required per prep batch of every 20 or fewer field samples. Therefore, for each field sample collected, there must be a total of four samples (2 FRBs, 2 field samples), with one set of MS/MSD or MS and FD with every 20 samples or less (total of 6 QC samples with 2 field samples). In EPA Method 533, the MS/MSD is referred to as Laboratory Fortified Sample Matrix (LFSM) and Laboratory Fortified Sample Matrix Duplicate (LFSMD).

<sup>2</sup>Stage 3 validation may be performed on 90% of field samples and Stage 4 validation on 10% of samples. Both validation stages will allow for the data validator to have enough information to recalculate the reported laboratory result.

<sup>3</sup>All laboratories participating in an ISO 17043 approved proficiency testing (PT) program for EPA Methods 533 and 537.1 meet requirements to participate in the EPA proficiency testing studies program.

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social media. Additionally, installations that publish a Consumer Confidence Report (CCR) must include all PFAS sampling results in the CCR using the same language in enclosure (1).

7. To effectively track and report PFAS data, final testing results for PFAS in finished drinking water collected from Navy-owned drinking water systems will be reported to CNIC via a monthly tasker. CNIC will continue to manage the upload of all results to the Defense Occupational and Environmental Health Readiness System - Industrial Hygiene, Environmental Health Module (DOEHRS-IH EH). Results submission must include the final laboratory report documenting final laboratory results, results in electronic data delivery (EDD) format to support DOEHRs-IH EH upload, and the completed reporting template included in reference (a). To support these reporting requirements and ensure consistency, installations must ensure:

a. All laboratory contracts include requirement for PFAS sampling delivered in EDD format in addition to regular laboratory reports.

b. All sample point names are consistent for DOEHRs-IH EH data entry. The sample point name must begin with "PFAS" to distinguish the sample location from the regular Navy Medical drinking water surveillance data. Regions must review the list of sample point names in enclosure (2) and ensure all future sampling events reference these sample point names for DOEHRs-IH EH data entry. If a new sample point is not in the sample point name list in enclosure (2), the following naming convention must be used: "PFAS [Installation] [Sample Location]."

8. My technical point of contact regarding this matter is Ms. Kristen Bass, CNIC HQ N45, who may be contacted at DSN 312-288-4950, commercial (202) 433-4950, or kristen.c.bass.civ@us.navy.mil.

J. A. CROSBY  
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