

**Subject: UPDATE ON PFAS AND INFORMATION ON TESTING**



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

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## Department of Environmental Protection

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Charles D. Baker  
Governor

Karyn E. Polito  
Lieutenant Governor

Kathleen A. Theoharides  
Secretary

Martin Suuberg  
Commissioner

Dear Public Water Supplier:

Per- and Polyfluoroalkyl Substances (PFAS) are emerging contaminants of significant concern. PFAS are a family of chemicals used since the 1950s to manufacture stain-resistant, water-resistant, and non-stick products. PFAS are widely used fire-fighting foams and in common consumer products as coatings, on food packaging, outdoor clothing, carpets, leather goods, ski and snowboard waxes, and more. PFAS in drinking water is an important emerging issue nationwide, as well as here in Massachusetts.

This letter is designed to update you on agency efforts and to provide information on how you can test your system, even as we develop regulatory standards.

### **Background**

In 2016, the United States Environmental Protection Agency (EPA) published a drinking water Health Advisory Level for two of the PFAS compounds (Perfluorooctanesulfonic acid, PFOS, and Perfluorooctanoic acid, PFOA) combined at 0.070 micrograms per liter (ug/L) or 70 parts per trillion (ppt). In June 2018, MassDEP issued an Office of Research and Standards Guideline (ORSG) for drinking water of 70 ppt for PFOA, PFOS, PFNA (Perfluorononanoic acid), PFHxS (Perfluorohexanesulfonic acid) and PFHpA (Perfluoroheptanoic acid) combined. The three additional PFAS were included because they share very similar chemical structures and the available data indicates they are likely to exhibit similar toxicities. The ORSG was established to be protective against adverse health effects for all people consuming the water for a lifetime and is also applicable to shorter-term exposures of weeks to months during pregnancy and breast-feeding.

As part of the agency's efforts to address PFAS compounds, MassDEP has continued to review the current scientific information, studies and assessments on PFAS. Based on this evaluation, MassDEP has

proposed draft amendments to the Massachusetts hazardous waste cleanup regulations (the Massachusetts Contingency Plan or “MCP”), that include groundwater and soil cleanup standards. The proposed groundwater cleanup standard is 20 ppt for the 5 compounds in the 2018 ORSG (PFOA, PFOS, PFNA, PFHxS, and PFHpA), plus Perfluorodecanoic acid (PFDA)(six total). MassDEP is accepting comment on the draft MCP regulations, including the proposed PFAS cleanup standards, until July 19, 2019. In addition, MassDEP’s Office of Research and Standards is convening its Health Effects Advisory Committee to provide scientific input on the technical basis of the proposed MCP standards and their implication regarding a potential revised ORSG with a limit of 20 ppt for the sum of the 6 PFAS compounds.

In April 2019, MassDEP initiated the process to develop a drinking water standard for public drinking water suppliers, known as a Maximum Contaminant Level (MCL), for the six PFAS compounds. This forthcoming MCL will be promulgated under the Commonwealth’s standard regulation development process, including a public comment period. ORS will review the comments received during the MCP regulation process and this will inform any changes to the ORSG and the MCL development. MassDEP seeks to align the forthcoming MCL with the MCP groundwater cleanup standard and any revised ORSG. Information on the MCL development efforts, including opportunities for early stakeholder engagement, can be found here: <https://www.mass.gov/info-details/per-and-polyfluoroalkyl-substances-pfas>

### **Testing**

**In the interim period while these standards are being promulgated, MassDEP is encouraging all public water suppliers (PWS) statewide to voluntarily collect and analyze PFAS samples from the entrance points to your distribution system as soon as possible.**

Voluntary testing of your finished water will provide information to you, your customers, local officials, and MassDEP on whether PFAS is present in your drinking water at levels of concern. For PWS with PFAS at levels of concern, MassDEP will work with PWS on the action(s) they should take including additional monitoring, developing a plan to reduce PFAS levels, and notification to consumers and public officials. This information will also be utilized for investigations into the possible sources of the contamination and identification of potentially responsible parties.

Please see the attached “Voluntary PFAS Sampling Guidance for PWS,” which provides sampling procedures, lab analysis requirements, and guidance on what happen if PFAS is detected. This

information is also located at webpage <https://www.mass.gov/lists/communication-to-public-water-suppliers>

Sincerely,

A handwritten signature in black ink, appearing to read "A.M. Yvette DePeiza". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

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

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

Attachment: Voluntary PFAS Sampling Guidance for PWS (June 2019)

**MassDEP Drinking Water Program**  
**Voluntary PFAS Sampling Guidance for Public Water Suppliers**  
**(June 2019)**

**Public Water Suppliers (PWS) undertaking voluntary PFAS water quality sampling should take the following actions:**

- Collect a sample at the entrance point (s) to your distribution system.
- *Because of the ubiquitous nature of PFAS in many consumer products, it is important to follow specific sampling protocols when collecting samples to minimize the chance of cross contamination of the sample.* Collect all samples following the Sample Collection procedures located at <https://www.mass.gov/doc/field-sampling-guide-for-pfas/download>.
- Use a laboratory certified by EPA or a laboratory approved by the MassDEP Drinking Water Program:
  - ✓ Use a laboratory approved by EPA for UCMR3 monitoring. See list labs here: <https://www.mass.gov/info-details/per-and-polyfluoroalkyl-substances-pfas#laboratories-and-testing-for-pfas->;
  - Or
  - ✓ Use a laboratory certified by another state or certification authority 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/media/1995311> .
- Use EPA Method 537 or 537.1
- Report all contaminants in the scope of either method and report PFOA, PFOS, PFNA, PFHxS, PFHpA and PFDA 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 the sample(s) at the entrance point to your distribution system?**

Another sample should be collected from the same location(s). This sample will be used to confirm the 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.*

- If the confirmed PFAS level is above the ORSG of 70 ppt, you will be asked 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 MCP groundwater cleanup standards 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 standards of 20 ppt but 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

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

If you have any additional questions about implementing a voluntary baseline sampling program, please contact the Drinking Water Program at [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov), and use the subject line “PFAS.” or contact the staff listed below.

**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 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	<a href="mailto:Catherine.wanat@mass.gov">Catherine.wanat@mass.gov</a>
Central	Robert Bostwick	508-849-4036	<a href="mailto:Robert.Bostwick@mass.gov">Robert.Bostwick@mass.gov</a>
Northeast	Amy LaPusata	978-694-3291	<a href="mailto:Amy.lapusata@mass.gov">Amy.lapusata@mass.gov</a>
Southeast	William Schwartz	508-946-2818	<a href="mailto:William.schwartz@mass.gov">William.schwartz@mass.gov</a>
Boston: <a href="mailto:Program.director-dwp@mass.gov">Program.director-dwp@mass.gov</a> or Margaret Finn 617-292-5746			