



ASSISTANT SECRETARY OF DEFENSE

3500 DEFENSE PENTAGON
WASHINGTON, DC 20301-3500

JUL 23 2020

SUSTAINMENT

MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY (INSTALLATIONS,
ENERGY AND ENVIRONMENT)
ASSISTANT SECRETARY OF THE NAVY (ENERGY,
INSTALLATIONS AND ENVIRONMENT)
ASSISTANT SECRETARY OF THE AIR FORCE
(INSTALLATIONS, ENVIRONMENT AND ENERGY)
DIRECTOR, DEFENSE LOGISTICS AGENCY (INSTALLATION
MANAGEMENT)

SUBJECT: Monitoring of Per- and Polyfluoroalkyl Substances Sampling for Installations with
Non-Department of Defense Drinking Water Systems

1. Purpose

This policy identifies requirements for monitoring of drinking water for potential per- and polyfluoroalkyl substances (PFAS) impact at military installations where the Department of Defense (DoD) is not the drinking water purveyor.

2. Applicability

This policy shall apply to all military installations¹ where DoD receives drinking water from a non-DoD drinking water purveyor.

3. Assessment of Non-DoD Purveyor's PFAS Sampling Data

Each military installation that receives drinking water from a non-DoD purveyor² shall:

- a. If the non-DoD purveyor's PFAS sampling status is not already known, or cannot be determined by reviewing Consumer Confidence Reports, the military installation will request the most recent finished drinking water sampling data for PFAS from the non-DoD purveyor providing drinking water to the installation.
- b. If the non-DoD purveyor has not conducted drinking water sampling for PFAS in the past three years; or the most recent sample results are more than one year old and showed detection(s) above the method reporting level, the military installation will request in writing (template at Attachment 1) that they collect a new sample.

¹ The term 'military installation' means a base, camp, post, station, yard, center, homeport facility for any ship, or other activity under the jurisdiction of the Secretary of a military department or the Secretary of Defense, including any leased facility, or, in the case of an activity in a foreign country, under the operational control of the Secretary of a military department or the Secretary of Defense, without regard to the duration of operational control. For this policy, such term does not include any leased facility used exclusively for recruiting activities.

² A drinking water system not owned by DoD that supplies drinking water to a military installation

- c. If the non-DoD purveyor indicates they will not provide drinking water sampling data or conduct drinking water sampling for PFAS, provide notice to the non-DoD purveyor (template at Attachment 2) that the military installation will sample finished drinking water at a location nearest the entry point to its drinking water system. The military will then collect at least one sample at each entry point to the distribution system and submit for laboratory analysis of all PFAS analytes specified in EPA Method 537.1. If applicable, samples shall be taken prior to any additional treatment provided by the military installation. Operation and Maintenance (O&M) funds shall be used for sampling and analysis costs.

4. Results

If results of sampling conducted by the non-DoD purveyor or the military installation indicate exceedance of the U.S. Environmental Protection Agency (EPA) PFOS, PFOA, or PFOS + PFOA lifetime Health Advisory (HA) level of 70 parts per trillion (ppt), the military installation will request the purveyor take immediate action to decrease the PFAS levels to below 70 ppt. If the purveyor is unwilling to take such action, document this information, and coordinate with appropriate chain of command and legal office to immediately pursue actions to address exposure to drinking water with levels of PFOS/PFOA above 70 ppt on the military installation. Additionally, military installations shall notify, through the appropriate chain of command, the Office of the Deputy Assistant Secretary of Defense for Environment.

5. Notification of Results

- a. If sampling conducted by either the non-DoD purveyor or the military installation exceeds the HA level, the military installation will post a public notice on its public webpage as soon as practical but no later than 30 days from receipt of validated sampling results. For those military installations that produce their own Consumer Confidence Report, these results will be included in that report as well.
- b. Military installations with PFOA, PFOS, or PFOS + PFOA results less than the HA level, including results less than the method reporting limit, will include the public notice in the Consumer Confidence Report (if the installation is required to complete one) posted on the military installation's public webpage.

6. Timeline

Each military installation will implement this memorandum immediately and shall complete the required actions as soon as possible, but no later than 18 months from the date of this memorandum.

7. Additional Requirements and Waivers

- a. The DoD Components may exercise reasonable discretion to go beyond these requirements.

- b. The Deputy Assistant Secretary of Defense for Environment may approve waivers to this policy.

My point of contact for this matter is Mr. Terry Bowers at terry.l.bowers14.civ@mail.mil or (703) 693-9447.



W. Jordan Gillis

Attachments:

Template for 3b

Template for 3c

cc:

Chief, National Guard Bureau

TO: [POC]
[Municipality or Municipal Drinking Water Utility]
[Municipality Address]

FROM: [POC]
[Military Installation]

DATE: [Today's Date]

SUBJECT: Request for Per- and Polyfluoroalkyl Substances Sampling Data from Finished Drinking Water Provided to Military Installations By Non-Department of Defense Drinking Water Purveyors

To Whom It May Concern,

In accordance with Department of Defense (DoD) Policy on monitoring for per- and polyfluoroalkyl substances (PFAS) at installations where drinking water is provided by a non-DoD municipality, [military installation] is requesting all finished drinking water sampling data for PFAS from [municipality or municipal drinking water utility] which provides [military installation]'s drinking water.

If no PFAS sampling data is available, [military installation] is requesting [municipality or municipal drinking water utility] to conduct sampling for PFAS on the finished drinking water that is provided to [military installation].

If you have any questions, please contact [POC] from [Military Installation] at [phone] or by email at [email].

Signed,
[POC], [military installation]

TO: [POC]
[Municipality or Municipal Drinking Water Utility]
[Municipality Address]

FROM: [POC]
[Military Installation]

DATE: [Today's Date]

SUBJECT: Military Installation-Conducted Sampling for Per- and Polyfluoroalkyl
Substances in Finished Drinking Water Provided By Non-Department of Defense
Drinking Water Purveyors

To Whom It May Concern,

In accordance with Department of Defense (DoD) Policy on monitoring for per- and polyfluoroalkyl substances (PFAS) at installations where drinking water is provided by a non-DoD purveyor, [military installation] will conduct PFAS sampling of finished drinking water at the entry point to [military installation's] drinking water distribution system. [military installation] will provide a copy of the results to [non-DoD purveyor].

If you have any questions, please contact [POC] from [Military Installation] at [phone] or by email at [email].

Signed,
[POC], [military installation]