

# DoD Environmental Data Quality Workgroup Memorandum

## Subject: Recommendation to Address Shorter Holding Times for Specific Per- and Polyfluoroalkyl substances (PFAS) When Using EPA Method 1633 for PFAS Investigations



March 27, 2025

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While the standard holding time before samples must be extracted for most analytes listed in EPA Method 1633 is 28 days for water, soil, and tissue samples, there are a few analytes in the method that have shortened holding times. None of these analytes have associated regulatory limits and trying to meet these shortened holding times will be challenging and result in unnecessary expenditure of resources.

Section 8.5 of EPA Methods 1633 and 1633A for the analysis of PFAS identify shortened sample holding times for four PFAS in aqueous samples and one PFAS in soil or sediment. Laboratories are unlikely to extract/analyze samples before these shortened holding times are exceeded.

Aqueous samples analyzed for NMeFOSE, NEtFOSE, NMeFOSAA, and NEtFOSAA have a seven-day holding time if stored at 0 – 6 °C. NMeFOSE and NEtFOSE may undergo transformation to NMeFOSAA and NEtFOSAA respectively when stored at 0 – 6 °C if stored for longer than seven days. If the samples are stored at or below -20 °C the holding time for these PFAS can be extended to 90 days, but very few laboratories have the capability or capacity to routinely store samples at this temperature.

Soil or sediment samples analyzed for NFDHA have a three-day holding time regardless of storage temperature.

Tissue samples analyzed for NFDHA have a three -day holding time if stored at 0 – 6 °C.

Except for 9Cl-PF3OUdS and 11Cl-PF3ONS, after a sample is extracted, the extract may be held for up to 90 days before analysis. Sample extracts for 9Cl-PF3OUdS and 11Cl-PF3ONS, regardless of matrix type, have a 28-day holding time.

Currently none of the PFAS with shortened holding times have toxicity factors or corresponding EPA Regional Screening Levels, thus any additional uncertainty associated with a holding time exceedance for these analytes will not affect current decision making.

The DoD Environmental Data Quality Workgroup recommends projects continue to request analysis of the PFAS with shortened holding times but accept qualified results if a holding time is exceeded. This qualification can appear along with the result or in the case narrative. Qualifying results will allow any uncertainty to be considered in future decision making. Project planning documents should indicate that DoD does not expect laboratories to prepare and/or analyze samples within the shortened holding time and that DoD is willing to accept any additional uncertainty. This approach should be recorded using worksheets 15 and 19&30 of the Uniform Federal Policy for Quality Assurance

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Project Plans optimized worksheets

([https://www.epa.gov/sites/default/files/documents/ufp\\_qapp\\_worksheets.pdf](https://www.epa.gov/sites/default/files/documents/ufp_qapp_worksheets.pdf)). The worksheets should be used to indicate which compounds have the shortened holding times and describe how results will be qualified. The worksheets should acknowledge that a holding time exceedance is likely, and that the exceedance will be addressed in data validation and usability. Regulatory acceptance of this approach should be recorded.