

PFAS LABORATORY AND REPORTING REQUIREMENTS FOR IMPORTED BOTTLED WATER SYSTEMS

Sample Analysis:

Follow sampling guidelines, preservatives, and containers as specified in EPA Method 537.1 (2018). Ensure that extraction and analysis holding times are met according to Section 8.5 of EPA Method 537.1 (2018). The preservative used should be 5 grams/liter Trizma© crystals (equal to 1.25 grams per 250 mL container) and sample containers should be 250 mL polypropylene sample bottles fitted with unlined polypropylene screw caps. Trizma© acts as a buffer and removes free chlorine in chlorinated finished drinking water.

Laboratories must report PFAS in the acid form. Linear and branched isomers must be quantified and combined to determine the total. If standards containing the branched and linear isomers cannot be purchased, only the linear isomer can be identified and quantitated in field samples and QC samples using the linear standards because the retention time of the branched isomers cannot be confirmed.

Data Reporting:

- Sampling results must clearly identify your WSID, product and package size, and sample location. If the sample location is a finished bottled water product, the results must clearly identify the type and package size.
- Sampling results must include all 18 PFAS analytes analyzed under EPA Method 537.1 (2018).
- Data with qualifiers must be flagged, particularly when detections are found in field blanks, trip blanks, and instrument blanks at or above the reporting limit.
- If any of the following five PFAS are detected above the reporting level of 2.0 ng/L in a sample, trip blanks and field blanks need to be analyzed and included in your sampling results for that sampling location:
 - **PFOA** (perfluorooctanoic acid);
 - **PFOS** (perfluorooctane sulfonic acid);
 - **PFHxS** (perfluorohexane sulfonic acid);
 - **PFHpA** (perfluoroheptanoic acid); and
 - **PFNA** (perfluorononanoic acid)
- Field blanks and Trip blanks do not need to be analyzed or included in your samplings results for a sampling location if the above five PFAS are not detected above the reporting level in the sample.
- Sampling results must be submitted via the File Transfer Protocol (FTP) site following the instructions and form in the following pages.

**Drinking Water and Groundwater Protection Division
File Transfer Protocol (FTP) Site Submission Instructions**

The Water Supply Program of the Drinking Water and Groundwater Protection Division (Division) uses an FTP site as the preferred way to transfer large electronic documents. Files submitted to the FTP site will be downloaded and processed daily by Division administrative staff. **Files will NOT be stored long-term on this site.** Therefore, submissions must provide sufficient information to make clear the nature of the submission, the water system or project the submission is for, and the intended recipient of the application or document. **These documents are for public drinking water or groundwater withdrawal-related projects only, not wastewater system or potable water supply projects.**

Each submission must include a cover letter or letter of transmittal, or the attached FTP Document Identification Form, as the first page of the document. If you choose to design your own cover sheet, it must at a minimum include:

- 1. Water System Name and WSID**
- 2. Description of document or purpose of submittal**
- 3. Intended Division Recipient**
- 4. Author's name, email, and relationship to water system**
- 5. PID# or Project Name**
- 6. Document Type (PER, Permit Application, etc.)**

Documents submitted without this information will be rejected by the Division and deleted from the FTP site. You will NOT receive notification of this rejection.

Drinking Water and Groundwater Protection Division

TO SUBMIT A DOCUMENT:

If using Windows, paste the following link into the Windows Explorer address bar (found by choosing "Computer" on the Start menu). If using a Mac, paste the link into the address bar in Finder. Do **NOT** paste the link into a web browser to access the FTP site. If you have used Act 250's FTP, you may need to right click the FTP location saved under "Computer" in Windows Explorer and select Login As to get prompted for credentials.

ftp://ftp.anr.state.vt.us/Public%20Water%20Supply/

Use the following credentials to log in when prompted:

USER: watersupply

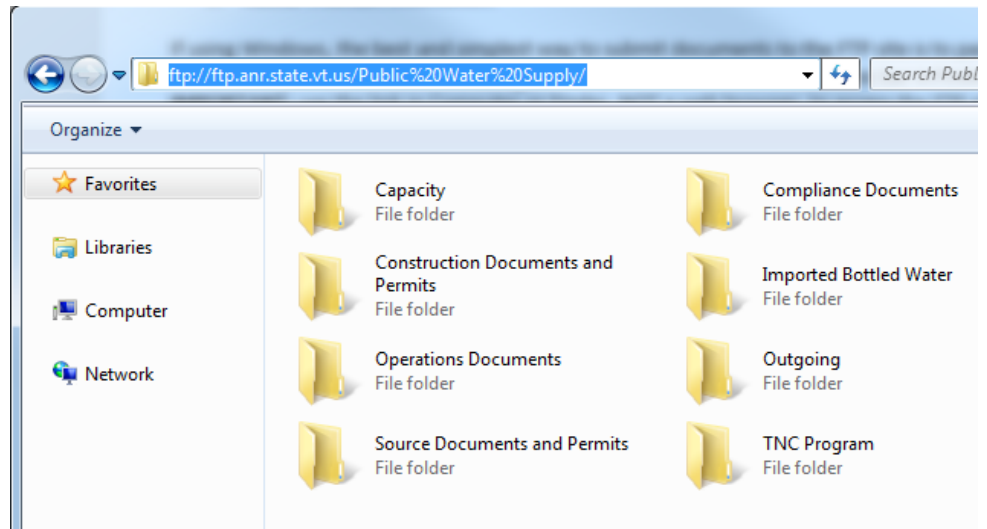
PASSWORD: C0mm@nd (the second character is a **zero**, not the letter "O")

Choose the correct submission folder following the outline below. Create a single new sub-folder within the submission folder and give it a clear name. Copy and Paste (or click and drag) the submittal documents into the appropriate FTP folder, being sure all contents are clearly labelled and ordered for assembly. Do **NOT** include multiple sub-folders or expect Division staff to organize and weed out essential information from large submissions. Incomplete or unorganized submissions will be rejected without notice.

IMPORTANT: Once a document is placed into the FTP folder, it **CAN NOT** be opened from that location, so be sure the submission is correct and complete before copying it to the FTP site. Division staff will remove the document from the FTP site and open it on their own computers to view and process the documents.

Choosing the Correct Folder:

- **Capacity:** *submittals for Asset Management Grants/Applications, leak detection information, managerial and financial capacity, etc.*
- **Construction Documents and Permits:** *includes construction permit application submittals, revised submittals, preliminary engineering reports, and closeout documentation*
- **Operations Documents:** *responses to sanitary surveys, Permits to Operate, O&M Manuals, etc.*
- **Source Documents and Permits:** *includes source permit applications and correspondence, Source Protection Plans, Source Protection Plan Updates, etc.*
- **Compliance Documents:** *Lead & Copper Rule submittals, Sampling Plans (e.g. for Lead & Copper, RTCR, DBPs), etc.*
- **Imported Bottled Water:** *Laboratory data relating to bottled water sources outside Vermont, etc.*
- **TNC Program:** *Submittals related to Transient, Non-Community systems' operations and compliance*
- **Outgoing:** *Used for outgoing files from the Division, do not use this folder to submit documents.*



Please contact Patrick Southern at patrick.southern@vermont.gov with any questions or problems pertaining to use of the Division FTP site.

FTP DOCUMENT IDENTIFICATION FORM

Document Name			
Water System Identification			
WSID #		Water System Name	
Document Identification			
PID # or Project Name			
Division Recipient			
Document Type			
Document Purpose			
Author Identification			
Author Name			
Phone		Email	
Relation to Water System			