



State of New Jersey  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

OFFICE OF QUALITY ASSURANCE

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**PHILIP D. MURPHY**

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**SHEILA Y. OLIVER**

*Lt. Governor*

**SHAWN M. LATOURETTE**

*Commissioner*

January 31, 2022

RE: Per- and Polyfluorinated Alkyl Substances (PFAS) Alternate Testing Procedure – EPA Draft Method 1633

Dear Laboratory Manager:

The U.S. Environmental Protection Agency (EPA) recently released EPA Draft Method 1633 for use as a single laboratory validated analytical method to test for per- and polyfluoroalkyl substances (PFAS) in non-drinking water matrices (such as non-potable water and solid/chemical materials). Based upon the review of this draft method conducted by the New Jersey Department of Environmental Protection, Office of Quality Assurance (OQA), it has been determined that EPA Draft Method 1633 meets the criteria for the Alternate Test Procedure (ATP) process detailed at N.J.A.C. 7:18-2.20. Therefore, the OQA can begin to accept ATP applications for PFAS certification using EPA Draft Method 1633 in matrices other than drinking water (non-potable water and solid/chemical materials matrices).

Any laboratories seeking to obtain new certification for PFAS testing using the EPA Draft Method 1633 ATP, or any seeking to switch existing certification to the EPA Draft Method 1633 ATP, shall submit a hard copy initial application or modification application to the OQA in accordance with the process detailed below. Please note that a laboratory **cannot** concurrently be certified to test PFAS using a laboratory-developed and/or non-standard (LDNS) method (e.g., a laboratory-developed standard operating procedure) and the EPA Draft Method 1633 ATP in a particular matrix. Consequently, a laboratory presently certified for PFAS testing using an LDNS method, may, at its discretion, apply to switch its present certification to the EPA Draft Method 1633 ATP as discussed below.

For a laboratory seeking primary accreditation, the application must include, at a minimum, the following:

1. A complete modification application, including completed Part I (Administrative Information), Part II (Personnel), and Part III (Analytical Testing Parameters).
  - A Part II is only required if changes to the presently approved laboratory personnel are made or if the application is for a new category. If any new personnel are being added for this analysis, the laboratory shall submit a Part II and the education and experience documentation required under N.J.A.C. 7:18-2.10.
  - The Part III must indicate the parameters for which certification is requested using EPA Draft Method 1633. If the laboratory is presently certified to test PFAS using a LDNS method, the Part III must show a request to drop this certification upon receipt of certification for EPA Draft Method 1633. Please note, for laboratories with current LDNS method PFAS certification, the existing certification will not be dropped until certification for the EPA Draft Method 1633 ATP is granted.
2. All associated fees
  - If the laboratory is presently certified for analysis in a particular category, it shall submit only the \$400 modification fee and the \$600 non-standard method review fee.
  - If the laboratory does not presently hold certification for a category for which it seeks certification, it shall additionally remit the category fee of \$1675 per matrix.
3. A draft Standard Operating Procedure (SOP)
4. A summary of the data for the most recent Method Detection Limit (MDL) study
5. Precision and Accuracy study / Demonstration of Capability and the associated raw data for each
6. Proficiency Test (PT) provider name and study number(s) used for PTs analyzed using EPA Draft Method 1633. Please note, laboratories must ensure that they request, prior to the close of the study, that the PT provider submit the results to the OQA directly; and
7. The raw data package associated with the PT(s) results.

For a laboratory with secondary accreditation in New Jersey, the laboratory shall obtain accreditation to use EPA Draft Method 1633 from its Primary Accreditation Body (AB). The laboratory shall submit to the OQA a scope of accreditation demonstrating certification for EPA Draft Method 1633 in the matrix for which NJ secondary accreditation is sought, **and in addition shall submit the information listed in 1, 2, and 6 above**. If such accreditation cannot be obtained from the laboratories' primary AB, the laboratory shall submit a complete package for NJ primary accreditation, as well as documentation demonstrating that the laboratory has clients requiring this testing.

All application documents must be submitted together as one package, or the package will be returned to the laboratory. No electronic documents can be submitted to comply with these package requirements unless specifically requested by the auditor during the review process.

The certification process will take approximately 4-6 months from the time a complete application is received until certification is granted. Additional documentation may be requested during the review process and on-site audits may be required. Applications which require an on-site audit be performed prior to granting certification may take longer than 6 months. The EPA Draft Method 1633 certification will appear on the laboratory's ACPL as "User Defined EPA Draft Method 1633" once certification is granted. All applications will be processed in the order in which they are received.

Please note that in addition to the required \$400 modification fee, a laboratory certified for an LDNS is subjected to the Department's \$600 review fee **every time modifications to the LDNS are made** and submitted to the Department for review. However, a laboratory certified for the EPA Draft Method 1633 will only have to remit the \$600 review fee upon initial application for the method. Once the OQA has determined the information provided is sufficient to meet the requirements of EPA Draft Method 1633, no additional review fee will be needed for future SOP revisions, as the SOP will be based on the method itself.

If you have any questions or if this office can be of any further assistance, please contact Rachel Ellis or me at (609) 292-3950.

Sincerely,



Michele M. Potter  
Manager