

DoD Environmental Data Quality Workgroup Memorandum

Subject: EPA Method 1633 Sample Volume Modification

June 18, 2025



Under Section 9.1.2 of EPA Method 1633 (and most 1600-Series methods), laboratories are allowed to make modifications to an EPA method, including those that may involve changes to the sample volume or size. However, EPA's Sufficiently Sensitive Methods rule requires that regulated entities employ methods that they can demonstrate are sensitive enough to determine compliance with any regulatory limits. Section 9.1.2.2 provides the documentation required for any method modification. All ongoing QC requirements contained in the method shall also be met.

The EPA and DoD EDQW want to ensure the sample volume collected can accurately represent the source, therefore, the volume of field sample collected shall not be lower than 100 mL. This limit is based on the fact that EPA Method 1633 was validated for the analysis of landfill leachates, a very complex matrix, using 100 mL of samples. Exceptions to this volume minimum are allowed only when historical data indicates the sampling source contains very high concentrations of PFAS. Very high concentrations of PFAS are defined as concentrations that, when a 100 mL collected sample is prepared, would require the extract to be diluted to the extent the requirements for sample dilutions (EPA Method 1633A, Section 15.3) are not met.

Additionally, the EPA and DoD EDQW agree that HDPE wide-mouth bottles shall be used for all aqueous samples to ensure representative samples are collected. These clarifications will be made in the upcoming version of EPA Method 1633.

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