Environment Testing

🔅 eurofins

The What, When, and How of Utilizing EPA 1633A

The What

The When

The How

The U.S. EPA, in collaboration with the Department of Defense, has finalized a method for the measurement of 40 PFAS in non-potable water, soils, biosolids, landfill leachate, and fish tissue via LC-MS/MS. This method has been multi-lab validated and developed in accordance with the required quality assurance and control procedures specified for EPA Clean Water Act methods in the Code of Federal Regulations (CFR).

The final version of EPA 1633A was released by the U.S. EPA on December 5, 2024 and published for public comment in the CFR as part of a Methods Update Rule on January 21, 2025. The public comment period closed on March 24, 2025. Although the method remains draft, EPA has long encouraged laboratories, regulatory authorities, and other interested parties to review and use the draft versions of this method, including in NPDES permits, and a number of states have begun offering accreditation for some version of 1633 or 1633A.

Eurofins has thoroughly reviewed the final draft of method 1633A, determined what was needed for implementation across our network, and implemented a standardized approach across all supporting laboratories.

Contractions Contractions Environment Testing

1633A Frequently Asked Questions



When will Eurofins be ready to support the final version of 1633A?

Eurofins is currently supporting the final version of 1633A across our program labs.

Is Eurofins certified for the final version of EPA 1633A?

Our labs currently maintain primary NELAC and DoD ELAP accreditation for this method and are in the process of pursuing accreditation with the few select states that have begun offering accreditation specific to the latest version.

What are the required reporting limits for wastewater?

There are no required reporting limits specified in the method for any matrix, only example ranges of what was achievable during the multi-lab validation for aqueous and soil matrices. Eurofins implemented LOQs that fall within or below the example ranges in the method.

What are the required reporting limits for biosolids/leachate?

There are no required reporting limits specified in the method for any matrix, only examples of what was achievable during the multi-lab validation for aqueous and soil matrices. For biosolids and landfill leachate, the method specifies the following in Table 9: "MDLs and LOQs for landfill leachates and biosolids were not determined directly in the multi-laboratory validation study. Given the smaller sample sizes analyzed for leachates and biosolids, the MDLs and LOQs for leachates and biosolids are likely to be 5 and 10 times higher than for other aqueous samples and solid samples, respectively. Laboratories analyzing leachates and/or biosolids must determine their own MDLs and LOQs for those matrices". Eurofins implemented LOQs consistent with existing methodology for these matrices in order to support a smoother transition from pre-existing methods to the new method.

🛟 eurofins

1633A Frequently Asked Questions

Do I need to begin using EPA 1633A right away?

This depends upon the state, agency, or program you are conducting testing for. Some states have indicated they will begin offering accreditation for EPA 1633 or 1633A once it is promulgated. Offering accreditation is not a regulatory requirement for testing. This will be determined by the regulatory agency, usually the programs or site remediation divisions. A few states have clarified they intend to require this method once it is promulgated, and their accreditation agency has begun offering certification for it. We expect this will evolve over the course of 2025.

The DoD currently requires use of the Draft 1633 method. In a memo released on February 28, 2024, the EDQW clarified they do not require laboratory accreditation to any particular version of EPA 1633, but that laboratories seeking accreditation to the final version shall follow the requirements in Table B-24 of the DoD/DoE Quality Systems Manual Version 6.0 (QSM 6.0). Although not regulatory, the EPA has strongly encouraged the states with NPDES permitting authority to begin permitting for PFAS using EPA 1633. Each state will make this determination for themselves, but we expect to see requirements for EPA 1633A in wastewater permits moving forward.

Is there an advantage to switching from 537 Modified to EPA 1633A when Eurofins is my lab?

Improved data quality: There is not. Eurofins' method 537 Modified and EPA 1633A have been demonstrated to generate data of comparable quality.

Cost: The cost of EPA 1633A and 537M is comparable when applied to the same parameters and matrices.

TAT: The TAT for EPA 1633A and 537M is comparable when applied to the same parameters and matrices.

Reporting limits: 537M supports slightly lower

RLs for certain PFAS, but overall limits are comparable between the two methods.

Analyte lists: EPA 1633A was written and validated for 40 PFAS, but as a performancebased method, analytes can be added, provided performance criteria specified in the method are achieved. Although this expansion is underway, current needs for an extensive list of PFAS are still supported by 537M, which has long achieved expanded analyte lists up to 70 PFAS. Whether this is advantageous or not depends upon the project specific objectives.

5

6

1633A Frequently Asked Questions



What Changed?

The December 2024 version of the method is identified as Method 1633A and supersedes all previous versions. It addresses various minor editorial issues noted in the January 2024 version, along with several technical clarifications.

While the changes in the latest version were largely administrative and do not alter our laboratory procedures, EPA 1633A provides clearer guidance on project-specific decision points that must be addressed before testing. Both EPA and DoD have emphasized that these methods include site-specific considerations and require project-specific data quality objectives (DQOs) that must be determined by client program personnel and clearly communicated to the laboratory.

PFAS Testing Excellence: Meeting Your Data Quality Objectives

Eurofins has identified all project-specific decision points in EPA Method 1633A and developed a standardized approach to address these requirements. To simplify the process for our clients, we have created a Project Directives form that consolidates all necessary decision points into a single document.

This approach allows us to understand your specific project requirements upfront and ensure that the analytical results meet your data quality objectives. By addressing these requirements at the beginning of the project, we can help you avoid potential re-work and additional costs associated with data that does not meet your specific project needs.

Our standardized implementation of Method 1633A across all Eurofins laboratories ensures consistency and reliability in PFAS testing, supporting the successful completion of your environmental projects.



TARYN MCKNIGHT VP of Product, PFAS Practice Leader taryn.mcknight@et.eurofinsus.com



JONATHAN THORN I Technical Director, PFAS Practice Leader jonathan.thorn@et.eurofinsus.com

