



DEPARTMENT OF THE ARMY
ASSISTANT SECRETARY OF THE ARMY
INSTALLATIONS, ENERGY AND ENVIRONMENT
110 ARMY PENTAGON
WASHINGTON DC 20310-0110

SAIE-ZA

8 January 2021

MEMORANDUM FOR

COMMANDER, ARMY MATERIEL COMMAND
DEPUTY CHIEF OF STAFF, G-9
CHIEF, U.S. ARMY RESERVE
DIRECTOR, ARMY NATIONAL GUARD

SUBJECT: Army Environmental Per- and Polyfluoroalkyl Substances (PFAS) Policy

1. References:

- a. Department of Defense Instruction (DoDI) 4715.18, Emerging Contaminants of Environmental Concern, Effective September 4, 2019.
- b. Army Regulation (AR) 200-1, Environmental Protection and Enhancement, December 13, 2007.
- c. Department of Defense Manual (DoDM) 4715.20, Defense Environmental Restoration Program (DERP) Management, March 9, 2012, Incorporating Change 1, August 31, 2018.
- d. DoDI 4715.08, Remediation of Environmental Contamination Outside the United States, November 1, 2013, Incorporating Change 2, August 31, 2018.
- e. Memorandum, DAIN-ZA, March 12, 2020 subject: Policy Guidance Update - Use and reporting of Fluorine Containing Aqueous Film Forming Foam.

2. Background:

- a. PFAS are a suite of emerging chemicals of concern as defined in reference 1.a. The Army has worked in concert with the Office of the Secretary of Defense (OSD) on appropriate approaches to identify, assess, and address Department of Defense (DoD) releases of PFAS that impact drinking water supplies, both on and off installations.
- b. In May 2016, the Environmental Protection Agency (EPA) issued a lifetime Health Advisory (HA) level for drinking water of 0.07 micrograms per liter ($\mu\text{g/L}$) for

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perfluorooctanesulfonic acid (PFOS) and perfluorooctanoic acid (PFOA), individually or combined. The HA is not an enforceable regulatory standard. Some states and foreign countries hosting Army installations have promulgated their own regulations or guidance relating to PFAS.

3. This policy, effective immediately, supersedes and cancels the memorandum from Assistant Secretary of the Army for Installations, Energy and Environment, 10 June 2016, Subject: Perfluorinated Compound (PFC) Contamination Assessment, and directs the following.

a. Water systems – The Army will sample or obtain sampling data for PFAS for the drinking water distributed on Army installations from both Army-owned and operated and non-Army-owned and operated drinking water systems.¹ Sampling is to be completed at the frequencies required by the most recent OSD and Army guidance based on the sampling results, and if there is a conflict, the most stringent guidance is to be used. When a drinking water purveyor is unable to provide sampling results for PFOS/PFOA, the Land Holding Commands (LHCs) will ensure that sampling is performed at the installation. PFAS sample results will be reported in the Defense Occupational and Environmental Health Readiness System, and exceedances of the EPA HA or properly promulgated and enforceable state or host nation drinking water standards will be reported to the Deputy Chief of Staff (DCS), G-9 Environmental Division (DAIN-ISE) and office of the Deputy Assistant Secretary of the Army for Environment, Safety and Occupational Health (ODASA(ESOH)).

b. Finished Drinking Water samples will be analyzed by the most current EPA approved method by an EPA, state, or DoD Environmental Laboratory Accreditation Program (ELAP) accredited laboratory certified to use the approved EPA Method.² If the sample results show PFOS/PFOA in exceedance of the EPA HA level of 0.07 µg/L or properly promulgated and enforceable state or host nation drinking water standards, the installation will notify DAIN-ISE and ODASA(ESOH) and users as soon as possible and implement mitigation such as supplying alternative drinking water or using different source water until the levels are reduced below the EPA HA. This drinking water sampling shall not be funded from the Defense Environmental Restoration Program (DERP) account.

c. Action to mitigate exposure required in 3.b., appropriate notifications, and risk communication activities must be coordinated with and approved by the installation's LHC and consistent with Headquarters, United States Department of the Army (HQDA) approved PFAS risk communication guidance.

¹ For purposes of this policy, sampling will be conducted or sampling results will be obtained for drinking water systems serving Army installations, no matter how many users are served by the drinking water system.

² The current approved EPA Method is 537.1 for PFAS analysis.

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d. Army cleanup programs – The Army will continue to research and identify locations where PFAS-containing materials are known or suspected to have been used, stored, or released on Army installations. The Army will assess and investigate these releases as appropriate and implement necessary response actions using the relevant provisions of References 1.b.-1.d. and other applicable DoD and Army cleanup policies and guidance. Consistent with DoD's use of the Relative Risk Site Evaluation (RRSE) framework, potential DERP PFAS-release sites are prioritized and sequenced along with other DERP sites for further action based on risk, with higher-risk sites being addressed before lower-risk sites. LHCs shall also prioritize and sequence Compliance-related Cleanup (CC) sites using RRSE.

(1) Final PFAS Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) reports and sampling results will be publicly accessible from the Army PFAS web page, after LHCs/installations conduct appropriate security reviews. This requirement applies to final primary PFAS reports and not the entire CERCLA Administrative Record.

(2) Prior to initiating off-installation PFAS-related sampling or response actions, the installation will coordinate through the chain-of-command and provide a memorandum through the G9 to the DASA(ESOH) for approval that describes the sampling or action.

4. ODASA(ESOH) will initiate notifications to impacted Congressional delegations in the following instances:

a. When installations are added to the inventory of installations where PFAS-containing materials are known or suspected to have been used, stored or released;

b. When installations are planning to conduct off-installation sampling of drinking water due to suspected PFAS impacts from Army activities as described via memorandum in 3.d.(2); and

c. When HA exceedances are confirmed in on or off-installation finished drinking water from Army activities.

5. Firefighting emergencies are the only authorized use of Aqueous Film Forming Foam (AFFF)-containing PFAS in the Army. Consistent with DoD policy and pursuant to reference 1.e., Army prohibits the discharge and use of AFFF-containing PFAS for testing and training.

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6. In the event there is an incident or emergency involving the use or release of AFFF into the environment, treat the event as a spill, and immediately contact the Installation Spill Response Team. Their support is critical to limiting potential future environmental impacts.

7. The point of contact for this action is John Tesner, Director for Restoration, 703-697-1987, john.e.tesner.civ@mail.mil.

A handwritten signature in blue ink that reads "Alex A. Beehler". The signature is written in a cursive, flowing style.

Alex A. Beehler

CF:

U.S. Army Medical Command (ATTN: Public Health Directorate)

U.S. Army Corps of Engineers