



DEPARTMENT OF THE AIR FORCE  
WASHINGTON, DC

OFFICE OF THE ASSISTANT SECRETARY

11 August 2016

MEMORANDUM FOR AF/A4  
AF/SG  
AFIMSC/CC  
NGB/CR

FROM: SAF/IE  
1665 Air Force Pentagon  
Washington, DC 20330-1665

SUBJECT: SAF/IE Policy on Perfluorinated Compounds (PFCs) of Concern

- References:
- (a) DoDI 4715.08, *Remediation of Environmental Contamination Outside the United States*, 1 Nov 2013
  - (b) DoDI 4715.18, *Emerging Contaminants*, 11 Jun 2009
  - (c) DoDM 4715.20, *Defense Environmental Restoration Program (DERP) Management*, 9 Mar 2012
  - (d) AFI 32-1067, *Water and Fuel Systems*, 4 Feb 2015
  - (e) AFI 32-7020, *The Environmental Restoration Program*, 14 Nov 2014
  - (f) AFI 48-144, *Drinking Water Surveillance Program*, 20 Apr 2015
  - (g) AFI 32-7091, *Environmental Management Outside the United States*, 18 Mar 2016

The U.S. Environmental Protection Agency (EPA) identified certain PFCs as emerging contaminants of concern which affect installations across the Air Force. Specifically, EPA issued a lifetime drinking water Health Advisory (HA) for the PFCs perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS). PFOS is a component of the Air Force's legacy and current Aqueous Film Forming Foam (AFFF) and PFOA is a stable end product resulting from the degradation of precursor substances. AFFF remains crucial to the Air Force and other DoD Components' actions to protect people and property associated with the Defense mission.

The Air Force is committed to the safety and well-being of its personnel and the general public, both on and off installations. The Air Force will implement the actions set forth in this memorandum with open, transparent and responsive communications with the public and regulators. Consistent with on-going efforts, if the Air Force releases PFOA/PFOS into the environment, and has a reasonable basis to believe there is the potential for unacceptable risk to human health and the environment, we will take action under applicable Federal or state law, in cooperation with the appropriate regulatory agencies, to protect our personnel and the public.

To ensure the Air Force maintains a proactive, consistent and systematic approach regarding PFOA/PFOS, I am directing the Air Force to take the following actions:

a. Advocate for and allocate funds for the assessment, investigation, mitigation and environmental response to PFOA/PFOS releases, as needed, to ensure the protection of human health and the environment, consistent with applicable Federal or state law.

b. Identify all locations on installations where the Air Force has reason to suspect there may have been a release of PFOA/PFOS attributable to Air Force actions, and confirm whether there exists a potential unacceptable risk to human health or the environment, consistent with applicable Federal or state law. As directed in SAF/IE memo, "Testing Drinking Water for Perflouroctane Sulfonate (PFOS) and Perfluorooctanoic Acid (PFOA)," dated 17 Jun 16, or as subsequently amended, where the AF is the purveyor, test drinking water and where AF is not the purveyor, assess water producer's response to EPA's new health advisory.

c. Address any PFOA/PFOS releases that pose unacceptable risk, including migration off-base, in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), and references (a)-(e). The reference dose (RfD) of 0.00002 mg/kg/day used by USEPA to derive a 70 parts per trillion drinking water lifetime HA for PFOA and PFOS is to be used as a Tier 3 human health toxicity value to calculate human health risk, in accordance with reference (b).

d. Developing drinking water sampling guidance for PFOA/PFOS. Where drinking water samples indicate unacceptable risk to human health, as defined by exceeding USEPA's lifetime drinking water HA for PFOA and PFOS, take appropriate mitigation action for all sources on current and former Air Force installations, as well as public and private water sources reasonably believed to be contaminated by Air Force actions.

e. Develop a plan that ultimately eliminates use of PFOS/C8-based and PFOA-containing AFFF on Air Force installations. The Air Force will advocate for and allocate funds to dispose of PFOS/PFOA-containing stocks, as well as procure and use MILSPEC-approved C6-based AFFF for mobile and facility-installed fire-fighting systems.

f. Maintain a leadership position on this issue by continued monitoring of scientific and industry AFFF improvement efforts, and adjust the Air Force AFFF replacement plan, as needed, to further enhance environmental, health, and fire-fighting postures.

g. Immediately halt routine, daily operational checks and testing of the foam discharge systems on Air Force fire-fighting vehicles, unless the resulting effluent can be contained and managed in a safe, environmentally-protective manner, as certified by the base civil engineer's environmental representative, in accordance with applicable local, county, and state regulations.

h. Initiate new and/or improved fire-fighting and facility-related training, tactics, techniques, technology and procedures, including facility design and construction, to mitigate or eliminate the release of AFFF to the environment. Effectively immediately treat all releases of

PFOS/PFOA-containing AFFF in the same way as a hazardous materials release response consistent with section 4.3.2 of reference (d).

This policy applies to Air Force operations, activities, and installations, which include the Active Air Force, Air Force Reserve, and Air National Guard, located in the United States (to include States, territories, and possessions of the United States). This policy memorandum also applies to Base Realignment and Closure locations and activities at Air Force Government-Owned, Contractor-Operated facilities in the United States. A separate policy will be issued in the future to address PFCs of Concern at Air Force installations and activities located outside the United States (i.e., in foreign countries). Meanwhile, continue to follow relevant overseas environmental requirements in applicable international agreements, country-specific Final Governing Standards (FGS), or the Overseas Environmental Baseline Guidance Document (OEBGD), if no FGS exists, references (a) and (g).

The POC for this matter is Ms. Catherine Fairlie, DSN 224-8458, [catherine.a.fairlie.civ@mail.mil](mailto:catherine.a.fairlie.civ@mail.mil).



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