

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Request Information on Usage of Perfluorooctyl Sulfonates Containing Materials

We would like you to provide information on the impact to the Department of Defense of the U.S. Environmental Protection Agency's (U.S.EPA) proposed rule that calls for the phase-out of 90 perfluorooctyl sulfonate (PFOS) chemicals (See attachment). The Mil Spec for Aqueous Film Forming Foams (AFFF) allows the use of PFOS, perfluorooctanoic acid (PFOA), and telomers to produce fluorochemical surfactants which are key to helping other AFFF's agents meet low fire-fighting surface tension requirements. AFFF is used in a number of critical life saving situations in DoD and currently, there are no known substitutes that are as effective as the materials in the Mil Spec.

Last year the EPA released data that indicates PFOS chemicals are persistent, bioaccumulating and toxic. PFOS has been found in the blood of the general US population, in wildlife, and in people overseas. The U.S.EPA will prevent manufacture or import of PFOS after December 31, 2002, including PFOS-based AFFF, unless a 90-day notice is filed and approved. They are also evaluating PFOA and telomer chemicals and these chemicals may also be subject to manufacturers' withdrawal from the market place (similar to 3M's action for PFOS) or future EPA rule making.

Request you perform an assessment of the impact of EPA's phase-out of PFOS to your organization and provide a copy to my office **by 10 Sep 01**. This assessment should include the quantity (in lbs.) and type of materials that contain PFOS, PFOA and telomer. Include the amount of AFFF or PFOS/PFOA/telomer-containing materials in stock, number of systems and the amount (in lbs.) used per year. Also list the operations where AFFF or PFOS/PFOA/telomer-containing materials are used and identify all mission critical uses, amounts, usage rate, stockpile, and potential substitutes, if any. Mission critical uses are those where no available substitutes and phase-out of PFOS/PFOA/telomer will negatively impact operational effectiveness and operational suitability of combat missions or contribute significantly to the degradation of combat capability.

In addition, please explain the mission impacts if a fire suppression system is not replaced, cost of replacement options and estimate quantities needed for stockpiling for mission critical uses. Identify any operations that release PFOS-containing materials to the environment and take appropriate steps to prevent or stop these releases. We will use this information to develop a DoD AFFF and PFOS/PFOA/telomer-containing material management strategy. My POC is Mr. Gary Hamilton. He can be reached at (703) 604-1820, email: gary.hamilton@osd.mil. If you have any questions, please contact him.

Curtis M. Bowling
Director, Force Protection

Attachment:
As stated

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