

AFFF and PFOS/PFOA DASN(E) Policy Memo July 2016

NAVSEA 05P5
Mary Hunstad

What are PFOS and PFOA?

- PFOS (perfluorooctane sulfonate) and/or PFOA (perfluorooctanoic acid) are substances found in all MIL-spec AFFF.
- Both PFOS and PFOA have been found in ground and drinking water at public water utilities and military sites where testing, training, or firefighting with AFFF occurred.
- AFFF is only one source of PFOS and PFOA – others include manufacturing processes, packaging, and surface treatments such as Scotchguard® and Teflon®.
 - Major manufacturers have been reducing PFOA levels in their processes and products in response to a voluntary EPA initiative.
- The latest MIL-Spec AFFFs still contain trace amounts of PFOA.
- PFOS is only found in AFFF made by 3M Corporation. 3M ceased production in 2001/2002.
- On 19 May 2016, EPA issued lifetime health assessments of 70 ppt for PFOS, PFOA or the combination.

DASN (EI&E) Policy Memo

- DASN(E) policy memo of 17 June 2016 states DON intention to remove, dispose, and replace legacy AFFF containing PFOS and/or PFOA once suitable substitutes are identified. Until suitable replacements identified:
 - Cease uncontrolled environmental release shore-side, except in emergency.
 - Prevent environmental release for outdoor training; testing of firefighting crash and response vehicle AFFF systems; testing of hangar AFFF and other fixed systems. (shore based activities only)
 - Update/implement requirements to ensure fire and emergency service vehicles and equipment at DON installations and facilities are tested and certified in a manner that does not allow release of AFFF to the environment.
 - By end of FY 2017, remove and dispose of PFOS containing AFFF in drums and cans from local stored supplies of shore installations and ships.
(Note - This is the 3M AFFF)

3% 3M
AFFF



Short Term Way Ahead



- ASD(EI&E) hosted initial meeting in June to lay out way ahead. Attended by DASN(E), OPNAV, USFFC, DLA, NAVSEA, NAVFAC, Air Force, and Army. Follow-on mtg in August.
- DLA checking all inventory for 3M (PFOS) AFFF.
- Testing AFFFs currently or recently on the QPL to determine PFOA level. Results expected late July.
 - Based on data, identify which are the better (lowest PFOA) products.
- Issue letter to DLA identifying the better AFFF products for use in procurement.
- Develop testing methodology to enable a lower limit of detection for PFOA.
- Issue Naval message to TYCOMs recommending all ships identify and remove 3M AFFF in cans/drums. Other commands will be info'd and can use the message to forward actions within their command if desired.
- Revise the AFFF Mil-Spec (already underway) to incorporate PFOA limits.

Long Term Actions - still under development, but will likely include a one-time replacement of AFFF in Fire and Emergency Service vehicles, shore-based hangars and other shore-based systems, and shipboard tanks.

