



ACQUISITION
TECHNOLOGY
AND LOGISTICS

OFFICE OF THE UNDER SECRETARY OF DEFENSE
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MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY
(ACQUISITION, LOGISTICS & TECHNOLOGY)
ASSISTANT SECRETARY OF THE NAVY
(RESEARCH, DEVELOPMENT AND ACQUISITION)
ASSISTANT SECRETARY OF THE AIR FORCE
(ACQUISITION)
CHAIRMAN OF THE JOINT CHIEFS OF STAFF (J-4)

SUBJECT: Phase-Out of Perfluorooctanoic Acid (PFOA)

Perfluorooctanoic Acid (PFOA) is used in the formulation of products critical to the Department of Defense (DoD). These products include high-performance fluoroelastomers and fluoropolymers with high heat/pressure resistance properties (e.g., O-rings; tank and pipeline seals; aircraft fuselages; engine housings). PFOA was also used in the past to produce Aqueous Film-Forming Foam (AFFF) for fire-fighting.

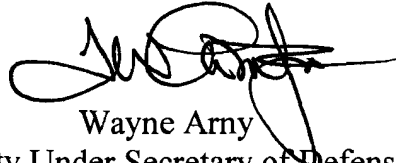
PFOA is bio-persistent and has been found widely in blood samples from the general population. As a result, EPA and the producing industry created the PFOA Stewardship Program which commits industry to phasing out PFOA production and use by 95% by 2010 and 100% by 2015. Because of the impending phase-out and the critical DoD uses of articles formulated with PFOA, it was elevated to the Emerging Contaminants (ECs) Action List in September by the EC Governance Council. Accordingly, a Phase II Impact Assessment was initiated.

Over the past several months, my staff has met with a number of chemical industry representatives. These representatives have assured us that suitable substitutes are being developed. Should substitutes not be developed for a specific critical application, industry has the ability to extend production beyond the goal dates.

After conducting an examination of the risks related to PFOA phase-out, we believe the risks are minimal to DoD functions and programs. We plan to propose to the EC Governance Council that PFOA be returned to the EC Watch List. The implications of this action are that we do not intend to develop risk management options for PFOA since industry is taking appropriate actions.



Please distribute this information to your Program Managers so they can ensure that any replacement articles formulated with substitute chemicals meet performance requirements. Also, please contact my staff should you discover any applications where substitutes will not meet performance requirements. My contact for this issue is Paul Yaroschak at (703) 604-0641 and paul.yaroschak@osd.mil.



Wayne Arny
Deputy Under Secretary of Defense
(Installations and Environment)

cc:

Deputy Assistant Secretary of the Army (Environment, Safety & Occupational Health)

Deputy Assistant Secretary of the Navy (Environment)

Deputy Assistant Secretary of the Air Force (Energy, Environment, Safety & Occupational Health)

Director, Defense Logistics Agency (DSS-E)

Director, Defense Research & Engineering

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Deputy Under Secretary of Defense (Logistics & Material Readiness)