
From: Rudroff, Jim CIV OASN (EI&E), ODASN Environment
To: Berkoski, Daniel T CIV NAVSEA, SEA 05
CC: Hunstad, Mary P CIV NAVSEA HQ, SEA 05; Fletcher, Steven G CIV NAVSEA HQ, SEA 05; Mach, Richard CIV OASN (EI&E), ODASN (Environment); Nehm, Lindsay R CIV OPNAV, N45; Pletke, Mike CIV OPNAV, N45
Sent: 4/6/2016 8:06:54 PM
Subject: RE: 3M AFFF advisory
Attachments: TAB B - Attachment - ECGC Endorsements v2.doc; ATTACH003.eml; 14-10-21 DASN (E) PFC memo.pdf; USA000204-16 - EIE signed ECGC Meeting Follow-up.pdf

Dan,

I'm forwarding several attachments in response to your email below. Notably, the OSD Emerging Contaminants (ECGC) memo's endorsements attachment includes, "The Military Services will: Issue Service-specific risk management procedures to prevent routine uncontrolled land-based releases of AFFF during maintenance, testing, and training activities; Where and when practical to do so, remove & properly dispose of PFOS-based AFFF from the local stored supplies for non-shipboard use to prevent future environmental response action costs. Focus on removing and replacing known PFOS-based AFFF in unopened drums/cans versus AFFF already loaded into system tanks/bladders. PFOS-free AFFF is available on the DoD Qualified Products List.

DON has endorsed these recommendations as prudent, risk management actions to eliminate/minimize the release of PFOS-based AFFF from local stored supplies ashore. Relative to 3M AFFF product which is in cans and drums aboard ship as highlighted in Steve Fletcher's email (attached), it makes prudent sense to extend/apply OSD's recommendation to take risk mitigating action by evaluating and advising all concerned on the removal and proper disposal of 3M AFFF in drums/cans - to avoid installation & use aboard ship. Caveat this with - any ship with cans of 3M AFFF must have a replacement supply of (cleaner) product available to ensure safety of the ship and crew at all times.

VR,

Jim

-----Original Message-----

From: Berkoski, Daniel T CIV NAVSEA, SEA 05
Sent: Wednesday, April 06, 2016 8:52 AM
To: Rudroff, Jim CIV OASN (EI&E), ODASN Environment
Cc: Hunstad, Mary P CIV NAVSEA HQ, SEA 05; Fletcher, Steven G CIV NAVSEA HQ, SEA 05
Subject: 3M AFFF advisory

Jim,

After further discussions with Mary, we're moving to draft a naval advisory that's geared towards removal and proper disposal of the 3M PFOS AFFF that's still in cans and drums. We can direct the removal for Navy ships, and make a recommendation to the other services that they take similar action.

In looking for some references that would support our position, I came across the attached OSD risk alert that appears to date to 2011. I'm thinking of referencing the attached in the advisory, as it does explain the environmental concerns, however it does state that PFOS AFFF can still be used. Are you aware of any additional OSD or Navy directives that may have been issued that would be a better reference?

V/r,

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