DEPARTMENT OF THE NAVY
OFFICE OF THE ASSISTANT SECRETARY
(ENERGY, INSTALLATIONS AND ENVIRONMENT)
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WASHINGTON, DC 20305-1000

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MEMORANDUM FOR DEPUTY CHIEF OF NAVAL OPERATIONS
(FLEET READINESS AND LOGISTICS) (N4)
DEPUTY COMMANDANT OF THE MARINE CORPS
(INSTALLATIONS AND LOGISTICS)
DEPUTY COMMANDANT OF THE MARINE CORPS
(AVIATION)

SUBJECT: Aqueous Film Forming Foam (AFFF) Control, Removal, and Disposal

Ref: (a) DASN (E) Policy Memo, 21 Oct 2014
(b) ASD (EI&E) Policy Memo, 28 Jan 2016
(c) EPA Perfluorinated Chemical (PFC) Health Advisories, 19 May 2016

Perfluorinated compounds (PFCs)/per and polyfluoroalkyl substances (PFASs) are a suite of over 100 chemicals, several of which are of emerging public health concern to the Department of the Navy (DON), U.S. Environmental Protection Agency (EPA), state regulators, public water systems, and the general public. The most common DON activity that results in the release of PFC/PFAS to the environment is through the use of AFFF for testing, training, firefighting, and other emergency responses.

Reference (a) directed actions regarding two PFC/PFAS, perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA), at cleanup sites and in drinking water systems. In reference (b), ASD (EI&E) directed the DoD Components to issue Service-specific policies to prevent routine uncontrolled environmental releases of AFFF during maintenance, testing, and training activities, and remove and properly dispose of uninstalled PFOS containing AFFF drums and cans from local stored supplies (non-shipboard).

On 19 May 2016, the U.S. Environmental Protection Agency (EPA) issued reference (c) to provide lifetime drinking water health advisories for PFOS and PFOA, which are contained in older formulations of AFFF. The newest formulations of MILSPEC-compliant AFFF (i.e., products qualified since November 2015) may still contain trace quantities of PFOA.

DON intends to remove, dispose, and replace legacy AFFF that contains PFOS and/or PFOA once environmentally suitable substitutes are identified and certified to meet MILSPEC requirements. This policy directs the following actions be taken until suitable replacements are certified:

- Immediately cease the uncontrolled environmental release of AFFF for shoreside installations, with the exception of emergency responses. Installations should

verify and ensure that the following activities have appropriate controls in place to prevent an environmental release: controlled outdoor training with AFFF; testing of firefighting and crash response vehicle AFFF systems; testing of hangar AFFF and other fixed systems. Where such non-emergency operations are deemed necessary, complete containment, capture, and proper disposal mechanisms and procedures must first be in place to the maximum extent practicable prior to conducting such actions to ensure no AFFF is released to the environment.

- Update and implement Navy and Marine Corps firefighting system requirements, as needed, 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 the release of AFFF to the environment.

- By the end of FY2017, remove and dispose of uninstalled PFOS-containing AFFF in drums and cans from local stored supplies for shore installations and ships to prevent future environmental releases.

The above actions are vitally important to ensure all personnel and their families who live or work on DON installations and facilities are protected from environmental contaminants and receive safe drinking water.

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