



DEPARTMENT OF THE NAVY
THE ASSISTANT SECRETARY OF THE NAVY
(ENERGY, INSTALLATIONS AND ENVIRONMENT)
1000 NAVY PENTAGON
WASHINGTON DC 20350-1000

October 21, 2014

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

SUBJECT: Perfluorinated Compounds (PFCs) – An Emerging Environmental Issue

References: (a) OPNAVINST 5090.1D
(b) MCO P5090.2A
(c) DoDI 4715.18
(d) SECNAV Info Memo, 29 Jul 2014

The Department of the Navy (DON) is committed to ensuring all men, women, and children who live or work on DON installations and facilities are protected from environmental contaminants and receive safe drinking water. Navy and Marine Corps maintain comprehensive environmental instructions (references (a) and (b)) detailing procedures to meet and exceed requirements found in statute, regulation, and policy. Reference (c) established Department of Defense (DoD) policy relative to emerging contaminants, such as PFCs.

PFCs are a suite of chemicals of emerging public health concern to the U.S. Environmental Protection Agency (EPA) and state regulators, primarily in drinking water systems. One of the major DoD uses of PFCs is as a fire extinguishing agent in aqueous film forming foam (AFFF). EPA added new PFC sampling requirements under the Safe Drinking Water Act (SDWA) Unregulated Contaminant Monitoring Rule 3 (UCMR 3), requiring all large and 800 small public water systems to test for these chemical between 2013-2015. This testing is being conducted to determine the extent of PFCs in drinking water systems nationwide and whether drinking water standards should be established.

Per reference (d), my staff coordinated a meeting with the DoD Component subject matter experts to evaluate these emerging contaminants and identify paths forward regarding the future use, cleanup, and protection of DON drinking water systems. To date, only two PFCs (perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA)) have sufficient toxicological information to make cleanup and drinking water safety decisions. DoD is taking the lead and will be conducting a study of AFFF formulations to determine whether safer alternatives are available that meet our firefighting requirements. After coordinating with your Navy and Marine Corps staff, I am directing the following actions be taken regarding PFOS and PFOA cleanup sites and drinking water systems:

- Defense Environmental Restoration Program (DERP) – identify all known and suspected sites where PFOS and/or PFOA may have been released on active and Base Realignment and Closure (BRAC) installations. As appropriate, address these contaminant releases including migration off-site, under DERP and in accordance with reference (c).
- DON drinking water systems in the United States – Ensure all applicable UCMR 3 testing and reporting requirements are met by December 2015. If exceedances of Provisional Health Advisory (PHA) values are identified, supply alternative drinking water until these levels can be reduced below the PHAs. For installations not required to test under the UCMR 3, and where the installation produces drinking water from on-installation sources, by December 2015, sample finished drinking water from all DON systems for PFOS and PFOA where there is an identified or suspected PFC release within approximately 1-mile upgradient to the drinking water source. Address any PHA value exceedances per above.
- DON overseas drinking water systems – DERP does not apply overseas, so PFC release site information may not be available. Therefore, all DON overseas drinking water systems shall be sampled for PFOS and PFOA by December 2015 and any PHA value exceedances addressed per above.
- Drinking water systems with detections above the Method Reporting Limit (MRL), but below the PHA value shall determine appropriate follow-up actions, in coordination with the chain of command, which may include additional sampling to ensure levels in drinking water, remain below the PHA value.
- Report all drinking water PHA value and MRL exceedances and corrective actions to my office.

My point of contact is Mr. Richard Mach at (703) 614-5463 or richard.mach@navy.mil.


Donald R. Schregardus