



DEPARTMENT OF THE AIR FORCE
WASHINGTON DC

OFFICE OF THE ASSISTANT SECRETARY

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MEMORANDUM FOR DISTRIBUTION C
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FROM: SAF/IEE
1665 Air Force Pentagon
Washington, DC 20330-1665

SUBJECT: Department of the Air Force Management Strategy for Addressing PFAS

The release of per- and polyfluoroalkyl substances (PFAS) into the environment is a significant concern. Due to the military use of PFAS-containing fire-fighting foam, these substances may be found in the soil, groundwater, and surface water at and around Department of the Air Force (DAF) installations. To effectively address PFAS issues and ensure compliance with applicable legal and regulatory requirements, the DAF issues this Management Strategy.

The following six objectives are provided to all levels of leadership to mitigate PFAS impacts on human health and the environment, while acknowledging the evolving technical and regulatory landscape. It is paramount these efforts support our mission's continued effectiveness and operational readiness.

Objective 1: Protect Human Health and the Environment

The DAF is dedicated to ensuring the safety and health of Airmen, Guardians, the civilian workforce, and the communities that host our installations by:

- Ensuring access to safe drinking water for people living and working on active and former installations and in the surrounding communities
- Reducing the risk of human contact with PFAS-impacted media and minimizing or eliminating the release of PFAS to the environment from DAF activities.

Objective 2: Transition from Fluorine-containing Products to Fluorine-free Alternatives and Minimize Potential PFAS Release or Exposure Risk

The DAF commits to phasing out PFAS-containing aqueous film-forming foam (AFFF) firefighting products and replacing AFFF with fluorine-free foam (F3) alternatives or water where appropriate. The actions DAF is undertaking or plans to undertake to minimize potential PFAS releases and mitigate risks include:

- Prohibiting the use of and actively eliminating fluorine-containing AFFF products

- Removing and replacing legacy fluorine-containing firefighting foam with F3 alternatives in our mobile assets (e.g., fire trucks)
- Removing AFFF and rinsing it from fixed fire suppression systems at DAF facilities, including tanks, piping, and components upstream from proportioners
- Procuring alternatives to AFFF, such as non-foam, water-based fire suppression sprinkler systems, and trenching floor drains in facilities
- Requiring lockout/tagout to prevent inadvertent accidental discharges of fluorine-containing foam from fire suppression systems
- Disposing of existing stockpiles of fluorine-containing AFFF in compliance with applicable regulations and policies
- Developing guidance for safely handling, managing, and disposing of fluorine-containing wastes and materials to prevent future releases

Objective 3: Fulfill Cleanup Responsibilities Related to PFAS Releases at DAF Sites

The DAF will clean up PFAS at its sites in accordance with applicable federal cleanup laws and requirements, including the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), National Contingency Plan, Defense Environmental Restoration Program, Resource Conservation and Recovery Act, and Federal Facility Agreements. The DAF will achieve this by:

- Identifying and investigating legacy PFAS releases from installations
- Mitigating PFAS migration off base and preventing PFAS exposure while long-term solutions are developed
- Reducing health risks by using available and innovative technologies to separate, remove, and appropriately dispose of PFAS-impacted media (soil, groundwater, surface water, air) from the environment
- Utilizing adaptive PFAS site management based on new information and technology development
- Employing best management practices (BMPs) to innovate and modernize the handling of materials containing PFAS. BMPs guide planning, design, construction, operation, maintenance, and disposal within the Environmental Restoration Program; Military Construction (MILCON) Program; and Facility Sustainment, Restoration, and Modernization (FSRM) activities

- Providing rapid emergency response to immediately address accidental spills of materials containing PFAS when they occur

Objective 4: Invest in New PFAS Alternatives, and Treatment and Destruction Technologies

The DAF leads efforts to improve existing PFAS treatment and develop innovative separation, treatment, and destruction technologies by:

- Investing in research and development of F3 and PFAS-replacement alternatives and PFAS-destruction technologies
- Using the DAF Broad Agency Announcement program to further develop and field test PFAS treatment and destruction technologies
- Partnering with Department of Defense (DoD) organizations through the Strategic Environmental Research and Development Program (SERDP) and the Environmental Security Technology Certification Program (ESTCP) to identify, evaluate, and advance the best technologies available for characterizing, treating, and managing PFAS.

Objective 5: Integrate PFAS Mitigation into Compliance Programs

The DAF will embed PFAS mitigation requirements within our environmental compliance programs to ensure comprehensive and effective management of PFAS-related issues by:

- Assessing PFAS-related, federal, state, and local requirements as they evolve and incorporating them into our compliance framework
- Identifying and employing best management practices for PFAS mitigation and disposal that support the mission
- Strategizing long-term planning and programming to address potential PFAS mitigation requirements in programs beyond environmental compliance.

Objective 6: Engage and Collaborate with Stakeholders

The DAF proactively engages with and addresses the concerns of DAF offices, DoD, the military and civilian workforce, communities, regulatory agencies, and other federal agencies and Congress by:

- Actively participating in the DoD PFAS Task Force and related working groups to support DAF equities and share updates and lessons learned

- Tracking and providing progress reports on PFAS cleanup efforts to DoD, including timely reporting of PFAS-impacted drinking water well treatment data to Congress via a publicly facing website
- Engaging effectively and transparently with state, tribal and local officials, members of Congress and their staffs, restoration advisory boards, and affected communities. This includes building and nurturing relationships with community members and stakeholders to maintain or regain trust, listening to their concerns, working together to achieve common goals, and ensuring they feel included and valued in decision-making processes
- Improving community outreach programs to be more inclusive and responsive, raising awareness through fact sheets, workshops, and seminars on PFAS risks and information on how to avoid contact with or consumption of PFAS.

The DAF is dedicated to protecting human health and the environment in the communities hosting our installations by eliminating PFAS-related health and exposure risks. In meeting fiscal year 2020 National Defense Authorization Act (NDAA 2020) requirements, the DAF prohibits the use of AFFF products, works to replace AFFF with F3 firefighting alternatives, accelerates clean-up efforts at PFAS-contaminated sites, invests in PFAS alternatives and innovative cleanup technologies, integrates PFAS mitigation into Compliance Programs, and engages and collaborates with stakeholder community groups, government and regulatory agencies.

If you have any questions, please contact Ms. Michelle Brown, Director SAF/IEE Environment, michelle.brown.36@us.af.mil.

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