



DEPARTMENT OF THE AIR FORCE  
WASHINGTON, DC 20330-1000



OFFICE OF THE ASSISTANT SECRETARY

MEMORANDUM FOR AF/A4  
NGB/CR  
AF/SG  
AFIMSC/CC

DEC 29 2017

FROM: SAF/IEE  
1665 Air Force Pentagon  
Washington, DC 20330-1665

SUBJECT: Managing AFFF-related perfluorooctane sulfonate and perfluorooctanoic acid (PFOS/PFOA) Waste

SAF/IE policy memorandum, dated 11 Aug 2016, directed the Air Force to “Identify all locations on installations where the Air Force has reason to suspect there may have been a release of PFOS/PFOA attributable to Air Force actions and confirm whether there exists a potential unacceptable risk to human health or the environment, consistent with applicable Federal or state law” to “ensure the Air Force maintains a proactive, consistent and systematic approach regarding PFOS/PFOA...” Air Force response activities in accordance with the aforementioned direction have resulted in waste that must be managed.

The intent of this policy memo is to protect human health and the environment by establishing consistent approaches for managing PFOS/PFOA waste generated from various activities. Because PFOS/PFOA are neither “hazardous substances” nor “hazardous wastes”, existing statutes or regulations largely do not address how to manage wastes derived from PFOS/PFOA releases.

Therefore, I am directing AF/A4, NGB/CR, AF/SG, and AFIMSC/CC to (a) develop implementation guidance that reflects current best technical judgement on how to manage PFOS/PFOA-containing waste to achieve human health protection (in particular, to minimize the risk of further release to drinking water that would cause exceedance of EPA’s lifetime health advisory of 70 ppt), and (b) update it periodically as needed to address changes in regulatory requirements or DoD determinations of risk or development of new technologies. Of course, transport and management of such waste should also comply with any applicable legal requirements (see DERP Manual, Enc. 3, Section 6, b).

If you have questions, please contact the following POCs as applicable: Active/Reserve: [AFCEC.CZ.PFOS-PFOA@us.af.mil](mailto:AFCEC.CZ.PFOS-PFOA@us.af.mil), BRAC (AFCEC/CIB): [Stephen.Termaath@us.af.mil](mailto:Stephen.Termaath@us.af.mil) or Air National Guard (NGB/A4O): [Kevin.L.Mattoch.civ@mail.mil](mailto:Kevin.L.Mattoch.civ@mail.mil).



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