



ASSISTANT SECRETARY OF DEFENSE

3500 DEFENSE PENTAGON
WASHINGTON, DC 20301-3500

May 20, 2020

SUSTAINMENT

MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY (INSTALLATIONS,
ENERGY AND ENVIRONMENT)
ASSISTANT SECRETARY OF THE NAVY (ENERGY,
INSTALLATIONS AND ENVIRONMENT)
ASSISTANT SECRETARY OF THE AIR FORCE (INSTALLATIONS,
ENVIRONMENT AND ENERGY)
COMMANDER, UNITED STATES AFRICA COMMAND
COMMANDER, UNITED STATES CENTRAL COMMAND
COMMANDER, UNITED STATES FORCES, JAPAN
COMMANDER, UNITED STATES FORCES, KOREA

SUBJECT: Reporting Host Nation Per- and Polyfluoroalkyl Substances Requirements at
Installations Outside the United States

The Secretary of Defense created a Per- and Polyfluoroalkyl Substances (PFAS) Task Force to manage growing health concerns over releases of these substances and the effects on military installations and their surrounding communities. Similar to the United States, host nation partners are navigating the challenges of evaluating the need for and the development of PFAS-related restrictions and standards. In January 2020, I issued a data call requesting you, the Department of Defense (DoD) Lead Environmental Components (LECs), provide current information on evolving host nation standards and DoD Final Governing Standard (FGS) language related to PFAS.

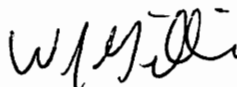
To sustain the Department's efforts and to continually update this information, we need the DoD LECs to report when host nations promulgate standards and/or issue health advisories or thresholds for PFAS compounds. This information will enable the Department to understand environmental requirements outside the United States, forecast potential increased host nation enforcement actions and requirements, and determine if changes in policy are necessary.

Therefore, I am establishing a new reporting requirement for notifying the Office of the Deputy Assistant Secretary of Defense for Environment (ODASD(ENV)) and other impacted Services regarding information about PFAS requirements in host nations. Using the attached template, each LEC shall report the following:

- Host nation name and LEC information;
- Summary narrative of new host nation PFAS regulation/guidance, the source of the regulation/guidance, the impacted media, and a legal interpretation of the regulation/guidance by the cognizant LEC counsel;
- Estimated or known timeline when regulation/guidance will go into effect; and
- Summary description of potential impact on Final Governing Standards.

Due to the heightened focus on DoD's response to PFAS issues, this information shall be reported through the appropriate chain of command to DASD(ENV) and applicable Department Deputy Assistant Secretaries via email as soon as possible for any proposed standards or guidelines and within 30 days of the host nation promulgating standards or issuing guidelines for PFAS.

My point of contact is Lt Col Chad Gemeinhardt at 572-372-6889 or chad.a.gemeinhardt.mil@mail.mil.



W. Jordan Gillis

Attachment:

As stated

cc:

COMMANDER, U.S. CYBER COMMAND
COMMANDER, U.S. EUROPEAN COMMAND
COMMANDER, U.S. NORTHERN COMMAND
COMMANDER, U.S. INDO PACIFIC COMMAND
COMMANDER, U.S. SOUTHERN COMMAND
COMMANDER, U.S. SPECIAL OPERATIONS COMMAND
COMMANDER, U.S. STRATEGIC COMMAND
COMMANDER, U.S. TRANSPORTATION COMMAND

OSD (USD A&S) Reporting Spreadsheet for PFAS Requirements for Installations Outside the United States

Host Nation	LEC	POC	<p style="text-align: center;">Specify the requirement as a regulation or a guidance: Provide a summary narrative of the new PFAS regulation/guidance, the source of the regulation/guidance, the impacted media, and a legal interpretation of the regulation/guidance by a DoD attorney.</p> <p style="text-align: center;">(NOTE: Please provide English translation of the requisite information.)</p>	<p style="text-align: center;">Known or Estimated Timeline For When New Regulation/Guidance Will Go Into Effect</p>	<p style="text-align: center;">Potential Impact on Final Governing Standards</p>
e.g. Japan	e.g. Commander, U.S. Forces Japan	e.g. Name, organization, email address, and phone number	<p>e.g. Under the Water Works Law, the Ministry of Health, Labour, and Welfare (MHLW) established a new drinking water quality standard (DWQS) (i.e. a regulation) of 70 ppt for PFOS and/or PFOA. This standard applies to municipal drinking water.</p> <p>Legal interpretation by DoD attorney can be provided as separate attachment if needed.</p>	e.g. April 1, 2020	e.g. Final Governing Standards may need to be updated to incorporate new promulgated standard.