MEMORANDUM FOR ALMAJCOM/CC and DISTRIBUTION C

SUBJECT: Air Force Ban on Purchases of Ozone Depleting Chemicals (ODCs) -- ACTION MEMORANDUM

Jan 7 1993

This policy implements the National Defense Authorization Act for Fiscal Year 1993, Title III, Section 326 (Public Law 102-484), and the Under Secretary of Defense (Acquisition) August 11, 1992 policy on ODCs. Effective January 1, 1993 we are instituting the attached Air Force policy governing the purchase, use, and management of controlled ODCs. This policy applies to all Air Force, Reserve, Air National Guard and Government Owned Contractor Operated activities.

We are taking this action for several reasons. Recent scientific data shows the earth's ozone layer is being destroyed far more rapidly than we previously believed, and for the first time, ODCs in the atmosphere threaten to deplete the ozone layer over populated areas of the world. Last month, the United Nations agreed to end chlorofluorocarbon (CFC) production by 1995*, and halon production by 1994 at the Montreal Protocol renegotiations. This will result in a global ODC production ban. Additionally, declining market demand will likely create supply problems before the production phaseout date, jeopardizing missions dependent on a continued supply of these substances.

This is a challenging task, but we expect each of you to take whatever steps are necessary. The production phaseout is imminent. The sooner we learn to live without these substances, the less likely we are to suffer a mission stoppage because they are not available, and the less we will contribute to the depletion of the earth's ozone layer.

Merrill A. McPeak, General, USAF
Chief of Staff

Donald B. Rice
Secretary of the Air Force

Attachment
Air Force ODC Policy

*End of calendar year
AIR FORCE POLICY ON OZONE DEPLETING CHEMICALS (ODCs)

This policy applies to all Air Force, Reserve, Air National Guard, and Government Owned Contractor Operated (GOCO) activities, and equipment, systems and products acquired by contract

Applicable Air Force Policy Directives and Instructions will be revised to incorporate this policy.

Waivers permitted under this policy are for the purpose of extending the time to develop and implement mission critical ODC alternatives, and not to allow "business as usual." Waivers shall not be required for ODCs currently in use, provided an alternative has been identified, and that no future requirement to purchase new ODCs exists. Waivers shall be required to purchase new ODCs, or obtain ODCs from the Defense Logistics Agency ODC bank for mission critical applications.

This policy is effective January 1, 1993, and includes the following ODCs:

HALONS:

Halon 1211, Halon 1301, Halon 1202 and Halon 1011 are used primarily as firefighting agents. Halon 2402 is used for vector control in some missile systems.

CHLOROFLUOROCARBONS (CFCs);

CFCs-ll, -12, -113, -114, -115, -13, -111, -112, -211, -212, -213, -214, -215, -216, and -217. These are used primarily as refrigerants and cleaning solvents.

OTHER CONTROLLED SUBSTANCES:

Carbon Tetrachloride and Methyl Chloroform, which are used primarily as cleaning solvents.

Methyl Bromide, which is used as a pesticide and fumigant.

DEFENSE LOGISTICS AGENCY ODC "BANK"

The Air Force endorses the practice of recycling ODCs through an ODC bank to meet mission critical applications, until non-ODC alternatives can be identified and implemented. The DLA is establishing a DoD ODC bank to ensure that supplies for mission critical uses are available to the Services. AF/CE shall develop guidance for AF participation in the DLA ODC bank.
HALON POLICY

HALON USE AND PURCHASE POLICY

- The purchase of newly produced halons is prohibited as of June 1, 1993, unless a waiver is approved. Halon needed to meet mission critical applications will be recycled from existing stocks, such as the DLA ODC bank.

- Mission critical halon applications are defined as halons used on board aircraft which are required to meet flight safety, flight survivability, or flight certification requirements.

Airborne Systems and Subsystems

- SAF/AQ shall require aircraft in development (pre Milestone III) not be designed to include halon, but shall incorporate alternatives currently under development. SAF/AQT shall develop non-halon systems for aircraft, in coordination with other Federal Agencies and the private sector.

- Halons needed to meet mission critical applications will be obtained by using existing stocks, or from the DLA ODC bank in the event the DLA ODC bank is unable to meet requirements, recycled halons may be purchased from commercial sources.

- Existing aircraft halon systems which discharge to the atmosphere for other than actual fire situations, such as fuel tank inerting systems, shall be used only in actual combat, or for actual inflight emergencies. SAF/AQ and AF/LG shall evaluate halon alternatives for these systems, and shall direct program offices responsible for aircraft using these systems to implement alternatives, once available.

- Correcting fire warning systems and operational procedures that result in false alarms and false discharges shall be a top priority of system managers.

Halon on Flightlines

- Halon systems on crash/rescue vehicles shall be disabled. AF/CE shall implement a phased program to replace these systems with ones containing non-halon fire fighting agents.

- AF/LG, AF/CE and SAF/MIQ shall jointly select a halon alternative for the 1501b flightline extinguishers and shall implement a phased replacement program. Halon removed from crash/rescue vehicles, or from existing installation stock, may be used to service flightline extinguishers until the phased replacement program is complete, without need for a waiver. Flightline extinguishers shall be serviced using recycling equipment. The recycled halon shall be used to reservice the halon extinguishers remaining in the inventory until the phased transition is complete. Halon remaining after the transition is complete shall be added to the AF account of the DLA ODC bank.
Halon in Facilities

- Purchasing halon extinguishers for facility applications is prohibited. Existing extinguishers may be retained and replaced through attrition, without need for a waiver. Halon removed from facility portable extinguishers may be used to service flightline extinguishers until the phased replacement of the flightline halon extinguishers is complete. Once complete, excess halon shall be added to the AF account of the DLA ODC bank.

- Total flooding systems shall not be specified or purchased. Automatic discharge mechanisms shall be disabled and systems shall be placed on manual activation in order to reduce accidental halon loss to the atmosphere. Existing systems do not require waivers, but shall be replaced with non-Ahalon alternatives through attrition, as facilities are renovated, modified, or removed from service.

HALON BANKING STRATEGY

- SAF/AQ shall identify total annual halon required to meet mission critical applications, by quantity, type and application for SAF/AQ managed systems until the halon requirement no longer exists. AF/LG shall identify same requirements for AF/LG managed systems. AF/CE shall consolidate Air Force total requirements and submit to SAF/MIQ. SAF/MI shall forward Air Force requirements to DLA for their use in managing the DoD ODC bank. The requirements shall consist of the total halon required to make up for de minimis losses during recycling, plus an amount required for actual firefighting, plus a minimum amount for accidental loss.

- Air Force halon shall be managed according to the following:

- AF/LG shall direct that halon be removed from aircraft being retired from service and be redeployed or added to the AF account of the DLA ODC bank.

- AF/LG shall direct that all servicing of aircraft halon systems capture the halon for recycling. No atmospheric discharge during servicing, other than de minimis, is permitted. Halon captured by field servicing organizations shall be recycled for reuse either by contract, or by returning to depot. Halon not restorable to usable condition shall be stored until approved destruction facilities are available.

- AF/CE shall direct that halon be removed from closure bases before being turned over to the Air Force Base Disposal Agency, and added to the AF account of the DLA ODC bank.

- AF/CE shall direct that halon removed from flightline fire extinguishers, crash rescue vehicles and other non-mission critical applications which have been declared excess, be added to the AF account of the DLA ODC bank.
• AF/CE shall direct that deactivated facility halon systems declared excess be added to the AF account of the DLA ODC bank. Halon in existing facility systems shall be made available to the AF account of the DLA ODC bank through attrition as facilities are modified and the halon systems are deactivated. Replacements for facility halon systems shall be programmed through normal maintenance, repair, or construction programs.

• AF/CE shall identify the location, amount, and type of halon in facilities. AF/LG shall identify the same information for AF/LG owned systems, the supply pipeline, and reserve storage. This information shall be used to ensure adequate amounts are available to meet mission critical applications and that excess halon is added to the AF account of the DLA ODC Bank.

**CFC POLICY**

**REFRIGERANTS**

• The acquisition of facility air conditioning systems, AGE equipment and other refrigeration and support equipment, using ODCs is prohibited as of January 1, 1993.

• AF/LG shall prohibit the purchase of commercial vehicles with ODC air conditioning equipment after June 1, 1993; and shall implement procedures to comply with Clean Air Act requirements for recycling ODCs when servicing existing vehicle ODC air conditioning systems.

• AF/CE shall develop installation guidance for managing refrigerant inventory so existing chillers can be maintained until the end of their economic life. A good maintenance and repair program is key to the success of this strategy. Refrigerators and other domestic equipment shall be replaced with non-ODC equipment at the end of its economic life. The purchase of recycled ODCs from commercial sources is permitted to maintain this equipment; however, this approach shall not be a substitute for effective management and recycling of existing refrigerant inventory and proper repair and maintenance of equipment.

  -- AF/CE shall support projects for ODC recycling equipment, and chiller modifications for leak detection and efficient purge hardware in the Pollution Prevention Program.

  -- AF/CE shall direct that ODCs be recovered from equipment being retired at the end of its economic life, and used to service the remaining ODC systems in the inventory.

  -- Chillers shall be programmed for replacement at the end of their normal service life as normal maintenance and repair.
Airborne Cooling Systems and Subsystems

- SAF/AQ shall direct that systems in development (pre Milestone III) not be designed to use ODC refrigerants.

- Existing systems that require ODC refrigerants are considered mission critical.

- SAF/AQ and AF/LG shall prohibit the purchase of newly produced ODC refrigerants, effective June 1, 1993. Refrigerants needed to meet mission critical applications will be obtained by using existing stocks, or from the DLA ODC bank. In the event the DLA ODC bank is unable to meet requirements, recycled refrigerant may be purchased from commercial sources.

- SAF/AQ shall identify total annual ODC refrigerant required to meet mission critical applications, by quantity, type, and application for SAF/AQ managed systems until the ODC requirement no longer exists. AF/LG shall identify same requirements for AF/LG managed systems. AF/CE shall consolidate Air Force total requirements and submit to SAF/MIQ. SAF/MI shall forward Air Force requirements to DLA for their use in managing the DoD ODC bank. The requirements shall be the total refrigerant required to make up for de minimis losses which occur during recycling, plus an amount required to account for ODCs lost due to catastrophic system failure. Correcting leaking systems shall be a top priority for system managers.

SOLVENTS

- Effective April 1, 1994 the purchase of ODC solvents, and equipment/systems/products requiring ODC solvents for maintenance or operation is prohibited.

- Any new system or modification to an existing system may not include the use of ODCs unless approved by SAF/AQ. This authority may not be delegated.

- No solvent uses shall be considered mission critical.

GENERAL POLICY PROVISIONS

Specifications, Standards and Technical Orders

- SAF/AQ and AF/LG and AFMC shall tailor all specifications and standards in use that require ODCs to allow non-ODC alternatives. Responsible activities will forward a copy of the tailored pages of the specification or standard with a request for revision to the preparing activity for the document. Responsible offices will also provide a complete copy to the Air Force Custodian and a copy of the cover letter to the Air Force Standardization Office.

  - AFMC shall develop interim specifications, standards, and ODC purity requirements if necessary.
• AFMC shall review all Air Force Technical Orders in use to identify ODC uses and provide a list of affected Technical Orders to Program Managers and Directors. Program Managers and Directors shall revise them to allow the use of non-ODC alternatives with a goal to be complete by April 1, 1994.

• Substitute chemicals must comply with Section 5 of the Toxic Substances Control Act (TSCA) and Section 612 of the Clean Air Act Amendments of 1990 as specified by the EPA proposed rule "Stratospheric Ozone Protection: Significant New Alternatives Policy (SNAP) Program" (40 CFR Part 82). Alternatives which are hazardous or Class II ODCs may be used only as a last resort after all other environmentally preferable alternatives have been evaluated and rejected for technical or economic reasons.

Acquisition and Contract Actions Involving the Purchase Newly Produced ODCs:

• SAF/AQ and AF/LG shall implement procedures making non-use of ODCs a salient characteristic of any item, sub-item, product, service, or process. Further, the non-use of ODCs will normally be a technical requirement in all Air Force requisitions.

• AF/SG, in consultation with AF/LG, shall compile a list of national stock numbered items which contain ODCs. Base supply shall no longer accept orders for these items, and will no longer dispense them unless a waiver has been granted.

• Local acquisition of ODC containing products without a waiver is prohibited.

This section of the policy implements Public Law 102-484, National Defense Authorization Act for FY93, Section 326.

• No contract awarded after June 1, 1993 shall include a requirement to use ODCs or any requirement that can be met only through the use of ODCs, without approval of SAF/AQ.

    --SAF/AQ can grant approval only by certifying that a suitable alternative is not currently available. This approval shall not be delegated.

    --If SAF/AQ determines an economically feasible alternative is available for use in a contract under evaluation, the appropriate contracting officer shall enter into negotiations to modify the contract to require the use of the alternative.

• Beginning on October 1, 1993 and continuing for 8 calendar quarters thereafter, SAF/AQ is required to submit a report to SECDEF on approvals granted during the preceding quarter within 30 days after the end of each quarter.
• Beginning on January 1, 1997 and continuing for 4 years thereafter, SAF/AQ is required to submit a report to SECDEF on approvals granted during the preceding year within 30 days after the end of each year.

WAIVERS

Requirements of the USD(A) policy of August 11, 1992 and Public Law 102-484 are not waiverable.

• AF/CE shall develop waiver application and approval procedures.

• Waivers for existing contracts prescribing ODCs which extend beyond April 1, 1994 (June 1, 1993 for refrigerants and halons) can be used when attempts to negotiate their accelerated elimination are unsuccessful. If a contractor does not meet the specified requirement of any solicitation, we can determine the contractor to be nonresponsive. If solicitation requirements preclude the use of ODCs in the manufacturing process or as a component of the final delivered end items and any contractor chooses not to comply with these requirements, these proposals or bids may be found nonresponsive.

• SAF/AQ, AF/LG and AF/CE are waiver approval authorities in their respective areas. SAF/MIQ will coordinate on all waiver applications.

    --Waiver approval authorities will maintain copies of each approval on file until the waiver is no longer required, and will provide written semiannual status updates to SAF/MIQ.

• All waiver applications must certify that non-ODC alternatives do not exist, are not economically feasible, or that recycled ODCs cannot meet mission requirements. All mission critical applications, including those sustainable using recycled ODCs from the DLA bank, require a waiver.

• SAF/AQ, AF/LG, AF/CE and SAF/MIQ will draw on appropriate experts to consult in the approval process, as necessary.