

Before MN/MPCA at <https://mpca.commentinput.com/?id=fGW4cdeEZ>

RE: PFAS in Products: Currently Unavoidable Use – Rulemaking

Comments: Lockheed Martin Corporation - Michael Anderson, Technical Fellow/ESHS Advocacy

Lockheed Martin Corporation (Lockheed Martin) is a leading global security and aerospace and defense company, ensuring those we serve always stay ahead of ready. We solve complex challenges, advance scientific discoveries, and deliver innovative solutions that help our customers keep people safe and nations secure against foreign threats. Our products include but are not limited to military fixed and rotary-wing aircraft, weapon systems, communications equipment, space hardware, maritime systems, and a sustainment and spare parts program to ensure the operability of our products for decades to come.

Lockheed Martin is reliant on formulations, materials, equipment, parts, and components that have proven successful through testing and qualification. Whether it be the displays, coatings, and fluids within a military aircraft, printed wire boards on naval vessels, wiring and cabling for a weapon or radar system, or the photovoltaic cells on a satellite, our customer, largely the Department of War (DoW) demands formulations, materials and products that are proven and maintain the highest level of performance and resiliency towards the harsh environments and conditions in which our products operate.

To meet these performance requirements and deliver state-of-the-art products, Lockheed Martin must be able to select and utilize formulations, materials, equipment, parts, and components based on performance and qualification criteria to ensure proper functionality, conformity with military specifications, and the avoidance of failure. Prohibitions on chemicals or groups of chemical substances, such as the impending restriction on Per- and Polyfluoroalkyl Substance (PFAS) or articles that contain these substances may be counter to these performance objectives and are dangerous to the defense sector, the DoW, and global customers (nations) who depend upon our products for national security and public safety.

Aside from performance-driven requirements and discovery challenges of PFAS in the complex supply chain, defense sector manufacturers must conform with the strictest qualification and safety protocols across all of industry. Certification is a key process to ensure that aircraft, military hardware, or any other equipment parts or essential formulations comply with the required strict levels of safety and performance. Requalification may take several years to decades to identify, investigate, test, and qualify a new piece of hardware or formulation manufactured with a different material or chemistry. Lastly, existing equipment including spare parts used in legacy finished products must be preserved to ensure the viability of those legacy programs. It is not feasible to recertify or requalify new equipment, materials or parts used in the sustainment of legacy equipment because of a state or regional restriction.

The materials, parts, and components that we procure must be able to perform not only the first time, but every time without failure, to avoid disastrous outcomes related to public safety and national security. Failure is simply not acceptable.

To meet these stringent requirements, Lockheed Martin must have access to the top performing products, materials and chemistries needed to achieve its targeted objective within the boundaries of strict

qualification, standardization, and performance. Furthermore, we need to have access to suppliers, many who serve the commercial and industrial sectors without disruption, including obsolescence of formulated and fabricated products.

Lockheed Martin appreciates the opportunity to provide insight into the critical usage of PFAS and recommends that MPCA issue a broad exemption for aerospace and defense products and applications that have no PFAS-free alternatives. This approach was supported by the Department of the Air Force in a letter to the Minnesota House of Representative, dated February 19, 2026 at <https://www.house.mn.gov/comm/docs/GrQIwpVrdEupcsDHLNeliQ.pdf>. If you have any questions, please do not hesitate to reach out to me at michael.g.anderson@lmco.com.