

USE, DISCHARGE, AND DISPOSAL OF FIREFIGHTING FOAM PRODUCTS

Fluorinated, or PFAS containing, firefighting foam concentrates such as AFFF, AR-AFFF, FFFP, AR-FFFP, FP, and AR-FP contain small amounts of fluorinated surfactants. Fluorinated surfactants are key raw materials within many foam concentrates that substantially reduce surface tension, enabling rapid extinguishment, low fuel pick-up as well as superior post fire security and protection. This Notice is issued as a reminder concerning the use, discharge, and disposal of firefighting foam products containing fluorinated surfactants.

As has been advised previously, these firefighting foam products may leave a fluorosurfactant chain, including certain per- and polyfluoroalkyl substances (PFAS), in the environment which can persist and potentially reach groundwater, including drinking water. In 2016, the US Environmental Protection Agency (US EPA) issued a Final Lifetime Health Advisory relating to the levels of certain PFAS, specifically PFOA and PFOS, which potentially may be found in drinking water, and various Countries, States and Territories have been setting their own levels, laws and regulations concerning PFAS. The regulatory landscape concerning PFAS and firefighting foam continues to evolve, with additional regulatory agencies reviewing the issues and some Countries, States and Territories or agencies setting or considering drinking water levels that are lower than the US EPA's levels. The EPA's health advisories containing its views relating to PFOA and PFOS may be found via the link below. PFAS are ubiquitous in the environment and may be found in many commonly used products, in addition to firefighting foam products. Certain PFAS also may break down in the environment to form other PFAS chemicals. The applicable Safety Data Sheets (SDS), Guidance Documents and Technical Bulletins, as well as EPA's health advisories and any laws, regulations, and codes concerning PFAS or firefighting foam products applicable in your area, should continue to be consulted before usage, discharge, and disposal of these products.

As has been previously advised and following these regulatory developments, care should continue to be taken to avoid or minimize when possible the uncontrolled use, discharge or disposal of the product into the environment, including waterways. In addition, we remind our customers that for many years training foams not formulated with fluorinated surfactants have been available for use during training to simulate the usage of a variety of these products. These training foams should continue to be strongly considered for use during training.

If any foam product is released into the environment, efforts should continue to be made to control, contain and collect the discharge for proper disposal, while following all applicable laws, regulations, and codes.

As a further resource concerning the use, discharge, and disposal of these products, we remind our customers also to consult the Fire Fighting Foam Coalition's (FFFC) Best Practice Guidance for Use of Class B Firefighting Foam and the National Fire Protection Association (NFPA) Code 11, including its Annex E, entitled, "Foam Environmental Issues".

External Resources - EPA health advisories:

<https://www.epa.gov/ground-water-and-drinking-water/drinking-water-health-advisories-pfoa-and-pfos>

EPAPFAS Action Plan:

www.epa.gov/pfas/epas-pfas-action-plan

FFFC best practice guide:

[https://docs.wixstatic.com/ugd/](https://docs.wixstatic.com/ugd/331cad_188bf72c523c46adac082278ac019a7b.pdf)

[331cad_188bf72c523c46adac082278ac019a7b.pdf](https://docs.wixstatic.com/ugd/331cad_188bf72c523c46adac082278ac019a7b.pdf)

NFPA:

<https://www.nfpa.org/Codes-and-Standards/All-Codes-and-Standards/Codes-and-Standards>



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