

1 Introduction

Aqueous film-forming foam (AFFF) is a highly effective firefighting product intended for fighting high-hazard flammable liquid fires. AFFF products are synthesized by combining hydrocarbon foaming agents with fluorinated surfactants to achieve a product that has been used at military installations, civilian airports, petroleum refineries, bulk storage facilities, and chemical manufacturing plants (Hu et al. 2016; CONCAWE 2016).

This fact sheet is targeted to local, state, and federal regulators and tribes in environmental, health and safety roles as well as AFFF users at municipalities, airports, and industrial facilities. This fact sheet is not intended to replace manufacturer specifications or industry guidance for AFFF use, or to discuss alternatives in detail. It is only intended to educate users on AFFF use to reduce and eliminate potential harm to human health and the environment. Additional information is available in the Guidance Document.

2 What is AFFF?

Class B firefighting foams are commercial surfactant solutions that are designed and used to combat Class B flammable fuel fires. All Class B foams are not the same. Although not usually categorized this way from a fire protection viewpoint, they can be divided into two broad categories from a per- and polyfluoroalkyl substances (PFAS) perspective: fluorinated foams that contain PFAS and fluorine-free foams (F3) that do not contain PFAS.

There are six groups of Class B foams that contain PFAS and four groups of Class B foams that do not contain PFAS. Figure 1 illustrates all categories of Class B foams. This fact sheet focuses on AFFF only as these are the primary foams that contain fluorosurfactants.

ITRC has developed a series of fact sheets that summarize recent science and emerging technologies regarding PFAS. The information in this and other PFAS fact sheets is more fully described in the **ITRC PFAS Technical and Regulatory Guidance Document (Guidance Document)** (<https://pfas-1.itrcweb.org/>).

This fact sheet outlines methods to properly identify, handle, store, capture, collect, manage, and dispose of AFFF to limit potential environmental impacts, and includes:

- Definition of AFFF
- Best Management Practices for AFFF use
- Regulations Affecting Sale and Use
- Foam Research and Development

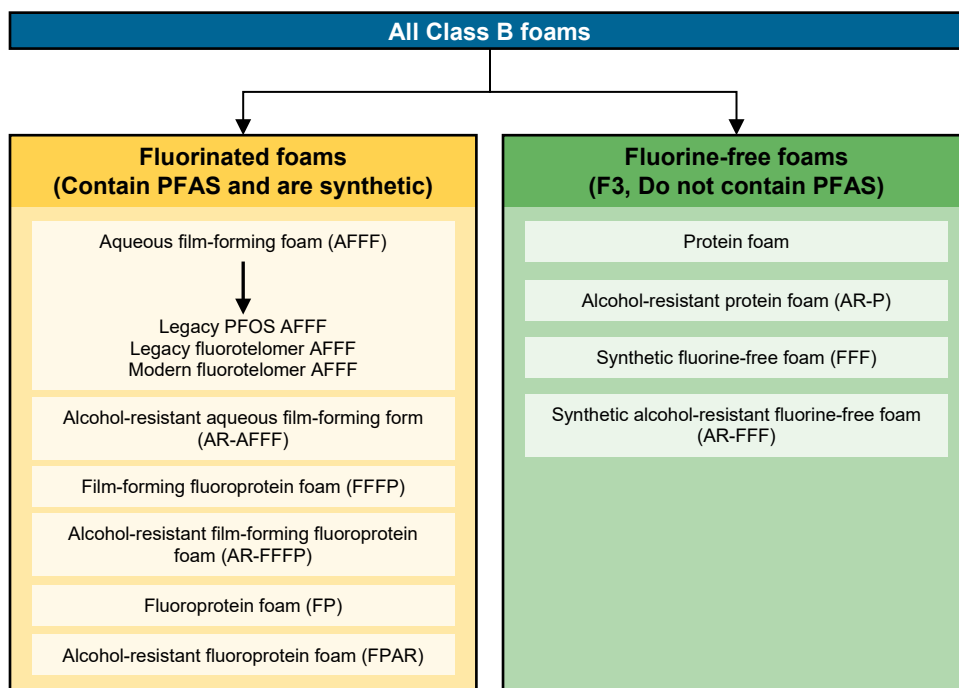


Figure 1. Types of Class B foams.

Source: S. Thomas, Wood, PLC. Used with permission.

Aqueous Film-Forming Foam (AFFF) *continued*

AFFF is considered a fluorinated foam and when mixed with water, the resulting solution achieves the interfacial tension characteristics needed to produce an aqueous film that spreads across the surface of a hydrocarbon fuel (petroleum greases, tars, oils and gasoline; and solvents and alcohols) to extinguish the fire and to form a vapor barrier between the fuel and atmospheric oxygen to prevent re-ignition. This film formation is the defining feature of AFFF.

AFFF has been used at chemical plants, flammable liquid storage and processing facilities, merchant operations (oil tankers, offshore platforms), municipal services (fire departments, firefighting training centers), oil refineries, terminals, and bulk fuel storage farms, aviation operations (aircraft rescue and firefighting, hangars), in some industrial fire extinguishers, and military facilities.

There are three possible types of AFFF, each is presented in Figure 1:

- legacy PFOS AFFF (manufactured in the US from the late 1960s through 2002)
- legacy fluorotelomer AFFF (contain some long-chain PFAS) (manufactured in the US from the 1970s until 2016)
- modern fluorotelomer AFFF (short-chain PFAS became the predominant fluorochemicals used in manufacturing in response to USEPA 2010/2015 voluntary PFOA Stewardship Program)

Most foam manufacturers now produce Class B F3s. Performance of these foams should be evaluated carefully as future purchasing decisions are made. Organizations should determine whether a Class B F3 can achieve the required performance specifications for their specific flammable liquid hazards as part of pre-planning for replacement materials (FFFC 2016). As of publication, F3s do not meet the performance requirements of the Mil-Spec and therefore are not used at federal- and FAA-regulated facilities (FAA 2020). A mandate within the FAA Reauthorization Act of 2018 (enacted October 5, 2018) directs the FAA to stop requiring the use of fluorinated foam no later than 3 years from the date of enactment (October 4, 2021), so F3 use is anticipated at FAA-regulated facilities in the near future. The National Defense Authorization Act of fiscal Year 2020 (signed into law Dec 20, 2019) requires the DOD to phase out its use of AFFF at all military installations by Oct. 1, 2024, with limited exceptions, and immediately stop military training exercises with AFFF. The secretary of the Navy must publish specifications for PFAS-free firefighting foam at all military installations and ensure that the foam is available for use by Oct. 1, 2023.

3 Best Management Practices (BMPs) for Class B AFFF Use

Firefighting foams are an important tool to protect human health and property from flammable liquid fire threats. Proper management and usage strategies combined with the ongoing refinement of environmental regulations will allow an informed selection of the viable options to sustainably use firefighting foams. BMPs should be established for the use of any firefighting foam to prevent possible releases to the environment that can lead to soil, groundwater, surface water, and potentially drinking water contamination. The discharge of firefighting foams to the environment is of concern because of the potential negative impact they can have on ecosystems and biota. AFFF, due to the presence of PFAS, poses a unique challenge to protecting the environment when it is released. Specifically, for AFFF, the amount of PFAS from foam that may enter groundwater depends on the type and amount of foam used, the degree of containment, when and where the foam was used, the type of soil and the depth to groundwater. AFFF is typically discharged on land but can run off into surface water or stormwater or infiltrate to groundwater. A conceptual site model (CSM) is presented in Figure 2.

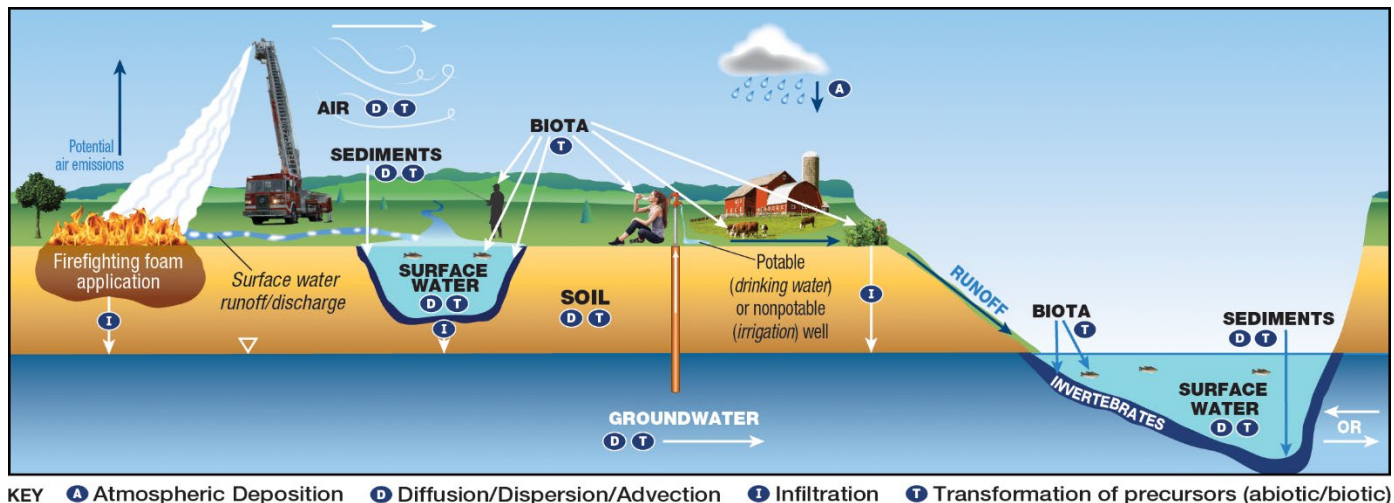


Figure 2. CSM for fire training areas.

Source: Adapted from figure by L. Trozzolo, TRC. Used with permission.

Aqueous Film-Forming Foam (AFFF) *continued*

BMPs should consider the entire life cycle for AFFF, including procurement and inventory, foam systems and operations, emergency firefighting operations, immediate investigative and clean-up actions, treatment and disposal and system replacement.

The procurement and inventory of foam should be carefully considered. Foams should be selected that meet the performance specification requirements governing the use. Foams procured should be documented, labelled clearly and adequately contained. Foam use and disposal should be carefully tracked and recorded.

When evaluating foam systems and operations, from fixed-system testing, mobile firefighting equipment testing and appropriate training exercises, engineering and administrative controls as well as personal protective equipment (PPE) should be carefully evaluated. During emergency firefighting operations following a release of firefighting foam, PPE should be used correctly, maintained, and decontaminated routinely. Immediate investigative and clean-up actions include initial mitigation efforts such as source control, containment tactics, and recovery tactics.

The treatment and disposal of AFFF products and environmental media impacted with PFAS can be complex, time consuming, and costly. Practitioners should be aware of approved and available disposal options prior to the generation of PFAS-impacted waste or the start of an AFFF replacement project to avoid potentially lengthy waste storage timeframes. Currently, available disposal options for AFFF and PFAS-impacted materials are limited and each option has its advantages and disadvantages. More information is included in the Guidance Document.

Firefighting foam replacement is complex and could require a complete system review and, potentially, redesign and modification of system components to meet the new objectives or material and performance requirements. Foam replacement should include an evaluation of specific hazards and application objectives, a review of applicable performance standards, an understanding of engineering requirements for foam product storage and application, and a check to ensure that the foam product is approved for use for the specific hazards being mitigated.

4 Regulations Affecting the Sale and Use of AFFF

There are many State, Federal, and International regulations and guidance documents governing the procurement, use, and disposal of AFFF. Activities range from AFFF take-back programs and prohibition of manufacture, sale, use, and import of AFFF through to restrictions and requirements for disposal. Refer to the Guidance Document for further information.

BMPs start with pre-planning and deciding which foam to keep in stock. The team should consider key factors such as these:

- Whether F3 alternatives can meet site-specific performance requirements
- Site-specific evaluation of likely fire hazards and potential risks for life, public safety, and property
- Potential environmental, human health, and financial liabilities associated with AFFF releases
- Site constraints, including existing equipment retrofit requirements to adapt to alternate foams



Figure 3. Life cycle considerations for AFFF.
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Aqueous Film-Forming Foam (AFFF) *continued*

5 Foam Research and Development

A substantial amount of research related to AFFF alternatives and replacement chemistries has recently been completed and/or is being considered at the time of publication. For more information related to this topic, please refer to the Guidance Document. Several organizations globally have made investments in research and development around AFFF from the assessment of their use, environmental impacts, as well as socioeconomic impacts of transition to and performance specifications of F3 alternatives.

6 References and Acronyms

The references cited in this fact sheet and further references can be found at <https://pfas-1.itrcweb.org/references/>. The acronyms used in this fact sheet and in the Guidance Document can be found at <https://pfas-1.itrcweb.org/acronyms/>.



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