
FIRE DEPARTMENT SERVICE ANNOUNCEMENT

Bulletin #11, FAA & DoD action in AFFF, February 19, 2021

The Federal Aviation Administration (FAA) Reauthorization Act of 2018 requires the conversion from AFFF to fluorine-free firefighting foams by October 4, 2021. The Department of Defense (DoD) must, according to the National Defense Authorization Act (NDAA), complete conversion to fluorine-free firefighting foams by October 2024. The DoD had previously taken action to discontinue using AFFF for training purpose.¹ This had accounted for 93% of its AFFF use.

“In planning for an AFFF replacement, as required in the FY 2020 National Defense Authorization Act (NDAA), the Congressional Budget Office (CBO) estimated that it would cost DoD \$35,000 per vehicle to retrofit to a new firefighting foam technology. However, DoD has learned from previous foam transitions that fully removing foams containing PFOS or PFOA from current systems will likely require replacement of almost every component of Aircraft Rescue and Firefighting (ARFF) vehicles. Based on DoD’s estimate, ARFF vehicle replacement may be required to meet the NDAA requirement.”²

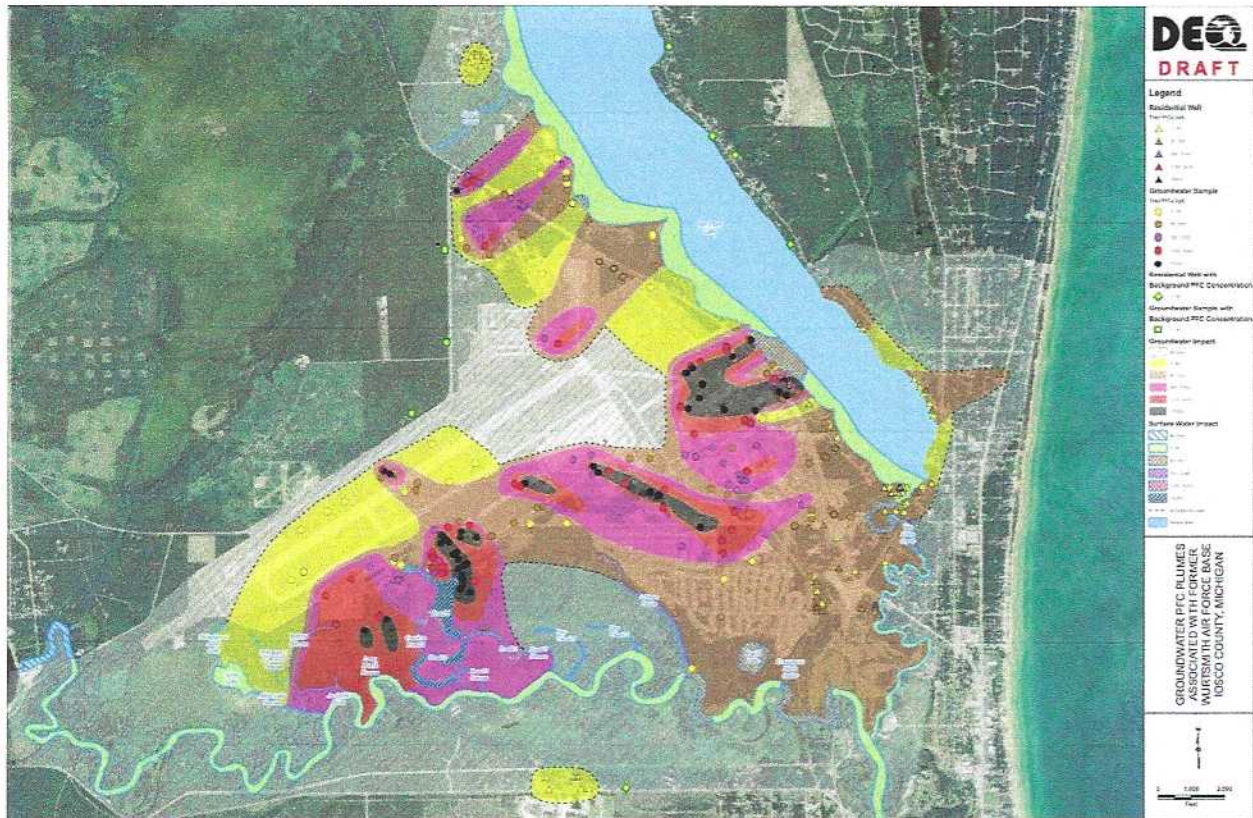
AFFF production and usage have been banned in 180 countries except for use in emergencies. While it has been known to put out burning jet fuel, it is hazardous in its own right.³ AFFF has been contaminating water supplies near military bases.

The Foam Exposure Committee is actively continuing to test firefighting foam samples for total fluorine content. The intent is to provide a clean listing of fluorine-free firefighting foams for fire departments to reference. At present, there are workable, fire tested products that are currently available as fluorine-free firefighting foams that have been used successfully for decades.

1 Department of Defense, Memorandum, Transmittal of Facts Sheets for Blood Testing for DoD Firefighters Per- and Poly-fluoroalkyl Substances Levels, September 29, 2020, <https://www.health.mil/Search-Results?query=firefighters,%20pfas,%20blood,%20testing&refSrc=1>

2 Department of Defense, Per- and Polyfluoroalkyl Substances (PFAS) Task Force, Progress Report, March 2020, https://media.defense.gov/2020/Mar/13/2002264440/-1/-1/1/PFAS_Task_Force_Progress_Report_March_2020.pdf

3 Firefighting Foam in Water Near Bases Gets Congressional Attention, Jim Absher, 15 Jan 2020, <https://www.military.com/daily-news/2020/01/15/firefighting-foam-water-near-bases-gets-congressional-attention.html>



Wurtsmith Air Force Base is a decommissioned US Air Force base that was used from 1920 – 1993. It is considered the first military-operated site with identified PFAS anywhere in the world. Oscoda Area Site Locations of PFAS contamination from the Michigan DEQ, the former Wurtsmith Air Force Base are shown in this diagram. The section to the left hand side, just off the runway is where a single aircraft crash occurred in 1988. The PFAS contamination plume shown going out from the crash was caused by the AFFF firefighting foam used. The plume flows under the runway, into the FT02 plume and then continues into Clark’s Marsh. The first GAC plant that the Air Force installed is at FT02. Lake Huron is to the East.

[https://www.michigan.gov/documents/pfasresponse/Oscoda Area and Former Wurtsmith Air Force Base Pfas Update Meeting Presentation January 19 2021 713535 7.pdf](https://www.michigan.gov/documents/pfasresponse/Oscoda_Area_and_Former_Wurtsmith_Air_Force_Base_Pfas_Update_Meeting_Presentation_January_19_2021_713535_7.pdf)