

# Aqueous Film Forming Foam Guidance for Firefighting Organizations

#### **Contact Information**

For questions about storing AFFF safely or the transition timeline contact Sean Smith:

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#### ADA Accessibility

To request an ADA accommodation, contact Ecology by phone at 360-407-6700 or email at <u>hwtrpubs@ecy.wa.gov</u>, or visit https://ecology.wa.gov/accessibility. For Relay Service or TTY call 711 or 877-833-6341. This guidance explains how to safely manage aqueous film forming foam (AFFF) that contains per- and polyfluoroalkyl substances (PFAS), pending development of a collection and disposal program. It provides current information and recommendations for firefighting organizations who have inventories of AFFF subject to <u>RCW 70A.400<sup>1</sup></u> and are considering opting in to Ecology's AFFF collection and disposal program.

# **AFFF Background**

Passage of RCW 70A.400 began a Washington state AFFF transition timeline. We began to work with firefighting organizations with AFFF to seek environmentally protective disposal options.

We're currently conducting an Environmental Impact Statement (EIS) review of proposed AFFF collection and disposal program options. We expect this review to take 12–18 months to complete.

We plan to start foam collection after we complete the review and select an environmentally protective disposal pathway. We will provide you with additional information as we complete these steps. In the meantime, it's important to manage your AFFF product inventory safely.

# How to Manage your AFFF Product Inventory

Consistent with RCW 70A.400, you may continue to retain AFFF product inventories for use in actual firefighting.

- If you decide to no longer retain AFFF as product, properly manage and dispose of the AFFF as dangerous waste.<sup>2</sup>
- If you continue to maintain your AFFF as product, store it safely and securely.

We provide the following guidance, best management practices, and available resources:

<sup>&</sup>lt;sup>1</sup> https://app.leg.wa.gov/RCW/default.aspx?cite=70A.400

<sup>&</sup>lt;sup>2</sup> As required under the Dangerous Waste Regulations: WAC 173-303.



### Use the least hazardous AFFF in inventory first

- If you use AFFF in actual firefighting, use newer AFFF before older foam to limit exposure risks for fire fighters and the environment.
  - AFFF manufactured after 2003 is likely to be less toxic than older AFFF. Older AFFF may contain longer chain PFAS molecules, which are known to be toxic at very low levels.

### **Store AFFF product inventories safely**

Proper storage will help you retain product information for eventual collection and avoid accidental release of the foam.

- Don't sell or give away AFFF to other fire departments—that's inconsistent with the purpose of the collection and disposal program.
- Protect AFFF containers and tanks from the elements (such as sunlight and extreme weather and temperature).
- Store containers inside a structure (such as a building or shed).
- Use secondary containment to prevent release of AFFF to the environment in the case of a spill or accident while in storage.
- Label containers and tanks with the contents, manufacture date and any hazard(s) of the contents (e.g., Toxic).
  - Indicate "Product AFFF" or equivalent on the label to differentiate between product AFFF and any similar waste AFFF you decided to dispose of.
- Keep containers and tanks clean so you can see any signs of leakage or other problems when you inspect them.
- Maintain safety data sheets (SDS) for the AFFF and keep them available.
- Immediately <u>report any spills</u><sup>3</sup> to Ecology at 1-800-258-5990.

**New empty containers and containment storage pallets are available.** You can receive up to \$1,000 in new empty containers and secondary containment to safely store AFFF product. If you need these resources, please contact our contracted supplier directly: Patty Keene with Clean Harbors at 206-258-0901 or keene.patricia@cleanharbors.com.

<sup>&</sup>lt;sup>3</sup> http://ecology.wa.gov/report-a-spill