



ENERGY, INSTALLATIONS,
AND ENVIRONMENT

ASSISTANT SECRETARY OF DEFENSE

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MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY (INSTALLATIONS,
ENERGY AND ENVIRONMENT)
ASSISTANT SECRETARY OF THE NAVY (ENERGY,
INSTALLATIONS AND ENVIRONMENT)
ASSISTANT SECRETARY OF THE AIR FORCE
(INSTALLATIONS, ENVIRONMENT AND ENERGY)
DIRECTOR, NATIONAL GUARD BUREAU (JOINT STAFF, J8)
DIRECTOR, DEFENSE LOGISTICS AGENCY (LOGISTICS
OPERATIONS)

SUBJECT: Guidance for the Change Out from Aqueous Film Forming Foam to Fluorine-Free
Firefighting Systems in Facilities

In accordance with Section 322 of the Fiscal Year 2020 National Defense Authorization Act (NDAA), the Department of Defense (DoD) must discontinue all land-based use of Aqueous Film Forming Foam (AFFF) containing per-and polyfluoroalkyl substances starting September 30, 2024, with the possibility of two one-year extensions. DoD has begun replacing AFFF in fire suppression systems with fluorine-free alternatives and is committed to meeting the NDAA's requirements. This memorandum provides guidance to DoD Components on AFFF removal and rinsing requirements for facility fire suppression systems.

As DoD transitions from AFFF to fluorine-free alternatives, it will remove AFFF from facility fire suppression systems, including tanks, piping, and components, by the NDAA deadline (which includes any extensions). Rinsing of fire suppression systems, after AFFF removal, is dependent on several factors, such as each system's configuration, previous use of AFFF, and planned future usage of the system. This memorandum applies to the transition from AFFF to all fluorine-free alternatives (e.g., use of fluorine-free firefighting foam [F3], water-only systems, trench drains, etc.).

(1) For fixed fire suppression systems in facilities where the AFFF will be replaced with a fluorine-free alternative and the system will be completely drained of AFFF from tank to sprinkler head (to the maximum extent practicable), DoD Components will:

- a. Conduct a single water rinse of tanks, components, and piping from the AFFF tank to (and including) the proportioner, for system components that will be reused with the new fluorine-free alternative.
- b. After the single rinse, drain and drip-dry all components.
- c. Ensure appropriate containment is incorporated into the process to minimize inadvertent AFFF releases or impacts.

(2) For fixed fire suppression systems in facilities where the AFFF will be replaced with a fluorine-free alternative and the system will be completely drained of AFFF from the tank to the proportioner (to the maximum extent practicable), DoD Components will:

- a. Conduct a single water rinse of tanks, components, and piping from the AFFF tank to (and including) the proportioner, for system components that will be reused with the new fluorine-free alternative.
- b. After the single rinse, drain and drip-dry all components.
- c. Ensure appropriate containment is incorporated into the process to minimize inadvertent AFFF releases or impacts.
- d. DoD Components will report any use or release from facility fire suppression systems in accordance with the Assistant Secretary of Defense (Energy, Installations, and Environment) (ASD(EI&E)) Memorandum, Response and Reporting of Aqueous Film Forming Foam Usage, and Accidental Releases/Spills on Military Installations and National Guard Facilities, dated April 7, 2022. This reporting will be required until DoD Components completely drain/discharge the system from the proportioner to sprinkler head containing the AFFF/water mixture.
- e. The Environmental Protection Agency (EPA) has designated perfluorooctanesulfonic acid (PFOS) and perfluorooctanoic acid (PFOA), found in AFFF, as hazardous substances under Section 102(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Accordingly, DoD Components will calculate the amount (in pounds) of PFOS and PFOA associated with any AFFF mixtures released to the environment¹ from a facility fire suppression system.
 - i. If the estimated amount released exceeds one (1) pound or more of PFOS or PFOA in any 24-hr period, DoD Components must report and provide required external notification and follow up in accordance with CERCLA section 103 and Emergency Planning and Community Right-to-Know Act (EPCRA) section 304.
 - ii. This reporting will be required until DoD Components completely drain/discharge the system from the proportioner to sprinkler head containing the AFFF/water mixture.

(3) For fixed AFFF fire suppression systems in facilities that will be abandoned in place or removed, the DoD Components will:

¹ Releases that are contained within a facility or other containment structure, preventing AFFF from reaching the environment are not subject to requirements in paragraph (f).

- a. Completely drain the system of AFFF from tank to sprinkler head, to the maximum extent practicable.
- b. For systems (or portions of systems) that will be abandoned in place, conduct a single water rinse of tanks, components and piping from the AFFF tank to (and including) the proportioner. Drain all liquids from the system to the maximum extent practicable. Drain and drip-dry all components.
- c. For systems (or portions of systems) that will be removed, drain all liquids from the system to the maximum extent practicable. Drip-dry components prior to sending for recycling or disposal.
- d. Ensure appropriate containment is incorporated into the process to minimize inadvertent AFFF releases or impacts.

For locations within the United States, DoD Components will dispose of AFFF, rinsate, and other AFFF-impacted wastes generated as part of the transition in accordance with the ASD(EI&E) Memorandum, *Interim Guidance on Destruction or Disposal of Materials Containing Per- and Polyfluoroalkyl Substances in the United States*, dated July 11, 2023 (or any subsequent update). For locations outside the United States, DoD Components will dispose of AFFF, rinsate, and other AFFF-impacted wastes in accordance with local Final Governing Standards or the Overseas Environmental Baseline Guidance Document, as appropriate.

The point of contact for this guidance is Ms. Cristina Harvey, OASD(EI&E), at 703-571-9067 or marcia.c.harvey2.civ@mail.mil.

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