



ENERGY, INSTALLATIONS,
AND ENVIRONMENT

ASSISTANT SECRETARY OF DEFENSE
3400 DEFENSE PENTAGON
WASHINGTON, DC 20301-3400

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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 Procurement of Fluorine-Free Firefighting Foam Agents Other than
Products Qualified Under MIL-PRF-32725

In accordance with the requirements in Section 322 of the Fiscal Year (FY) 2020 National Defense Authorization Act (NDAA), the Department of Defense was required to implement a military specification (MILSPEC) for a fluorine-free firefighting foam agent, and cease procurement of firefighting foam that contains in excess of one part per billion (ppb) of per- and polyfluoroalkyl substances (PFAS) after September 30, 2023¹. A Defense Federal Acquisition Regulation was promulgated to implement this requirement at 48 CFR 223.7402 and 48 CFR 252.223-7009.

Within the DoD's inventory of firefighting systems, certain systems and equipment are outside the performance parameters or product characteristics of the MILSPEC for fluorine-free foam (F3) fire extinguishing agent (MIL-PRF-32725), e.g., systems that need alcohol-resistant firefighting agents. In other words, the F3 MILSPEC products do not meet the performance requirements for these systems and equipment. In addition, as per DoD Manual 4120.24 *Defense Standardization Program (DSP) Procedures*, dated October 15, 2018, not all products appropriate for DoD use require inclusion in a MILSPEC. This memorandum provides direction to the DoD Components for procurement of alternative fluorine-free firefighting foam agents outside the parameters of MIL-PRF-32725.

For firefighting systems not required to use firefighting foam agents that conform to a MILSPEC, and the selected firefighting foam agent is not qualified to meet the specifications and standards of MIL-PRF-32725, DoD Components will demonstrate compliance with the NDAA requirements as follows:

- PFAS testing and content. The product must demonstrate PFAS are not detected using the sampling and testing protocols detailed in Section 4.5.7.1 of MIL-PRF-32725.

¹ This prohibition does not apply to firefighting foam for use onboard ocean-going vessels.

- Manufacturer’s PFAS certification. The manufacturer must certify in writing that PFAS have not been intentionally added to the agent.
- Prohibited materials. The content of non-MILSPEC firefighting foam agents must not contain any chemicals categorized as “prohibited” in accordance with the National Aerospace Standards Hazardous Materials Target List (NAS 411-1) and products must be used, managed, and disposed of in accordance with all applicable environmental regulatory requirements and manufacturer recommendations.

Documentation of PFAS testing and manufacturer certification of PFAS content will be provided to the Office of the Assistant Secretary of Defense (OASD) for Energy, Installations, and Environment (EI&E) before the initial procurement of alternative fluorine-free firefighting foam agents.

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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Brendan M. Owens