



OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE

**3400 DEFENSE PENTAGON
WASHINGTON, DC 20301-3400**

**ENERGY, INSTALLATIONS,
AND ENVIRONMENT**

April 7, 2022

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 (INSTALLATION
SUPPORT)

SUBJECT: Response and Reporting of Aqueous Film Forming Foam Usage, and Accidental
Releases/Spills on Military Installations and National Guard Facilities

Aqueous Film Forming Foam (AFFF) is used as a fire-extinguishing agent and is known to contain certain per- and polyfluoroalkyl substances (PFAS). The Department is investing in research, development, testing and evaluation to identify PFAS-free firefighting solutions that meet the lifesaving performance requirements of current AFFF products. Until suitable AFFF replacements are identified, the Department of Defense (DoD) is establishing this policy to ensure consistent actions are taken when responding to an allowable use or accidental release of AFFF on military installations and National Guard facilities. This policy also includes reporting requirements that will allow for transparency of DoD's AFFF usage and spills to include follow-on actions to address such activities.

In accordance with the requirements outlined in Section 323 of the Fiscal Year (FY) 2020 National Defense Authorization Action (NDAA), AFFF will not be used for training personnel or testing of equipment unless there are complete containment, capture, and proper disposal mechanisms in place to ensure no AFFF is released into the environment. This policy replaces and rescinds the previously adopted Assistant Secretary of Defense for Sustainment (ASD(S)) memorandum, "Prohibition of Testing and Training with AFFF," dated September 18, 2020.

When AFFF must be used for emergency response or when there is an accidental release on a military installation or National Guard facility, the Military Departments will:

- Treat the release as a spill and follow their existing spill response plans and procedures to contain and recover the AFFF to the extent practicable.
- Dispose of these materials, in coordination with installation environmental staff, to minimize releases to the environment.
- Report the usage and release as described below.

Per Section 318 of the FY 2021 NDAA, the DoD Components are required to report any AFFF usage, or spill that is above 10 gallons of AFFF concentrate or 300 gallons of mixed foam. Within 24 hours, notification shall be forwarded through the appropriate chain of command to the Office of the Deputy Assistant Secretary of Defense for Environment and Energy Resilience (ODASD(E&ER)) via email at osd.pentagon.ousd-a-s.mbx.asds-environment@mail.mil. This policy, and reporting requirements herein, implements the FY 2021 NDAA requirements and supersedes the previous ASD(S) memorandum, “Aqueous Film Forming Foam Usage and Spill Reporting,” dated January 13, 2020. Routine maintenance activities¹, pier-side ship testing, and training and testing activities where the AFFF is completely contained and disposed, do not constitute a use or spill requiring reporting under this policy. This report must include the following information using the template in attachment 1, 24-hour AFFF Release and Response Reporting Spreadsheet:

- Name of installation
- Date of the AFFF use or spill
- Either:
 - The amount of concentrate released, the type (i.e., C6 or C8), and specified concentration (i.e., 3 percent or 6 percent)
 - The amount of foam released, the type (i.e., C6 or C8), and specified concentration (i.e., 3 percent or 6 percent)
- Root cause of use or spill (i.e. accidental release, used for fire extinguishment)
- Summary narrative of AFFF usage or spill
- Notifications made to the DoD Component Environmental Department.

Additionally, the DoD Components will report either planned actions or actions taken to address the usage or spill. If not included in the initial report, this information must be submitted to ODASD(E&ER) not later than 45 days after submitting the initial notice of the usage or spill. Reporting will describe:

- Actions taken to arrest and clean up the spill.
- Coordination with relevant local and State environmental protection agencies.

¹ AFFF systems installed in facilities (e.g., hangars) and mobile equipment (e.g., aircraft rescue firefighting (ARFF) vehicles) require periodic maintenance, including post emergency response ARFF flushing and hangar flow testing per UFC 3-601-02.

Finally, the DoD Components will continue annual reporting for the previous fiscal year to ODASD(E&ER) by November 15th using the template in attachment 2, and will include all information from the 24-hour AFFF Release and Response Reporting Spreadsheet in addition to all uses or spills that did not meet those thresholds in order to provide complete usage or spill information. The DoD Components will document previously unreported uses or spills by indicating yes or no in the additional spreadsheet column.

The point of contact for this matter is Ms. Alexandria Long, Office of the Deputy Assistant Secretary of Defense for Environment and Energy Resilience, at 703-571-9061 or alexandria.d.long.civ@mail.mil.

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Michael McAndrew
Deputy Assistant Secretary of Defense for Construction
Performing the Duties of Principal Deputy Assistant
Secretary of Defense for Energy, Installations,
and Environment

Attachments:

1. 24-hour AFFF Release and Response Reporting Spreadsheet
2. Annual AFFF Release and Response Annual Reporting Spreadsheet

INTERNAL DELIBERATIVE - DO NOT RELEASE

OSD (USD A&S) 24 Hour AFFF Release and Response Reporting Spreadsheet*

Installation	Date	Time	Amount of AFFF Concentrate (in gals)	Amount of Mixed Foam (AFFF concentrate and water in gals)	Type of AFFF (C6 or C8)	Concentration of AFFF (3% or 6%)	Cause of Release (Fire response, fuel spill, accidental release, etc.)	Summary of AFFF usage or spill	Release Notification Made to Environmental Department for any on-base release(person's name and contact)
Base Pick a Post	21-Aug-19	12:30	25	1666	C6	6% 3M	e.g Hanger 11 experienced an inadvertent discharge of AFFF in zone 1. S/F secured fire main to prevent further discharge. Fire main was restored at approximately 1345 EDT. Cause of mishap is unknown. Estimated discharge is 25 gallons of finished foam, six percent AFFF and 94 percent fire main mix. Environmental safety report has been completed. Final report this incident.	e.g Environmental Impact was limited to 5 gallons of finished foam that entered the storm drain.	e.g. Environmental team contacted following accidental hangar release of AFFF

* A detailed Action Plan is required not later than 45 days after submitting notice of usage or spills including actions taken and coordination accomplished with local and State environmental protection agencies
 Complete only one of Column E or F, either release/use is concentrated product or mixed foam

INTERNAL DELIBERATIVE - DO NOT RELEASE

OSD (USD A&S) Annual AFFF Release and Response Reporting Spreadsheet*

Installation	Date	Time	Use in Mutual Aid Response	Amount of AFFF Concentrate (gals)	Amount of Mixed Foam (AFFF concentrate & water) (gals)	Type of AFFF (C6 or C8)	Concentration of AFFF (3% or 6%)	Cause of Release (Fire response, fuel spill, accidental release, etc.)	Summary of AFFF usage or spill	Release Notification Made to Environmental Department for any on-base release (person's name and contact)	Release Notifications Made to Supported entity for off-base mutual aid response (name and contact)	Description of Actions Taken to Arrest and Clean up the Spill	Description of any coordination with relevant local and State environmental protection agencies	Previously included in 24 hr reporting (Yes/No)
Base Pick a Post	21-Aug-19	12:30	(If yes, details required in Column K {for on-base} or L {for off-base})	25	1666	C6	6% 3M	e.g Hanger 11 experienced an inadvertent discharge of AFFF in zone 1. S/F secured fire main to prevent further discharge. Fire main was restored at approximately 1345 EDT. Cause of mishap is unknown. Estimated discharge is 25 gallons of finished foam, six percent AFFF and 94 percent fire main mix. Environmental safety report has been completed. Final report this incident.	e.g Environmental Impact was limited to 5 gallons of finished foam that entered the storm drain.	e.g. Environmental team contacted following accidental hangar release of AFFF	e.g. Local Fire Department Chief informed of AFFF usage as part of mutual aid response to gasoline station fire	e.g. stopped discharge of foam at source by securing fire main. Prevented most of the foam from discharge by capturing and collecting foam for proper disposal.	e.g. State Department of Environmental Quality; reported discharge to storm drain per permit requirements	yes

*Complete only one of Column E or F, either release/use is concentrated product or mixed foam
 **In addition to the information from the 24-hr reporting, include any use or spill not otherwise reported in the 24 hr notification spreadsheet. This would include spills or use below the reportable threshold and use for mutual aid response.