



DEPARTMENT OF THE ARMY
DEPUTY CHIEF OF STAFF, G-9
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

DAIN-ZA

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Policy Guidance Update – Use and reporting of Fluorine Containing Aqueous Film Forming Foam

1. Reference:

- a. Army Regulation (AR) 420-1 (Army Facilities Management, Chapter 25, Fire and Emergency Services) 12 February 2008, Rapid Action Revision, 24 August 2012.
- b. Memorandum, Secretary of the Army, 26 June 2018, subject: Delegation of Army Authority Having Jurisdiction under National Fire Protection Association Standards (NFPA).
- c. Memorandum, DAIM-ZA, 29 June 2016, subject: Limiting use of Aqueous Film Forming Foam.
- d. Memorandum, DAIM-ZA, 29 March 2017, subject: Disposal Instructions for Excess Aqueous Film Forming Foam.
- e. Department of Defense Memorandum, January 13, 2020, subject: Aqueous Film Forming Form Usage and Spill Reporting.
- f. Army Regulation (AR) 190-45 (Law Enforcement Reporting), 27 September 2016.

2. As the Authority Having Jurisdiction, I am issuing this memorandum to reiterate and update Army policy on the use of Aqueous Film Forming Foam (AFFF). This memorandum supersedes other Army guidance or regulations when there is a conflict between the documents.

3. Effective immediately, Army Fire and Emergency Services (F&ES) organizations will cease discharging AFFF except when required in emergency situations. This prohibition includes ceasing annual and after-maintenance vehicle tests where AFFF is discharged, training fires using AFFF, vehicle operational checks using AFFF, refractometer checks, and any other non-emergency circumstance involving the discharge of AFFF.

4. National Fire Protection Association Standard 403 requires use of Military Specification (MIL-SPEC) AFFF in all vehicles that support aviation firefighting.

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All new Aircraft Rescue Firefighting (ARFF) vehicles received after this notice will only be serviced with MIL-SPEC approved C6 AFFF.

5. Effective immediately, older stocks of MIL-SPEC AFFF (referred to as C8 AFFF) will be replaced with newer MIL-SPEC AFFF (referred to as C6 AFFF). Use of AFFF, other than MIL-SPEC AFFF, is prohibited.

6. Reference 1d., non-discharge test kits for ARFF vehicles are required to be available and used at each installation with an ARFF mission.

7. Per DoD Guidance (reference 1.e.), I am establishing a new reporting requirement for AFFF usage or spills (not associated with use) at all Army sites. Using the attached spreadsheet, each Army Installation shall report the following:

- a. Name of installation and date of the AFFF use or spill.
- b. Amount (gallons) and type of AFFF with specified concentration (three or six percent).
- c. Cause of use, or spill (i.e., accidental release, used for fire extinguishment).
- d. Summary narrative of AFFF usage or spill.
- e. Notifications made to DoD Component Environmental Department for on-base releases or to supported entity for mutual aid responses.

8. Required data must be collected and reported using the attached spreadsheet. The collection of this information will begin immediately, with the completed spreadsheet due to the Office of the Deputy Chief Of Staff G-9, DAIN-ISL annually by October 31, starting in 2020.


9. Because of the heightened focus on DoD's use of AFFF, an additional reporting requirement for any AFFF usage, release, or spill that is above 10 gallons of AFFF concentrate, or 300 gallons of mixed foam, or any other situation that may receive adverse media attention. These incidents shall be reported in accordance with AR 190-45, para 8-2, as a *Category 1 Serious Incident Report based upon the nature, gravity, potential for adverse publicity, or potential consequences of the incident.*

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10. The point of contact for this action is Mr. AJ Eversley, armando.eversley2.civ@mail.mil, 571-256-9707.

Encl


JASON T. EVANS
Lieutenant General, GS
Deputy Chief of Staff, G-9

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