Pasco Fire Department

As a resident of Washington State and employee of Pasco Fire Department who uses firefighting foams for a variety of fire types, I applaud the state for being proactive and funding the safe disposal of PFAS-containing foams. The pervasive nature of these chemicals and their long-term health affects make the safe disposal of these foams important to all Washingtonians. The program is well conceived the communications from DOE have been informative and timely.

I have a concern for fire departments that serve FAA indexed airports with Aircraft Rescue and Firefighting (ARFF) responsibilities. The timeline of the foam collection program may conflict with FAA federally mandated firefighting foam requirements. There are 10 commercial service primary airports in Washington State that will be directly impacted. Title 14 Code of Federal Regulations (CFR) Part 139 requires that these airports carry foams that meet military specifications (MIL-PRF-24385). Currently, all foams that meet MIL-PRF-24385 are "legacy" AFFF or C6 formulations, both of which contain fluorinated surfactants. While C6 foams are considered the "safer" alternative because they bioaccumulate at a much lower rate and are less biopersistant, concerns remain about their toxicity, biodegradability, mobility and persistence in the environment.

Included in the FAA Reauthorization Act of 2018 is a mandate directing the FAA to stop requiring the use of fluorinated foam no later than October 4, 2021. This means that departments with ARFF responsibilities may be legally bound to keep legacy or C6 foams past the collection dates provided by the program, causing thousands of gallons to slip through the cracks of the program. Providing a foam collection after October 2021 should allow these departments to participate and ensure that these pervasive chemicals do not further contaminate our soil and groundwater. Thank you for your consideration.

Mike Maier
Fire Captain
Pasco Fire Department
1011 E Ainsworth Ave
Pasco, WA 99301