



Department of Community Affairs



Division of Fire Safety

Director's Office

To: All Fire Departments

From: Richard J. Mikutsky – Director / State Fire Marshal

Re: Updated guidance on the use of Class B Aqueous Film Forming Foam (“AFFF”)

Date: November 29, 2022

As the investigation into Class “B” Foam continues, this office continues to receive inquiries regarding the use of foam during firefighting and training evolutions. This memo has been developed in conjunction with NJ-DEP and shall supersede the original Class “B” Foam memo dated August 2019.

AFFF is a fire suppressant used to extinguish flammable liquid fires such as fuel fires. AFFF is purchased as a concentrate, typically referred to as “3%” or “6%,” depending on its mixture ratio with water. Common brands include 3M Light Water AFFF.

AFFF contains certain per- and polyfluoroalkyl substances (“PFAS”), including perfluorooctane sulfonic acid (“PFOS”) and perfluorooctanoic acid (“PFOA”). The New Jersey Department of Environmental Protection (“NJDEP”) has issued regulations that apply to PFAS, including listing PFOS and PFOA as hazardous substances.

Updated guidance is provided below:

- 1) AFFF should never be used for training; instead, use foams that are specifically meant to be used for training purposes.
- 2) AFFF should only be used on Class “B” fires where all other firefighting options have been considered or are not viable, i.e., letting a fire burn out.
- 3) Legacy AFFF (produced before 2016) should only be used when no other option is available.
- 4) In determining whether to use AFFF, issues such as product performance, safety, property protection, operational practicalities and cost should always be considered.

- 5) Use of AFFF should be limited to only the amount required to protect life and property and when firefighter safety is paramount.
- 6) Anytime AFFF is used Local Haz-Mat and NJDEP must be notified immediately. NJDEP should be notified via its hotline, 1-877-WARNDEP.
- 7) All firefighting foams have the potential to cause environmental harm, particularly in bodies of water and to drinking water supplies. All reasonable and practical steps must be taken to manage and mitigate that risk.
- 8) All inventory of unused AFFF must be securely stored and labeled consistent with NFPA 11 to prevent unintended releases.
- 9) If unused AFFF cannot be properly stored and labeled consistent with Item 8 above, it must be properly disposed of by a Hazmat licensed contractor.