



Bulletin #88, March 30, 2024  
State Programs

<u>State</u>	<u>Year</u>	<u>Cost for Collection</u>	<u>Collected Foam (gallons)</u>	<u>Cost per Gallon</u>
Arizona	2022	\$395,500	10,000	\$40
Colorado	2021		10,000	\$40 *
Connecticut	2021	\$ 2,000,000	40,000	\$50
Delaware	2023			
Illinois	2023		85,500	
Indiana	2022	\$1,500,000	50,000+	\$30
Massachusetts	2018	\$100,060	17,500	\$6
Michigan	2023	\$1,600,000	60,355	\$27
New Hampshire	2022	\$668,000	10,000	\$67
New Jersey	2024	\$250,000	18,000	\$14
North Carolina	2023	\$20,000,000	120,094**	\$166
Ohio	2024	\$3,000,000	40,000***	\$75
Rhode Island	2022	\$200,000	11,000	\$18
Vermont	2018		2,500	
Washington	2023		40,000	
Wisconsin	2023	\$1,500,000	38,500	\$39
To date		\$31,213,560	553,449	

\* DPHE pays \$40 per gallon to departments so that they can purchase PFAS-free replacement foam.

\*\* Inventoried in NC.

\*\*\* \$40k to \$70k estimated



USEPA has listed 9 PFAS as proposed changes in hazardous chemicals for Resource Conversation and Recovery Act Hazardous Constituents (RCRA). “To be listed as a hazardous constituent under RCRA, scientific studies must show that the chemical has toxic, carcinogenic, mutagenic, or teratogenic effects on humans or other life forms. EPA evaluated toxicity and epidemiology data for these chemicals and determined that these nine PFAS compounds meet the criteria for listing as a RCRA hazardous constituent.”

Fire departments should look for the costs of AFFF removal to increase dramatically once these chemicals are listed as HazMat. These may include “C6” products as USEPA finalizes rules.

Be fully aware of other carcinogens used in replacement foams.

In 2020 California banned AFFF but has not yet established a take back program. Thus far, sixteen other states have pre-emptively acted with take-back programs to avoid the higher anticipated costs of AFFF disposal that will occur to fire departments that wait.

For instance, the wording from the Ohio AFFF Takeback Program:

“Materials eligible for this Takeback Program are per-and polyfluoroalkyl substance (PFAS)-containing aqueous film-forming foam (AFFF) and related PFAS-containing materials (such as PFAS-containing AFFF rinsates).

Materials that would be classified as hazardous wastes or universal wastes at the time of their disposal/treatment under State of Ohio and Federal Hazardous Waste regulations (<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-I/part-261>, <https://codes.ohio.gov/ohio-administrative-code/rule-3745-51-03>, <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-I/part-273>, <https://codes.ohio.gov/ohio-administrative-code/rule-3745-50-10>) are ineligible for this program.”

Proposal to List Nine Per- and Polyfluoroalkyl Compounds as Resource Conversation and Recovery Act Hazardous Constituents, February 8, 2024, <https://www.epa.gov/hw/proposal-list-nine-and-polyfluoroalkyl-compounds-resource-conservation-and-recovery-act>

Ohio, OH AFFF Takeback Program, <https://oh.revive-environmental.com/>