

Collection and Disposal Program White Paper

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Background

The [Wisconsin executive budget act of 2021](#) includes a firefighting foam collection and disposal program that would require the Department of Natural Resources to administer a program to collect and store or dispose of unused firefighting foam that contains PFAS. The voluntary program would likely work with a contracted third party to administer the collection and storage or disposal of the foam.

The program was allocated \$1 million in a one-time continuing appropriation. The funds will not be made available and the program cannot begin until a [13.10 request](#) is reviewed and approved by the Joint Committee on Finance.

PFAS Firefighting Foam in Wisconsin

In September 2020, the DNR published [the findings of a survey](#) of fire departments in Wisconsin. Nearly three quarters of Wisconsin fire departments participated in the 2020 survey, which found that 77% of responding fire departments had purchased, stored, trained with, or used fluorinated firefighting foam at some point in the past.

Based on the response, it is estimated that there may be 63,200 to 96,300 gallons of fluorinated firefighting foam at fire departments in Wisconsin, with as much as 30,000 gallons available for disposal (expired or unwanted).

Industry estimates and costs incurred in other states indicate a likely potential range in cost per gallon from \$15 to \$30.

Foam Collection Programs in Other States

1. [Michigan](#) collected 51,404 gallons for \$1.4 million. Michigan contracted with US Ecology, which took the foam to a Subtitle C treatment plant and landfill in Grand View, Idaho where it was mixed with cement to solidify.
2. [Connecticut's take back program launched in 2021](#). The Department of Energy and Environmental Protection received \$2 million to initiate a AFFF foam collection, disposal, and replacement program. Utilizing Clean Harbors and survey data gathered prior to program implementation, estimating approximately 40,000 gallons of AFFF to be collected. Stage 1 of the program is collection of containerized foam; Stage 2 will involve decontamination (date of implementation TBD). Foam solidified & landfilled at CH facility in Sarnia, ON. Foam consolidated at one location per town. Cost:
3. [Washington](#) has not yet collected any foam. In 2018, the Washington State legislature passed a law restricting the use of PFAS in firefighting foam. Their initial plans for a collection and

disposal program were put on hold as they continued to identify the safest and most environmentally sound practices.

4. [Massachusetts](#) – Collected approximately 15,866g of AFFF in 2018 and incinerated it in OH for a cost of approximately \$100K.

Considerations and/or steps to take for moving forward to secure funds and implement this budget provision:

1. Develop 13.10 request to secure funds from Joint Finance Committee.
2. Solicit bids for contractor.
3. Determine who is eligible for the foam collection effort.
4. Conduct new survey of fire departments (in partnership with WSFCA).
 - a. Pre-collection to better inform state on how much/what type of PFAS is on hand
 - b. Ability to make programmatic decision if there is more foam than funds: what category of foam to collect (see consideration #5 below)
 - c. As sign-up tool to gather info for actual collection
 - d. Example – [Washington](#)
5. Determine which foams will be priority or may be excluded, given limited resources.
 - a. Manufacture or expiration date?
 - b. Types of foams?
 - c. Label-less?
 - d. Rinsate or other decontamination products/byproducts from fire trucks?
6. Determine most efficient process for collection
 - a. Survey to schedule pick-up (WA)
 - b. Regional collection days (MI)
7. Determine process for storage, transportation, and final management – in accordance with ch. NR 159 procedures.