



INTERNATIONAL LIQUID TERMINALS ASSOCIATION

Safely Transitioning from PFAS Firefighting Foams at Liquid Terminals:

Maintaining critical infrastructure
while protecting public health
and the environment

ILTA supports the safe and rapid transition to PFAS-free firefighting foams, balancing fire safety, human health, and environmental considerations.

Founded in 1974, the **International Liquid Terminals Association (ILTA)** advocates on behalf of the liquid terminal industry in Congress and at federal agencies. We serve as a key resource for our 80+ members, representing a key link in supply chains for a wide range of commodities, including crude oil, gasoline, diesel, jet fuel, ethanol, industrial chemicals, fertilizers, and agricultural oils, and are active at over 1,500 facilities in all 50 states.

TRANSITIONING TO PFAS-FREE FIREFIGHTING FOAM

Firefighting foams containing PFAS (aqueous film forming foam, or 'AFFF') have been in use for decades due to their effectiveness at suppressing fires and their ability to keep communities, workers, and infrastructure safe. With the growing evidence of the negative health effects due to PFAS exposure, industry has worked with foam suppliers to develop PFAS-free foams.

THE PATH FORWARD

As alternative foams are developed and deployed, it is critical that fire safety precautions remain in place. Unlike some firefighting foam end-users, liquid terminals require special firefighting capabilities because of the vast volumes of flammable liquids stored and the unique methods to fight fires that must be used in the rare event of a fire.

SUPPORTING A SAFE TRANSITION TO PFAS-FREE FIREFIGHTING FOAM:

There are key considerations that will ensure liquid terminals can transition as fast as possible without compromising safety.



Develop a Strategic Timeline: All relevant stakeholders should be convened to determine the time and resources needed to transition as fast and as safely as possible.



Support Alternative Foam RD&D: Further RD&D is needed to ensure fluorine-free foams and replacements can safely and effectively extinguish the rare, but potential, liquid terminal fires. Fluorine-free foams must prioritize keeping firefighters, employees, communities, and infrastructure safe. Testing under special conditions, researching new chemistries to minimize replacement remorse, and support for the scale-up of new foam production must all be accomplished.



Implement Consistent National Regulations: Regulations currently vary between states, which could lead to confusion regarding practices for foam use and storage for industries operating across state lines-- especially for the liquid terminal industry, which can require mutual aid to respond to fire incidents. National standards for facilities and firefighters are needed to assure that the same foam, training, and equipment can be used at all facilities across state lines to ensure mutual aid in the unlikely event of a fire.



Address the Disposal of Existing Stocks: Clear direction and support will be needed to safely dispose of existing stocks of firefighting foam if alternative firefighting foams are adopted.



Exempt Liquid Terminals under CERCLA: Firefighting foams containing PFAS have enabled fires to be extinguished as rapidly as possible to promote safety, protect infrastructure, and minimize unwanted biproducts. Until the transition to alternative foams is complete across the industry, the risk of future liability should not weigh against a facility's options to respond to fire events. We understand that exemptions for airports are being considered by EPA and would encourage the Agency to consider this for the liquid terminal industry, as certainty for industry would reinforce best safety practices across these facilities.

What is PFAS?

Per- and polyfluoroalkyl substances (PFAS) are a group of synthetic chemicals including PFOA, PFOS, GenX, and many others. Scientific research shows PFAS are very persistent in the environment and human body and has linked exposure of PFAS to adverse human health effects. PFAS are found in many products including aqueous film forming foams (AFFF) which has been used to extinguish liquid-based fires at airports, military bases, chemical plants, and refineries for decades.



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