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DRAFT ONLYPAPER

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SUBJ: AQUEOUS FILM FORMING FOAM (AFFF) E50N ISSUES

BACKGROUND

- Aqueous Film Forming Foam (AFFF) was developed in the 1960s to provide better fire protection than the existing protein foam. AFFF is the primary DOD manual fire-fighting agent for protecting high value assets.
- A class of chemical substances referred to as Perfluorooctyl Sulfonates (PFOS), are components and degradation product of some commercial AFFFs. PFOS can potentially degrade back to PFOSA (acid), which is highly persistent in the environment and has a strong tendency to bioaccumulate. Studies indicate that exposure to PFOSA is widespread and recent tests have raised concerns about long term potential effects in people (developmental, reproductive, and systemic toxicity) and wildlife.

DISCUSSION

- EPA has a proposed Significant New Use Rule (SNUR) under section 5(a)(2) of the Toxic Substances Control Act (TSCA) for 90 different perfluorooctyl sulfonates (PFOS) compounds.
- Under the SNUR, entities potentially affected by the requirements of the proposed rule may include, but are not limited to: manufacturers, importers, and exporters of the PFOS compounds. The SNUR requires EPA notification at least 90 days before commencing the manufacture or import of the 90 PFOS compounds.
- Primary commercial manufacturer of PFOS compounds began voluntary phase out of the production of certain PFOS compounds on 31 December 2000. Steady reduction on production volumes for remaining PFOS compounds will continue through 2001 and 2002, with final phase-out by 31 December 2002.
- All current Navy-approved AFFF formulations contain either PFOS, PFOA or fluorinated Telomers.
- EPA & commercial manufacturers are conducting hazard assessments of PFOA and Telomers respectively. Both are PFOS precursors and may be subject to future regulation.
- SNUR comment period ended 01 Jan 01. EPA is reviewing public comments and responses to the SNUR. Estimate next EPA public meeting on this issue in March 2001.

RECOMMENDATION

- Provided as information to DUSD(ES)
- For Navy: Action-NAVSEA/NAVAIR
 - Provide firefighting/survivability technical review and impact assessment of currently approved MILSPEC AFFF materials with regards to SNUR requirements.
 - Participate in current and future meetings to monitor and provide technical input on issues related to potential impacts posed by this SNUR, on Navy firefighting/survivability requirements.

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