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Subject: Highlight

AFFF environmental issues. Navsea 05L4 recently attended a combined industry, EPA, and DoD meeting regarding AFFF environmental issues. It was first noted that this issue is not a repeat of the Halon and ozone-depleting substances issue. EPA has a great deal of concern with specific chemicals referred to as PFOS and PFOA, which are being phased out of manufacture by 3M. PFOS and PFOA are not used by any of the other three manufacturers of AFFF mil spec foam. The surfactants used by these other foam manufacturers belong to a family of chemicals called "telomers". Telomers are used in many products, including the manufacture of teflon, and have much different properties from PFOS.

To date, telomers have not been identified as being persistent, bioaccumulative, and toxic (referred to as "PBT" by the EPA), and telomers do not degrade into PFOS or PFOA. The "PBT" criteria is what EPA considers in determining what controls should be placed on a chemical. Manufacturers of telomers are conducting more detailed research on how telomers behave in the human body, which is expected to be completed next year. Even if telomers were found to be of concern, under the Toxic Substances Control Act (TSCA), there is no provision by which EPA could ban them, although civil suits could seriously influence the market.

No immediate action is required to research AFFF alternatives. However a POM issue will be generated that may be required to address any concerns arising from the ongoing toxicological studies.