

From: [REDACTED]
To: [REDACTED] (ENV)
Cc: [REDACTED]
Bcc: [REDACTED]
Subject: RE: PFHxA RAC discussion on firefighting foams
Date: 03 December 2020 17:13:00
Attachments: [RE Questions on the PFAS in firefighting foams report.msg](#)

Dear [REDACTED]

Yes, Wood basically confirmed my understanding of their method but did not provide the actual Excel spreadsheet or other calculations behind. It is not possible to trace back the calculations without that, so their response is not very helpful. I think it was actually Ramboll in charge of this assessment and I will be in contact with them soon for the new contracts we will have with them (I will send more information on this soon), so I will ask them about these emission assessment calculations. What is strange in their reply is that they say these numbers were derived to inform the cost-effectiveness ratio and not intended to calculate precise emissions. In any case, I will try to clarify all of this with Ramboll directly if they were indeed running these calculations.

Regarding the share of C6/PFHxA, Wood had tried to get this information during the study but without success apparently, due to manufacturer's secrecy on this aspect. I will coordinate with [REDACTED] and check if there was any useful information in the PFHxA public comments in this regard.

Separately, two new tasks we will contract to Ramboll is to (1) summarise the universal PFAS restriction CfE comments related to firefighting foams, and (2) try again to get information of share if C6 foams. Hopefully we will receive more information from there.

Best regards,

[REDACTED]

From: [REDACTED] (ENV) <[REDACTED]>
Sent: 03 December 2020 16:51
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]> [REDACTED] <[REDACTED]>
<[REDACTED]> [REDACTED] <[REDACTED]>
Subject: RE: PFHxA RAC discussion on firefighting foams

Dear [REDACTED]

I saw that Wood finally replied.

It would indeed be interesting to investigate more if there are PFAS based foams other than C6. If they are mostly C6, they would be already covered by the PFHxA restriction. Our restriction would still be needed to prevent regrettable substitution, but it would probably have less impact.

Kind regards

[REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, December 1, 2020 1:18 PM
To: [REDACTED] (ENV) <[REDACTED]>
Cc: [REDACTED] (ECHA) <[REDACTED]> [REDACTED] (ECHA) <[REDACTED]>
<[REDACTED]> [REDACTED] <[REDACTED]> [REDACTED] <[REDACTED]>

Subject: RE: PFHxA RAC discussion on firefighting foams

Dear [REDACTED]

Wood looked at releases of total PFAS from firefighting foams (not only C6), however, I'm not sure this will explain the difference with the PFHxA restriction since several stakeholders seem to have claimed that current PFAS foams are all C6 based. This information could not be verified by Wood when doing the market analysis (manufacturers not willing to disclose substance ID) but I am planning another attempt to know more about this either directly or via a consultant.

Thank you for proposing to remind Wood about my request, this would be appreciated, also because formally this part was falling under DV ENV project, not ECHA's.

I assume we should be able to describe the different assumptions considered in Wood's report and other restrictions and their outcomes as a sensitivity analysis in order not to re-do all the assessments but rather give a spectrum of possible values.

Happy to discuss,

Best regards,

[REDACTED]

From: [REDACTED] (ENV) <[REDACTED]>
Sent: 01 December 2020 13:45
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]> [REDACTED] <[REDACTED]>
<[REDACTED]> [REDACTED] <[REDACTED]>
Subject: RE: PFHxA RAC discussion on firefighting foams

Dear [REDACTED]

Thanks for following this, I unfortunately could listen only at the beginning because I'm now following POPRC. I do not remember exactly if the data from Wood were on all PFAS used on fire-fighting foams or if there were specific data on C6-based PFAS. If they are for all PFAS, maybe this could explain part of the difference.

It is indeed very important that we are aligned in the two restrictions on the emission factors. Do you want me to remind Wood of the your question?

Kind regards

[REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, December 1, 2020 12:14 PM
To: [REDACTED] (ECHA) <[REDACTED]> [REDACTED] <[REDACTED]>
[REDACTED] (ENV) <[REDACTED]> [REDACTED] <[REDACTED]>
<[REDACTED]>
Cc: [REDACTED] (ECHA) <[REDACTED]>

Subject: PFHxA RAC discussion on firefighting foams

Dear all,

I followed the RAC discussion on PFHxA in firefighting foams. As several RAC members I could not either understand from the background document or the RAC DO how this number of 7-39 t/y of emissions were derived from the initial assumptions.

In any case these numbers are pretty different from the ones derived by Wood in their report where they came up with 117 tons of PFAS emissions per year in the environment (coming from 18 000 t foam used per year x 2.5% PFAS content in the foam x 26% emission rate in the environment (all sectors combined)).

How the 26% emission rate has been derived is not yet fully clear to me because we don't have the underlying Excel sheet with the calculations. I requested it to Wood/Ramboll several weeks ago but I still haven't received it.

Also, the amount of foam in stock is very different: 75 000t in the PFHxA proposal, compared with 210 000 – 435 000 t in Wood's report. However, I think this stock figure mainly affects the SEA part for disposal costs and does not so much affect the emission estimation but I need to double-check that.

The annual use rate of the foam will also need to be checked.

To summarise, we will have to check a number of elements in Wood's report in light of what is being done under the PFHxA dossier.

Let's keep posted,

Best regards,

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