
From: John P. Farley
To: Berkoski, Daniel T CIV NAVSEA, SEA 05; Glover, Carl CIV CNIC HQ, N3; King, Thomas W CIV I&L; Simone, Joseph A CIV NAVFAC HQ, CI; Smith, Gordon CIV SEA 05
CC: Hunstad, Mary P CIV NAVSEA HQ, SEA 05
Sent: 10/20/2014 12:53:59 PM
Subject: RE: Cost/Benefit Analysis of Legacy AFFF Replacement (UNCLASSIFIED)

Dan:

You noted that current AFFF's are essentially based on a C6 fluorosurfactant formulation, which has C8 impurities. That is essentially correct for Ausul (Ansulite Type 3 and Type 6), Chemguard Type 3 and Type 6, and National Type 3 and Type 6. That is not correct for Buckeye Type 3 and Fire Ade Type 6. These products use fluorosurfactants with a different chemical structure, which have either 5 or 7 completely fluorinated carbon atoms. Because they do not have any C8 impurities they are Not subject to the EPA PFOA Stewardship Program.

Bottom Line: Buckeye and Fire Ade do not have any PFOS or PFOA and are fully compliant with the current EPA guidelines related to the C8 (Biological Accumulative) issue. They do contain fluorochemicals so they would be environmentally persistent in the environment since they are manmade chemicals that do not occur naturally in the environment.

R/ John

John P. Farley
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-----Original Message-----

From: Berkoski, Daniel T CIV NAVSEA, SEA 05
[mailto:daniel.berkoski@navy.mil]
Sent: Monday, October 20, 2014 8:32 AM
To: Glover, Carl CIV CNIC HQ, N3; King, Thomas W CIV I&L; John P. Farley; Simone, Joseph A CIV NAVFAC HQ, CI; Smith, Gordon CIV SEA 05
Cc: Hunstad, Mary P CIV NAVSEA HQ, SEA 05
Subject: FW: Cost/Benefit Analysis of Legacy AFFF Replacement (UNCLASSIFIED)

Gentlemen,

Forwarding the following on behalf of Mary Hunstad (NAVSEA Fire Protection Systems TWH). This is a follow-up development to a PFOS/PFOA AFFF meeting we had in September originated by OUSD(I&E). The attached document goes into the details. We're looking to provide a consolidated Navy response, so please review and return comments to my attention NLT Tuesday 10/28. Please indicate if you'd like to be part of the study working group.

Joe, feel free to forward to your counterparts at AF/Army. It looks like this has been distributed mainly to the environmental community, so their fire protection community may not yet be aware.

V/r,

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-----Original Message-----

From: Yaroschak, Paul J DOD @ ERD-VA
[mailto:Paul.J.Yaroschak@usace.army.mil]
Sent: Friday, October 17, 2014 12:59 PM
To: Mach, Richard CIV OASN (EI&E), ODASN (Environment); Tesner, John;
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HQ, SEA 05
Subject: Cost/Benefit Analysis of Legacy AFFF Replacement (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Richard, John, Vic and Nanette: We held a special EC Steering Group meeting on PFOA/PFOS issues as requested by the Services on 2 September. One result of that meeting was a request for ODUSD(I&E) EC Program to conduct a cost/benefit analysis regarding the replacement throughout DoD of legacy (PFOS based) AFFF. The motivation for the study was the costly assessment and cleanup actions resulting from releases of legacy AFFF.

On 24 September, DUSD(I&E) staff participated with a host of Navy staff (e.g., DASN(E), NAVSEA, NRL, N45, CNIC) to discuss issues relating to the DoD MilSpec managed by NAVSEA and newer AFFF formulations. During that meeting, basic agreement was reached on the parameters of the cost/benefit study. Attached is a draft study plan following the NAVSEA template. Please do the following by 3 November:

- (1) Provide any comments on the study plan to Drew Rak at Noblis (Andrew.Rak@Noblis.org <mailto:Andrew.Rak@Noblis.org>)
- (2) Provide nominations to the study Working Group as described in the plan.

Thanks. Paul

Paul. J. Yaroschak, P.E.
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Secretary of Defense (Installations & Environment)

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Classification: UNCLASSIFIED
Caveats: NONE