ANGUS FIRE

Department of the Navy

Naval Sea Systems Command

1333 ISAAC Hull Avenue SE

Washington Navy Yard

DC, 20376-7026

June 24, 2016

Dear Mr Fletcher,

Re: PFOA and PFOS Content inquiry of Products on Qualified Products List (QPL-24385)

Following Mr Konen's recent correspondence, 4123, Ser 05S/2016-222 dated May 26, I am pleased to include technical data on the product content of PFOA and PFOS in our QPL listed products Tridol^{C6} M3 and Tridol^{C6} M6. Testing confirmed that Angus Fire USA's products do not contain PFOS (branched or liner) or PFOA at detectable levels. Our global research team also tested several fluorocarbon surfactants and have included calculated results in support of the analytical data.

In order to support your request for information, and to make a full and comprehensive submission, we would consider the rest of this document to contain Confidential Business Information (CBI) as it pertains to proprietary formulation information. As a result, we kindly request that permission to disclose any of the information contained within this submission is sought from Angus Fire USA prior to release. In addition, due to the CBI status of this document we request this data be excluded from the scope of the Freedom of Information Act.

Angus Fire USA welcomes this opportunity to work with NAVSEA and would support a more engaged and interactive relationship as the understanding about the fate and transport of PFAS species develops.

For and on behalf of Angus Fire USA,

Yours Sincerely,

David Plant

Global Product Manager – Firefighting Chemicals

Angus Fire USA, 141 Junny Road, Angier, NC 27501
Main Office: 919-639-6151 - Main Fax: 919-639-6131

Background Information

[redacted]

[1] A[redacted]
re[redacted]
[2] C[redacted]

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[redacted]

Production

[redacted]

Test Samples

[redacted]

[redacted]

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Test Methodology

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Results

Component	Units	Tridol^{C6} M3 (C6)	Tridol^{C6} M6 (C6)	Fluoro-carbon A	Fluoro-carbon B	Fluoro-carbon C	Tridol^{C6} M3 (C6) Calculated	Tridol^{C6} M6 (C6) Calculated
PFBA (Perfluoro-n-butanoic acid)	mg/l	[redacted]						
PFPA (Perfluoro-n-pentanoic acid)	mg/l							
PFHxA (Perfluoro-n-hexanoic acid	mg/l							
PFBS (Perfluoro-1-butanesulfonate)	mg/l							
PFHpA (Perfluoro-n-heptanoic acid)	mg/l							
6:2 FTS (Fluorotelomer sulfonate)	mg/l							
PFOA (Perfluoro-n-octanoic acid)	mg/l							
PFHxS (Perfluoro-1-hexanesulfonate)	mg/l							
PFNA (Perfluoro-n-nonanoic acid)	mg/l							
PFHpS (Perfluoro-1-heptanesulfonate)	mg/l							

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PFDA (Perfluoro-n-decanoic acid)	mg/l	[redacted]
Linear PFOS (Perfluoro-1-octanesulfonate)	mg/l	
Branched PFOS	mg/l	
PFUnA (Perfluoro-n-undecanoic acid)	mg/l	
PFDoA (Perfluoro-n-dodecanoic acid)	mg/l	
PFOSA (Perfluoro-octanesulfonamide)	mg/l	
Total PFOS	mg/l	

Table 1: Measured and calculated results

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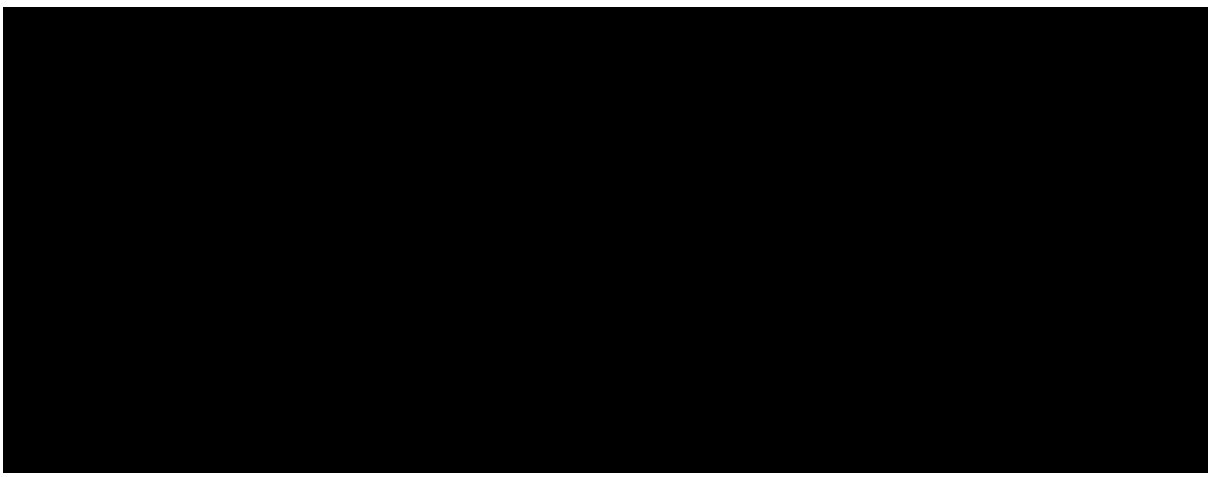
Discussion



Please refer to the later section entitled *Follow-up Testing* for more information.

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Conclusions

[redacted]

[redacted]

Follow-up Testing

[redacted]

---------- END OF SUBMISSION ----------

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