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Subject: AFFF environmental update

This correspondence is provided to dissell rumors regarding the banning of AFFF.

A combined industry, EPA, and DoD meeting was held on May 31, 2001, regarding AFFF environmental issues.

It should be first noted that this issue is not a repeat of the Halon and ozone-depleting substances issue. This issue is not related to global environmental problems such as greenhouse warming or ozone-depletion.

EPA has a great deal of concern with specific chemicals referred to as PFOS and PFOA. PFOS has been used in large numbers of 3M products, including AFFF foam used by the Navy.

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. For example, it is unknown if the human body can metabolize telomers in such a way as to create a different PBT chemical. Such studies are not routinely required to determine product safety.

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. Until there is evidence that telomers used in AFFF are actually harmful PBT materials, no action should be taken to research alternatives. It is expected that the manufacturer's additional studies of telomers will be completed next year.

The idea that AFFF would be banned was promulgated by an Air Force laboratory interested in developing a new research program.