

MR #

AR 226-1006 46051

2 PP

Mary Dominiak

03/29/2001 03:23 PM

To: dbennett@nns.com
cc: Karen Lannon/DC/USEPA/US@EPA, NCIC OPPT/DC/USEPA/US@EPA

Subject: AR-226: PFOS and AFFF

Dear Mr. Bennett:

The Agency has a substantial amount of data on perfluorooctyl sulfonates (PFOS), including some data specific to 3M's "Light Water" AFFF formulations, in our Administrative Record file AR-226. Since there are over a thousand documents in the file, I would encourage you to start by contacting the TSCA Non-Confidential Information Center (NCIC) -- telephone 202-260-7099 between noon and 4:00 pm Eastern time, or email oppt.ncic@epa.gov -- and requesting a copy of the index to AR-226. All of the information from AR-226 is available without charge on CD-ROM's that you provide: the NCIC can tell you how to submit blank CD-R media and obtain data disks in return, containing the specific documents that you would like to review. Some of the documents specific to AFFF use various "FC" product numbers in their titles, or refer to the "Light Water" trade name. I believe that most of them are found among the files numbered AR226-0670 through AR226-0926, although there may be additional ones outside that range.

The Agency is in the midst of rulemaking activity on PFOS. EPA published a proposed significant new use rule (SNUR) on October 18, 2000 (65 FR 62319) for 90 PFOS chemicals being discontinued by 3M Corporation. The Agency's proposed rule would not affect continued use of existing stocks of products containing the chemicals, but would subject future manufacture or importation of these 90 PFOS chemicals to Agency notice and review. This proposed SNUR has not yet been promulgated as a final rule. Comments were due January 1, 2001, and a public meeting was held on the proposed rule on March 27, 2001, to provide commenters with an opportunity to clarify the information they had presented in response to the proposed rule. A PDF copy of the proposed SNUR is attached for your information. EPA is now reviewing all of the comments. If you would like to see what has been filed in that proceeding, you can request information from the NCIC personnel on Docket OPPTS-50639.

Not all AFFF products contain PFOS. Some of the MilSpec products contain perfluorooctanoic acid (PFOA) or a telomer chemical; non-MilSpec products may use other chemistries of which I am unaware. EPA is currently conducting a hazard assessment on PFOA and the telomers, which may raise concerns similar to PFOS, and the chemical manufacturers have initiated voluntary, multi-year research programs to more fully develop an understanding of the toxicity and fate of these chemicals. Information on PFOA, the telomers, and the ongoing research programs is also available in AR-226.

If you would like to stay abreast of the EPA's activities on PFOS, PFOA, and the telomers, I would be happy to add you to our email notification list, which we use to alert people to major events.

If you have additional questions on this matter, please feel free to contact either me or Karen Lannon (202-260-2797; email lannon.karen@epa.gov). I will be out of the office until next week Thursday 5 April, but would be happy to help you then.

Sincerely,

Mary F. Dominiak

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Official FR SNUR.pdf

----- Forwarded by Karen Lannon/DC/USEPA/US on 03/28/2001 07:16 AM -----

"Bennett, Dave (O27)" <dbennett@nns.com> on 03/27/2001 08:33:28 AM

To: Karen Lannon/DC/USEPA/US@EPA
cc:

Subject: PFOS data

Good Morning,

I am a Marine Chemist and work within our Environmental Health and Safety department. My function in the maritime industry is to protect workers from physical and chemical hazards. Naturally, Newport News Shipbuilding being the largest shipbuilder in the United States and an OSHA VPP site very interested in any new data regarding these chemicals. How can I get any data related to AFFF and perfluorooctyl sulfonates? I am interested in the product and any products of degradation that may negatively impact the environment or our workers.

Thank you

David Bennett
757-688-1800