

From: Baryliski Doug J NSSC
To: 'skiely@mrosenblatt.amsec.com'
CC: Hunstad Mary P NSSC; Plunkett R Bryan CONT NSSC; Solomon Carmelita J CONT NSSC
Sent: 8/26/2003 3:48:20 PM
Subject: RE: Ban on AFFF

The below is old news. People keep confusing the 3M PFOS issue with impacting Navy AFFF.

All current regulatory activity is still only related to 3M products which have now been out-of-production for two years. There is no new news on the issue in the past year. We still have three qualified mil spec AFFF manufacturers, and a fourth has just completed testing. A supply system contract has been in place since late last year with one of the qualified manufacturers. The chemicals in these current AFFF products have very broad industry application, including in TEFLON, so industry will not make any shift until there is proof of toxicity issues. When I say industry, I don't mean AFFF makers, I mean the DuPonts of the world. If an environmental issue develops, it will be magnitudes greater than a firefighting issue, and possibly bigger than the ozone issue.

We have previously submitted issue papers to look at AFFF alternatives, considering it prudent to do some early work, but without any crisis, the papers have not been funded.

DDX is planned to have AFFF, and there is no plan to look for alternatives as part of the DDX program.

It is an exaggeration to compare the removal of AFFF with asbestos removal. Asbestos was a construction material in wide use in structures, and with airborne particle issues.

The Toxic Substances Control Act, which governs the issues surrounding the AFFF chemical components, does not have any provision for production bans, but would primarily cover Significant New Use Rules (SNUR). Since our use of AFFF is not new, the TSCA would not have a direct impact on Navy AFFF use. Comparison to ozone-depleting chemicals, for which production was banned by international treaty, is not really accurate. Certainly if toxicity issues did come to light industry would want to come up with alternatives. But industry can't afford to simply drop production of AFFF components, because as I noted, these chemicals have very broad uses. We would likely see some procurement cost growth as commercial usage changed to more environmentally friendly products, and substantial disposal costs. Eventually we would likely have to change to a different foam firefighting agent.

But there is no environmental regulation change at this point, and none about to come out.

Let's at least wait to push the panic button until we have some additional news about toxicity.

R/Doug Baryliski

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

From: skiely@mrosenblatt.amsec.com [mailto:skiely@mrosenblatt.amsec.com]
Sent: Tuesday, August 26, 2003 11:01 AM
To: baryliskidj@navsea.navy.mil
Cc: hunstadmp@navsea.navy.mil; PlunkettRB@navsea.navy.mil; SolomonCJ@navsea.navy.mil
Subject: FW: Ban on AFFF

<< File: AI 15161 RS.doc >> << File: 15161 Attach.txt >> Doug - Do you have any new info on the future of AFFF?? I thought the issue was behind us but some questions have come up (see below). I provided the attached response, but if you have anything to add/change, I'd appreciate it.

Sean Kiely
M. Rosenblatt & Son - An AMSEC LLC Group
Phone: (202) 608-8416
Fax: (202) 544-5645
email:skiely@mrosenblatt.amsec.com

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

From: Plunkett R Bryan CONT NSSC [mailto:PlunkettRB@NAVSEA.NAVY.MIL]
Sent: Friday, August 08, 2003 11:10 AM
To: Barden Tara L CONT NSSC
Cc: Solomon Carmelita J CONT NSSC; Kiely, Sean; Holinsworth, Bob; Parish

Benjamin A NNVA; Alejandro Rene CONT NNVA; Linares Richard M CONT NSSC;
Lewis Edward A NSSC
Subject: FW: Ban on AFFF

Tara,

Please assign action to Aux&Crew to look into status of possible AFFF ban
and whether this will affect the CVN 70 RCOH planning. Due date 25 Aug 03.

Thanks,
Bryan

Bryan Plunkett
Aux&Crew SEM - RCOH/CVN 76
CVN 70 RCOH Aux&Crew IPT Lead
PEO Aircraft Carriers
(202) 781-4301
(202) 781-4640 (fax)
plunketttrb@navsea.navy.mil

> -----Original Message-----

> From: Parish Benjamin A NNVA
> Sent: Friday, August 08, 2003 10:22 AM
> To: Plunkett R Bryan CONT NSSC
> Cc: Metcalf Brian A LCDR NNVA; Frank Burke (E-mail)
> Subject: FW: Ban on AFFF

>

> Bryan where does this issue stand now? Do we need to address it for 70 or
> did it just go away? Inquiring minds want to know.

>

> Ben Parish
> Assist Project Supervisor
> SUPSHIPNN C152P1
> 757 688 1741 Cell 757 876 5083
> FAX 757 688 1950

>

> -----Original Message-----

> From: Lewis Edward A NSSC [mailto:LewisEA@NAVSEA.NAVY.MIL]
> Sent: Friday, March 09, 2001 8:41 AM
> To: Corley Wesley S NSSC
> Cc: Plunkett R Bryan CONT NSSC; Ngo Tien M NSSC; Parish Benjamin A NNVA;
> Speca Aaron M NNVA; Wujick Christine A NSSC; Montgomery Mike L CONT NSSC;
> 'Mike Turner'
> Subject: FW: Ban on AFFF

>

> Wes,

>

> FYI. We will continue to monitor this situation and it's potential impact
> to the CVN 70 RCOH.

>

> V/R,

>

> Ed Lewis
> PEO Aircraft Carriers
> RCOH Ship Design Manager
> (703) 607-1818 x 331 (Voice)
> (703) 607-2495 (Fax)
> (703) 505-6728 (Cell)
> Lewisea@navsea.navy.mil

>

>

> -----Original Message-----

> From: Fink Jeff E NSSC
> Sent: Friday, March 09, 2001 8:05 AM

> To: Raber James D NSSC; Snyder CF (Charles) NSSC; Bergner Richard L
 > NSSC; Wujick Christine A NSSC; McAllister Keith R NSSC; Lewis Edward A
 > NSSC; Gimbel Weldon K NSSC; Orski Gary A NSSC; Ngo Tien M NSSC; Waldman
 > Jack S NSSC; Plunkett R Bryan CONT NSSC; Bob Morris (E-mail); Jim Counts
 > (E-mail); Sean Kiely (E-mail)
 > Subject: Ban on AFFF
 >
 > Just wanted to keep everyone up to date on the AFFF issue. For those of
 > you who do not know EPA has proposed a rule which has the potential to ban
 > future production and import of chemicals that are integral to the
 > production of AFFF.
 >
 > Background AFFF was developed by the Navy Labs in the 1960s to provide
 > better fire protection than the older protein foam. AFFF is used in
 > machinery rooms, flight decks and hangar bays on most Navy ships. Mil-Std
 > AFFF is used at most airports throughout the world and is considered by
 > the insurance industry as the premier fire fighting agent.
 > Some of the chemical components of AFFF are categorized as
 > Perfluorocetyl Sulfonates (PFOS) which can potentially degrade into PFOSA
 > (acid). PFOSA is highly persistent in the environment and has a strong
 > tendency to bioaccumulate. (which means, like lead, the body absorbs this
 > chemical, but does not get rid of it. Over time the body can accumulate
 > this chemical to toxic levels) Studies indicate that exposure to PFOSA is
 > widespread and recent tests have raised concerns about long term effects
 > in people and wildlife.
 > There are four manufacturers on the QPL for AFFF. 3M won the current
 > contract to supply AFFF to DOD. This contract expires in Dec '02. 3M,
 > worried about the potential future problems, has decided to get out of the
 > market as soon as the contract is over. They have already stopped their
 > production of things like ScotchGuard that have the same PFOS.
 >
 > James Rudroff of N452C wrote a point paper on this issue. (see attachment)
 >
 > I have been told be NAVSEA 05L4 that there is a question as to whether the
 > other manufacturers will stay in the market knowing that 3M got out and
 > why they got out. There is an AFFF Workshop being held on March 16th at
 > the Pentagon sponsored by the Assistant Deputy Under Secretary of Defense
 > Force Protection in which NAVSEA 05L4, EPA, DLA will be in attendance. If
 > production of AFFF is discontinued there will certainly be a major impact
 > to Carriers as well as the rest of the Navy. The scope of effort to
 > replace AFFF will be larger than the Freon elimination program. The effort
 > could be on the magnitude of Asbestos elimination. However it is to early
 > to panic and to discuss corrective action. We need to let the tech
 > community and industry experts have a chance to assess the total picture
 > and develop a POA. The Aux and Crew Team here at PEO Carrier will be
 > closely monitoring the situation.
 >
 > <<Jeff_F-1.TIF>>
 > Jeff Fink
 > PEO - E
 > DSEM Aux & Crew
 > (703) 607-1701 x343
 >