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AR 226-1065

January 30, 2002

**Fire
Fighting
Foam
Coalition**Thomas A. Cortina
Executive Director

Mr. Charles M. Auer
Director, Chemical Control Division
Office of Pollution Prevention and Toxics
Environmental Protection Agency (7405M)
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Mr. Auer:

Thank you for meeting with members of the Fire Fighting Foam Coalition (FFFC) last September to discuss aqueous film-forming foam (AFFF) fire fighting agents. We appreciated the opportunity to discuss with EPA our views on the importance of AFFF for extinguishing flammable liquid fires and the differences between PFOS and telomer-based AFFF agents.

At that meeting you asked us to provide EPA with information on the chemistry and quantity of fluorosurfactants used in the production of AFFF agents. We subsequently requested that fluorosurfactant manufacturers submit to EPA as confidential business information (CBI) the exact chemistry of the fluorosurfactants they sell for the production of AFFF and that AFFF manufacturers submit data to FFFC on the amount of fluorosurfactants they use in the manufacture of AFFF.

We have been informed that two fluorosurfactant manufacturers have submitted CBI information to the docket and we expect one or two others to submit information in the future.

Based on the data submitted to FFFC by AFFF manufacturers, the amount of fluorosurfactant actives or solids used in 1999 to produce AFFF agents that were sold in the United States was approximately **138,000 pounds**. This figure does not include fluorosurfactant used in AFFF agents that were manufactured in the U.S. for export or fluorosurfactant used in AFFF agents that were manufactured outside the U.S. and imported. It is our understanding that the companies that reported to FFFC represent over 95% of U.S. production of telomer-based AFFF agents.

We hope this information is helpful and we look forward to continuing to work with you on issues related to AFFF fire fighting agents. Please let us know if you have any questions.

Sincerely,

Thomas A. Cortina
Executive Director

cc: Barbara Leczynski
Mary Dominiak

CONTAIN NO CBI