
From: John P. Farley
To: Joe Scheffey; Berchtold, Brian D CIV NAVSEA HQ, NAVSEA 05
CC: Hunstad, Mary P CIV NAVSEA HQ, SEA 05; Barylski, Douglas J CIV NSWCDD, Z23; James W. Fleming; Bradley A. Williams
Sent: 4/15/2011 2:29:26 PM
Subject: RE: AFFF MILSPEC BACKGROUND_REVIEW

Joe:

We have been discussing the reformulation issue here at the Lab this week in preparation for Monday. As you know the EPA guidelines are currently somewhat vague. The following interpretation was provided by Tom Cortina:

"It is an overall requirement that the telomere manufacturers have agreed to. It is not specific to individual products.

Under the EPA PFOA Stewardship Program, telomere manufacturers have agreed to reduce C8 and higher homologues from plant emissions and products by 95% by 2010 and to virtually eliminate by 2015. There are already products that meet this requirement, including one on the QPL".

FYI, I believe that the QPL product noted may be CHEMGUARD but this has not been verified.

My question, from the Navy perspective, is how will this be validated and what will be the NAVSEA ruling for success?? It would seem that the EPA did not specifically say they expect the C8 to be zero (i.e., it is a goal to work for). It would seem that this may be reasonable since the chances of eliminating all of the C8 impurities may be problematic.

It would seem then that as part of the reformulation process that the Navy should have some means to validate the C8 content. Jim Fleming and Brad Williams are looking into this to see if NRL could do a simple MASSPEC analysis to note any presence of C8 in the concentrate formula. The Navy will then have to decide what will be the acceptable performance metric for MILSPEC AFFF Reformulation testing (i.e., C8 zero or a limited amount of C8 impurity that does not overpower the overall toxicity of the concentrate formula). We will be prepared to discuss this issue further on Monday.

R/ John

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

From: Joe Scheffey [mailto:JOE@haifire.com]
Sent: Friday, April 15, 2011 9:23 AM
To: John P. Farley; Berchtold, Brian D CIV NAVSEA HQ, NAVSEA 05
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If time permits, and there is interest, I suggest two other topics of discussion:

1. Impact of 6:2 FTS on new AFFF reformulations - see attached background information, for internal use only. I would like feedback, particularly from the NRL chemists.
2. Impact of ICAO Level 3 foam testing and potential implications ("how good is good enough") - I am gathering information

Joe Scheffey