

AR 226 - 0940

August 30, 2000

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1P
Mr. Charles Auer
US Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue
Mail Stop 2405
Washington, DC 20460

Re: 3M AFFF Phase-out

Dear Mr. Auer:

Kidde Fire Fighting is a Pennsylvania based manufacturer of numerous products utilized within the fire control and fire fighting segments. KFF is a separate company within the Kidde sector of Williams PLC holdings which serves numerous industry segments within the fire control and fire fighting industry on a worldwide basis. Collectively, the parent company holdings are the largest producer of foam concentrates within the industry.

At our U.S. facility located in West Chester, PA, current company capacities can be expanded three-fold for the manufacturer of foam concentrates on an annual basis. The KFF products are branded National Foam, Angus and Lorcon which are well recognized foam concentrate brands utilized within the government, municipal, and industrial market sectors. Additional capacities are available within Kidde Sector which assures Kidde foam concentrate capabilities can absorb market demand.

The KFF branded products utilize specialty fluorochemicals produced by Atochem, Ciba Specialty Chemicals and Dynax which are all derived from the telomerization (TFE) process. Through the TFE process, the foam concentrates marketed by KFF do not contain the perfluorooctanyl sulfonates (PFOS) which have generated the EPA concerns about 3M's foam concentrate products.

In recent weeks, KFF and industry contacts have been informed about EPA's consideration of an extension to the 3M foam concentrate phase-out plan published on May 16, 2000. Foam concentrate producers do not anticipate any product shortages in either domestic or international markets served by the industry. EPA should survey the foam concentrate manufacturers or industry recognized organizations such as National Fire Protection Association (NFPA), which can provide supporting statistical data.

KFF foam concentrates have been formulated in an environmentally responsible manner throughout the years. We encourage EPA's further review of 3M's phase-out plan since a real or perceived products shortage does not exist in our viewpoint.

Advise if you require any further information or assistance.

Respectfully yours,



Chuck LaBounty
Director of Marketing

Cc: Jack Hittson, KFF President

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ANGUS
FIRE



POWHATAN

Automatic
Sprinkler