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ATOFINA CHEMS INC			
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SUPPORT: LETTER FROM ATOFINA CHEMS INC RESPONDING TO USEPA REQUEST FOR ADDITIONAL INFORMATION REGARDING SUBJECT CHEMICAL OF PREVIOUS SUBMISSION, 8EHQ-0201-14860, DATED 5/24/2001			
Chemical Category			

OFFICE OF TECHNICAL SUBSTITUTES
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ATCFINA Chemicals, Inc.

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Attn: Section 8(e)
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460-0001

Contain NO CBI

Subject: 8EHQ-0201-14860

Dear Sir:

In response to your letter of February 23, 2001, ATOFINA Chemicals, Inc. (ATOFINA) does not currently manufacture or import this product into the United States. The product is manufactured and sold in Europe as a fluorosurfactant and hydrocarbon co-surfactant package designed specially as an additive for water based portable fire extinguishers. It is the foaming agent for these portable extinguishers and when added to a water based portable extinguisher for class A fires, it is able to put out fuel fires, such as gasoline or kerosenes. It can also be used to put out Class B fires. The fluorosurfactant present in the formulation of fire fighting foams allows the premix solution to form a homogeneous and strongly stable aqueous film of foam that spreads over the surface of the burning fuels.

This product would replace other fluorosurfactants currently on the market. The recommended concentration of these surfactant packages is a function of performance, with most recommendations being at a level of 1%.

In the future, ATOFINA would like to offer this product to U.S. manufacturers of fire fighting foams. Customer worker exposure is expected to be minimal as the compounding areas for formulating the products and filling of the portable extinguishers are closed systems. Further, the MSDS for this product reports on the allergic skin reactions seen in guinea pigs with repeated exposure. The ATOFINA MSDS and label indicate the product may cause allergic skin reaction. Precautions include not getting the material in eyes, on skin or on clothing; avoiding breathing vapor or mist; washing thoroughly after handling; and wearing of appropriate chemical resistant protective clothing, gloves and goggles. End-users of fire fighting foams containing the product would consist of professional fire-fighters wearing full fire fighting turn out gear (full Bunker Gear) or one-time users with short duration exposure during emergencies.

We assume this information responds to all of your needs.

Sincerely,

Debra Randall

Debra Randall, DABT
Product Safety Manager



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