



Alliance for Telomer Chemistry Stewardship

May 3rd, 2021

Attn: Joint Environment & Natural Resources Committee

Dear Chair Brenner, Chair Tucker and Members of the Committee:

The Alliance for Telomer Chemistry Stewardship (ATCS) is a global organization that advocates on behalf of C6 fluorotelomer-based products. Our members are leading manufacturers of fluorotelomer based products. Our mission is to promote the responsible production, use, and management of fluorotelomer based products, while also advocating for a sound science- and risk-based approach to regulation. Fluorotelomer-based products are versatile chemistries with wetting and spreading features, as well as unique properties that repel water, oil and stains. These unique characteristics make fluorotelomers a critical component of first responder gear, medical garments, paints and coatings, upholstery, class B firefighting foam, among other uses that families and businesses across the world rely on.

On behalf of the members of ATCS, we are supportive of LD 1505 *with* clarifying amendments in regards to the firefighting foam manufacturing and take back provisions.

This legislation while preserving the ability to use C6 Fluorosurfactant-based foam (AFFF) in emergency situations, eliminates the overuse of the foam in training scenarios. The restriction on testing provides stewardship principals and industry best practices for the usage of AFFF. However, an amendment to continue manufacturing of AFFF will keep it available to give firefighters the best available tool to extinguish Class B fires safely and efficiently. Allowing the continued manufacturing process of AFFF would also negate the need for a take back program for now until efficient alternatives are approved. We are certain this must needed legislation is right for environmental stewardship and retaining safety in emergency Class B situations in Maine.

AFFF foams are the most effective foams currently available to fight high-hazard flammable liquid fires (Class B) in military, industrial, chemical, fuel depot/storage, aviation and other applications. AFFF have proven effectiveness in large scale tank fires, fuel-in-depth fires and other high hazard Class B fires. Their unique film-forming and fuel repellency properties provide rapid extinguishment, critical burnback resistance and protection against vapor release, which help to prevent re-ignition and protect fire fighters working as part of rescue and recovery operations.

Thank you for your consideration and amendment of this important legislation.

Sincerely,

Shawn Swearingen
Director, Alliance for Telomer Chemistry Stewardship