



File Code: 5162
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Dr. Michael Payne
Western Institute for Food Safety and Security (WIFSS)
University of California – School of Veterinary Medicine

Sent via email mpayne@ucdavis.edu

Dear Dr. Payne:

I am responding to your comment about our Federal Register Notice on the Qualified Product List for Wildland fire Chemicals; OMB Control Number 0596-0182.

I work for the Wildland Fire Chemical Systems (WFCS) program within the USDA Forest Service. I believe there is some misunderstanding about the scope and intent of our data collection which I would like to correct.

Our program is charged with developing specifications for the evaluation of wildland fire chemicals (long-term retardants, class A foams, and water enhancers) used by wildland fire agencies as part of their firefighting operations, maintaining the Qualified Products List (QPL), and conducting the laboratory evaluations for suppliers of candidate products who like to have their products listed. This work is all performed under the guidance of the Fire Chemicals Board made up of representatives of the fire operations communities from federal and state agencies with wildland fire operations mandates.

When a supplier proposes a new product, they must provide our program with a confidential disclosure sheet which provides very specific information about the makeup of their product. We ask these questions of each submitter one time as part of the initial evaluation of their product. The product must remain the same or a new evaluation is required.

They must also provide copies of the material safety data sheets (MSDSs) for the product and every component of the product. This information is reviewed for compliance with section 2.2 through 2.4 of our specifications. Copies of the three specifications can be found on our web site at www.fs.fed.us/rm/fire; select the “Wildland Fire Chemicals” tab; and then select a product type from the first section of the page. The agencies have developed a short list of ingredients that will not be accepted. There are also several categories and lists of chemicals such as Extremely Hazardous Substances (EHS), and known or suspect carcinogens that are reviewed to minimize hazards to workers, members of the general public, and the environment. These are cross referenced with the confidential disclosure sheets and if found, additional testing and analysis may be required or the submission returned to the supplier with our statement of reasons.

During the product evaluation mammalian toxicity, aquatic toxicity, and biodegradability tests are performed on the product. These tests have pass/fail points and the product evaluation stops if any of these points are exceeded. Otherwise the evaluation proceeds.



Risk assessments of the risk to human health and the environment are conducted in accordance with US Environmental Protection Agency (EPA) protocols and findings documented to assist wildland fire managers in selecting products appropriate for their unique environments.

All of this work constitutes one portion of the evaluation. Other parts of the evaluation examines the performance of the product with regard to other characteristics pertinent to the use of the products are completed prior to a product being placed on the QPL.

It takes 18 to 24 months to complete the evaluation and list a product on the QPL. All of these steps are taken to minimize the hazards associated with a very hazardous job performed by all firefighters.

I hope that I have addressed your comments. If you have any questions related to this work, please contact me at the address shown above, by phone at 406-329-4819, or email at cjohnson12@fs.fed.us or contact our Program Leader, Shirley Zylstra at the same address or by phone at 406-329-4859, or email at szylstra@fs.fed.us.

Sincerely,

Cecilia Johnson

CECILIA W. JOHNSON
Fire Chemicals Technical Specialist
Wildland Fire Chemical Systems

CC: S.Zylstra
L.Anderson
W.Cota