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July 6, 2026

Mr. Hunter Jones
Washington Office – Fire and Aviation Management
Fire Chemicals Branch Chief
5785 Highway 10 West
Missoula, MT 59808

Dear Hunter:

Thank you for the opportunity to comment on the proposed renewal of the information collection for the Qualified Products Lists (QPL) for Fire Chemicals for Wildland Fire Management.

1. Is this information collection necessary?
Yes. We believe this information collection is necessary because it helps ensure that wildland fire retardants meet established safety, environmental, and performance standards before they are approved for use. There is significant public interest in both protecting the environment and ensuring these products perform as intended. The information collected gives the Forest Service the data it needs to make informed decisions and helps maintain confidence in the products approved for federal use.

2. Is the estimated burden accurate?
Based on our experience, the estimated burden appears to be somewhat low. Although manufacturers maintain much of the required information, preparing and supporting submission often requires additional coordination, documentation, and follow-up.

3. How could the information collected be improved?
We believe there are several opportunities to improve the quality and usefulness of the information collected. Individual formulation components should be evaluated against performance specifications rather than being tied to a single source of supply. This would provide greater flexibility for manufacturers while helping reduce supply chain risks for both the Forest Service and its customers. We also recommend requiring independent third-party heavy metals testing for newly submitted products using ready-to-use material and analytical methods capable of measuring contaminants at parts-per-billion levels. This would provide an added level of confidence that products continue to meet environmental requirements. Finally, environmental testing should focus primarily on the ready-to-use product rather than the concentrate. Since the ready-to-use product is what is applied during wildfire operations, it provides the most meaningful information regarding potential environmental exposure.

4. How could the burden on respondents be reduced?
The process could be made more efficient by allowing manufacturers to reference information that has already been submitted when it has not changed. This would reduce unnecessary duplication while still providing the Agency with the information it needs.
We also encourage the Forest Service to look for opportunities to streamline the review and approval process. Based on our experience, the review process moved more efficiently when the Missoula laboratory played a larger role in approving new product submissions. We encourage the Forest Service to consider giving the laboratory more authority in the approval process. Relying on the expertise of the technical staff could help speed up reviews while maintaining the high standards of the qualification process.

Sincerely,

Marcela Munoz

Marcela Munoz
Director of R&D
Perimeter Solutions