



# INTERNATIONAL ASSOCIATION OF FIRE CHIEFS

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March 29, 2010

Administrator Lisa Jackson  
United States Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Administrator Jackson:

On December 17, 2009, the EPA announced that the use of decaBDE, a flame retardant, was being phased out in the United States as a result of negotiations with Albemarle Corporation, Chemtura Corporation, and ICL Industrial Products, Inc. All three companies committed to stop production and importation of the chemical by December 31, 2012 and to end all uses by the end of 2013. As stated in the EPA's announcement, the impetus for this action was the concern over the long-term impacts on health and the environment caused by these chemicals as outlined in studies conducted by EPA.

Albemarle recently announced the production of a new flame retardant product called Earthwise GreenArmor "that meet(s) the societal needs in an environmentally sound manner," according to a statement issued by Albemarle on December 8, 2009. In a full-page ad in USA TODAY on February 4, 2010, Albemarle stated that this new line of products are "environmentally-friendly."

The International Association of Fire Chiefs (IAFC), as the leading organization representing 12,000 fire chiefs around the globe, is dedicated to reducing the loss of life, injuries and devastation caused by fires. However, we are equally concerned that the methods used to accomplish this be done in a way that minimizes, as much as possible, the impact on people's health and the environment.

Towards that end, we would like to express our desire that any chemicals used as a replacement for decaBDE be fully tested to ensure that they do not have an adverse impact and that the results of this testing be verified by the EPA and that any claims made by manufacturers or importers be substantiated by sound analysis and testing. We believe that this step will help to ensure that the problems that have arisen out of the use of decaBDE are not repeated and that by addressing the problem of fire safety we are not creating unintended consequences on human health and the environment.

I appreciate your attention in this matter.

Sincerely,

Chief Jeffrey D. Johnson, EFO, CFO, MIFireE  
President and Chairman of the Board