

To the Committee,

Special attention should be paid to diversion of old stock, auditing and accounting for industrial chemicals that have avoided higher level scheduling. Some of these industrial chemicals are very useful and indispensable but require proper care when disposed. They should be treated with the same attention as drug precursors or certain solvents. Legitimate industrial and scientific use allowed but with accounting.

Today's lesson will be on a technical product by 3M known as Fluorinert. Running through the technical and regulatory errata one can find, "Bananas : Not known to contain." Further down in the regulatory datasheet it says, "Per- and polyfluoroalkyl substances (PFAS) : Intentionally added. "Please see section 3 of the SDS"" Then in section 3 of the SDS it is 100% PFAS. It's a very important product because it is used to cool electronics specifically high performance computing, avionic, naval applications. It's also used to cool biological tissue in medical research and electro-optical equipment.

3M is discontinuing Fluorinert so it faces a dual waste management problem of being end of life and high volume purchases for legacy equipment. Old equipment being resold and reused. Diversion of old and end of life Fluorinert.

It's been possible to buy Fluorinert by the liter for 20 years on Ebay. Various amateur laser and telescope supply websites sell it as well. Anyone can get their hands on 100% pure PFAS pretty easily and cheaply. One of the most publicized and repeated misuses of Fluorinert on the internet is the countless direct liquid cooled personal computer projects that has no doubt exposed many content creators to very high doses of PFAS and risks copy-cat exposures.



The fish tank PC display by Gigabyte at Computex 2018.

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