October 20, 2020

David Staub, Fire Chief
Arizona Fire Chiefs Association
Payson Fire Department
400 W. Main Street
Payson, AZ 85541
Email: Dstaub@paysonaz.gov

Dear Chief Staub,

The Arizona Department of Environmental Quality is reaching out to provide information, resources and advice regarding the use of certain Aqueous Film Forming Foam (AFFF) due to its potential adverse impacts to public health and the environment.

Certain AFFF’s contain an emerging contaminant called PFAS (per- and polyfluoroalkyl substances). PFAS are a group of chemicals that are linked to adverse human health outcomes from exposure. Some studies have shown that exposure to certain PFAS may increase the risk of cancer, affect the immune system and impact children’s development, and additional research is ongoing.

The most significant PFAS human exposure pathway is drinking impacted municipal or well water. AFFF that contains PFAS can be a major source of PFAS release to the local environment and has the potential to create adverse impacts to public health and the environment if it reaches drinking water, groundwater or surface water. ADEQ urges Arizona’s fire departments and emergency responders to take extreme care to minimize release of AFFF containing PFAS into the environment.

At this time, EPA has a drinking water Health Advisory Level (HAL) in place for two PFAS compounds and is in the process of making a regulatory determination related to establishing enforceable drinking water standards for certain PFAS. Regulation of PFAS is increasing at federal and state levels and is focused on lowering the limits for acceptable levels of PFAS in groundwater and soil, as well as requiring remediation projects to address PFAS contamination. These increasing regulations are accompanied by hundreds of class actions, personal injury claims and individual lawsuits that have been brought on behalf of municipalities and water districts for costs associated with removal of PFAS from potable water sources. Specifically, AFFF that contains PFAS is the subject of more than 500 ongoing legal actions [see AFFF Products Liability Litigation (MDK No. 2:18-mn-2873-RMG): https://www.scd.uscourts.gov/mdl-2873/index.asp].

In Arizona, PFAS has already impacted and continues to threaten Tucson’s drinking water supply. Tucson Water has removed four drinking water production wells from service due to PFAS found at levels higher than EPA’s HAL in the regional groundwater aquifer near Davis Montan Air Force Base. Additional drinking water production wells in Tucson Water’s central wellfield are at risk from PFAS. The central wellfield has the potential to provide water to over 600,000 people and is the sole alternate drinking water supply to the Central Arizona Project for central Tucson.

To address the PFAS threat to Tucson’s drinking water supply, ADEQ has dedicated funds from its limited Water Quality Assurance Revolving Fund to delineate and capture PFAS-contaminated groundwater from impacting additional drinking water production wells and is working with Tucson Water and Davis Montan Air Force Base, and the Air Force Civil Engineering Center. In addition, ADEQ notified private well owners in the area, whose wells are not regulated by ADEQ, about the potential for PFAS impacts. At the owners’ requests, ADEQ tested 13 privately-owned wells for PFAS and for three of these wells that showed PFAS levels higher than the EPA HAL, ADEQ worked with the Air National Guard to provide the residents with an alternate source of healthy drinking water.

Continuing to protect Arizonans and Arizona’s water resources from PFAS impacts is critical. ADEQ has prepared an online resource about current scientific, regulatory and legal developments related to PFAS and AFFF which may
contain PFAS. ADEQ’s online “PFAS Resources” includes information to support your decision-making about using AFFF and its alternatives so that potential impacts to the environment can be minimized and mitigated. Please review the “PFAS Resources” and accompanying “AFFF Resources for Fire Departments & LEPCs” at: https://www.azdeq.gov/PFOA/PFOS.

ADEQ understands the priority of firefighters and first responders is to protect life and property. Understanding and mitigating the potential risks associated with environmental releases of AFFF containing PFAS is prudent. We strongly recommend that Arizona’s fire departments and Local Emergency Planning Committees carefully review and consider this information to better understand the risks and potential consequences of continued use of AFFF containing PFAS and implement best practices to reduce the risk of releases of AFFF. For questions about ADEQ’s online PFAS Resources or additional information, please contact Paula Panzino, ADEQ Chief Science Officer at panzino.paula@azdeq.gov.

Sincerely,

Laura Malone
ADEQ Waste Programs Division Director

cc: AFCA Arizona Fire Chiefs Association Executive Committee
    Arizona Fire District Association
    State of Arizona Local Emergency Planning Committees (LEPCs)
October 20, 2020

Larry Rooney
Arizona Director to the Western Fire Chiefs Association
Avondale Fire/Rescue Department
1825 N. 107th Avenue
Avondale, AZ 85392
Email: lrooney@avondale.org

Dear Mr. Rooney,

The Arizona Department of Environmental Quality is reaching out to provide information, resources and advice regarding the use of certain Aqueous Film Forming Foam (AFFF) due to its potential adverse impacts to public health and the environment.

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Sincerely,

Laura Malone
ADEQ Waste Programs Division Director

cc:  AFCA Arizona Fire Chiefs Association Executive Committee
     Arizona Fire District Association
     State of Arizona Local Emergency Planning Committees (LEPCs)
Paul Adams, Executive Director  
Arizona Fire Chiefs Association  
7850 N. Silverbell Rd.  
Suite 114-335  
Tucson, AZ 85743  
Email: padamsaz@icloud.com

Dear Mr. Adams,

The Arizona Department of Environmental Quality is reaching out to provide information, resources and advice regarding the use of certain Aqueous Film Forming Foam (AFFF) due to its potential adverse impacts to public health and the environment.

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Sincerely,

Laura Malone
ADEQ Waste Programs Division Director

cc:   AFCA Arizona Fire Chiefs Association Executive Committee
      Arizona Fire District Association
      State of Arizona Local Emergency Planning Committees (LEPCs)
Dear Chief Freitag,

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Sincerely,

Laura Malone
ADEQ Waste Programs Division Director

cc:   AFCA Arizona Fire Chiefs Association Executive Committee
      Arizona Fire District Association
      State of Arizona Local Emergency Planning Committees (LEPCs)
October 20, 2020

Jake Rhoades, Fire Chief
Treasurer of the Arizona Fire Chiefs Association
Kingman Fire Department
310 N. 4th Street
Kingman, AZ 86401
Email: jrhoades@cityofkingman.gov

Dear Chief Rhoades,

The Arizona Department of Environmental Quality is reaching out to provide information, resources and advice regarding the use of certain Aqueous Film Forming Foam (AFFF) due to its potential adverse impacts to public health and the environment.

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Sincerely,

Laura Malone
ADEQ Waste Programs Division Director

cc: AFCA Arizona Fire Chiefs Association Executive Committee
    Arizona Fire District Association
    State of Arizona Local Emergency Planning Committees (LEPCs)
October 20, 2020

Tom Shannon, Fire Chief
Vice-President of the Arizona Fire Chiefs Association
Scottsdale Fire
Witzeman Public Safety Building
8401 E. Indian School Road
Scottsdale, AZ 85251
Email: TShannon@scottsdaleaz.gov

Dear Chief Shannon,

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