



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

October 20, 2020

Haley Nicoll, Coordinator
Apache County Emergency Management
P O Box 518
St. Johns, AZ 85936
Email: hnicoll@co.apache.az.us

Dear Ms. Nicoll,

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)]: <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 Monthan 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 Monthan 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

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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
Arizona Fire District Association
State of Arizona Local Emergency Planning Committees (LEPCs)



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ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

October 20, 2020

Mary Dalton, President
Arizona Fire District Association
P O Box 6778
Chandler, AZ 85246
Email: mdalton@afma.az.gov

Dear Ms. Dalton,

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Laura Malone
ADEQ Waste Programs Division Director

cc: AFCA Arizona Fire Chiefs Association
State of Arizona Local Emergency Planning Committees (LEPCs)



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Misael Cabrera
Director

October 20, 2020

Gabriel Lavine, Director
Cochise County Office of Emergency Services
1415 Melody Ln. Building A
Bisbee, AZ 85603
Email: glavine@cochise.az.gov

Dear Mr. Lavine,

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Laura Malone
ADEQ Waste Programs Division Director

cc: AFCA Arizona Fire Chiefs Association
Arizona Fire District Association
State of Arizona Local Emergency Planning Committees (LEPCs)
Judith Lynn, Deputy Director – jlynn@cochise.az.gov



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ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

October 20, 2020

Wes Dison, Interim Emergency Manager
Department of Emergency Management
219 E. Cherry Ave.
Flagstaff, AZ 86001
Email: wdison@coconino.az.gov

Dear Mr. Dison,

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Sincerely,



Laura Malone
ADEQ Waste Programs Division Director

cc: AFCA Arizona Fire Chiefs Association
Arizona Fire District Association
State of Arizona Local Emergency Planning Committees (LEPCs)
Mark Christian, Coordinator: mchristian@coconino.az.gov
Sam Beckett, Coordinator of Information: sabeckett@coconino.az.gov



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ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

October 20, 2020

Josh Beck, Coordinator
Gila County Emergency Management
5515 South Apache Ave. Suite 400
Globe, AZ 85501
Email: jbeck@gilacountyaz.gov

Dear Mr. Beck,

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Laura Malone
ADEQ Waste Programs Division Director

cc: AFCA Arizona Fire Chiefs Association
Arizona Fire District Association
State of Arizona Local Emergency Planning Committees (LEPCs)
Carl Melford: cmelford@gilacountyaz.gov
Celena Cates: ccates@gilacountaz.gov



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ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

October 20, 2020

Brian Douglas, Health Director
Graham County Department of Health
826 S. Main St.
Safford, AZ 85546
Email: bdouglas@graham.az.gov

Dear Mr. Douglas,

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Hank Metzger: hmetzger@graham.az.gov



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Misael Cabrera
Director

October 20, 2020

Steve Rutherford, Health Director
Greenlee County Department of Health
P O Box 908
Clifton, AZ 85533
Email: srutherford@greenlee.az.gov

Dear Mr. Rutherford,

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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

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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
Arizona Fire District Association
State of Arizona Local Emergency Planning Committees (LEPCs)



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

October 20, 2020

Mimi Hernandez, Coordinator
La Paz County Office of Emergency Management
1108 Joshua Ave.
Parker, AZ 85344
Email: mhernandez@lapazcounty.org

Dear Ms. Hernandez,

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.

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State of Arizona Local Emergency Planning Committees (LEPCs)



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

October 20, 2020

Jesus Haro, Emergency Services Planner
Maricopa County Emergency Management Department
5630 E. McDowell Rd.
Phoenix, AZ 85008
Email: jesus.haro@maricopa.gov

Dear Mr. Haro,

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Laura Malone
ADEQ Waste Programs Division Director

cc: AFCA Arizona Fire Chiefs Association
Arizona Fire District Association
State of Arizona Local Emergency Planning Committees (LEPCs)
Erin King: erin.king@maricopa.gov



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

October 20, 2020

Byron Steward, Director
Mohave County Emergency Management
700 W. Beale St.
Kingman, AZ 86401
Email: byron.steward@mohavecounty.us

Dear Mr. Steward,

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Laura Malone
ADEQ Waste Programs Division Director

cc: AFCA Arizona Fire Chiefs Association
Arizona Fire District Association
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Mike Browning: mike.browning@mohavecounty.us
Jazmyne Tarkowski: jazmyne.tarkowski@mohavecounty.us



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

October 20, 2020

Catrina Jenkins, Emergency Manager
Navajo County Emergency Management
P O Box 668
Holbrook, AZ 86025
Email: catrina.jenkins@navajocountyaz.gov

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Laura Malone
ADEQ Waste Programs Division Director

cc: AFCA Arizona Fire Chiefs Association
Arizona Fire District Association
State of Arizona Local Emergency Planning Committees (LEPCs)
Rhonda Krouse: Rhonda.krouse@navajocountyaz.gov



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

October 20, 2020

Jeff Guthrie, Director
Pima County Emergency Management and Homeland Security
3434 E. 22nd St.
Tucson, AZ 85713
Email: jeff.guthrie@pima.gov

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Laura Malone
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cc: AFCA Arizona Fire Chiefs Association
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Shane Clark: shane.clark@pima.gov
Griselda Moya-Flores: Griselda.moya-flores@pima.gov



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

October 20, 2020

Charles Kmet, Emergency Manager
Pinal County Office of Emergency Management
P O Box 727
Florence, AZ 85132
Email: charles.kmet@pinal.gov

Dear Mr. Kmet,

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Laura Malone
ADEQ Waste Programs Division Director

cc: AFCA Arizona Fire Chiefs Association
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Wade Brannon: wade.brannon@pinal.gov



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

October 20, 2020

Ray Sayre, Director
Office of Emergency Management
2150 N. Congress Dr. Suite 110
Nogales, AZ 85621
Email: rsayre@santacruzcountyaz.gov

Dear Mr. Sayre,

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): <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 Monthan 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 Monthan 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

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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
Arizona Fire District Association
State of Arizona Local Emergency Planning Committees (LEPCs)
Frank Granados: fgranados@rrioricofire.org
Sobeira Castro: scastro@santacruzcountyaz.gov



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

October 20, 2020

Randolph Clark, Deputy Emergency Manager
Office of Emergency Management
1100 Commerce Dr.
Prescott, AZ 86305
Email: randolph.clark@yavapai.us

Dear Mr. Clark,

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
Arizona Fire District Association
State of Arizona Local Emergency Planning Committees (LEPCs)
Tiffany Chiaravalloti: tiffany.chiaravalloti@yavapai.us



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

October 20, 2020

Tony Badilla, Emergency Manager Director
Office of Emergency Management
2200 W. 28th St.
Yuma, AZ 85364
Email: tony.badilla@yumacountyaz.gov

Dear Mr. Badilla,

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Sincerely,



Laura Malone
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