



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

March 25, 2021

Dear Facility Owner/Operator/EHS Manager,

The Arizona Department of Environmental Quality (ADEQ) is reaching out to provide information, resources and advice regarding the use of certain aqueous fire fighting foam (AFFF) due to its potential adverse impacts to public health and the environment.

ADEQ is aware that our customers in industry may keep AFFF in their inventory to help with emergency fire-fighting practices on their premises. Certain AFFF contains 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 industries 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. Once federal standards are established, Arizona will evaluate the options for resulting PFAS compounds. 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 groundwater, which by Arizona law is considered a source of drinking water. For example, 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 north of Davis Monthan Air Force Base and additional drinking water production wells in Tucson Water's central wellfield are at risk. 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.

More recently, on February 18, 2021, Luke Air Force Base (AFB) issued a press release and a notification letter to customers of a nearby water utility company warning them that PFAS above the HAL had been detected in their water supply wells. In the notification letter, Luke AFB provided specific instructions for how affected customers can obtain bottled water as a substitute for tap water until a system is put in place to address the PFOS/PFOA before it reaches users. The water company serves 4,700

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customers and additionally the potentially impacted area includes as many as 45,000 people. These circumstances prompted the ongoing Arizona Corporation Commission investigation and its related public meetings.

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 firefighting 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/pfas-resources>.

Understanding and mitigating the potential risks associated with environmental releases of AFFF containing PFAS is prudent. Maintaining a robust product stewardship strategy for the products designed, produced, sold or used minimizes impacts to human health and the environment. We strongly recommend that Arizona's industries 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 include replacing current inventory, 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 L. Malone
ADEQ Waste Programs Division Director
Executive Director, Arizona State Emergency Response Commission

cc: Paula Panzino, CSO