



MEMORANDUM

Date: June 18, 2021

To: The Honorable Chair and Members
Pima County Board of Supervisors

From: C.H. Huckelberry 
County Administrator

Re: **Update on Per- and Polyfluoroalkyl Substances in Pima County**

Per- and polyfluoroalkyl substances (PFAS) are a class of more than 3,000 man-made chemicals widely used in common household consumer products including non-stick pans, stain protection coating on textiles (fabrics, upholstery, carpets), as well as the coating of common food packaging and even dental floss. Significantly, these compounds are also widely used in the military and firefighting foams. The most common route of human exposure to this class of chemicals is through ingestion primarily of food (72%), but also from water (22%) and dust (6%).

This class of compounds have been the source of emerging health concerns. Although the science is still in its infancy, epidemiologic studies suggest that human exposure as evidenced by serum PFAS levels may be associated with human disease including increased risks for certain cancers, impaired kidney, liver and thyroid function, immune system disorders, and developmental issues. Although these associations are very concerning, they do not in themselves establish causality. A good summary of the current state of knowledge regarding the human impacts of PFAS exposure is addressed in a detailed report by the University of Arizona College of Public Health and included in my [memorandum of January 29, 2020](#).

It should be noted that although the Environmental Protection Agency (EPA) has identified this class of compounds as "emerging contaminants of concern." There are no national regulatory standards for the presence of these contaminants in drinking water. Instead the EPA has established a non-regulatory, non-enforceable, drinking water "health advisory level" for two of these compounds (perfluorooctanoic acid and perfluorooctane sulfonic acid); set at 70 parts per trillion.

On February 2, 2020, I followed up with a report on the status of PFAS received and conveyed by the [Pima County sewerage system](#). I provided an additional communication on October 29, 2020, related to restoring [land application of biosolids](#) based on an assessment demonstrating low PFAS contamination risk.

On April 8, 2021, the EPA released a report entitled, Human Health Toxicity Values for Perfluorobutane Sulfonic Acid (PFBS) and Related Compound Potassium Perfluorobutane Sulfonate. Subsequently on April 27, 2021, EPA Administrator Regan established a new

“EPA Council on PFAS” charged to better understand and ultimately reduce the potential risks caused by these chemicals. Based on these actions, it is clear that the human health impacts of PFAS contamination are being monitored by federal authorities and that subsequent regulatory action is likely to happen in this space, although not in the short term.

The Arizona Department of Environmental Quality (ADEQ) has continued to pursue a strategy to address the PFAS threat to Tucson’s drinking water supply. ADEQ has dedicated funds from its Water Quality Assurance Revolving Fund to delineate and capture PFAS-contaminated groundwater from impacting additional drinking water production wells, in coordination with Tucson Water and the Air Force Civil Engineering Center.

On June 8, 2021, the City of Tucson announced that Tucson Water suspended operation of the Tucson Airport Remediation Project (TARP) water treatment facility, shifting water delivery of approximately 60,000 customers to a combination of recharged Central Arizona Project water and other groundwater sources not contaminated with PFAS.

The County has a limited role regarding PFAS exposure occurring as a result of drinking water given that we do not serve potable water. Additionally, the County does not have the regulatory authority in terms of ground water and water systems regulation until and unless the EPA establishes drinking water standards. Regardless of PFAS drinking water levels, any impactful future risk mitigation and exposure reduction strategies will need to address the exposures that are associated with food preparation and packaging.

The District 5 Supervisor has requested a presentation on this topic at the June 22, 2021 Board of Supervisors meeting. Attached is presentation that will be given by the Department of Environmental Quality for your advance review. Dr. Garcia will also be available during the Board meeting to respond to questions.

Attachment

- c: Jan Leshar, Chief Deputy County Administrator
- Carmine DeBonis, Jr., Deputy County Administrator for Public Works
- Francisco García, MD, MPH, Deputy County Administrator and Chief Medical Officer, Health and Community Services
- Yves Khawam, PhD, Assistant County Administrator for Public Works
- Ursula, Nelson, Director, Environmental Quality
- Jackson Jenkins, Director, Regional Wastewater Reclamation