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## FIRE DEPARTMENT SERVICE ANNOUNCEMENT

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Bulletin #41, A Duty to Warn, October 22, 2021

Firefighters have been unaware of the known toxicity in Aqueous Film Forming Foams (AFFF).

“Aside from standard workplace safety requirements regarding hazardous materials right-to-know, there has been no legal duty to warn or to require notice of hazards to first responders who handle AFFF. Several studies have concluded that some PFAS were elevated in blood of first responders. The New Hampshire Department of Health and Human Services PFC Blood Testing Program (NH DHHS 2016) results indicate the geometric mean levels of PFOS and PFHxS in firefighters were elevated versus the geometric mean levels of those who had not worked as firefighters. Numerous other studies indicated that blood serum levels were elevated in firefighters (LeMasters et al. 2006; Jim ey (sic) al. 2006; (Dobraca et al. 2015).”<sup>1</sup>

We now know that:

“The U.S. Department of Defense began examining AFFF toxicity in the early 1970s after the foam became required by the Navy ... In 1973, an Air Force report on toxicity experiments noted the foam’s fluorocarbon component resisted biodegradation and recommended treating discharge with activated carbon, as well as limiting its input to sewer systems, which ultimately lead to waterways. By 1985, the Navy was treating AFFF as potentially harmful to the environment based partly on toxicity data from foam manufacturers like 3M and calling for more study on aquatic life. By 1991, the Army was referencing AFFF as “hazardous material” in waste management plans.”<sup>2</sup>

Red Cross blood supplies have been testing for PFAS since the 1970s.<sup>3</sup> The National Health and Nutrition Examination Survey (NHANES) began testing blood for PFAS in 1999.<sup>4</sup>

No one thought to notify the firefighters. Incident commanders (IC) “must have responsibility with authority.”<sup>5</sup> An IC “Is expected to make strategic decisions based on risk acceptance or avoidance.”<sup>6</sup> But, the fire service has had critical toxicity information on PFAS chemicals withheld from them for decades. Now, fire chiefs are receiving public pressure for contaminating water resources while they were uninformed. Fire training centers in the US have contaminated water resources. Public pressure is mounting.

1 Per- and Polyfluoroalkyl Substances (PFAS), ITRC Technical/Regulatory Guidance, September 2020, p. 214, [https://pfas-1.itrcweb.org/wp-content/uploads/2020/10/itrc\\_pfas\\_techreg\\_sept\\_2020\\_508-1.pdf](https://pfas-1.itrcweb.org/wp-content/uploads/2020/10/itrc_pfas_techreg_sept_2020_508-1.pdf)

2 ‘They brought the poison.’ Air Force refuses to own AFFF around Oscoda, mlive news, Garret Ellison, May 27, 2021, <https://www.mlive.com/public-interest/2021/05/they-brought-the-poison-air-force-refuses-to-own-pfas-around-oscoda.html>

3 Typeinvestigations, 3M Knew About Dangers of Toxic Chemicals Decades Ago, Sharon Lerner, July 31, 2018, <https://www.atsdr.cdc.gov/pfas/health-effects/us-population.html>

4 PFAS in the U.S. Population, Agency for Toxic Substances and Disease Registry (ATSDR), <https://www.atsdr.cdc.gov/pfas/health-effects/us-population.html>

5 Risk Management Practices in the Fire Service, January 2018, U.S. Fire Administration/FEMA, p. 26, [https://www.usfa.fema.gov/downloads/pdf/publications/risk\\_management\\_practices.pdf](https://www.usfa.fema.gov/downloads/pdf/publications/risk_management_practices.pdf)



Fire Chief Michael H. Quint, EFO, End of Watch, December 2012 of multiple cancers attributed to his firefighting career.