



INTERNATIONAL ASSOCIATION OF FIRE FIGHTERS®

HAROLD A. SCHAITBERGER
General President

EDWARD A. KELLY
General Secretary-Treasurer

August 14, 2019

The Honorable James Inhofe
Chairman, Senate Armed Services Committee
United States Senate
Washington, D.C. 20510

The Honorable Jack Reed
Ranking Member, Senate Armed Services Committee
United States Senate
Washington, D.C. 20510

The Honorable Adam Smith
Chairman, House Armed Services Committee
United States House of Representatives
Washington, D.C. 20515

The Honorable Mac Thornberry
Ranking Member, House Armed Services Committee
United States House of Representatives
Washington, D.C. 20515

Dear Chairman Inhofe, Ranking Member Reed, Chairman Smith, and Ranking Member Thornberry:

On behalf of the nation's 317,000 professional fire fighters and emergency medical responders, I thank you for your strong and continuing commitment to our national defense and security. As you work to reconcile differences between the House and Senate versions of the National Defense Authorization Act (NDAA), I respectfully request your support for the following key provisions which impact fire fighters and emergency medical personnel.

The IAFF supports several provisions addressing poly- and per-fluoroalkyl substances (PFAS), a class of chemical compounds posing threats human health and the environment. PFAS have long existed as an ingredient in the production of aqueous fire fighting foams (AFFF) used by Department of Defense fire departments for nearly a half-century. Known as "forever chemicals" because they resist degradation in the environment, high concentrations of PFAS have been found in groundwater sources located at more than 400 current and former military installations. There is a growing body of evidence linking exposure to PFAS chemicals with multiple human health impacts including kidney and testicular cancer, thyroid disease, liver damage, preeclampsia in pregnant women, and low birth weight in infants.

For several decades, federal fire fighters have been regularly exposed to PFAS-laden AFFF during active fire fighting, training, and apparatus checks and maintenance; including replenishment activities. These repeated exposures place fire fighters' health at significant risk.

The IAFF supports provisions in the National Defense Authorization Act which help fire fighters better track their exposure to PFAS and reduce fire fighters' current and future exposures.

Medical Screening for Department of Defense (DoD) Fire Fighters

Position: The IAFF **supports** identical language in both Section 708 of the House-passed bill and Section 704 in the Senate-passed bill directing the Secretary of Defense to provide blood testing to determine DoD fire fighters' exposures to PFAS, and requests that such language be maintained in the final bill.

Screening DoD fire fighters for the presence of PFAS during a fire fighter's annual medical examinations is a safe and reasonable means to monitor exposures to PFAS, allowing a fire fighter to seek guidance and counseling from a physician if elevated levels are present. Further, such testing would validate or negate engineering controls put in place to reduce or eliminate further exposures.

Replacement of Fluorinated AFFF with Fluorine-Free AFFF

Position: The IAFF **supports** Section 318 of the House-passed bill directing the Secretary to the Navy publish a new Mil-Spec for AFFF and further prohibit the use of the toxic PFAS-laden legacy foams after September 30, 2025.

Developing an alternative for and replacing toxic fluorinated AFFF will allow the Department of Defense to better protect fire fighter health and the environment. The dates established by the House-passed bill provide the Department with ample time to transition to non-fluorinated foam.

Prohibiting the Uncontrolled Release of Fluorinated AFFF at Military Installations

Position: The IAFF **supports** Section 319 of the House-passed bill prohibiting the uncontrolled release of fluorinated AFFF.

Directing the Secretary of Defense to prohibit the uncontrolled release of PFAS-laden AFFF during non-emergency conditions is sound policy. Further, codifying the authorized release of fluorinated AFFF during emergency conditions sets a clearly discernable parameter for mitigating acceptable risk.

Prohibiting the Use of Fluorinated Fire Fighting Foams during Training Exercises

Position: The IAFF **supports** Section 320 of the House-passed bill prohibiting the use of fluorinated AFFF for training exercises.

Fire fighter training requirements dictate the use of fire fighting foams in order to understand and experience the effects weather, surface materials, and discharge flows have on firefighting foams and extinguishment capabilities. However, the same experience can be achieved by using currently existing nonfluorinated fire fighting foams, which protects fire fighters and the environment from the hazards associated with toxic fluorinated foams.

Proper Disposal of PFAS-Laden AFFF

Position: The IAFF **supports** Section 330D of the House-passed bill directing the Secretary of Defense to properly dispose of PFAS in accordance with the Clean Air Act.

The Secretary of Defense must take measures to protect our military and civilian Department of Defense from further exposure to toxic PFAS-laden AFFF. Properly disposing of this toxic substance eliminates the hazardous substance and thereby protects those serving the Department.

Prohibiting the Use of Fire Fighting Foams Containing PFAS

Position: The IAFF **supports** Section 330E of the House-passed bill prohibiting the land-based use of fire fighting foam containing PFAS.

Prohibiting the procurement of toxic PFAS-laden fire fighting foams and the subsequent use of the toxic AFFF is necessary and proper to protect fire fighters, the public and the environment from further exposure to the harm caused by PFAS.

Designating PFAS as a “Hazardous Substance” under CERCLA

Position: The IAFF **supports** Section 330O of the House-passed bill designating toxic PFAS as a Hazardous Substance under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA.)

Designating certain PFAS chemicals as hazardous substances under CERCLA would promote the appropriate cleanup of the worst contaminated sites in the country that pose substantial threats to human health and/or the environment, including sites currently or formerly owned or operated by the Department of Defense.

Additionally, the IAFF opposes one provision in the House-passed bill relating to Public Safety Telecommunicators (PST).

Categorizing Public Safety Telecommunicators as a Protective Service Occupation

Position: The IAFF **opposes** Section 1117 of the House-passed bill directing the Office of Management and Budget to designate Public Safety Telecommunicators (PST) as a protective service occupation.

PSTs act as a conduit between citizens seeking emergency assistance and responding fire fighters and emergency medical personnel. While we fully respect and recognize the important role 911 professionals play in the emergency response system, we oppose categorizing them on the same level as fire fighters and law enforcement officers. Protective service occupations are occupations involved in the direct protection of life and property. Fire fighters, emergency medical responders, and others serving in protective service occupations undergo rigorous training and put their bodies on the line every day on the job, while PSTs generally operate from inside a controlled, stable environment. PSTs are removed from the hazards associated with

responding to and functioning at emergency scenes and are unlikely to contact toxic chemicals released into the air, the dangerous levels of heat, smoke and fire at fire scenes, acts of violence from the public, and the countless other risks fire fighters and emergency medical responders encounter daily. While we recognize the critical role PSTs perform, their duties do not equate to the level of risk to health, safety, and life that accompany the responsibilities performed by frontline emergency responders such as fire fighters, emergency medical responder or law enforcement officers.

Again, thank you for your consideration and your leadership on issues of importance to our nation's professional fire fighters and emergency medical personnel. We look forward to continuing to work with you to safeguard the national defense.

Sincerely,

A handwritten signature in blue ink that reads "Harold A. Schaitberger". The signature is written in a cursive, flowing style.

Harold A. Schaitberger

General President

cc: Members, House Committee on Armed Services
Members, Senate Committee on Armed Services