



November 25, 2020

Administrator Andrew Wheeler
Mailcode 1101A
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator Wheeler,

We are writing to inform you that tests ordered by Public Employees for Environmental Responsibility (PEER) have found per-and polyfluoralkyl substances (PFAS) in the pesticide Anvil 10 + 10. PEER had these tests conducted because of concern about the use of PFAS in pesticides and herbicides as a surfactant, dispersant and anti-foaming agent, based on our review of scientific literature and patents, and our discussion with experts in the field.

Our tests revealed that Anvil 10+10 contains roughly 250 parts per trillion (ppt) of perfluorooctanoic acid (PFOA), and 260 – 500 ppt of hexafluoropropylene oxide dimer acid (HFPO-DA), a GenX replacement for PFOA. PEER alerted Massachusetts Department of Environmental Protection (MADEP) to its results, and MADEP independently tested nine samples of Anvil 10+10 from five different containers, and found eight different PFAS, including PFOA and PFOS. Some PFAS levels were over 700 ppt. Based on these results, we are requesting that EPA immediately ask *all* manufacturers of pesticides and herbicides and their adjuvants to self-disclose to EPA whether they use PFAS in their products or in their manufacturing processes. We are also asking EPA to immediately develop a regime to test different pesticides and herbicides on the market for PFAS and make those findings public. Finally, we are asking EPA to release to the public any information they already have about registered pesticides with any kind of PFAS as an active or inert ingredient.

The attached letter to Martin Suuberg, Commissioner, Department of Environmental Protection, Commonwealth of Massachusetts, provides more details about our work in Massachusetts on Anvil 10+10.

It is unclear whether the PFAS found in Anvil 10+10 is an ingredient added by the manufacturer, contained in one of the ingredients supplied to Anvil's manufacturer by other companies, or a contaminant from the manufacturing or storage process. Moreover, since we only tested for 36 PFAS out of the 9,252 on the U.S. Environmental Protection Agency's (EPA's) inventory, it is impossible to know if other PFAS might be in Anvil 10+10. However, it is worth noting that

EPA's list of approved inerts for pesticides contain several PFAS, and these chemicals should be withdrawn from approval immediately.

This is a significant environmental issue. PFAS are associated with liver damage, thyroid disease, developmental issues, reduced fertility, high cholesterol, obesity, hormone suppression and cancer. It is nonsensical to deliberately spray millions of acres with PFAS-contaminated pesticides, at the same time that states are grappling with developing regulatory limits for PFAS and cleaning up contaminated drinking water.

Your prompt response to this request is greatly appreciated.

Sincerely,

Tim Whitehouse
Executive Director

cc: Dennis Deziel, EPA Region 1 Regional Administrator