



PUBLIC EMPLOYEES FOR ENVIRONMENTAL RESPONSIBILITY

962 Wayne Ave • Suite 610 • Silver Spring, MD 20910

January 26, 2021

Noah Valenstein
Secretary
Florida, Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399

Nikki Fried
Commissioner
Florida Department of Agriculture and Consumer Services
3125 Conner Blvd., Ste. E
Tallahassee, FL 32399-1650

Dear Secretary Valenstein and Commissioner Fried:

On behalf of Public Employees for Environmental Responsibility (PEER), I am writing to request that Florida:

1. Quarantine Anvil 10+10 products statewide;
2. Launch a comprehensive investigation into the universe and use of products stored in fluorinated high-density polyethylene (HDPE) containers; and,
3. Require pesticide companies to provide comprehensive tests of their products showing the absence of fluorinated chemistry before Florida allows the sale or use of such pesticides.

This past fall, testing done for PEER's New England office revealed the presence of per- and polyfluoroalkyl substances (PFAS) in Anvil 10+10, a pesticide used for mosquito control in Florida and many other states. PEER immediately contacted the Massachusetts Department of Environmental Protection (MADEP) because that state had approved Anvil 10+10 for use in that state's wide-ranging arbovirus control program. MADEP independently tested nine samples of Anvil 10+10 from five different containers, and found eight different PFAS, including PFOA and PFOS. EPA was notified and determined that the fluorinated HDPE containers used to store and transport the Anvil 10+10 contained PFAS compounds that leached into the pesticide product. EPA is now asking states with existing stock of Anvil 10+10 stored in HDPE containers to "red tag" the stock and hold it for now.

The presence of PFAS in pesticides and in HDPE containers is a serious public health issue. Fluorinated HDPE containers may be used to hold consumer products, insecticides, pesticides and other crop protectant products and could be leaching PFAS into these products as well. This is not acceptable. PFAS are associated with a variety of ailments, including suppressed immune function, thyroid disease, testicular and kidney disease, cancers, and liver damage. The immune suppressive effect of PFAS is of particular concern to persons exposed to COVID-19, the flu, and other related diseases. PFAS are often referred to as “forever chemicals” because they do not break down in the environment and build up in our blood stream.

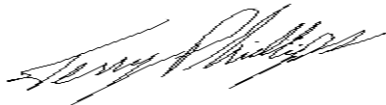
Many Florida communities are struggling to find the funds to filter PFAS from their water supplies. For example, in 2020, PEER tested reclaimed water and biosolids in Delray Beach that both showed excessively high levels of PFAS. This prompted Delray officials to test the city’s drinking water, and those results likewise showed high levels of PFAS contamination. Florida communities should not be absorbing even more PFAS showered from the skies in insecticides sanctioned by the State of Florida.

Our request is consistent with the recent steps taken by New York State to address PFAS contamination.

Florida’s PFAS control strategy must be comprehensive and include all agencies within Florida. PEER is happy to assist Florida, Department of Environmental Protection and Florida Department of Agriculture and Consumer Service in any way we can.

Please do not hesitate to contact me if you have any questions.

Sincerely,



Jerrell Phillips
Director, Florida PEER

Cc: Tim Bahr, Director, Division of Waste Management, Florida, Department of Environmental Protection

Kelly Friend, Agricultural Environmental Services Director, Florida Department of Agriculture and Consumer Services