



March 24, 2021

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

Dear Administrator Regan,

We are writing to inform you that tests ordered by Public Employees for Environmental Responsibility (PEER) have found per- and polyfluoroalkyl substances (PFAS) in the pesticide Permanone 30-30 used by Maryland and other states in their mosquito control programs. PEER and the Maryland Pesticide Education Network conducted these tests because of concern about the use of PFAS in pesticides and herbicides, either as surfactants, propellants, dispersants and/or anti-foaming agents, and because of concerns about PFAS contamination from manufacturing processes and leaching from storage containers.

Permanone 30-30 is used across the country to kill mosquitos and other insects. It is extremely toxic to fish and aquatic invertebrates.

Our tests revealed that Permanone 30-30 contains 3500 parts per trillion (ppt) of Perfluorooctanoic acid (PFOA) and approximately 630 parts per trillion of hexafluoropropylene oxide dimer acid (HFPO-DA), a GenX replacement for PFOA. Because of its health dangers, many manufacturers have voluntarily phased out the production of PFOA, and EPA currently has a lifetime health advisory of 70 ppt for PFOA. The Member State Committee (MSC) of the European Chemicals Agency has [identified HFPO-DA](#), its salts and acyl halides as substances of very high concern due to their probable serious effects on human health and the environment.

EPA recently stated on [its website](#) that it “considers any level of PFAS to be potentially toxicologically significant.”

Based on these results, we ask EPA to immediately conduct its own testing of Permanone 30-30, the containers used to store Permanone, and the company's manufacturing process. We are also asking EPA to immediately develop a regime that would require manufacturers to test different pesticides and herbicides on the market for PFAS and make those findings public. In addition, the synergistic effects of combined pesticides and PFAS must be studied and addressed. Finally, we are asking EPA to release to the public any currently held information about registered pesticides with any PFAS as an active or inert ingredient and any information you have about any containers that may be made with PFAS.

We have written to Joe Bartenfelder, Secretary of the Maryland Department of Agriculture, and Ben H. Grumbles, Secretary of the Maryland Department of the Environment, to provide them with our test results.

It is unclear whether the PFAS found in Permanone 30-30 is an ingredient added by the manufacturer, contained in one of the ingredients supplied to Permanone'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 over 9,000 on EPA's inventory, it is impossible to know if other PFAS might be found in Permanone 30-30.

PFAS in pesticides is a significant environmental and health issue. PFAS are associated with liver damage, thyroid disease, developmental issues, reduced fertility, high cholesterol, obesity, hormone suppression and cancer. PFAS do not break down in the environment, and there is no known way to dispose of these chemicals safely. It is nonsensical to deliberately spray millions of acres with PFAS-contaminated pesticides while states are grappling with developing regulatory limits for PFAS and cleaning up contaminated drinking water.

Unfortunately, this is another example of EPA failing in its most basic duty to protect human health and the environment from PFAS contamination. Your prompt response to this request is greatly appreciated.

Sincerely,

Tim Whitehouse
Executive Director
Public Employees for Environmental Responsibility

Ruth Berlin
Executive Director
Maryland Pesticide Education Network