



March 24, 2021

Joseph Bartenfelder, Secretary
Maryland Department of Agriculture
50 Harry S. Truman Parkway
Annapolis, Maryland 21401

Ben Grumbles, Secretary
Maryland Department of Environment
1800 Washington Boulevard
Baltimore, Maryland 21230

RE: PFAS in Permanone 30-30

Dear Secretaries Bartenfelder and Grumbles,

Public Employees for Environmental Responsibility (PEER) and Maryland Pesticide Education Network (MPEN) are providing results from tests ordered by PEER which have found per-and polyfluoralkyl substances (PFAS) in the pesticide Permanone 30-30. This pesticide is used by Maryland in its mosquito control program.

PEER and the MPEN had these tests conducted because of concern about the use of PFAS in pesticides and herbicides, either as surfactants, dispersants, propellants, and/or anti-foaming agents, and because of concerns about PFAS contamination from manufacturing processes and leaching from storage containers.

As noted in the enclosed letter to the US EPA, our tests revealed that Permanone 30-30 contains 3500 parts per trillion (ppt) of Perfluorooctonic 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.

Maryland's Mosquito Control Section provides direct service to approximately 2,100 communities in 16 Maryland counties, potentially applying Permanone 30-30 to thousands of acres. The impact of this exposure to PFAS could affect hundreds of thousands of Maryland citizens, as well as harming fragile ecosystems of the Chesapeake Bay. As you are aware, PFAS are called "forever chemicals" since they do not break down in the environment and build up in our blood stream. They are associated with a variety of ailments, including suppressed immune function, thyroid disease, testicular and kidney disease, cancers, and liver damage.

Given the serious issue of PFAS contamination in Maryland, we request that the state :

- 1) Cease the use of Permanone 30-30 and terminate its use by private mosquito control companies in Maryland;
- 2) Ensure that any pesticide, prior to use for mosquito control to replace Permanone 30-30, is properly tested by the US EPA or the state chemist or certified laboratory and shown to not contain any PFAS, including from an adjuvant or container contamination;

- 3) Annually test all Maryland registered pesticides (insecticides, herbicides, fungicides and rodenticides) to ensure they do not also contain any PFAS.

We ask that the state act in an expedient manner to address this issue, prior to using any other pesticide to manage mosquitoes this season.

Sincerely,

Tim Whitehouse
Executive Director
Public Employees for Environmental Responsibility

Ruth Berlin
Executive Director
Maryland Pesticide Education Network

cc. Dennis R. Schrader, Acting Secretary of Health
Jeannie Haddaway-Ricco, Secretary of Natural Resources
Brian E. Frosh, Attorney General