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January 24, 2023

Marc Elrich, County Executive  
Montgomery County  
Executive Office Building 2<sup>nd</sup> Floor  
101 Monroe St.  
Rockville, MD 20850

Evan Glass, President  
Montgomery County Council  
100 Maryland Ave, Suite 6  
Rockville, MD 20850

Dear County Executive Elrich and County Council President Glass:

We are writing to ask you to prohibit the application of class A and B biosolids, such as Bloom<sup>i</sup> fertilizer products, on county agriculture fields, golf courses and public lands because of extremely high levels of toxic PFAS in these products. Recent testing for Public Employees for Environmental Responsibility (PEER) by Eurofins Laboratory of Bloom reveals dangerously high levels of PFAS in this product.<sup>ii</sup>

Most alarming, PEER's test found:

1. 21 parts per billion of PFOA.<sup>iii</sup> This amount is 5.3 million times higher than the U.S. Environmental Protection Agency's (EPA) Lifetime Health Advisory Level for PFOA in drinking water, which is .004 parts per trillion.<sup>iv</sup>
2. 26 parts per billion of PFOS.<sup>v</sup> This amount is 1.3 million times higher than EPA's Lifetime Health Advisory Level for PFOS in drinking water, which is .02 parts per trillion.<sup>vi</sup>
3. Dangerously high levels of other PFAS, such as PFHpA<sup>vii</sup> and PFBS,<sup>viii</sup> which were found at 65 parts per billion and 30 parts per billion, respectively.

These test results are in line with the results of test done by the Sierra Club and the Ecology Center in 2021,<sup>ix</sup> which were done before EPA updated its Lifetime Health Advisory Levels for PFOA and PFOS. EPA's lifetime health advisories identify levels to protect all people, including sensitive populations and life stages, from adverse health effects resulting from exposure throughout their lives to these PFAS in drinking water.<sup>x</sup>

We recognize that the amount of PFAS in biosolids does not directly correspond to EPA's advisories for lifetime exposures to PFAS in drinking water, however, high levels of PFAS in biosolids threaten our drinking water, surface water and food supplies with contamination that is difficult, if not impossible to remediate. We are particularly alarmed by the high levels of

PFAS detected in Bloom fertilizer because it is applied in northwest Montgomery County where most of this area, including Poolesville, wholly outside the WSSC service area, is dependent on a sole source aquifer for drinking water, irrigation of croplands and support of livestock.

The threats posed by PFAS in biosolids to our community are not abstract or academic. Poolesville recently closed two drinking water wells due to high levels of PFOA and PFOS. Upper Montgomery County's sole source aquifer is particularly vulnerable to contamination from biosolids because of the area's thin soils and fractured bedrock.

While the state and town do not yet know the cause of the PFAS contamination in Poolesville's wells, overwhelming scientific evidence demonstrates that PFAS from biosolids will migrate to surface and ground water and will be taken up by plants and ingested by humans and livestock. The application of biosolids with high levels of PFAS will threaten our food supply and result in long-last human exposure that is difficult to control or reverse.

We urge you to act now to stop the spread of toxic biosolids in Montgomery County. The problem of PFAS contamination in our communities will only grow if the county does not act now to stop this known source of PFAS contamination.

Thank you for your attention to this matter. Please let us know if you have any questions.

Sincerely,

Tim Whitehouse, Executive Director, Public Employees for Environmental Responsibility  
Caroline Taylor, Executive Director, Montgomery Countryside Alliance  
Steve Findlay, President, Sugarloaf Citizens Association

cc Jeremy Criss, Director of Agricultural Services  
cc Wade Yost, Town Manager, Poolesville, MD

**Attachments:**

PFAS Test results on Bloom  
Chart with Test Results

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<sup>i</sup> <https://bloomsoil.com/>

<sup>ii</sup> See attachments A and B.

<sup>iii</sup> Perfluorooctanic Acid

<sup>iv</sup> *Lifetime Drinking Water Health Advisories for Four Perfluoroalkyl Substances*, 87 Fed. Reg. 36848.

<sup>v</sup> Perfluorooctanesulfonic acid

<sup>vi</sup> *Lifetime Drinking Water Health Advisories for Four Perfluoroalkyl Substances*, 87 Fed. Reg. 36848.

<sup>vii</sup> PFHpA has been associated with heightened reproductive hormone concentrations (Zhou 2016), impaired lung function in children (Qin et al. 2017), allergies (Okada 2014), the failure of renal transport systems to control the excretion of uric acid (Seo et al. 2018).

<sup>viii</sup> PFBS has been associated with asthma (Rappazzo 2017, Sunderland 2018), the disruption of thyroid hormone balances (Lee and Choi 2017, Ren et al. 2016), the disruption of reproductive hormone concentrations (Zhou

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2016), immunosuppression (Sunderland 2018), higher LDL cholesterol (Zeng et al. 2015, Seo et al. 2018), and impaired lung function in children (Qin et al. 2017).

<sup>ix</sup> Sierra Club and Ecology Center, *Sludge in the Garden, Toxic PFAS in Home Fertilizer Made from Sewage Sludge* available at <https://www.sierraclub.org/sites/default/files/PFA-Garden-Sludge-Report.pdf>.

<sup>x</sup> See question 4, <https://www.epa.gov/sdwa/questions-and-answers-drinking-water-health-advisories-pfoa-pfos-genx-chemicals-and-pfbs#:~:text=EPA%E2%80%99s%20lifetime%20health%20advisories%20identify%20levels%20to%20protect,a%20margin%20of%20protection%20against%20adverse%20health%20effects>.