Statement regarding Synagro's March 18, 2025 press release

Public Employees for Environmental Responsibility (PEER) is aware of Synagro's March 18, 2025 press release, and offers the following comments in response:

- Synagro has not released its "Independent Scientific Study," therefore it is impossible for us to comment on the study itself. We look forward to reviewing it.

- It is important to note that Synagro tested the soil where the biosolids were applied, not the two farms across the street that PEER and Johnson County tested. PEER and Johnson County did not test the farm where the biosolids were applied, because they were not allowed access.

- As a preliminary matter, Synagro characterizes the levels of PFAS found in its study as "well within background soil concentrations observed across the nation." There is no such thing as "background soil concentrations" of PFAS. PFAS are a manmade, synthetic family of chemicals that do not exist in nature. Any PFAS found in soils are the result of contamination. Moreover, a recent peer-reviewed study shows that PFAS levels at farms that applied biosolids are much higher than those that have not applied biosolids.

- Synagro alleges that since PEER and Johnson County found PFPrA in the soil and water on the farms we tested, and because PFPrA was not itself found in the biosolids sample we obtained, the PFAS contamination found on the affected farms could not possibly be from their biosolids. This is disingenuous for several reasons.

  First, the test method Synagro utilized (EPA 1633) does *not* test for PFPrA. It is unclear from the Synagro press release whether it was alleging that it also did not find PFPrA in the biosolid sample they tested; however, Synagro could not possibly have found this chemical even if it was present.

  Second, PEER and Johnson County were not allowed to test the land where the biosolids were applied, even though it was shortly after application that the animals on adjacent farms began sickening and dying. The biosolid sample tested by PEER and Johnson County was from a different batch,

albeit from the same processing plant, and different batches of biosolids have different levels of individual PFAS, depending on the municipal and industrial inputs.

Third, PFPrA, in addition to being an industrial chemical commonly found in waste treatment end products, is a stable, terminal degradation product of several other PFAS, including some that were found in the biosolids that PEER and Johnson County tested. While some PFPrA precursor PFAS have been identified, observation and analysis suggest there are many more sources than those that have been identified. In other words, while all PFAS are persistent, some do degrade and transform into other PFAS in the environment. Therefore, it is likely that the PFPrA found in PEER and Johnson County's testing was the result of degradation of other PFAS that were in the biosolids.

Fourth, PFAS are a large family of chemicals, likely numbering more than 10,000. PEER and Johnson County tested for 70 PFAS, and Synagro tested for 40. Studies show that there are *many* unidentified PFAS in biosolids. Because these PFAS are unidentified, it is impossible to claim that they do not degrade into PFPrA. The absence of evidence is not the same as the evidence of absence.

- Synagro states that, "[a]ll other reported PFAS concentrations, except PFPrA, are either within background concentrations for soils across the U.S. or below the April 2024 EPA enforceable MCLs for drinking water (i.e., for the pond and well-water samples)."

  MCLs are not an appropriate reference point in this case. We are focused on the levels of PFAS in the fish and cow meat on our clients' farms. EPA established a maximum contaminant level *goal* (MCLG) for consumption of PFOA and PFOS. These goals are the levels at which is there is no expected risk to public health and safety. For PFOA and PFOS, the MCLG is ***zero***, meaning that there is no safe ingestion level, a characterization EPA gives to very few substances (other examples are uranium and arsenic).

  The sample of Synagro biosolids tested by PEER and Johnson County contained 13,000 ppt of PFOS. The levels of PFOS in the fish from the stock ponds were 57,000 ppt and 74,000 ppt, respectively, and there was 610,000 ppt in the calf's liver. While the United States does not currently have limits of PFAS in food, EPA has stated unequivocally that there is no safe consumption level of PFOS.

  PEER is unaware of any other potential source for these extremely high levels of PFOS.

- Finally, in January of 2025, EPA issued a draft Risk Assessment for PFOA and PFOS in biosolids. EPA concluded, "… there may be human health risks exceeding the EPA's acceptable thresholds for some modeled scenarios when land-applying sewage sludge that contains 1 part per billion (ppb) of PFOA or PFOS." PEER's tests of Synagro's biosolids showed 13,000 ppt of PFOS, 13 times the level EPA says may cause human health risks.