Message

**From**: Grantham, Nancy [Grantham.Nancy@epa.gov]
**Sent**: 12/9/2020 2:58:15 PM
**To**: Deegan, Dave [Deegan.Dave@epa.gov]; Deziel, Dennis [Deziel.Dennis@epa.gov]; Szaro, Deb [Szaro.Deb@epa.gov]; McGuire, Karen [Mcguire.Karen@epa.gov]; Barmakian, Nancy [Barmakian.Nancy@epa.gov]; Gutro, Doug [Gutro.Doug@epa.gov]; Dixon, Sean [dixon.sean@epa.gov]; Senn, John [Senn.John@epa.gov]; Rumph, Mikayla [Rumph.Mikayla@epa.gov]; Melanson, Kate [Melanson.Kate@epa.gov]; Wintrob, Paul [Wintrob.Paul@epa.gov]; Dumville, Kelsey [Dumville.Kelsey@epa.gov]; Dennis, Allison [Dennis.Allison@epa.gov]; Siedschlag, Gregory [Siedschlag.Gregory@epa.gov]; Messina, Edward [Messina.Edward@epa.gov]; Dinkins, Darlene [Dinkins.Darlene@epa.gov]; Drinkard, Andrea [Drinkard.Andrea@epa.gov]; Hackel, Angela [Hackel.Angela@epa.gov]; Hull, George [Hull.George@epa.gov]
**Subject**: RE: Recent PFAS/Anvil items

Thanks much

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**From:** Deegan, Dave <Deegan.Dave@epa.gov>
**Sent:** Wednesday, December 9, 2020 9:54 AM
**To:** Deziel, Dennis <Deziel.Dennis@epa.gov>; Szaro, Deb <Szaro.Deb@epa.gov>; McGuire, Karen <Mcguire.Karen@epa.gov>; Barmakian, Nancy <Barmakian.Nancy@epa.gov>; Gutro, Doug <Gutro.Doug@epa.gov>; Dixon, Sean <dixon.sean@epa.gov>; Senn, John <Senn.John@epa.gov>; Rumph, Mikayla <Rumph.Mikayla@epa.gov>; Melanson, Kate <Melanson.Kate@epa.gov>; Wintrob, Paul <Wintrob.Paul@epa.gov>; Dumville, Kelsey <Dumville.Kelsey@epa.gov>; Deegan, Dave <Deegan.Dave@epa.gov>; Dennis, Allison <Dennis.Allison@epa.gov>; Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Drinkard, Andrea <Drinkard.Andrea@epa.gov>; Hackel, Angela <Hackel.Angela@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>; Hull, George <Hull.George@epa.gov>
**Subject:** Recent PFAS/Anvil items

Hi All, Just sharing for awareness two recent items on the Anvil 10+10 & PFAS issue. The first is a blog post from a Massachusetts state senator; the second are two Letters published in the Boston Globe.

Dave
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https://senatorjocomerford.org/a-wake-up-call-for-all-of-us-pfas-in-mosquito-spray/

**A WAKE UP CALL FOR ALL OF US: PFAS IN MOSQUITO SPRAY**

***By*** *Jo Comerford*
Posted *December 1, 2020*
***In*** *The People's Blog*

It's outrageous — the pesticide the state uses in its mosquito spraying program has been found to contain PFAS, a group of highly toxic chemicals.

In a *Boston Globe* article that was published today, I called for an immediate moratorium on the use of this pesticide and I'm not stopping there. I plan to introduce comprehensive legislation to protect our water, our kids, and ourselves from this toxic and permanent substance. But first let's take a step back and understand what's happening here.

PFAS chemicals are often called "forever chemicals," since they do not break down in the environment, and can accumulate and stay in the human body. They have been linked to a variety of diseases, including suppressed immune function, thyroid disease, testicular and kidney disease, cancers, and liver damage. Over the past years we've discovered the wide-ranging use of PFAS in products such as artificial turf, restaurant take-out containers, cosmetics and dog toys.

But recently, tests done on the pesticide Anvil 10+10 by the advocacy group Public Employees for Environmental Responsibility, and confirmed by state officials, show levels of PFAS greatly exceeding state limits.

**In 2019, the state sprayed almost 10,000 gallons of the Anvil 10+10 pesticide over 2 million acres, covering 100 cities and towns with a population of 1.5 million people.** Many of these towns in Southeastern Mass found high levels of PFAS in their water supplies, despite not being near any obvious sources. Now we know a possible reason for their contamination. Meanwhile, the state is already spending tens of millions of dollars to clean up contaminated water sources throughout the state, including in Westfield, made toxic due to PFAS.

This makes no sense. We should not be spraying PFAS out of airplanes at the same time we're spending millions to clean it up and working to ban it.

Bolstered by staunch advocates and local officials, I have been helping to lead efforts to scale back the general use of mosquito pesticides in Massachusetts and advance other more useful processes. Last year, Governor Baker filed a bill that would remove all restraints on the aerial spraying of pesticides. The bill was sent to the Public Health Committee that I co-chair, where we rewrote it and added significant new protections, including the right of cities and towns to opt-out of spraying and a *Mosquito Control for the 21st Century Task Force*, which will propose permanent reform to the state's system of mosquito control. You can read the bill we approved, as signed into law, here. I want to especially thank the Senate President for her commitment and vision to finding the best path forward to protect public health.

I am also working on comprehensive legislation to ban PFAS in pesticides, as well as food containers, toys, cosmetics, and many other products. The bill will be introduced in January at the start of the next session.

As I said in the *Globe*, this news is a wake-up call for all of us to demand more protection from exposure to dangerous products and chemicals. Only strong regulations and effective enforcement can protect our environment and push back against these assaults on our health and safety.

Let me know what you think. Send me a note at Jo.Comerford@masenate.gov.

https://www.bostonglobe.com/2020/12/08/opinion/states-mosquito-spray-poses-health-threat/?outputType=amp

**LETTERS**

**State's mosquito spray poses a health threat**

Updated December 8, 2020, 2:30 a.m.

With use of 'forever chemicals,' Mass. trades one ill for another

As an environmental lawyer and a toxicologist with nearly 60 years of collective experience with hazardous waste sites, we were disheartened by David Abel's article " 'Forever chemicals' found in Mass. mosquito spray" (Page A1, Dec. 2), which detailed the presence of PFAS in Anvil 10+10, the mosquito insecticide that the Commonwealth of Massachusetts has been spraying aerially over towns throughout the state. We live in Stow, where spraying was conducted over our houses and organic gardens.

It is a sad irony that with the heightened focus and enormous investment of resources by the Massachusetts Department of Environmental Protection to protect the public from potential dangers of minuscule PFAS concentrations, another state agency is unwittingly releasing this toxic chemical onto private and public lands. This mosquito control practice essentially trades one public health threat, Eastern equine encephalitis, for another, the degradation of our water supplies.

How are we to advise our clients to install costly treatment systems to reduce PFAS in drinking water supply wells to the Department of Environmental Protection's standards in the small parts per trillion when our own state government is broadcast-spraying a pesticide with PFAS concentrations many times greater? As residents with private wells and as

environmental professionals working to clean up PFAS in our groundwater and surface waters, we implore the Commonwealth to end its aerial spraying.
Susan Crane
Stow
Marie Rudiman
Stow
*Crane is an environmental lawyer, and Rudiman is a toxicologist who works in risk assessment.*

There are better alternatives to control mosquitoes

In the 1970s, it was common for towns to routinely spray several times a year to "control" various pests including mosquitoes. Sevin, malathion, and other toxics were used. In 1979, a statewide committee was formed to examine the role of the Pesticide Board and develop a Generic Environmental Impact Report on the use and impact of pesticides in mosquito control. I was on the citizens advisory committee. The report was completed but never adopted until it was revised almost 20 years later.

The use of aerial spraying was heavily criticized as being ineffective and environmentally damaging. I recall one professional saying, "To be effective, a drop of spray must hit the insect, like going after a butterfly with a machine gun."

There are so many alternatives for mosquito control: most simply, public education on eliminating standing water where mosquitoes breed; then, CO2 traps to monitor population; Bti in wetlands and Altosid briquets in storm drains, both for larval control; and finally, if necessary, truck spraying with a pyrethroid against EEE, but with a recognition of the ineffectiveness of such broadcasting.

As has been shown, aerial spraying is a disastrous method with negative side effects. We are good at inventing toxic chemicals but not so good at controlling their uses or unintended consequences.

Carolyn Bishop
Belmont