



## TENNESSEE FARM BUREAU FEDERATION

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March 14, 2025

David Tobias  
Office of Water  
Office of Science and Technology  
Health and Ecological Criteria Division  
Environmental Protection Agency  
1301 Pennsylvania Ave., NW  
Washington, DC 20460

**Re: Docket No. EPA-HQ-OW-2024-0504; Draft Sewage Sludge Risk Assessment:  
Perfluorooctanoic Acid and Perfluorooctane Sulfonic Acid**

Dear Mr. Tobias:

The Tennessee Farm Bureau Federation (TFBF) appreciates the opportunity to provide comments to the Environmental Protection Agency (EPA) regarding the proposed risk assessment for sewage sludge related to Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonic Acid (PFOS). TFBF is a general farm organization of over 695,000 family members whose purpose is to represent the widely varied commodity producers of Tennessee. Our policy is developed through a grassroots network of farmer members who identify, research, deliberate, vote on, and adopt policies on numerous issues related to agriculture and rural living. On behalf of our member producers, we encourage EPA to consider these comments.

Farmers have a deep and longstanding interest in protecting the environment based on philosophical beliefs and practical self-interest. The environment is essential to all agriculture and our families. Land is a farmer's most significant asset and primary source of income, and farmers have every incentive to leave this natural resource in better shape for the next generation. Modern agriculture is environmentally sustainable, and farmers strive to constantly improve the environmental resources in their care while playing a significant role in climate solutions. Success in farming is heavily dependent on the health of the environment. Farmers strive to balance earning a living from the land with being stewards of the land, air, and water in which they care for. Increasingly, farmers are asked to produce more using fewer resources.

According to the United States Department of Agriculture (USDA), total inflation-adjusted farm cash receipts are expected to decrease by \$14.2 billion (2.7 percent) from 2024 to 2025<sup>1</sup>. This is caused by a combination of low commodity prices and high input costs, including fertilizer. While fertilizer prices are expected to drop from 2024 to 2025, they have still been unnaturally high and highly volatile in recent years. Considering this, farmers need access to alternative

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<sup>1</sup> U.S. Department of Agriculture, Economic Research Service. (2025, February 6). *Farm Sector Income & Finances: Farm Sector Income Forecast*.

fertilizers, like biosolids, to maintain healthy soils. Applying biosolids to agricultural fields is a viable and much cheaper option than using commercial fertilizer, especially in the current state of the economy. Additionally, biosolids are domestically sourced, while around half of the nitrogen and 80 percent of potash fertilizer used on farms in the United States is imported<sup>2</sup>.

However, chemical contaminants such as PFOA and PFOS put farms at risk. Wastewater treatment plants (WWTP) should be required to test for these chemicals on-site and provide a copy of the complete analysis verifying the ingredients are legally safe before giving farmers access to biosolids and other substances. If found to be unsafe, WWTPs should not release these substances to landowners and should be held liable if they are found to cause financial damages to landowners. Subsequently, farmers, including renters and lessees, should not be liable if these contaminants are detected on their farm.

Moving forward, as EPA considers next steps, TFBF encourages collaboration of agencies, universities, and the private sector to develop proactive solutions and technologies to reduce the human health and environmental risks of contaminants such as PFOA and PFOS. EPA should also consider establishment of indemnification programs and funding to properly compensate farmers', producers' and/or landowners' financial losses associated with PFOS/PFOA. Any legislation or administrative action should not release the federal government and their contractors and subcontractors from liability associated with contamination of their land, water, crops, livestock or products by PFOS/PFOA. We believe EPA should make decisions simultaneously supporting agronomic use of biosolids while also protecting the public from chemical contaminants.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Eric Mayberry".

Eric Mayberry  
President  
Tennessee Farm Bureau Federation

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<sup>2</sup> U.S. Department of Agriculture, Foreign Agricultural Service. (2022, June 30). *Impacts and Repercussions of Price Increases on the Global Fertilizer Market*.