

Commonwealth of Pennsylvania



DEPARTMENT OF
ENVIRONMENTAL PROTECTION

DEPARTMENT OF
HEALTH

August 20, 2018

Susan Ingber
Agency for Toxic Substances and Disease Registry
Division of Toxicology and Human Health Sciences
1600 Clifton Road, N.E.
Mail Stop F-57
Atlanta, Georgia 30329-4027

Attention: Docket No. ATSDR-2015-0004

Re: 2018 Availability of Draft Toxicological Profile for Perfluoroalkyls.
83 FR 28849 (June 21, 2018)

Ms. Ingber:

The Pennsylvania Departments of Environmental Protection (PADEP) and Health (PADOH) appreciate the opportunity to comment on the Agency for Toxic Substances and Disease Registry's (ATSDR) Notice of Availability regarding the 2018 Availability of Draft Toxicological Profile for Perfluoroalkyls published on June 21, 2018 (83 FR 28849).

PADEP oversees and regulates more than 8,500 public water systems (PWS) across Pennsylvania. These PWSs serve drinking water to 11.3 million people. PADOH promotes healthy lifestyles, prevents injury and disease, and assures the safe delivery of quality health care of nearly 13 million residents.

PADEP and PADOH appreciate ATSDR's solicitation of comments as we continue to have serious concerns with Perfluoroalkyl Substances (PFAS) in drinking water. In particular, PADOH is currently working to better describe the burden and impact of PFAS on the community's health in one large impacted area where nearly 80,000 residents were potentially exposed to PFAS through drinking water.

The Departments offer the following comments and recommendations:

1. ATSDR should work collaboratively with the U.S. Environmental Protection Agency (EPA) to:
 - Assess and determine if the current health advisory for Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonic Acid (PFOS) is still adequate, or if the numerical value of the health advisory level (HAL) needs to be revised.

- Develop and deliver a clear and consistent public message regarding risks from PFAS, including consideration of messaging for special populations such as pregnant women, infants, breastfeeding mothers, children, immunocompromised and the elderly.
 - Develop consensus standards that can be used to support a regulatory determination for PFAS.
 - Develop guidance for state drinking water programs, public water systems, and the public regarding HALs, minimal risk levels (MRL), toxicity values, and reference doses so that the public understands how the values are used. In the meantime, develop interim chronic oral MRLs for at least PFOA and PFOS until further studies become available.
2. ATSDR should also prioritize PFAS efforts that address multiple PFAS compounds holistically. We recommend that ATSDR consider focusing on groups of PFAS compounds, rather than one compound at a time. This includes all efforts to develop toxicity values, reference doses, HALs, or regulatory maximum contaminant levels, as well as efforts to develop risk communication messaging.

Thank you for your consideration of these comments and recommendations. If you have questions, please feel free to contact Lisa Daniels, Director of PADEP's Bureau of Safe Drinking Water, by e-mail at ldaniels@pa.gov or by telephone at 717.787.9633.

Sincerely,



Patrick McDonnell
Secretary
Pennsylvania Department of Environmental Protection



Dr. Rachel Levine
Secretary
Pennsylvania Department of Health