

# PUBLIC SUBMISSION

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**Docket:** ATSDR-2018-0002

Exposure Assessments for Per- or Polyfluoroalkyl Substances (PFAS) 0923-18AJK

**Comment On:** ATSDR-2018-0002-0001

Per or Polyfluoroalkyl Substances PFAS Exposure Assessments\_60day 18AJK

**Document:** ATSDR-2018-0002-0008

Renee Lani Comment on FR Doc # 2018-15437

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## Submitter Information

**Name:** Renee Lani

**Organization:** FluoroCouncil

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## General Comment

Please see FluoroCouncil's comments in attached PDF. Thank you.

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## Attachments

FC Comments on ATSDR ICR -- 09-17-2018

September 17, 2018

Jeffrey M. Zirger  
Information Collection Review Office  
Centers for Disease Control and Prevention  
1600 Clifton Road, NE MS-D74  
Atlanta, GA 30329  
Submitted via [www.regulations.com](http://www.regulations.com)

**Re: Docket No. ATSDR-2018-0002; “Per- or Polyfluoroalkyl Substances (PFAS) Exposure Assessments”**

Dear Mr. Zirger:

FluoroCouncil appreciates this opportunity to provide comments on the Agency for Toxic Substances and Disease Registry (ATSDR) proposed information collection project titled “Per- or Polyfluoroalkyl Substances (PFAS) Exposure Assessments” (hereafter the “Project”). FluoroCouncil is a global organization representing the world’s leading manufacturers of products based on per- and polyfluoroalkyl substances (PFAS).<sup>1</sup> FluoroCouncil has a fundamental commitment to product stewardship and rigorous, science-based regulation, and, as part of its mission, addresses science and public policy issues related to PFAS.

In its Federal Register notice soliciting comments on the Project, ATSDR explains that, consistent with its Congressional mandate, the agency intends to conduct exposure assessments (EAs) “at current or former domestic military installations known to have PFAS in drinking water, groundwater, or any other sources of water.” (83 Fed. Reg. 34135.) ATSDR anticipates that the agency will conduct a total of up to 15 exposure assessments, with each EA covering approximately 150 households. *Id.* at 34136. Each EA will include the collection of biological samples (e.g., blood draws), as well as the completion of household questionnaires, while 10% of EAs will also include the collection of indoor environmental samples (e.g., tap water and indoor dust). *Id.* ATSDR anticipates that the results of these EAs will be used by public health professionals “to make informed decisions about the sources and impact of PFAS contamination in environmental media,” and the Agency intends to “use these EA findings to inform a future national PFAS health study.” *Id.* at 34317.

FluoroCouncil supports ATSDR’s efforts to better understand the sources of PFAS contaminants in groundwater and drinking water, as well as the potential health impacts associated with those contaminants. We also recognize the importance of gathering reliable and probative data to

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<sup>1</sup> FluoroCouncil’s member companies are Archroma Management LLC, Arkema France, AGC Inc., Daikin Industries, Ltd., Solvay Specialty Polymers, The Chemours Company LLC, Dynax Corporation (associate), and Tyco Fire Products LP (associate).

support those efforts and we believe that the EAs to be conducted by ATSDR have the potential to generate such data. To this end, we believe it is essential that ATSDR design the EAs to ensure that the data they generate are clear and unambiguous, scientifically valid, and, to the maximum extent possible, free from confounding factors.

We are concerned that some of the data ATSDR currently plans to collect will not satisfy these criteria. For example, we believe that survey questions regarding the types of flooring present in households may not help to illuminate the sources or impacts of PFAS contaminants in groundwater or drinking water and may only serve to confound data collected as part of the EA (e.g., from blood and water samples) that might otherwise shed light on the potential impacts of PFAS contaminants in water. Therefore we recommend that ATSDR remove questions about flooring from the household questionnaires. More broadly, in designing the EAs, ATSDR should account for the fact that certain PFAS are ubiquitous, with potential sources of exposure other than through groundwater or drinking water.

Furthermore, in order for the exposure assessments to be of utmost utility, the methodology and data collection efforts need to be designed to include ways to address two general concepts: (1) understanding correct chemical-specific relative source contributions and (2) improving estimates of human elimination kinetics and of human serum to water slope factors (i.e., intake versus clearance) at environmentally relevant dose levels.

Both of these items have direct and substantial quantitative impacts on the PFOA, PFOS, PFNA, PFHxS, and PFBS threshold values that have been derived by various agencies. We believe that it would be prudent for ATSDR to conduct analysis of individual level data (not just summary statistics), including paired human data (paired individual serum to water concentrations) and individual level concentration data from all potential sources in groundwater, drinking water or any other source.

Thank you for the opportunity to provide comments. Please contact me at 202-249-6737 or [jessica\\_bowman@fluorocouncil.org](mailto:jessica_bowman@fluorocouncil.org) with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Jess S12", with a stylized flourish at the end.

Jessica S. Bowman  
Executive Director