



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
LANSING



December 23, 2019

VIA ELECTRONIC SUBMISSION

United States Environmental Protection Agency  
EPA Docket Center (ORD Docket)  
Mail Code 28221T  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Sir or Madam:

SUBJECT: Docket ID No. EPA-HQ-ORD-2019-0275

The Michigan PFAS Action Response Team's (MPART) Human Health Workgroup (Workgroup) reviewed the United States Environmental Protection Agency's (EPA) Systematic Review Protocol for the PFDA, PFNA, PFHxA, PFHxS, and PFBA Integrated Risk Information System (IRIS) Assessments. The Workgroup consists of staff from the Michigan Department of Health and Human Services; Michigan Department of Environment, Great Lakes, and Energy; Michigan Department of Natural Resources; and Michigan Department of Agriculture and Rural Development.

MPART supports the EPA's efforts to advance the science of per- and polyfluoroalkyl substances (PFAS) risk assessment through this systematic review protocol. The EPA has provided a clear and thoughtful framework for conducting the systematic review of the five proposed PFAS. We appreciate the availability and regular updates to the literature search results that will be provided on the Health and Environmental Research Online (HERO) database.

This systematic review would only be improved by the inclusion of PFOA and PFOS. Inclusion of PFOS and PFOA would establish a standardized baseline for all individual PFAS toxicity assessments developed by the EPA going forward.

In addition, the Workgroup has the following specific technical comments:

- Because of their unique chemistry, PFAS properties are, in general, poorly predicted by most physiochemical and environmental fate models. The EPA should identify the specific prediction models used to determine the physiochemical properties presented in Section 2.1.1, Table 1. Further, the EPA should qualify the agency's confidence of each model's ability to predict these physiochemical properties.

December 23, 2019

- We encourage the EPA to provide more robust discussion on the agency's considerations for prioritizing the five PFAS addressed in the Systematic Review, as outlined in Section 2.2, Table 5. This would also provide more clarity on the inclusion of PFBS and GenX chemicals, but not PFOA and PFOS.
- The EPA should offer guidance on addressing the cumulative health risks associated with exposure to more than one PFAS, as was done for PFOS and PFOA in the 2016 Drinking Water Lifetime Health Advisories. This would be especially useful for the epidemiology studies, and it is unclear if cumulative risk would be discussed along with confounding.
- We support the EPA's recognition that allometric scaling may not be adequately predictive of interspecies differences of these PFAS.

Thank you for the opportunity to provide comments. If you have any questions, please contact me at 517-290-2943 or [SliverS@Michigan.gov](mailto:SliverS@Michigan.gov).

Sincerely,



Steve Sliver, Executive Director  
Michigan PFAS Action Response Team