



GRETCHEN WHITMER  
GOVERNOR

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



PHILLIP D. ROOS  
DIRECTOR

April 5, 2024

VIA WEBSITE

Narendra Chaudhari  
Office of Resource Conservation and Recovery (5304T)  
United States Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Dear Narendra Chaudhari:

**SUBJECT:** Comments on EPA's Proposed Listing of Specific PFAS as Hazardous Constituents Rule (Docket ID No. EPA-HQ-OLEM-2023-0278)

The Michigan Department of Environment, Great Lakes, and Energy (EGLE), Materials Management Division, is submitting the following comments for consideration regarding the United States Environmental Protection Agency's (EPA) proposed *Listing of Specific PFAS as Hazardous Constituents, Proposed Rule*, published in the Federal Register (FR) on February 8, 2024.

EGLE is supportive of the EPA's proposed rule to list the nine identified per- and polyfluoroalkyl substances (PFAS) compounds as hazardous constituents in Appendix VIII to Title 40 of the Code of Federal Regulations, Part 261. While EGLE supports the proposed PFAS listing, it recommends that the additional toxicological information used to support the listing be referenced in the FR. For example, Section V.B., *Summary of Toxicity and Health Effects Information for the Nine PFAS*, provides general information on the epidemiology data and toxicological responses. Additional information should be included to support the why and how PFAS cause harmful health effects, to validate and support the need for listing. Such information should include:

1. The difference between short- and long-chain PFAS.
2. Fate and transport.
3. Bioaccumulation.
4. Toxicokinetics of PFAS compounds.
5. The effects on the human body through the molecular, cellular, tissue, and organ system.

Thank you for the opportunity to provide comments regarding this proposed rule.

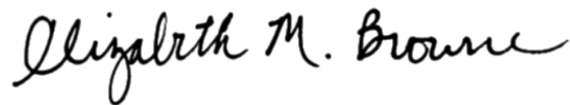
Narendra Chaudhari

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If you have any questions about these comments, please contact Maria Rose Edwin, Toxicologist, Corrective Action Unit, Hazardous Waste Section, Materials Management Division, EGLE, at 517-449-7718 or [EdwinM1@Michigan.gov](mailto:EdwinM1@Michigan.gov) or [EGLE-MMD-HWS@Michigan.gov](mailto:EGLE-MMD-HWS@Michigan.gov).

Sincerely,

A handwritten signature in black ink that reads "Elizabeth M. Browne". The signature is written in a cursive, flowing style.

Elizabeth M. Browne, Director  
Materials Management Division  
517-242-2746

cc: Phillip D. Roos, Director, EGLE  
Aaron B. Keatley, Chief Deputy Director, EGLE  
Tracy Kecskemeti, EGLE  
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## Listing of Specific PFAS as Hazardous Constituents

A Proposed Rule by the Environmental Protection Agency

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