

Summary of Comments on Draft Human Health Toxicity Assessments for GenX and PFBS January 22, 2018

On November 14, 2018, EPA [published](#) in the Federal Register draft human health toxicity assessments for hexafluoropropylene oxide dimer acid and its ammonium salt (GenX chemicals) and for perfluorobutane sulfonic acid (PFBS) and related compound potassium perfluorobutane sulfonate. For these chemicals, EPA states that the agency plans to develop only these toxicity assessments and will not add exposure assessments or address the legal, political, social, economic, and technical considerations involved in risk management of these chemicals. In taking this position:

- EPA failed to exercise its authority under the Safe Drinking Water Act (SDWA) to publish drinking water health advisories for unregulated contaminants.
- EPA displayed gross neglect of duty, particularly as the draft toxicity assessments document the presence of these chemicals in drinking water supplies in multiple areas of the country.

With regard to the GenX toxicity assessment, EPN is deeply concerned that EPA evaluated all the studies considered for derivation of the RfDs using the flawed draft 2018 guidance entitled “Application of Systematic Review in TSCA Risk Evaluations.” On August 16, 2018, EPN submitted detailed [comments](#) of that draft systematic review process, documenting:

- EPA’s failure to follow necessary internal and external peer review procedures in developing this process,
- Serious flaws permeating the entire TSCA systematic review process, and
- Critical flaws in evaluating individual studies for use in toxicity assessments.

Regarding the PFBS toxicity assessment, EPN is very supportive of EPA’s use of the ORD systematic review process in evaluating all the studies considered for derivation of the RfDs. However, there are some concerns:

- First, we do not understand EPA’s statement that “due to the lack of epidemiology studies on PFBS, subchronic and chronic RfDs for both kidney and thyroid were derived,” or why EPA failed to choose thyroid as the critical study for RfDs.
- Second, there is no document in the record which provides a response to peer review comments on PFBS. This is a critical supporting document which must be available to enable a comprehensive review of the PFBS toxicity assessment.

The [Environmental Protection Network](#) (EPN) is an organization comprised of over 350 EPA alumni volunteering their time to protect the integrity of US EPA, human health and the environment. We harness the expertise of former US EPA career staff and confirmation-level appointees to provide an informed and rigorous defense against current administration efforts to undermine public health and environmental protections.

Read EPN’s full public comments: <https://www.environmentalprotectionnetwork.org/pfas-comments/>

For more information, contact EPN by email at info@environmentalprotectionnetwork.org or call 202-656-6229.

Media inquiries can be directed to press@environmentalprotectionnetwork.org or 202-656-6229.