



December 13, 2021

Mr. Thomas Brennan
Director
Science Advisory Board
US Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Membership of the Science Advisory Board PFAS Review Panel

Mr. Brennan:

The American Chemistry Council (ACC) supports strong, science based regulations for per- and polyfluoroalkyl substances (PFAS) and appreciates the opportunity to engage in the process. We are concerned, however, about the lack of appropriate expertise on the panel that has been established to review draft EPA documents developed to support EPA's National Primary Drinking Water Rulemaking for PFAS. Based on the content of draft documents related to drinking water exposures to perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS) and the resulting charge questions to the panel, ACC believes that the assembled panel lacks sufficient expertise in critical areas to provide comprehensive and robust advice to the Agency.

Our comments are not meant to question the credentials of the current members of the review panel, but to identify important areas of expertise that are underrepresented on the panel. These areas include immunotoxicity, biostatistics, and dose-response. We recommend that the panel be expanded to supplement the membership in these areas, and that the panel's timeline to review the documents be postponed and/or extended to allow for the addition of these new members.

In addition, the current panel appears overweighted in the area of cost/benefit analysis and applied economics. While such expertise will be critical to reviewing the criteria for developing maximum contaminant levels (MCLs), it is not clear why these experts have been selected at this point – when the panel has been asked to review of approaches to developing health-based MCL goals and to assessing exposures to mixtures of PFAS. Although EPA has developed a draft analysis of cardiovascular disease (CVD), neither draft assessment considers CVD studies or endpoints for the derivation of the toxicity values. We request clarification as to why the panel has been asked to review data related to this endpoint when the Agency has



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concluded that findings for an association between PFOA and PFOS exposure and CVD outcomes are “mixed” and not sufficiently robust to serve as a basis for assessment.

Thank you for your attention to this matter. Please do not hesitate to contact me at 202-249-6727 or at srisotto@americanchemistry.com if you would like to discuss ACC’s concerns or candidates for additional panel members.

Sincerely,

Steve Risotto

Stephen P. Risotto
Senior Director

cc: Assistant Administrator Radhika Fox, OW
Dr. Suhair Shallal, DFO

