

United States Department of Agriculture (USDA)
Comments on the Interagency Science Discussion
Draft IRIS Toxicological Review of Perfluorohexanoic Acid (PFHxA) and Related Salts
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Table ES-1 indicated that the confidence level for the toxicity values for the proposed oral reference dose (RfD) and subchronic RfD was medium. The confidence in the Loveless et al. (2009) study used for both proposed RfDs was high, but this did not change the confidence level for the toxicity values derived from that study. Definitions were included in the assessment for when a study itself was classified as high, medium, or low confidence. Tables 5-8 and 5-12 discuss why designations for the RfDs were classified as medium; however, they do not discuss the meaning of medium confidence level for a toxicity value. USDA encourages EPA to include a discussion of the meaning of a medium confidence level designation for the toxicity values and notes that it would be beneficial to discuss how risk estimates should be interpreted when an RfD is based on a medium-confidence toxicity value from a high-confidence study, as opposed to a high-confidence toxicity value.

The assessment indicated that “osRfDs can be useful for subsequent cumulative risk assessments that consider the combined effect of multiple PFAS (or other agents) acting at a common organ/system.” USDA stresses the importance of identifying common mechanisms of toxicity prior to conducting any potential cumulative assessments.

These comments should not be interpreted as the official viewpoint of USDA due to the limited nature of the review process. Only three offices within USDA were included in the Step 6 review with short timeframes. As such, these comments reflect a limited review. More detailed comments could have been provided with additional time and expansion of the review across USDA.