United States Department of Agriculture (USDA)
Comments on the Interagency Science Discussion (Step 6)
Draft IRIS Toxicological Review of Perfluorodecanoic Acid (PFDA) and Related Salts
April 2024

Date: 05/22/2024

Peer reviewers from various USDA[1] agencies provided the following scientific comments for U.S. EPA's consideration.

H.1. CHARGE QUESTION 1 – LITERATURE SEARCH METHODS AND DOCUMENTATION

H.1.1. External Peer-Review Comments on Literature Search Methods and Documentation

USDA: It appears that bias was considered in only one direction (e.g., a bias toward a null finding).

H.2. CHARGE QUESTION 2 – NONCANCER HAZARD IDENTIFICATION

USDA: In response to charge questions H2, H3, and H4, USDA is concerned that EPA has not sufficiently addressed concerns with respect to confounding. While there may be limited correlation between certain PFAS chemicals, there is significant cooccurrence of PFDA and PFNA. The potential for confounding needs to be addressed. Moreover, this significant overlap between the two PFAS compounds has significant implications for how the RfD for each is used. We recommend considering the approach used by ATSDR or determining another approach to account for the possibility of confounding.

H.3. CHARGE QUESTIONS 3 AND 4 – NONCANCER TOXICITY VALUE DATA SELECTION AND MODELING

H.3.1. External Peer-Review Comments on Noncancer Toxicity Value Data Selection and Modeling for the Lifetime ("Chronic") Reference Dose (RfD)

USDA: The language revisions regarding confounding for immune effects are helpful.

H.3.2. Public Comments on Noncancer Toxicity Value Data Selection and Modeling for the Lifetime ("Chronic") Reference Dose (RfD)

USDA: We are unsure if the use of vaccine titers is sufficient to determine adverse effects. We share commenters concerns that the use of this effect is not sufficient to address whether the change in titers is clinically relevant. Relying on a precursor (the clinical significance of which is

[1] The USDA offices participating in the interagency scientific peer review include: the Food and Nutrition Service, Office of Policy Support; the Food Safety and Inspection Service, Office of Public Health Science; the Office of the Chief Economist, Office of Risk Assessment and Cost-Benefit Analysis; and the Office of the Chief Economist, Office of Pest Management Policy.

unknown) to a potentially adverse effect introduces additional uncertainty and may not be appropriate to use as the basis for an RfD.

H.4. CHARGE QUESTIONS 5 AND 6 – NONCANCER TOXICITY VALUE PHARMACOKINETIC EXTRAPOLATION AND UNCERTAINTY FACTORS

H.4.2. Public Comments on Noncancer Toxicity Value Pharmacokinetic Extrapolation

USDA: The additional language and characterization regarding the potential for exposure through breast milk is appreciated and sufficiently detailed.

H.4.3. External Peer-Review Comments on Noncancer Toxicity Value Uncertainty Factors

USDA: The rational for the uncertainty factors appears to be appropriate here.

H.4.4. Public Comments on Noncancer Toxicity Value Uncertainty Factors

USDA: The rational for the uncertainty factor for fecal clearance appears to be appropriate here.

H.5. CHARGE QUESTIONS 7 AND 8 – CARCINOGENICITY HAZARD IDENTIFICATION AND TOXICITY VALUE DERIVATION

USDA: No additional comments at this time.

H.6. ADDITIONAL COMMENTS

USDA: No additional comments at this time.