From: Haroutounian, Vahe (CDC/OD/OCS)
Sent: Mon, 21 Sep 2020 19:23:53 +0000
To: Moeller, Chester (CDC/OD/OCS)
Subject: Re: Comments on ATSDR proposed MRL's

Hi Trey,
I'm on it!
Very Respectfully,
Vahe Haroutounian
Get Outlook for iOS
From: Moeller, Chester (CDC/OD/OCS) <qlq3@cdc.gov>
Sent: Monday, September 21, 2020 3:19:20 PM
To: Haroutounian, Vahe (CDC/OD/OCS) <qpp9@cdc.gov>
Subject: FW: Comments on ATSDR proposed MRL's

Additional docs from DOD

From: Hoverman, Taylor <hoverman.taylor@epa.gov>
Sent: Friday, September 18, 2020 11:31 AM
To: Moeller, Chester (CDC/OD/OCS) <qlq3@cdc.gov>
Subject: FW: Comments on ATSDR proposed MRL's

DOD's comments

Taylor Meredith
Senior Advisor to the Administrator
U.S. Environmental Protection Agency
C: (b) (6) [redacted]
O: 202-566-2705

From: Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>
Sent: Friday, September 18, 2020 11:26 AM
To: Dunlap, David <dunlap.david@epa.gov>; Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: FW: Comments on ATSDR proposed MRL's

From: Bertrand, Charlotte
Sent: Monday, April 06, 2020 8:53 AM
To: danielle.steele@hhs.gov
Cc: Kramer, Jessica L. <kramer.jessical@epa.gov>
Subject: RE: Comments on ATSDR proposed MRL's

Danielle –

I hope you are doing well, I am sure that you are extremely busy right now. With this email I am attaching DOD comments on the ATSDR MRLs. Would you have any time to discuss with us in the next few weeks?

Best,
Charlotte

Charlotte Bertrand
Deputy Assistant Administrator for Policy
Office of Water
Phone (202) 564-2453

From: Bertrand, Charlotte
Sent: Tuesday, March 17, 2020 11:17 AM
To: danielle.steele@hhs.gov
Cc: Kramer, Jessica L. <kramer.jessical@epa.gov>
Subject: Comments on ATSDR proposed MRL's

Internal deliberative

Danielle –

It was a pleasure to meet you last week. Per our discussion, I am sending you the two sets of written comments that EPA has provided to the cross agency PFAS technical working group. These written comments summarize the main points of the conversations our technical/scientific staff have been having during the development of the MRLs. Once you have had a chance to look at these, please let me know if you have any questions, we would be happy to have a call with you and your team to discuss.

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From: Haroutounian, Vahe (CDC/OD/OCS)
Sent: Tue, 22 Sep 2020 16:03:17 +0000
To: Moeller, Chester (CDC/OD/OCS)
Subject: RE: Comments on ATSDR proposed MRL's
Attachments: ATSDR Report Summary and Analysis.docx

Hi Trey,

I've attached the summary for the ATSDR report. It addresses the EPA/DOD concerns, background info for the report, and my-take on the issues. The selected passages highlighted in YELLOW and GREEN give context to the EPA (b)(5)
Please let me know if you have any questions!

Very Respectfully,
Vahe Haroutounian

From: Moeller, Chester (CDC/OD/OCS) <qlq3@cdc.gov>
Sent: Monday, September 21, 2020 3:19 PM
To: Haroutounian, Vahe (CDC/OD/OCS) <qpp9@cdc.gov>
Subject: FW: Comments on ATSDR proposed MRL's

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DOD's comments

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Office of Water
Phone (202) 564-2453

Summary of October 2019 version of ATSDR's draft Toxicological Profile for Perfluoroalkyls

(b) (5) [redacted]

(b) (5) [redacted]

(b) (5) [redacted]

Background:

Perfluoroalkyls are stable, synthetic chemicals which unique because they repel oil, grease, and water. The two perfluoroalkyls made in the largest amounts in the U.S. are perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS). Perfluoroalkyls have been used in surface protection products such as carpet and clothing treatments, coating for paper and cardboard packaging, and have also been used in fire-fighting foams.

Analysis:

(b) (5) [redacted]

(b) (5) [redacted]

(b) (5)

From: Moeller, Chester (CDC/OD/OCS)
Sent: Mon, 21 Sep 2020 19:18:37 +0000
To: Haroutounian, Vahe (CDC/OD/OCS)
Subject: FW: Comments on ATSDR proposed MRL's
Attachments: EPA Comment ATSDR Explanatory Documents 2-4-2020.pdf, ATSDR_PFAS Tox Profile EPA comments 10-22-2019.pdf

Hi Vahe,

(b)(5)

(b)(5) I'm sending this over for you to review and if you could give me a summary and also an overview of your analysis to bring me up to speed. This was just introduced to me last Friday but this issue has been on hold for a while it seems.
No timeline at all here, but could be interesting for you. We can discuss later
-trey

From: Hoverman, Taylor <hoverman.taylor@epa.gov>
Sent: Friday, September 18, 2020 11:31 AM
To: Moeller, Chester (CDC/OD/OCS) <qlq3@cdc.gov>
Subject: FW: Comments on ATSDR proposed MRL's

EPA comments on the draft PFAS tox profile and explanatory docs.

Taylor Meredith
Senior Advisor to the Administrator
U.S. Environmental Protection Agency
C: (b) (6) [redacted]
O: 202-566-2705

From: Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>
Sent: Friday, September 18, 2020 11:25 AM
To: Dunlap, David <dunlap.david@epa.gov>; Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: FW: Comments on ATSDR proposed MRL's

This is what was sent to HHS. Do you want to share these? Also – I had then added on DOD's comments. I send that shortly

---

From: Bertrand, Charlotte
Sent: Tuesday, March 17, 2020 11:17 AM
To: danielle.steele@hhs.gov
Cc: Kramer, Jessica L. <kramer.jessical@epa.gov>
Subject: Comments on ATSDR proposed MRL's

Internal deliberative

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Deputy Assistant Administrator for Policy
Office of Water
Phone (202) 564-2453

INTERNAL DELIBERATIVE

U.S. EPA Comments Concerning ATSDR Explanatory Documents: PFOS Rationale for 10-fold Modifying Factor, and Single Dose Study

February 2020

(b) (5)

(b) (5)

(b) (5)

(b) (5)

(b) (5)

Previous Comments Provided in June 2017

(b) (5)

(b) (5)

Previous Comments Provided on October 21, 2019

(b) (5)

(b) (5)

[redacted]

EPA Review of ATSDR Draft Toxicological Profile for Perfluoroalkyls
October 21, 2019

(b) (5)

MAJOR COMMENTS

(b) (5)

(b) (5)

(b) (5)

tissues.

3. Approach for Derivation of Toxicity Values

(b) (5)

4. Use of Developmental Endpoints in derivation of Chronic MRLs

(b) (5)

(b) (5)

5. ***Literature for PFOA/S could be updated***

(b) (5)

Clarifications & Updated Information

(b) (5)

(b) (5)

(b) (5)

(b) (5)

From: Moeller, Chester (CDC/OD/OCS)
Sent: Mon, 21 Sep 2020 19:19:20 +0000
To: Haroutounian, Vahe (CDC/OD/OCS)
Subject: FW: Comments on ATSDR proposed MRL's
Attachments: DoD Technical Concerns ATSDR MRLs.doc

Additional docs from DOD

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OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
3500 DEFENSE PENTAGON
WASHINGTON, DC 20301-3500

SUSTAINMENT

Department of Defense Technical Concerns in the Agency for Toxic Substance Disease Registry Toxicological Profile for Perfluoroalkyl Substances

(b) (5)

[redacted]

(b) (5)

[redacted]