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PFA_s Comment #1

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August 31, 2009

Agency for Toxic Substances and Disease Registry
Division of Toxicology and environmental Medicine
1600 Clifton Rd, NE
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Atlanta GA 30333

Re: Comments on Toxicological Profile for perfluoroalkyls

Dear Dr Frumpkin:

I recently received a copy of the ATSDR Toxicological Profile for PerfluoroAlkyls (Draft for Public Comment) and am concerned with what appears to be a very significant omission. These chemicals are used (as noted in this document) extensively in surface coating and protectant formulations. There have been numerous reports of human injury over the years (references attached) but there is no mention of this potential pulmonary injury in the "Profile". Additionally there have been a number of animal studies and these are also not mentioned or reviewed in the ATSDR "Profile".

Several statements bring about my concern. For example on page 15, "regardless of the route of exposure, the liver is the main target for perfluoroalkyl compounds". Our experience with these chemicals shows that significant injury to the lungs occurs when these chemicals are aerosolized in Spray Sealants (leather protectors grout sealers, etc). In all the references attached the primary target is the lungs, not the liver. Additionally on page 39 (Health Effect, Inhalation, Respiratory Effects, section 3.2.1.2) there is no mention of the potential pulmonary injury these chemical have caused or the potential for human exposure, while thousands of human cases have been reported over the years. The exposure and injury continues to be reported with published reports as recent as this year (2009, see reference 5)

I would ask that the authors for this profile consider the attached references when evaluating the potential for human effect after inhalation exposure to perfluoroalkyls and include this evidence in the profile.



Designated as a Regional Poison Control Center by the
American Association of Poison Control Centers



I believe the authors focus far too heavily on oral exposure, while the evidence for human injury after inhalation is nearly completely ignored.

Sincerely

A handwritten signature in black ink that reads "Henry A. Spiller". The signature is written in a cursive style with a large, prominent "H" and "S".

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Waterproofing/sealant References

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