

PUBLIC COMMENT

Submitted to the U.S. Environmental Protection Agency via www.regulations.gov

Date: June 30, 2026

Docket ID: [EPA-HQ-OW-2025-0654](https://www.regulations.gov/docket/EPA-HQ-OW-2025-0654)

Re: Rescission of Regulatory Determinations and Removal of Related Provisions for Four PFAS Substances (PFHxS, PFNA, HFPO-DA (GenX), and the Mixture of These Three PFAS Plus PFBS) — Proposed Rule, published May 20, 2026 (FR Doc. 2026-10085)

Comment period closes: July 20, 2026

Summary

I write to place site-specific environmental monitoring data into the administrative record for this rulemaking. Two of the four PFAS the proposal would remove from regulation — **PFNA** and **PFHxS** — were both detected in fish tissue sampled from a stormwater outfall in our coastal watershed, with PFNA the second-highest of all compounds measured. I submit these data for the Agency's consideration. This comment enters factual information into the record and takes no position beyond requesting that the data be considered.

1. Who is submitting this comment

I submit this comment as an elected Special District Commissioner in South Walton County, Florida. The underlying laboratory analysis was commissioned by the Good Samaritan Institute, a Santa Rosa Beach nonprofit. I provide these data as an individual elected official placing factual monitoring information into the record; this comment does not purport to state a formal position adopted by the district's governing board.

2. The monitoring data

In April 2024, a sample of catfish was collected from the Mosquito Control Ditch #10 stormwater outfall (240 Osprey Ln, Santa Rosa Beach, FL 32459), which drains into the Choctawhatchee Bay watershed. The livers of **13 catfish** were combined into a single composite sample and analyzed by Pace Analytical Services (Lot ZD17009; Pace Project No. 10689691) using the EPA's draft Method 1633 for PFAS in tissue. Fourteen PFAS were detected. The detections most relevant to this proposed rule are summarized below; all values are in micrograms per kilogram (µg/kg), wet weight.

PFAS compound	Result (µg/kg)	Relevance to this proposed rule
PFNA	16.2	Determination proposed for rescission — 2nd-highest of all analytes detected
PFHxS	1.2	Determination proposed for rescission
HFPO-DA (GenX)	Not detected	Determination proposed for rescission — below detection (<0.38)
PFBS	0.43 (J, est.)	Component of the Hazard Index mixture addressed by the rule

PFOS	66.1	Context — MCL retained; most abundant compound in the sample
PFOA	0.96	Context — MCL retained
Total PFAS (14 detected)	96.7	Aggregate burden in the composite sample

Source: Pace Analytical Report of Analysis, Lot ZD17009 (attached). “J” denotes an estimated value below the reporting limit.

3. Why these data are relevant to the proposed rule

The proposal would rescind the regulatory determinations for PFHxS, PFNA, and HFPO-DA and for Hazard Index mixtures of those substances plus PFBS. The sample documents real-world occurrence of these named compounds in the aquatic food web of a Gulf coastal watershed: PFNA was present at the second-highest concentration of any compound measured, PFHxS was detected, and PFBS — a Hazard Index component — was detected at an estimated level. The collection point is a stormwater outfall, which indicates a plausible local transport pathway. Occurrence data of this kind speak directly to questions about the presence of these compounds in the environment.

4. Limitations (stated for the accuracy of the record)

Liver, not fillet. This is a composite of fish livers. Liver concentrates PFAS substantially more than the fillet people typically eat, so these values are a bioindicator of environmental presence — not a measure of human dietary exposure and not a fish-consumption advisory.

Scope. The result represents a single composite sample, from one location, at one point in time.

Method and QC. EPA Method 1633 is a draft method; several reported values are estimated (J-flagged), and certain quality-control surrogates fell outside control limits, as disclosed in the attached report. The PFNA and PFHxS detections were supported by clean method blanks.

Purpose. These data are offered as local monitoring evidence for the record, not as a risk assessment or regulatory determination.

5. Request

I respectfully request that EPA (1) include these data in the docket for this rulemaking, and (2) consider documented real-world occurrence of PFNA and PFHxS in coastal biota as part of its evaluation. I welcome the opportunity to provide the complete laboratory report and to support additional fillet-based and source-tracing sampling in our watershed.

The full laboratory report (Pace Lot ZD17009, 31 pages) is attached. An interactive summary of the data is available at pfas.saveourbay.net.

Respectfully submitted,

Douglas Liles

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Attachment: Pace Analytical Services, Report of Analysis, Lot ZD17009 (31 pp.).