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November 15, 2006

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EPA East – Room 6428 Attn: Section 8(e)
Office of Pollution Prevention and Toxics
US EPA
1200 Pennsylvania Avenue NW
Washington DC 20460-0001

CONTAINS NO CBI

Re: TSCA 8(e) Substantial Risk Notice: Supplemental to Docket No. 8EHQ-0598-373; Sulfonate-based and Carboxylic-based Fluorochemicals

To whom it may concern:

3M is submitting this notice to supplement its previous submissions on sulfonate-based and carboxylic-based fluorochemicals. The enclosed analytical reports are part of 3M's ongoing Decatur, Alabama site monitoring program. Interim Report #22 – Analysis of Soil Samples and Interim Report #24 – Analysis of Water, Sludge, and Sediment Samples were prepared by Exygen Research Laboratory and include data on Perfluorobutanesulfonate (PFBS), Perfluorohexanesulfonate (PFHS), and Perfluorooctanesulfonate (PFOS) in subsurface soil, ground water, surface water, and sediment collected from sites adjacent to the 3M Decatur production facility. 3M is submitting this report under TSCA section 8(e).

The specific offsite data that 3M believes are reportable are detailed in the enclosed summary table. The complete reports, which contain both onsite and offsite data, are also enclosed. Please note that although the reports are entitled "Interim", they are audited final reports. The "interim" designation has been applied because the entire Decatur site monitoring work-plan is ongoing.

If you have any questions, please do not hesitate to contact Deanna Luebker at (651) 737-1374.

Sincerely,

Katherine E. Reed
Staff Vice President, Environmental, Health and Safety Operations

Enclosures



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Surface Water PFBS, PFHS and PFOS Concentrations
April 2006

Sample ID	Description	Average PFBS (ppb, ng/mL)	Average PFHS (ppb, ng/mL)	Average PFOS (ppb, ng/mL)
DAL-SW-BPP01-0-060413	Marsh west of site	7.49	60.8	437
DAL-SW-BPP02-0-060413	Marsh west of site	5.77	39.7	354
DAL-SW-BPP03-0-060413	Marsh west of site	5.21	38.2	326
DAL-SW-BCT01-0-060412	Unnamed tributary to Bakers Creek at western site boundary	0.479	2.18	15.1
DAL-SW-BCT02-0-060412	Unnamed tributary to Bakers Creek at southern site boundary	2.26	13.6	279
DAL-SW-BCT03-0-060412	Unnamed tributary to Bakers Creek south of site	0.972	4.47	44.2
DAL-SW-BC01-0-060412	Bakers Creek south of site	0.0648	0.0316	0.0627
DAL-SW-BC02-0-060412	Bakers Creek south of site	0.0669	0.0377	0.0915
DAL-SW-BC03-0-060414	Bakers Creek east of site	0.153	0.442	3.92
DAL-SW-BC04-0-060414	Bakers Creek east of site	0.493	2.18	27.7
DAL-SW-BC05-0-060414	Bakers Creek east of site	0.0719	0.0618	0.686
DAL-SW-OSP01-0-060413	Pond on-site	0.189	0.0462	0.560
DAL-SW-OSP02-0-060413	Pond on-site	0.342	0.562	2.82
DAL-SW-OSP03-0-060413	Pond on-site	0.316	0.495	2.38