

AR226-3958

RECEIVED  
OPPT CBIC

2014 SEP 30 AM 11:50



September 18, 2014

Federal Express

CBIC Control Number

**362022**

U.S. Environmental Protection Agency  
EPA Docket Center  
Docket AR-226, Mail Code 28221T  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460

Attention: OPPT Docket No. AR-226

Subject: Environmental Assessment of Perfluoroalkyl Sulfonates at the  
3M Decatur, Alabama Manufacturing Site

Dear Sir or Madam:

On October 24, 2004, U.S. EPA and the 3M Company entered into a Memorandum of Understanding (MOU) to execute a Screening Level Human Exposure Assessment for perfluorooctanoic acid (PFOA). This program required that various environmental media on and off the 3M Decatur, Alabama manufacturing site be sampled and analyzed as defined by an extensive work plan. The last phase of this study was completed and summarized in a report submitted last year to U.S. EPA entitled "Addendum to the Data Assessment Report". Accordingly, all commitments under this program have been fulfilled and the entire program is documented in the Electronic Docket OPPT 2004 0112.

Since the 3M Decatur site also was used for the manufacture of perfluoroalkyl sulfonates, 3M voluntarily conducted a separate environmental monitoring program of substances that had been or were being manufactured at the site. The substances that were included in this environmental monitoring program were perfluorooctane sulfonate (PFOS), perfluorohexane sulfonate (PFHS) and perfluorobutane sulfonate (PFBS). Enclosed is a report entitled "Addendum to the Perfluorinated Sulfonates Data Report" that presents the perfluorinated sulfonates results for samples collected under the aforementioned final phase of the MOU program. The analytical data and environmental assessment of this monitoring effort are being submitted to the AR-226 Docket to augment information pertaining to fluorochemicals at this location. The report is being submitted in hard copy and electronic (CD) formats.

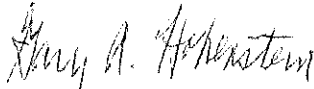
It should be noted that 3M has entered into an agreement with the Alabama Department of Environmental Management to execute a project of capping the former sludge incorporation fields on the plant site. This project includes the installation of a protective liner over the fields that is then covered with two feet of clean soils to

U.S. EPA Docket Center  
September 18, 2014  
Page 2

support growth of natural vegetation. Significant progress has been made on this multi-year effort. Several additional mitigation measures have also either been completed or undertaken to reduce potential releases to the environment.

If there are any questions or comments concerning this matter, please contact me at (651) 737-3570 or gahohenstein@mmm.com.

Regards,

A handwritten signature in cursive script, reading "Gary A. Hohenstein".

Gary A. Hohenstein  
Manager of Environmental and Regulatory Affairs  
3M Center, Building 224-5W-03  
St. Paul, MN 55133

Enclosure

cc: Toni Krasnic – Mail Code 7405M (with enclosures)