

AR 226-1696



April 12, 2004

Ms. Mary Dominiak
US Environmental Protection Agency
EPA East, Room 4410
1201 Constitution Avenue, NW
Washington, DC 20460

VIA FEDERAL EXPRESS

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Dear Mary:

On September 22, 2003 a meeting was held between 3M and EPA to discuss results of a number of monitoring programs carried out by 3M over the past few years. At that meeting data was presented on the Biosphere Monitoring Program, the Multi-City Study, and the previous Decatur Area Monitoring program. In addition, we held brief discussions of the data submitted on August 1, 2003 as part of the 3M LOI commitment. At the conclusion of that meeting EPA requested additional background information supporting this monitoring data.

Enclosed are the following documents that are in answer to that request:

1. CD Entitled "Sample Tracking of Wildlife Samples Analyzed for Concentration of Perfluorinated Chemicals".

This CD provides background information on the timeframe, location and storage techniques used for the wildlife tissue samples analyzed and reported to the AR-226 Docket and included in CD-4 of the 3M Voluntary submission of information. The title page of this document describes the storage conditions.

2. Information on the Market Basket Survey

This refers to the request for additional information on the actual source of the food items analyzed in the market basket survey carried out by 3M under the Multi-City study. In reviewing the various voluntary submittals made by 3M, this information can be accessed in CD-4 under Environmental Monitoring Studies - Multi-City Study. The specific report is titled "3M Multi-City Food Study (sampling report)". The report was prepared by Pace Analytical Services, Inc., Minneapolis, MN. Enclosed is the Title Page of that report for ease of locating the document.

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3. Carbon Adsorption Study for Removal of PFOA from Wastewater

3M did perform numerous studies to assess the treatability of PFOA using carbon adsorption. The enclosed is a very brief summary describing this work. As mentioned in the meeting, 3M has installed our activated carbon system at the 3M Cottage Grove, MN site and is evaluating this system in terms of removal. The system efficiency is removing the conventional substances and certain fluorochemicals. As noted, this system was installed for reasons unrelated to fluorochemicals.

4. Description of the Containment Structure for an Inactive Landfill at the 3M Decatur, AL Facility

A brief description of this structure and the timeline for installation is also enclosed. Please note that the containment system was designed for conventional substances under the RCRA program. It is anticipated that the containment methodology would also be effective for fluorochemicals.

5. Analytical Report: "Fluorochemical Characterization of Water and Sediment Samples, Decatur, AL, Bakers Creek #2 – July 2003 (E03-0561)

In the meeting of September 22, 2003, 3M presented data on PFOA collected as part of a monitoring program conducted in the Outfall Area and Bakers Creek at the Decatur, AL site. This data augmented the previously submitted monitoring reports of 2000 and 2002. This enclosed analytical report provides the raw data of the results reported in that September 22 meeting.

It is recommended that since the information being submitted as part of this letter contains information for PFOA and other fluorochemicals that this report be entered into the AR-226 Docket with reference given to the PFOA Docket.

If you have any questions, please contact me at the number listed below.

Very truly yours,

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C: Mary Ellen Weber