



November 16, 2009

EHQ 0598-373
AR 226-3930

CERTIFIED MAIL

Document Processing Center
EPA East – Room 6428 Attn: Section 8(e)
Office of Pollution Prevention and Toxics, U.S. EPA
1200 Pennsylvania Avenue NW
Washington, DC 20460-0001

Re: TSCA 8(e) Substantial Risk Notice: Sulfonate-based and Carboxylic-based
Fluorochemicals, Docket 8EHQ-0598-373 - Results from Analyses of Fish from
Alabama Surface Waters

Dear Sir or Madam:

3M is submitting this notice to supplement previous submissions on sulfonyl and carboxylic-based fluorochemicals (FCs), and more specifically our May 30, 2006 submittal concerning fish data for the Tennessee River. 3M is providing analytical summary sheets for state-generated fish data recently received from the Alabama Department of Environmental Management (ADEM). It is our understanding that this information has been provided to U.S. EPA Region 4 personnel. Furthermore, as this was a state-directed study, 3M is not familiar with information pertaining to sampling rationales, field sampling procedures, specific sampling locations, analytical techniques, data quality objectives, or Quality Assurance/Quality Control outcomes.

Three documents were received by 3M from ADEM and these have been copied, as received, to the enclosed CD. The following summarizes our understanding of each of the three documents or files:

- An Excel file, entitled “PFOA results 2008 FINAL.xls”. The first tab of this file contains PFOA and PFOS data for largemouth bass and channel catfish collected from the Wheeler Reservoir of the Tennessee River and Bakers Creek, a tributary to the river.
- An Excel file, entitled “Station descriptions.xls”. This file provides descriptions and information pertaining to sampling locations referenced in the aforementioned “PFOA results 2008 Final.xls” file. (Mile markers run from higher numbers to lower numbers as the river flows downstream.)
- A report entitled “FY2009 Fish Tissue Monitoring Program”. Data for many different constituents, for a variety of fish species and different water bodies, are summarized in this document. This report does not include data on FCs, but provides additional details on ADEM’s sampling.

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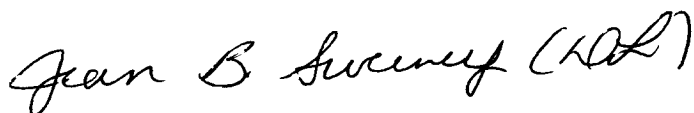
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While 3M does not believe that any of these data taken alone or cumulatively meet the "substantial risk" reporting threshold, and 3M was not responsible for the generation of this information, we nevertheless recognize the ongoing work by U.S. EPA to assess fluorochemical exposure pathways. Therefore, we are placing these results in the 8(e) docket as a supplement to previous submissions.

If you have any questions, please contact Deanna Luebker at 651-737-1374 or djluebker@mmm.com.

Sincerely,

A handwritten signature in black ink that reads "Jean B. Sweeney (HOL)". The signature is written in a cursive, flowing style.

Jean B. Sweeney
Vice President
Environmental, Health and Safety Operations

Enclosure