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3M Environmental, Health and
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3M

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Certified Mail

June 4, 2004



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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

SANITIZED

RE: TSCA 8(E) SUBSTANTIAL RISK NOTICE ON:
[fluorochemical salt]

COMPANY SANITIZED

Dear Sirs:

3M has received final data for an acute oral toxicity study in rats conducted with a research and development chemical [*fluorochemical salt*] indicating potential neurotoxic effects.

The study was conducted by NOTOX Safety and Environmental Research. Three female rats were dosed with 2000 mg/kg of the test substance. Two of the three rats died within 1 to 2 days after exposure.

Subsequently, three male and three female rats were dosed with 200 mg/kg of the test substance via oral gavage. All animals survived. Observations were made for fifteen days. On days 1 and 2, the females showed lethargy, hunched posture, uncoordinated movements, piloerection, and ptosis. Immediately after dosing, two of the males showed hunched posture.

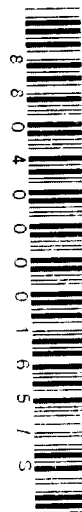
The oral LD50 of this material was established to be within the range of 200-2000 mg/kg.

3M is investigating this material for use as a surfactant in semiconductor processing, and we are currently in the pilot phase of commercialization. Once commercialized, this material will be formulated into an acid preparation (at approximately 100 ppm) that will be used in a highly controlled environment with minimal exposure to workers.

Enclosed please find the final report titled, "Assessment of Acute Oral Toxicity with T-7868 in the Rat (Acute Toxic Class Method)."

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Office of Pollution Prevention and Toxics
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Once a docket number has been assigned for this submittal, please send the docket number postal card to Cheri Kedrowski, 3M Center Bldg. 220-2E-02, St. Paul, MN 55144.

Please contact Paul Lieder (651-737-2678) if you have any questions or if we can provide additional information.

Confidentiality claim:

The specific chemical identity of the test substance is held to be confidential business information until a patent application is filed.

Sincerely,

A handwritten signature in cursive script that reads "Katherine E. Reed".

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