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May 12, 2005

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Re: Perfluorochemical Residential Exposure Data For Washington County, Minnesota

Ladies and Gentlemen:

We serve as counsel for Plaintiffs in a lawsuit that is currently pending against the 3M Company in State Court in Minnesota involving claims arising from exposures to perfluorochemicals released by or otherwise attributable to 3M. The lawsuit is styled, *Palmer, et al. v. 3M Company* (Minn. Dist. Ct. Court File No. C2-04-6309). 3M owns and operates a manufacturing facility in Cottage Grove where various perfluorochemicals, including PFOS and PFOA, were manufactured, released, and disposed for several decades. In the context of

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Plaintiffs' investigation of their claims, Plaintiffs' counsel arranged for sampling of private water wells and soil in the vicinity of 3M's Cottage Grove operations, along with blood sampling of individuals residing in areas that may have been impacted from perfluorochemical wastes attributable to 3M's Cottage Grove operations. In recognition of the potential threat to human health and the environment revealed by this data, and in response to USEPA's prior public requests for perfluorochemical monitoring data, we are providing copies of this initial round of data to you for inclusion in USEPA's Administrative Record 226 and OPPT-2003-0012.

The PFOS and PFOA results for the serum, whole blood, water, and soil samples collected and analyzed to date on behalf of Plaintiffs are summarized below. Please note that all results were provided by Axys Analytical Services LTD in Canada and were obtained, arranged for, and paid for without any involvement by 3M.

I. PFOA/PFOS SERUM/WHOLE BLOOD DATA

The following charts present summaries of the PFOA and PFOS serum and whole blood data collected from residents of Washington County, Minnesota. Please note that whole blood results were obtained for only 2 of the individuals tested (as indicated in the chart). We have grouped the available serum and whole blood data by drinking water source.

The first chart (Chart A) summarizes the blood data obtained from individuals consuming drinking water provided by the City of Oakdale, Minnesota, where recent testing has confirmed PFOS in 2 of the City's water supply wells in levels exceeding the State of Minnesota's recommended Health Based Value of 1 part per billion (1 ppb), and levels of PFOA just below 1 ppb. (See AR-226-1929, 1933, and 1935) 3M has reported detecting PFOS in tap samples collected from a 3M/Dyneon facility in Oakdale as high as 0.9 ppb and PFOA as high as 0.8 ppb. (See AR-226-1934)

The second chart (Chart B), summarizes blood data obtained from individuals whose drinking water is provided by either the City of Lake Elmo, Minnesota, the City of Cottage Grove, Minnesota, or the City of Hastings, Minnesota, where it has been reported that the levels of both PFOS and PFOA in those municipalities' water supplies are either not-detectable or below quantification levels. (See AR-226-1929, 1931, and 1932. See also Exhibit A) In regard to Hastings water, 3M has reported having detected PFOA in a municipal water supply well

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above the detection limit of 0.025 ppb but below the laboratory quantification limit of 0.05 ppb.
(See AR-226-1929 and 1931)

The third chart (Chart C), summarizes data obtained from individuals consuming drinking water from private wells, the vast majority of which have not yet been analyzed for perfluorochemicals. To the extent information is available regarding the level of perfluorochemicals actually detected in the specific private well providing water to the individuals whose blood was sampled, that information is provided in Chart C. Maps showing the general residential location of those whose blood was sampled are attached at Exhibit B.

The lab results for each of the serum and whole blood results are attached at Exhibit C. For privacy reasons, the names, addresses, and specific ages of each of those sampled are not provided with this submission. Also enclosed at Exhibit A are copies of materials, including materials distributed by the Minnesota Department of Health ("MDH"), discussing the levels of perfluorochemicals recently detected by MDH in the City of Oakdale municipal water supply and private Lake Elmo area wells, including detections of PFOS in both private and public water supply wells in levels exceeding the State's current recommended Health Based Value of 1 ppb for PFOS in water. We understand that MDH already is arranging for users of some of the contaminated private wells to begin receiving bottled water and water treatment. (See Exhibit A)

CHART A - OAKDALE CITY WATER CUSTOMERS

<u>SEX</u>	<u>AGE</u>	<u>PFOA (ppb)</u>	<u>PFOS (ppb)</u>	<u>YEARS ON WATER</u>
M	41-50	121.0	109.0	N/A
F	51-60	117.0	91.8	>30
M	>70	82.3	118.0	N/A
M	>70	78.6	112.0	>30
F	41-50	77.5	78.4	N/A
F	51-60	74.9	61.1	20-30

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<u>SEX</u>	<u>AGE</u>	<u>PFOA (ppb)</u>	<u>PFOS (ppb)</u>	<u>YEARS ON WATER</u>
F	>70	69.3	102.0	>30
F	61-70	59.9	71.0	N/A
M	61-70	58.7	61.7	<10
F	61-70	58.3	68.1	20-30
F	41-50	57.8	70.4	20-30
M	51-60	44.6	60.4	10-20
M	41-50	44.1	55.2	<10
M	61-70	39.8	46.5	20-30
F	18-30	38.8	47.6	20-30
M	51-60	37.1	51.1	>30
F	51-60	33.2	59.5	10-20
M	41-50	32.1	57.6	10-20
M	51-60	24.5	37.2	10-20
F	18-30	23.1	29.2	20-30
F	51-60	22.2	46.1	20-30
F	<18	19.1	42.9	10-20
F	61-70	6.96	22.6	>30
F	18-30	6.09	17.7	10-20

N/A=data not available

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**CHART B - LAKE ELMO/COTTAGE GROVE/ HASTINGS
CITY WATER CUSTOMERS**

<u>SEX</u>	<u>AGE</u>	<u>PFOA (ppb)</u>	<u>PFOS (ppb)</u>	<u>YEARS ON WATER</u>
F	51-60	42.3	49.5	<10
F	N/A	6.9	19.6	N/A
M	31-40	6.78 (4.22*)	10.5 (7.95*)	10-20
M	31-40	6.13	13.5	>30
M	>70	4.34	14.0	>30
F	51-60	4.10	17.3	10-20
M	51-60	3.89	21.2	10-20
F	N/A	3.36	21.4	N/A
F**	51-60	2.21	7.88	>30

* = whole blood analysis
 **= former 3M employee
 N/A=data not available

CHART C - WASHINGTON COUNTY PRIVATE WELL USERS

1. Lake Elmo Area Private Wells

<u>SEX</u>	<u>AGE</u>	<u>PFOA (ppb)</u>	<u>PFOS (ppb)</u>	<u>YEARS ON WATER</u>	<u>PFOA IN WATER</u>	<u>PFOS IN WATER</u>
M	41-50	45.7	19.7	20-30	N/A	N/A

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<u>SEX</u>	<u>AGE</u>	<u>PFOA (ppb)</u>	<u>PFOS (ppb)</u>	<u>YEARS ON WATER</u>	<u>PFOA IN WATER</u>	<u>PFOS IN WATER</u>
F	51-60	24.0	17.0	>30	N/A	N/A
M	N/A	16.4	22.1	N/A	N/A	N/A
F	41-50	15.7	9.27	10-20	N/A	N/A
F	>70	14.3	8.90	>30	N/A	N/A
M	61-70	12.1	9.78	>30	N/A	N/A
M	18-30	7.56	17.3	20-30	N/A	N/A
M	61-70	6.95	43.1	20-30	N/A	N/A
M	51-60	6.78	21.0	20-30	N/A	N/A
M	61-70	6.1	43.7	>30	N/A	N/A
M	51-60	5.35	20.4	N/A	N/A	N/A
F	41-50	3.14	11.2	N/A	N/A	N/A
F	61-70	2.4	12.0	>30	N/A	N/A

N/A=data not available

2. Cottage Grove/Hastings Area Private Wells

<u>SEX</u>	<u>AGE</u>	<u>PFOA (ppb)</u>	<u>PFOS (ppb)</u>	<u>YEARS ON WATER</u>	<u>PFOA IN WATER (ppb)</u>	<u>PFOS IN WATER (ppb)</u>
M**	>70	19.7	108.0	20-30	N/A	N/A

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<u>SEX</u>	<u>AGE</u>	<u>PFOA (ppb)</u>	<u>PFOS (ppb)</u>	<u>YEARS ON WATER</u>	<u>PFOA IN WATER (ppb)</u>	<u>PFOS IN WATER (ppb)</u>
F	31-40	17.1	16.9	<10	0.02	ND
F	61-70	7.38	32.5	>30	N/A	N/A
F	51-60	9.12	42.8	20-30	N/A	N/A
M	>70	6.42	32.5	>30	N/A	N/A
F	41-50	4.97	16.3	20-30	0.003	ND
F	41-50	4.68	12.0	<10	N/A	N/A
F	<18	3.87	15.8	<10	N/A	N/A
F	N/A	3.54 (2.98*)	8.51 (8.3*)	N/A	N/A	N/A
F	41-50	3.39	14.9	>30	N/A	N/A
M	<18	2.83	14.8	<10	N/A	N/A
M	41-50	2.01	22.4	<10	0.004	ND

*=whole blood analysis

**=former 3M employee

N/A=data not available

ND=not detected

II. PRIVATE WATER WELL DATA

Attached at Exhibit D are the private water well water results obtained to date. For privacy reasons, the specific addresses and names of the owners of the wells tested have been redacted. A map showing generally where the wells are located is attached at Exhibit E.

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III. PRIVATE PROPERTY SOIL RESULTS

Attached at Exhibit F are the private property soil results obtained to date. For privacy reasons, the specific addresses and names of the owners of the properties tested have been redacted. A map showing generally where the soil results were obtained is attached at Exhibit G.

Very truly yours,


Robert A. Bilott

RAB/mdm
Attachments

cc: Gale D. Pearson, Esq. (w/ attachments)
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