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Certified Mail

November 28, 2007

8EHQ-80-373

8EHQ-1207-00373
AR226-3799

NO CBI

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

Contain No CBI

Re: TSCA 8(e) Substantial Risk Notice: Supplemental to Docket No. 8EHQ-0598-373;
Sulfonate-based and Carboxylate-based Fluorochemicals

Dear Sir or Madam,

In October of 2006, 3M submitted two analytical reports (Exygen Study No. P0000760, E05-0209, Interim Report #22 – Analysis of Soil Samples and Interim Report #24 – Analysis of Water, Sludge, and Sediment Samples) to U.S. EPA. These reports were provided to supplement previous submissions on sulfonate-based and carboxylate-based fluorochemicals. The reports included data on perfluorooctanoate (PFOA) in soil, ground water and surface water collected from sites adjacent to the 3M Decatur manufacturing facility. They also included data for leachate collected from a nearby landfill, sanitary wastewater from the 3M facility and influent, effluent and sludge from the City of Decatur's Publicly Owned Treatment Works (POTW).

In November of 2006, 3M submitted companion reports (Exygen Study No. P0001131, E05-0210, Interim Report #22 – Analysis of Soil Samples and Interim Report #24 – Analysis of Water, Sludge, and Sediment Samples) to U.S. EPA containing data for perfluorobutane sulfonate (PFBS), perfluorohexane sulfonate (PFHS), and perfluorooctane sulfonate (PFOS) for the identical sample locations. All of the aforementioned samples were collected as part of an ongoing voluntary environmental monitoring initiative by 3M.

3M is now submitting the enclosed eight analytical reports to supplement the October and November 2006 submissions. These are summarized as follows:

Exygen Study No. P0000760, E05-0209 (PFOA)

Interim Report #9 – Analysis of Ground Water Samples

Interim Report #11 – Analysis of Public Water, Wastewater, and Sludge Samples

Interim Report #28 – Analysis of Groundwater Samples

Interim Report #29 – Reanalysis of Groundwater, Soil, and Sediment Samples



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Oxygen Study No. P0001131, E05-0210 (PFBS, PFHS, PFOS)

Interim Report #9 – Analysis of Ground Water Samples

Interim Report #11 – Analysis of Public Water, Wastewater, and Sludge Samples

Interim Report #28 – Analysis of Groundwater Samples

Interim Report #29 – Reanalysis of Soil and Sludge Samples

Much of this data is being submitted as supplemental either because it represents additional analytical results for previously reported locations or it reflects additional efforts to quantify results that previously did not meet data quality objectives (i.e., data that was reported as Not Reported (NR)).

To further summarize the relevant data from the enclosed reports, and to provide a better description of the sample locations, a summary table has been prepared and attached to this correspondence.

3M does not believe that these reports contain substantial risk information, but is providing them with recognition of EPA's continuing interest in fluorochemicals. If you have any questions, please contact Deanna Luebker at (651) 737-1374 or djluebker@mmm.com.

Sincerely,



Katherine E. Reed

Staff Vice President, Environmental, Health and Safety Operations

Enclosures (8)