

AR 226 - 1029



May 23, 2001

Dr. Charles Auer, Director
Chemical Control Division/U.S. EPA
Office of Pollution Prevention and Toxics
401 M Street, S.W., Mail Code 7405
Washington, DC 20460-0001

Dr. Oscar Hernandez
US EPA/OPPT/CCD (7405)
401 M Street, S.W.
Room E615B
Washington, DC 20460-0001

Gentlemen:

Attached for your information is a copy of a recent 3M filing of a TSCA 8(e) Supplemental notice for Sulfonate-based and Carboxylic-based and Carboxylic-based Fluorochemicals. This notice reported on completed analyses of several fluorochemical compounds in individual, stored human sera.

We are providing you a copy of this notice in preparation of a conference call I would like to arrange with you and Dr. Larry Zobel, Medical Director to 3M.

I will be in contact with you to arrange a mutually acceptable schedule for that call.

In the meantime, if you have any questions, please contact me at 651 733-6374.

Sincerely,

Michael A. Santoro
Director, Environmental, Health, Safety & Regulatory Affairs
Specialty Material Markets Group
3M Center Bldg. 236-1B-10
St. Paul, Minnesota 55144

C: Dr. Larry Zobel - 220-2E-02

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May 15, 2001



Document Processing Center (7407)
ATTN: Section 8(e) Coordinator
Office of Pollution, Prevention and Toxics
US Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460

Re: TSCA 8(e) Supplemental notice for Sulfonate-based and Carboxylic-based Fluorochemicals-Docket numbers 8EHQ-1180-373; 8EHQ-1180-374; 8EHQ-0381-0394; 8EHQ-0598-373

Dear Docket Coordinator:

3M recently completed analyses of several fluorochemical compounds in individual, stored human sera. We have previously reported results of perfluorooctane sulfonate for human sera from pooled samples.^(1, 2) In the current analyses, individual samples were measured for sulfonate-based and carboxylic-based compounds. Table 1 represents samples of 599 individuals from 23 different states in the U.S. in the age span 2-12. These samples were drawn in 1995. Table 2 represents over 600 individuals from six blood banks across the United States, focusing in the age span 20-69. These samples were drawn in 2000. 3M will send a final report on these analyses to the EPA in the near future.

Table 1. Summary of Samples Drawn in 1995, Ages 2-12

Compound	Average	Median	95 th percentile	Range
PFOS $C_8F_{17}SO_3^-$	43.5 ppb ^(a)	36.7 ppb	90.2 ppb	6.7-515 ppb
PFHS $C_6F_{13}CO_2^-$	15.0 ppb	3.8 ppb	71.3 ppb	<LLOQ ^(b) -712 ppb
PFOSAA $C_8F_{17}SO_2N(C_2H_5)-CH_2CO_2^-$	4.4 ppb	3.7 ppb	10.4 ppb	<LLOQ-23.8 ppb
M570 $C_8F_{17}SO_2N(CH_3)-CH_2CO_2^-$	3.4 ppb	1.8 ppb	12.5 ppb	<LLOQ-48.0 ppb
PFOSA $C_8F_{17}SO_2N^-$	<LLOQ	<LLOQ	<LLOQ	<LLOQ
M556 $C_8F_{17}SO_2NH-CH_2CO_2^-$	3.0 ppb	2.5 ppb	7.3 ppb	<LLOQ-19.1 ppb
PFOA $C_7F_{15}CO_2^-$	5.6 ppb	5.1 ppb	10.2 ppb	<LLOQ-56.1 ppb

(a) ppb is parts per billion; (b) <LLOQ is less than the lower limit of quantification

Table 2. Summary of Blood Bank Samples Drawn in 2000, Focusing on Ages 20-69

Compound	Average	Median	95 th percentile	Range
PFOS $C_8F_{17}SO_3^-$	43.7 ppb	35.8 ppb	90.5 ppb	<LLOQ-1656 ppb
PFHS $C_6F_{13}CO_2^-$	2.9 ppb	1.6 ppb	9.6 ppb	<LLOQ-66.3 ppb
PFOSAA $C_8F_{17}SO_2N(C_2H_5)-CH_2CO_2^-$	3.0 ppb	1.4 ppb	7.6 ppb	<LLOQ_60.1 ppb
M570 $C_8F_{17}SO_2N(CH_3)-CH_2CO_2^-$	1.8 ppb	0.9 ppb	5.3 ppb	<LLOQ_19.0 ppb
PFOSA $C_8F_{17}SO_2N^-$	<LLOQ	<LLOQ	<LLOQ	<LLOQ
M556 $C_8F_{17}SO_2NH-CH_2CO_2^-$	<LLOQ	<LLOQ	<LLOQ	<LLOQ-12.9 ppb
PFOA $C_7F_{15}CO_2^-$	5.6 ppb	4.7 ppb	12.9 ppb	<LLOQ-52.3 ppb

Section 8(e) Coordinator

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Please contact me at 651-733-5181 for additional questions relative to the above analyses.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Zobel MD MPH". The signature is fluid and cursive, with the letters "L", "Z", "M", and "D" being particularly prominent.

Larry R. Zobel, MD MPH
Staff Vice President & Medical Director
3M Medical Department

- (1) Letter to TSCA 8(e) Co-ordinator, May 15, 1998
- (2) Perfluorooctane Sulfonate: Current Summary of Human Sera and Toxicology, January 21, 1999