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8EHQ-80-373

Re: TSCA Section 8(e) Supplemental Notice on
Perfluorooctanesulfonate Docket Nos. 8EHQ-1180-374

Dear Sir and Madam:

On August 18, 2004, 3M Company (3M) submitted final reports for reproductive avian toxicity studies on perfluorooctanesulfonate (PFOS) in northern bobwhite quail and mallard duck, along with the analytical reports of serum, liver and egg concentrations, as well as reports for earlier pilot studies. It has come to our attention that some of the pages in this submission were illegible and others were omitted due to an inadvertent duplicating error. We enclose a corrected version of this submission and request that it replace the prior version delivered on August 18th. Please accept our sincere apologies for any inconvenience.

Sincerely,

Katherine E. Reed (97)

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



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3M General Offices

3M Center
St. Paul, MN 55144-1000
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August 18, 2004

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Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

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Re: TSCA Section 8(e) Supplemental Notice on
Perfluorooctanesulfonate Docket Nos. 8EHQ-1180-374

Dear Sir and Madam:

3M has received final reports for reproductive avian toxicity studies on perfluorooctanesulfonate (PFOS) in northern bobwhite quail and mallard duck. In a previous submission dated February 1, 2002, 3M described draft reports for these studies which indicated certain early post-reproductive phase regression effects. Although such effects are part of a normal physiological process in birds, these studies suggest that PFOS may have accelerated this process as compared to untreated birds. As also described in our previous submission, pilot studies preceded these studies and were inconclusive.

We are now providing the final reports for these studies, along with the analytical reports of serum, liver, and egg concentrations, as well as the reports for the pilot studies. In addition, we are submitting recently-received revised final reports for acute PFOS dietary studies in northern bobwhite and mallard. These reports were revised to reflect reporting changes after sample purity was refined. 3M also has prepared toxicological summaries for all studies being submitted today and is providing those summaries as a reference tool and to place the study results in context.

Please contact Susan Beach (651-778-7452) if you have any technical questions or if we can provide additional information. For any other assistance, please do not hesitate to contact the undersigned (651-778-4331).

Sincerely,

Katherine E. Reed (gr)

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

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