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RE: TSCA 8(E) Supplemental Notice: N-methylperfluorooctane sulfonamidoethanol, Docket No.
8EHQ-1004-15865A

Dear Sir/Madam:

3M is submitting this notice to supplement its previous submissions on N-methylperfluorooctane sulfonamidoethanol with reference to a cover letter dated October 26, 2004, and an e-mail from Terry Obryan dated January 11, 2006.

In that submission, 3M submitted water solubility and octanol/water partition coefficient data on this chemical. EPA has questioned whether the values are correct as the reported water solubility is more than three orders of magnitude higher than the EPIWIN estimated value, as well as estimated values for analogs. In addition EPA questions whether the identity of the chemical is accurate since there is handwritten information on the page.

In this letter, 3M confirms that the data submitted is data on N-methylperfluorooctane sulfonamidoethanol and that the data are correct. The EPIWIN model training set does not include partially fluorinated molecules such as this one. Therefore, the estimated Kow of this chemical using EPIWIN is likely higher than that measured due to this model's tendency to overestimate the octanol solubility and underestimate the water solubility because of the large perfluorinated chain contained in the molecule. In addition, the ecotoxicity studies were conducted in excess of water solubility and this material is apparently not acutely toxic at the solubility limit.

Final study reports are enclosed.

If you have any questions, please do not hesitate to contact me at 651-737-1374.

Sincerely,

Deanna Luebker

Deanna Luebker, MS, PhD
3M TSCA 8(e) Coordinator



Enclosures



MA# 292982