



December 16, 2002

VIA FEDERAL EXPRESS

Dr. Charles Auer  
US Environmental Protection Agency  
EPA East, Room 3166  
1201 Constitution Avenue, NW  
Washington, DC 20460

Dr. Oscar Hernandez  
US Environmental Protection Agency  
EPA East, Room 6220A  
1201 Constitution Avenue, NW  
Washington, DC 20460

Re: Information on Perfluorooctane Sulfonates and Related Compounds

Dear Charlie and Oscar:

Attached herewith is a copy of a recent submittal to the Docket No. AR-226 and the FYI Docket of a biodegradation study and analytical reports pertaining to perfluorooctanoic acid and its homologues. The reports are part of the continuing 3M voluntary submissions of data on perfluorooctane sulfonates and related compounds and our ongoing dialogue with EPA regarding fluorochemicals.

Included in this submission are the following:

- "Biodegradation Study Report: Biodegradation Screen Study for Telomer Type Alcohol", Pace Analytical Services, Inc. Study Number CA085, 3M Sponsor Study Number E01-0684.
- "Comparative Analysis of Fluorochemicals in Human Serum Samples Collected by 3M and Obtained Commercially", 3M Environmental Laboratory Study Number E02-1053.
- "Analysis of Endogenous Fluorochemicals in Normal Pooled Human Serum and Plasma", 3M Environmental Laboratory Study Number E02-1039.

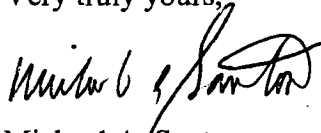
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Dr. Charles Auer  
Dr. Oscar Hernandez

- "Analysis of Pooled Human Sera and Plasma and Monkey Sera for Fluorocarbons Using Exygen Method ExM-023-071", Exygen Research Study Number 023-082, 3M Sponsor Study.

The analytical reports provide information of the isomer distribution of perfluorooctanoate. This information submittal responds to an ongoing question related to the widespread presence of PFOA in human sera samples. The analytical method used for the respective analytical studies has been fully validated for PFOS in rat liver and plasma matrices down to 50 ppb. Limited cross validation for PFOS, PFOA and the other perfluorinated carboxylates in human sera and plasma down to 0.1 ppb was performed. Additional validation is recommended.

3M would appreciate the opportunity to meet with you at your convenience to discuss the content of these reports. In the meantime, if you have any questions, please contact me at 651/733-6374.

Very truly yours,



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Safety and Regulatory Affairs  
Specialty Materials Markets  
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Document Control Office (DCO)  
Office of Pollution Prevention and Toxics (OPPT)  
US Environmental Protection Agency  
EPA East, Room 6428  
1201 Constitution Avenue, NW  
Washington, DC 20460

Attention: Docket No. AR-226 and the FYI Docket

Dear Sir or Madam:

This continues 3M's voluntary submissions of data on perfluorooctane sulfonates and related compounds, as part of our ongoing dialogue with EPA regarding fluorochemicals.

Included in this submission are the following:

- "Biodegradation Study Report: Biodegradation Screen Study for Telomer Type Alcohol", Pace Analytical Services, Inc. Study Number CA085, 3M Sponsor Study Number E01-0684.
- "Comparative Analysis of Fluorochemicals in Human Serum Samples Collected by 3M and Obtained Commercially", 3M Environmental Laboratory Study Number E02-1053.
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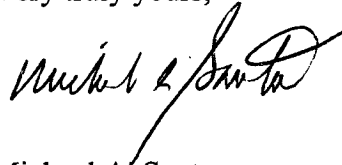
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The analytical method used for the respective analytical studies has been fully validated for PFOS in rat liver and plasma matrices down to 50 ppb. Limited cross validation for PFOS, PFOA and the other perfluorinated carboxylates in human sera and plasma down to 0.1 ppb was performed. Additional validation is recommended.

We will continue to provide information as it becomes available. Please feel free to contact me if you have any questions.

Very truly yours,



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Safety and Regulatory Affairs  
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Cc: Dr. Charles Auer  
Dr. Oscar Hernandez