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May 28, 1999

Frank D. Kover, Chief  
Chemical Information and Testing Branch  
Chemical Control Division  
Office of Pollution Prevention and Toxics  
U.S. Environmental Protection Agency  
401 M Street, S.W.  
Washington, D.C. 20460

MR 23055

RE: Fluorochemical Use, Distribution and Release Overview

Dear Mr. Kover:

As previously discussed, 3M is enclosing an overview paper and supporting appendices that provide detailed information regarding the manufacture, use, distribution and environmental release of sulfonyl-based fluorochemicals (FCs) produced by 3M. These materials are intended to present a preliminary life-cycle assessment of FC pathways for human and environmental exposure from the time these materials leave the control of 3M through their end-use and/or disposal. This assessment is primarily qualitative and is based on available information within 3M and the experience and judgment of 3M marketing and technical support staff.

3M is augmenting this preliminary exposure assessment with a variety of additional actions, including several stewardship initiatives and a comprehensive exposure assessment plan. Implementation of these actions is ongoing. 3M's stewardship and exposure assessment activities are summarized in the enclosed overview paper and will be described more fully in future submissions to EPA.

EPA now possesses considerable information about the health and environmental issues associated with 3M's FC product line. These include the comprehensive review of PFOS health effects and background chemistry paper submitted in February 1999, various Section 8(e) submissions and the enclosed preliminary exposure assessment. 3M scientists are available to meet with the EPA technical staff at the Agency's convenience to discuss the information we have submitted to the Agency. We will be in touch shortly to schedule this meeting.

Please note that portions of the enclosed overview paper and appendices contain proprietary and confidential business information (CBI) protected from disclosure under Section 14 of TSCA. Release of this information would be harmful to 3M's competitive position. We are therefore providing EPA with sanitized and unsanitized versions of both documents. We request that EPA maintain the confidentiality of the unsanitized version in accordance with TSCA Section 14 and EPA regulations. The sanitized version can be placed in the public docket.

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Page 2  
Frank D. Kover

3M appreciates your cooperation.

Sincerely yours,

*William A. Weppner*

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Enclosures

c: Oscar Hernandez  
David Williams  
8 (c) Dkt. Nos. 8EHQ-1180-373, 1180-374  
and 0381-0394

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