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3M **Certified Mail**

November 16, 2005

8EHQ-80-373

No CBI

Re: TSCA Section 8(e) Supplemental Submissions:
Docket Nos. 8EHQ-1180-373 and 8EHQ-1180-374

Dear Sir/Madam:

CONTAINS NO CBI

3M has previously submitted analytical results for serum measurements of various fluorochemicals. As a supplement to those submissions, 3M provides additional results as described below.

Two female fluorochemical plant workers provided 3M with serum samples for their children through their private physicians and requested that 3M analyze the samples. A total of three children were sampled, one time each. To the best of 3M's understanding, the children were approximately 8 months, ten months and two years of age at the time of sampling. At the time, the workers participated in 3M's occupational medical surveillance program for fluorochemicals. This program does not include children. The sampling was done at the request of the mothers.

Worker #1 had one child sampled, in the fall of 2000, when the child was about 10 months old. The mother's blood was sampled in the fall of 1998, and again in 2000, several months after the baby's birth, as part of the regularly scheduled occupational monitoring. Thus, the maternal levels are provided here to offer some context, but they do not represent immediate pre-pregnancy, gestational, or immediate post-partum levels.

Worker # 2 has two children. Child A was also sampled in the fall of 2000, at approximately age 2. The sample from 2000 was re-analyzed with improved analytical techniques in 2002. Child B was about 8 months old when sampled in the fall of 2002. Maternal values are available from the fall of 1998, March 2000, and June 2002, and as with worker #1, are provided to offer general context.

Sampling results are shown in the tables below. For results below the Lower Limit of Quantification (LLOQ) of the analytical method, the quantification limit for the chemical (where available) is shown in parenthesis.

WORKER #1 CHILD
(Approximately 10 months old when sample collected in Fall 2000)

ANALYTE	RESULTS (ppm)
Perfluorooctanesulfonate (PFOS)	Less than LLOQ (0.040)
Perfluorooctanoate (PFOA)	0.055
Perfluorohexanesulfonate (PFHS)	0.011
N-ethyl perfluorooctanesulfonamidoacetate (PFOSAA)	0.008
N-methyl perfluorooctanesulfonamidoacetate (M570)	0.007
Perfluorooctanesulfonamide (PFOSA)	Less than LLOQ (0.001)
Perfluorooctanesulfonamidoacetate (M556)	Less than LLOQ (0.004)

WORKER #1

ANALYTE	RESULTS (ppm)	
	Nov. 1998 Sample	March 2000 Sample
Perfluorooctanesulfonate (PFOS)	0.146	0.117
Perfluorooctanoate (PFOA)	0.069	0.338
Perfluorohexanesulfonate (PFHS)	0.026	0.026
N-ethyl perfluorooctanesulfonamidoacetate (PFOSAA)	0.018	0.008
N-methyl perfluorooctanesulfonamidoacetate (M570)	0.032	0.029
Perfluorooctanesulfonamide (PFOSA)	Below LLOQ	Below LLOQ (0.001)
Perfluorooctanesulfonamidoacetate (M556)	0.004	0.013

WORKER #2 CHILD A
(Approximately 2 years old when sample collected in Fall 2000)

ANALYTE	RESULTS (ppm)	
	2000 Method	Reanalysis of 2000 Sampling with 2002 Method
Perfluorooctanesulfonate (PFOS)	0.171	0.183
Perfluorooctanoate (PFOA)	0.195	0.138
Perfluorohexanesulfonate (PFHS)	0.064	0.054
N-ethyl perfluorooctanesulfonamidoacetate (PFOSAA)	Below LLOQ (0.006)	0.005
N-methyl perfluorooctanesulfonamidoacetate (M570)	0.009	0.007
Perfluorooctanesulfonamide (PFOSA)	Below LLOQ (0.001)	n/a
Perfluorooctanesulfonamidoacetate (M556)	0.008	n/a

WORKER #2 CHILD B
(Approximately 8 months old when sample collected in Fall 2002)

ANALYTE	RESULTS (ppm)
Perfluorooctanesulfonate (PFOS)	0.169
Perfluorooctanoate (PFOA)	0.224
Perfluorohexanesulfonate (PFHS)	0.028
N-ethyl perfluorooctanesulfonamidoacetate (PFOSAA)	0.008
N-methyl perfluorooctanesulfonamidoacetate (M570)	0.007

WORKER #2

ANALYTE	RESULTS (ppm)		
	Nov. 1998 Sample	March 2000 Sample [2002 reanalysis]	June 2002 Sample
Perfluorooctanesulfonate (PFOS)	0.091	0.161 [0.142]	0.090
Perfluorooctanoate (PFOA)	0.022	0.082 [0.067)]	0.025
Perfluorohexanesulfonate (PFHS)	0.013	0.018 [0.015]	0.009
N-ethyl perfluorooctanesulfonamidoacetate (PFOSAA)	Below LLOQ	0.020 [0.015]	Below LLOQ (0.004)
N-methyl perfluorooctanesulfonamidoacetate (M570)	0.006	0.057 [0.054]	Below LLOQ (0.057)
Perfluorooctanesulfonamide (PFOSA)	Below LLOQ	Below LLOQ (0.001) [n/a]	n/a
Perfluorooctanesulfonamido acetate (M556)	Below LLOQ	0.012 [n/a]	n/a

3M does not believe that these data meet the TSCA Section 8(e) "substantial risk" reporting threshold. In our view, these data are limited and provide no basis to draw any scientific conclusions. Nevertheless, 3M has decided to submit these data to the 8(e) docket, with the consent of the two workers, recognizing the ongoing work by U.S. EPA to assess fluorochemical exposure pathways and potential risks.

If you have any questions, please do not hesitate to contact Dr. Larry Zobel at (651) 733-5181.

Sincerely,

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