

3M Specialty Materials

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AR 226 - 1030

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June 28, 2001

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Attention: For Your Information Docket - Docket No. AR-226

Re: Information on Perfluorooctane
Sulfonates and Related Compounds



FYI-00-001378

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. We are enclosing one compact disc (CD) containing a number of studies, as more fully described below.

Contents of Submission

The enclosed information covers perfluorooctane sulfonates and certain related compounds as noted in previous submissions. Specifically, in preparing this submission, 3M reviewed information on the following chemicals:

- Perfluorooctane sulfonates
- Perfluorooctane sulfonyl fluoride
- Perfluorooctane sulfonamide
- Perfluorooctane sulfonylamido (ethyl) acetate
- Perfluorohexane sulfonate
- N-ethyl perfluorooctanesulfonamide
- N-ethyl perfluorooctane sulfonamidoethanol
- N-methyl perfluorooctane sulfonamidoethanol
- Perfluorooctanoic acid

For some of these materials, however, no additional information has become available since our December submission.



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Contain NO CBI

In this submission, we are enclosing primarily new information, along with a few older studies we have recently located in our files. We have also included on the CD of this submission copies of two studies, submitted May 15, 2000 and January 18, 2001 respectively, neither of which was previously included on a CD.

On the enclosed CD, you will find:

- A copy of this cover letter.
- An index to the toxicology, epidemiology and medical surveillance studies, and copies of those studies.
 - A number of the items on this index are analytical reports to accompany in-life studies for which we have previously submitted reports. We have indicated on the index where in our prior submissions the companion in-life study report appeared.
- An index and copies of environmental studies, including studies of
 - physical/chemical properties,
 - environmental fate,
 - ecotoxicity, and
 - environmental monitoring.

The studies of physical/chemical properties, fate and ecotoxicity are accompanied by robust summaries.

In addition to the index of environmental studies by chemical, there are indices from which you may access the environmental fate studies for multiple chemicals by type of study: hydrolysis, photolysis, or biodegradation. Each of these subject indices points to an Executive Summary describing the series of studies of the various fluorochemicals.

- An update to the bibliography of published literature in 3M's possession. This updates the bibliographic references we have previously provided. Please note that we have not included in this bibliography abstracts of the numerous presentations to the Society of Toxicology or the Society of Environmental Toxicology and Chemistry.

As in our past submissions, we have organized the studies by chemical, and within the sections for each chemical, by endpoint or type of study. However, there are now a significant number of studies that address multiple fluorochemicals. We have listed these studies together under a section of studies addressing multiple chemicals, rather than indexing them multiple times under the various chemicals as has been our prior practice. Thus, for example, medical surveillance of plant workers exposed to multiple chemicals, or the analytical data on fluorochemical levels in general population serum, are listed only once at the beginning of the toxicology, epidemiology and medical surveillance index, and are not indexed under PFOS, PFOA, etc. Similarly, the

environmental biomonitoring studies with multiple target analytes are listed in a section at the end of the environmental index and are not separately itemized under specific chemicals.

We have included in this submission copies of materials we have transmitted to the TSCA Section 8e docket since our last submission. Our large document submissions in May and June of 2000 did not include copies of all the various materials sent to the TSCA Section 8e docket over the years. However, as a convenience to the readers, we have included the recent TSCA Section 8e submissions on these CDs, as these submissions often provide preliminary data before final reports are available for submission.

Additional Data to Be Provided in Future Submissions

In my letter to Dr. Oscar Hernandez dated May 23, 2001, I noted a number of studies for which reports would be forthcoming. You will notice that several key items are not yet available:

- Portions of the PFOS 104-week chronic bioassay are undergoing further pathology review, and thus the report has not yet been completed.
- Because attention has been focused on the further review of the PFOS study, the report on the N-ethyl FOSE 104-week chronic bioassay has not yet been finalized.
- The reports on the 6-month primate studies of PFOS and PFOA are not yet complete.
- Analytical reports to accompany all these studies will be submitted concurrently with the relevant in-life studies as they become available.

We will continue to provide information on a regular basis as it becomes available.

CD Submission

Unlike our past submissions, we are submitting the voluminous materials in CD form only, without paper copies. We understand that EPA and OECD representatives have found this format most convenient. The CD is for read-only purposes and is not to be modified. 3M will maintain a paper copy and the original CD copy of the documents. As indicated in the note prefacing the CD, the paper copies will control over the CD in the event of any discrepancy.

The enclosed CD provides several "roadmap" pages at the beginning to facilitate navigation.

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We look forward to our continuing dialogue with the agency. Please feel free to contact me with any questions.

Very truly yours,



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