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3M

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EPA East – Room 6428 Attn: Section 8(e)
Office of Pollution Prevention and Toxics, US EPA
1200 Pennsylvania Avenue NW
Washington DC 20460-0001

Company Sanitized

RE: TSCA 8(e) Substantial Risk Notice: Docket No. 8EHQ-07-16721

To Whom It May Concern:

In October of 2007, 3M notified the EPA that draft data from a mouse local lymph node assay (LLNA) performed on an experimental chemical, [*fluorinated surfactant salt*], had been received. The design of this study included immunophenotyping via flow cytometry to determine %B cells, %T cells, and B:T cell ratio to ascertain whether the observed response was a result of irritation or sensitization.

Topical application of the test material resulted in a stimulation index greater than 3, as well as a greater than 25% increase in %B cells and in B:T ratio compared to both vehicle and naïve controls. These data suggest the test article is a dermal sensitizer.

The final report for this study is enclosed.

For reference, 3M has submitted data from an oral (gavage) developmental toxicity screening study in rats, a five day repeat oral study in rats, a 28 day repeat dose toxicity study in rats, and a standard mouse local lymph node assay conducted on the same chemical. These submissions have also been assigned the docket number listed above.

Please contact me at 651-737-1374 or djluebker@mmm.com if you have any questions or if we can provide additional information.

Sincerely,

Deanna J. Luebker, PhD
3M Toxicologist and TSCA 8(e) Coordinator



Enclosure

MR # 308163