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3M Specialty Materials

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October 9, 2000

3M

Dr. Oscar Hernandez
US EPA/OPPT/CCD (7405)
401 M Street, S.W.
Room E615B
Washington, D.C. 20460-0001

Dear Oscar:

Enclosed are twenty (20) copies of a document entitled "Draft Initial Assessment Report: Perfluorooctane Sulfonic Acid and its Salts " prepared by 3M on CD. It is 3M's understanding that you will distribute the CD's to the members of the OECD Existing Chemicals Task Force for their review prior to the technical meeting scheduled for October 26-27 in Washington.

The enclosed draft report follows the format outlined in the Screening Information Data Set (SIDS) Manual of the OECD, even though perfluorooctane sulfonic acid (PFOS) is not considered a high production volume chemical, and even though the data set on PFOS is substantially more robust than that covered in most initial assessment reports.

This draft report summarizes the information available as of July 20, 2000 and presents and evaluates information on PFOS exposure and biological effects in an initial assessment of potential human health and ecological risk. 3M has previously provided a CD set containing the underlying studies relied upon in this draft report. For some studies, reports are still in preparation. The substantial body of data reviewed in this draft report suggests that human serum levels found in occupational and non-occupational populations are not associated with adverse health effects. Similarly, levels found in the environment and in wildlife are not associated with adverse effects.

While the information in this report represents our current knowledge, additional information is currently under development and will aid in improving this initial assessment of risk of PFOS. Areas under study include ecological exposure and effects assessment, human exposure (through sera measurement), chronic studies in laboratory animals and additional tissue measurements of PFOS from previous studies.

To ensure the most accurate analytical results possible, work is presently being conducted to completely characterize samples used in testing and analysis over the last few years. Based on the results of further purity analysis, the values in the reports upon which this document is based will be revised. Therefore, the numbers in the document will also be modified in future revisions.

Please contact me directly at 651/733-6374 if you have any questions regarding this report.

Best regards,

William A. Weppner

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