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October 27, 2011



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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

Re: TSCA 8(e) Substantial Risk Notice: Supplemental to Docket No. 8EHQ-0598-373;
Sulfonate-based and Carboxylate-based Fluorochemicals – Cordova, IL well water
sampling

To whom it may concern,

3M is submitting this notice to supplement its previous submissions on sulfonyl-based and carboxylate-based fluorochemicals and more specifically, our September 5, 2006 submission on water samples taken from groundwater wells and from the water distribution system at the 3M plant site in Cordova, Illinois and our March 10, 2010 submission on water samples taken from commercial wells adjacent to the 3M Cordova facility.

The data contained in previous submissions and in this correspondence have been generated as part of an on-going site-related environmental assessment of fluorochemicals that 3M is performing for its 3M Cordova, Illinois manufacturing facility. As part of this effort, which is being done with the involvement and approval of the Illinois Environmental Protection Agency, 3M has recently received the enclosed well water data taken from various private residential properties in the vicinity of the 3M plant. Off-site data are limited to seven private wells, referred to by five-digit identification numbers as listed in the enclosures to this submittal.

Enclosed please find a map depicting the sampling locations, a data summary table, and a final analytical report (Interim Report #3-Analysis of 3M Cordova Groundwater Samples: July 2011; Analysis of Perfluorobutanoic Acid (PFBA), Perfluorooctanoic Acid (PFOA), Perfluorobutanesulfonate (PFBS), Perfluorohexanesulfonate (PFHS), and Perfluorooctanesulfonate (PFOS) in Groundwater Using LC/MS/MS for the "3M Fluorochemical (FC) Assessment Work Plan for the 3M Cordova, IL Facility).

With the exception of one low measurement of PFBS in one well and a similar low reading for PFOS in another well, the results for PFOA, PFOS, PFHS and PFBS were all less than the limit of quantitation (<0.025 ng/ml). PFBA results ranged from 0.0673 to 3.41 ng/mL.

For context, it should be noted that U.S. EPA has established Provisional Health Advisories (i.e. guidance levels pertaining to drinking water) of 0.4 and 0.2 ng/mL for PFOA and PFOS, respectively. We are not aware of any EPA plans to establish a PHA for PFBA. Further perspective is provided by recently issued site specific cleanup objectives as derived by the

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Illinois EPA. As established for the 3M Cordova site, these groundwater objectives are 0.4, 0.2 and 20 ng/mL for PFOA, PFOS and PFBA, respectively. Another comparator for PFBA comes from Minnesota where the Department of Health has set a Health Risk Limit (HRL) value for drinking water of 7 ng/mL for PFBA. In conclusion, all results for all the wells sampled are well below known drinking water guidance values or standards. Inherent in these criteria are assumptions and safety factors to ensure safe levels in drinking water for a lifetime of consumption.

While 3M does not believe that any of these data taken alone or cumulatively meet the "substantial risk" reporting threshold as defined by the EPA, we nevertheless recognize the on-going work of the U.S. EPA to assess fluorochemical exposure pathways. Therefore, we are placing these results in the 8(e) docket as a supplement to previous submissions.

If you have any questions or would like any additional information, please contact Deanna Luebker at (651) 737-1374 or djluebker@mmm.com.

Sincerely,



Jean B. Sweeney
Staff Vice President, 3M Environmental, Health and Safety Operations

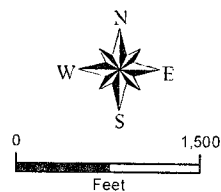
Enclosure



SOURCE Illinois National Aerial Photography
Program (NAPP) Quarter-quadrangle
Rock Island Illinois, 2005

Legend

- Site Boundary
- Residential Wells



Residential Wells
3M Cordova Facility
Cordova, IL

3M Cordova Facility

Cordova, IL

Perfluorochemical Results for Residential Wells Sampled on July 18, 2011

Sampling Location	PFBA	PFOA	PFBS	PFHS	PFOS
23321	0.224	<0.025	<0.025	<0.025	<0.025
22610	0.182	<0.025	<0.025	<0.025	<0.025
22704	0.452	<0.025	<0.025	<0.025	0.0412
22703	0.0783	<0.025	<0.025	<0.025	<0.025
22414	0.0673	<0.025	<0.025	<0.025	<0.025
22009	3.41	<0.025	<0.025	<0.025	<0.025
21421	1.73	<0.025	0.0583	<0.025	<0.025

All results in ng/mL (ppb).



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