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Certified Mail

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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) SUPPLEMENTAL SUBMISSION:
Docket No. 8EHQ-1180-373

Dear Sirs:

3M has received final results for an oral pharmacokinetic study in rats conducted with perfluorooctanesulfonyl fluoride (POSF, CAS# 307-35-7) indicating that the test substance metabolizes to perfluorooctane sulfonate (PFOS, CAS# 2795-39-3).

The study was conducted by 3M's Strategic Toxicology Laboratory. A single oral dose of 5 mg/kg POSF was administered to 15 male rats. Necropsies were performed on days 1, 4, and 29 post dose. The study results indicate that POSF was metabolized to PFOS. Maximum PFOS in the liver occurred on day 4 post dose at approximately 11 ppm, or 10% of the dose. On days 1 and 29 post dose, the PFOS concentration in the liver was 7 and 4 ppm, respectively.

POSF was used as an intermediate gas in an isolated industrial process to produce PFOS and related products. 3M no longer manufactures POSF.

Enclosed please find the final study titled "Pharmacokinetic Study of Perfluorooctanesulfonyl Fluoride (POSF) Following a Single Oral Gavage Dose in Rats."

Please contact Andrew Seacat (651-575-3161) if you have any questions or if we can provide additional information.

Sincerely,

Katherine E. Reed
Staff Vice President
Environmental, Health and Safety Operations

Enclosure