

8EHQ-0200-00373

AR226-0543

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

February 25, 2000

Contains No CBI

3M Company, Inc.
Attn: William A Weppner, Ph.D.
Director, Environmental, Health, Safety & Regulatory Affairs
Specialty Materials Group
3M Center, Bldg. 236-1B-10
St. Paul, MN 55144

SUBJECT: 8EHQ-1180-00373; 8EHQ-1180-00374

Dear Dr. Weppner:

The EPA Office of Pollution Prevention and Toxics is requesting additional information on 3M's perfluoroalkyl submissions at this time.

With regard to 8EHQ-1180-00374, please clarify whether the composition of the test material FC-95 (a/k/a T-3351) is entirely potassium perfluorooctane sulfonate or a homologous mixture of potassium perfluoroalkylsulfonates, as in the case of the ammonium carboxylate mixture comprising FC-143 (8EHQ-0381-00394). In 8EHQ-1180-00374, the chemical identities of five homologs of "potassium salts of perfluoroalkyl sulfonates" were claimed TSCA Confidential Business Information (CBI). Since then, only the identity of the perfluorooctane homolog has been declassified. Does 3M wish to maintain its TSCA confidentiality claim for the other four chemicals. If so, please substantiate this claim.

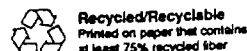
Also, please provide the identity of the perfluoroalkyl alcohol tested in the rat teratology study reported in your 5/15/84 supplementary submission (8EHQ-0584-00373). In your initial 8(e) submission, the test material was reported to be a mixture of two perfluoroalkyl alcohols, but the 5/15/84 supplement refers to the test material only as perfluoroalkyl alcohol.

EPA-OTS



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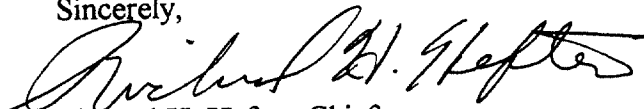
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Enclosed are the first pages of the submission referred to above and a copy of "Support Information for Confidentiality Claims". Please cite the assigned 8EHQ numbers and address your response to:

Document Control Office (7407)
Room G99 East Tower Attn: Section 8(e)
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460-0001

Questions regarding this request should be directed to Mr. Terry O'Bryan of my staff at (202) 260-3483 or E-Mail OBRYAN.TERRY@EPA.GOV

Sincerely,

A handwritten signature in dark ink, appearing to read "Richard H. Hefter". The signature is fluid and cursive, with the first name "Richard" being more prominent.

Richard H. Hefter, Chief
High Production Volume Chemicals Branch

Enclosures

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