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AR226 - 0636



Barbara Leczynski

05/05/2000 03:37 PM

To: Karen Lannon/DC/USEPA/US@EPA, Mary Dominiak/DC/USEPA/US@EPA
cc:
Subject: followup to perfluorochemicals meeting on April 28

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Charles Auer
05/05/2000 12:03 PM

To: dchakes1@mmm.com
cc: bob.sussman@lw.com, Oscar Hernandez/DC/USEPA/US@EPA, Neil Patel/DC/USEPA/US@EPA, Robert Perlis/DC/USEPA/US@EPA, Barbara Leczynski/DC/USEPA/US@EPA
Subject: followup to perfluorochemicals meeting on April 28

Dear Bill and Dan, 3M,

We found the meeting very helpful in furthering our understanding of the situation with regard to PFOS and other perfluorochemicals. Several points came up in the meeting discussion and I would like to relay our thinking in email form.

First, 3M had requested, in an April 27, 2000 letter, an extension of one week to respond to the request for information on PFOS. As indicated in the discussion, EPA understands the issue and, as indicated at the meeting, agrees to extend the date to May 5, 2000.

Second, in regards to making judgments as to the extent of the information that 3M should submit, we expect 3M to use its judgment in identifying the "other relevant information" that should be provided to assist EPA in evaluating the hazards, exposures, and risks of PFOS (and other perfluorinated sulfonates and carboxylates as discussed in previous emails).

Third, regarding submission of interim reports, we discussed having 3M submit interim reports on PFOS, per se, and to otherwise have 3M apply its judgment regarding "other relevant information" which should be considered for submission to EPA. It was also noted that any obligations on 3M to submit under TSCA section 8(e) are unaffected by any of these informal understandings.

Another area which has come up concerns information on PFOS residuals in products based on POSF. I spoke briefly with Bob and he thought that some of this information had been provided in one of the white papers but, if so, I am unable to find it. If you have reported this information, please point me to the location in a white paper. If the information was not previously provided, or if you have other information (including that which goes beyond the summary level that I suspect would be in a white paper) that you believe would be relevant in this regard, I am requesting that you provide the information in your possession or control regarding the levels of PFOS which are present in products based on POSF. It would be fine if this information (to the extent not already submitted) could be provided at the meeting with the Acting AA set for next Tuesday. If this is not possible, I request that it be provided by May 12, 2000.

If you have any questions, please get back to me. I thank you in advance for your cooperation.

Charles M. Auer
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