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July 28, 2006

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Office of Pollution Prevention and Toxics
US EPA
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8EHQ-81-394

RE: TSCA 8(E) SUBSTANTIAL RISK NOTICE ON: PFHS and PFOS; Supplemental to Sulfonate-based Fluorochemicals, Docket Nos. 8EHQ-1180-374; 8EHQ-0381-0394; 8EHQ-0598-373

Dear Sir/Madam:

Preliminary data from an on-going study sponsored by 3M that is being conducted by TNO Laboratories in Leiden, Netherlands suggest an effect of perfluorooctanesulfonate (PFOS) and perfluorohexanesulfonate (PFHS) on body weight, food consumption, and serum cholesterol in 15% dietary fat fed E3 Leiden transgenic mice *in vivo*. Cholesterol was reduced at dietary concentrations of 30 and 100 ppm for PFOS and 60 and 200 ppm for PFHS. Food consumption and body weight were reduced at dietary concentrations of 100 ppm PFOS and 200 ppm PFHS. On removal of the 100 ppm PFOS dosage-group mice from exposure through diet, food consumption and serum cholesterol showed recovery, but body-weights remained low. On removal of the 200 ppm PFHS dosage-group mice from exposure through diet, body weight and food consumption showed recovery, but serum cholesterol remained low. The lowered serum cholesterol in the 200 ppm PFHA dosage-group mice is being observed for recovering in the on-going study.

3M believes that this is the first observation in mice of cholesterol reduction as a result of treatment with PFOS and PFHS, and the first observations in mice treated with PFHS of reductions in body-weight and food consumption.

PFOS and PFHS has previously been shown to have the effect of reducing body-weight and serum cholesterol in rats, and PFOS has been shown to produce the latter effects in monkeys. Therefore, 3M believes this information to be corroborative.

A final report will be forwarded to the EPA when it is received from the test facility. If there are questions, please contact Dayna Blomquist (651-736-5413).

Sincerely,

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



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