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AR226-3828

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EPA East Room 6428
AR- 226 Docket
US Environmental Protection Agency
1201 Constitution Avenue, NW
Washington DC 20460

Attention: Docket No. AR-226

Subject: Environmental Assessment of Perfluoroalkyl Sulfonates
at the 3M Decatur, Alabama Manufacturing Site

Dear Sir or Madam,

On October 24, 2004, US EPA and the 3M Company and Dyneon LL entered into a Memorandum of Understanding (MOU) to carry out a Screening Level Human Exposure Assessment (SLHEA) for Perfluorooctane carboxylate. This program required that various environmental media on and off the 3M Decatur, Alabama manufacturing site were to be sampled and analyzed as defined by an extensive work plan. This work has culminated in a Peer Consultation Process during which a panel of experts provided comments and recommendations on the SLHEA and whether the Charge question posed in the MOU had been answered fully. This entire program has been documented in the Electronic Docket OPPT 2004 0112.

Since the 3M Decatur site also was used for the manufacture of perfluoroalkyl sulfonates, 3M voluntarily conducted a separate environmental monitoring program of substances that had been or were being manufactured at that site. The substances that were included in this environmental monitoring program were perfluorooctane sulfonate (PFOS), perfluorohexane sulfonate (PFHS), and perfluorobutane sulfonate (PFBS). The analytical data and reports, and the environmental assessment of this monitoring effort are being submitted to the AR-226 Docket to augment the information relative to fluorochemicals at this location. Enclosed is the report in hard copy and a CD of the electronic version.

It should be noted that 3M has entered into an agreement with the Alabama Department of Environmental Management to carry-out a project of capping the former sludge incorporation fields on the plant site. This project includes the installation of a protective liner over the fields that will then be covered with two feet of clean soils to support growth of natural vegetation. A groundwater extraction and treatment system is to be installed to minimize the migration of groundwater to the west of the site boundary. The project is in progress and will require a number of years to complete.

CONTAINS NO CBI

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If you would like to discuss the content of this report, we would be pleased to have a conference call or meet in EPA offices in Washington. In the meantime, if you need any additional information at this time, please contact me on 651 733-6374.

Sincerely,



Michael A. Santoro
Director, Environmental, Health,
Safety and Regulatory Affairs
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Enclosure