3M Chemicals

3M Center
St. Paul, MN 55144-1000
612 733 1110

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Charles M. Auer, Director
Chemical Control Division
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

RE: Meeting Request to Discuss Fluorochemicals

Dear Mr. Auer:

This letter is to reconfirm 3M Company's request to meet with you and your staff to discuss future cooperation between the Agency and the company on testing, product stewardship and risk assessment initiatives for perfluorooctane sulfonate (PFOS)-based fluorochemicals. As described in 3M's TSCA Section 8(e) submission of May 15, 1998, 3M has detected in U.S. blood bank samples from individuals with no known occupational exposure low PFOS levels in the blood at approximately 30 parts per billion (ppb) on average. The exposure pathways responsible for these PFOS levels are not known at this time, but could be related to the product, use and/or disposal of products manufactured by 3M and its customers.

In 3M's judgment, current information and data do not demonstrate that the PFOS levels measured in human serum present a significant health risk. For over thirty years, human serum has been known to contain organic fluorine at ppb levels. Recently, 3M has determined that PFOS appears to comprise a measurable fraction of human organic fluorine levels. Based on over twenty years of medical monitoring and epidemiological data, however, the PFOS blood levels identified in 3M's fluorochemical production workers (single digit parts per million (ppm) levels) are not associated with any hematological, hormonal or clinical chemistry changes. Similarly, a mortality study of 3M's fluorochemical production workers did not indicate any disease category in excess of expected.

Nonetheless, the finding of low ppb PFOS levels in the blood of the general population and the use and distribution patterns of PFOS-based fluorochemicals has led 3M management to undertake a comprehensive testing and product stewardship program for these chemicals. This program includes the following components:

- Animal testing of PFOS and other fluorochemicals which may breakdown or metabolize to PFOS in order to evaluate a range of toxicological end-points (including carcinogenicity and reproductive effects) and better define kinetics and biological fate of these chemicals in rodent and primate species.[1]

[1] 3M also filed an 8(e) report on September 14, 1998 providing preliminary results from two-generation reproductive studies on PFOS and ethyl fose alcohol.

- Environmental fate and effects studies to better characterize environmental exposure pathways for PFOS and its potential ecotoxicity.

- Evaluation of life-cycle exposures for industrial and consumer fluorochemical products that could breakdown or metabolize to PFOS in order to better characterize the nature, magnitude and extent of potential PFOS exposure by workers and the general population.

- Product reformulation, including reduction of residuals in 3M products, to minimize exposure of downstream users to PFOS-based fluorochemicals. Additionally, customer communication initiatives, including revised MSDSs and a stewardship program are underway.

To support this program, 3M has created an independent Scientific Advisory Panel comprised of recognized experts in relevant disciplines. 3M also is working with a range of outside consultants to assist us in the program described above.

3M wishes to meet with you in the immediate future to discuss the recent finding of PFOS levels in human blood and to review its testing and product stewardship program. 3M's management is committed to working in partnership with EPA on risk assessment and risk management issues for PFOS-based fluorochemicals and would like to develop a framework for ongoing dialogue and collaboration with EPA as our efforts continue. We would like to schedule a meeting with you during the week of December 14th, if your schedule permits.

3M also has received the recent letter from Administrator Browner inviting participation in EPA's testing initiative for High Production Volume (HPV) chemicals. We would like to take the opportunity at the upcoming meeting, should EPA wish, to provide an update on 3M's activities to develop a response to this letter.

Representing 3M at the meeting will be myself, along with Dr. Charles Reich, Group Vice President, Chemical Markets Group; Dr. Larry R. Zobel, M.D. MPH, Staff Vice President and Medical Director, 3M Medical Department; and Dan Hakes, Product Steward Specialist.

Please call me at 651/733-6374 to confirm a date and time for the meeting.

Sincerely yours,

William A. Weppner

William A. Weppner, Ph.D.
Director of Environmental, Health,
Safety & Regulatory Affairs for the
3M Chemical Markets Group

cc: Paul Campanella
Frank Cover
David Williams