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3M

June 14, 2000

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Office of Pollution Prevention and Toxics
United States Environmental Protection Agency
401 M Street, Southwest
Room 403 East Tower (Mail Code 7405)
Washington, D.C. 20460

MR37076



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Contain NO CBI

Dear Charlie:

This letter responds to the May 25, 2000 letter received from Richard H. Hefter, Chief of the High Production Volume Chemicals Branch of EPA, requesting certain information from 3M.

The May 25th letter requests copies of certain studies – highlighted on an attachment to the letter -- that were “not included with other listed studies” provided in 3M’s May 4, 2000 submittal. All of the highlighted studies on the attachment to the letter are studies in progress for which 3M does not yet have any final reports. As indicated in 3M’s May 4th submittal cover letter, we did provide protocols and study plans, where available, for these studies in progress. We have reviewed our files and determined that the May 4th submittal did, in fact, contain copies of these protocols and study plans, where available.

The summary study plan for the “Biodegradation Studies” (referenced as 2a on the attached sheet by Mr. Hefter) was provided. It is the same summary plan that is entitled “3M Microbial Metabolism Program.” There are not two different study plans. We provided the study plan because the study is not yet complete.

The protocol for phytotoxicity (referenced as 7 on the attached sheet by Mr. Hefter) is still in the development stage and was not provided in the May 4th submittal.

The summary sheet for the Global Environmental Sampling Plan (referenced as 8 on the attached sheet by Mr. Hefter) was provided. It is the one page summary sheet that was attached to the files discussing studies on environmental monitoring. It has also been subsequently provided as part of the May 15, 2000 follow-up submittal to you.

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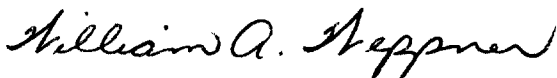
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Mr. Hefter's letter of May 25, 2000 also makes reference to a New York Times article that indicated that some Scotchgard products – Scotchgard Cleaner for Rugs and Carpet, Scotchgard Cleaner for Fabric & Upholstery, and Scotchgard Heavy Duty Water Repellent -- would remain in production. The letter requests confirmation that these products will remain in production and requests complete chemical compositions for these products and for any other Scotchgard products that will remain in commerce.

As 3M indicated when we first informed EPA of the plan to phase out production of perfluorooctanyl chemistry substantially by the end of the year, this phase out would cover some – but not all – of 3M's Scotchgard products for the reason that not all of 3M's Scotchgard products are based on perfluorooctanyl chemistry. With what we have already told EPA in mind, 3M can confirm that the products mentioned in the May 25th letter would remain in production. We are hesitant, however, to provide the chemical composition for these products due to the sensitive confidentiality issues and the lack of relevance of these compositions given that the products are not based on the perfluorooctanyl chemistry being phased out by 3M, but instead, are comprised of non-perfluorochemical formulations. We would be pleased to discuss our position with the Agency further and to answer any questions.

Please let me know if you or Mr. Hefner has questions regarding this response.

Very truly yours,



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