

May 1, 2001

CERTIFIED MAIL

Document Processing Center (7407)
(Attn: Section 8(e) Coordinator)
Office of Toxic Substances
US Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Re: TSCA 8(e) NOTICE For: Acute Toxicity Honey Bee Studies on Perfluorooctane Sulfonate, potassium salt, CAS# 2795-39-3

Dear Sir:

3M is submitting the results from recent oral and contact acute toxicity tests performed with 1-octanesulfonic acid, 1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-heptafluoro-,potassium salt (CAS No. 2795-39-3) – commonly referred to as PFOS – on honey bees. The two studies were performed by Central Science Laboratory (CSL), Sand Hutton York YO41 1LZ, UK.

The contact toxicity test involved painting the bees with various concentrations of PFOS and observing the bees for 96 hours. The results of this study show that the 96 hour Contact LD50 was 59.7 mg/Kg of body weight (4.78 µg./bee) with a NOEL of 24.1 mg/Kg (1.93 µg./bee). Under both the classification scheme developed by Atkins et al (1977) (contact only) and the classification scheme for the International Commission for Bee Botany (ICCB) (1985) (oral and contact), this contact LD50 would be classified as "moderately toxic".

The oral toxicity test was performed by feeding sucrose solutions containing PFOS to bees for a period of four hours and observing them for 72 hours. The oral LD50 was calculated to be 5mg/Kg of body weight (0.4 µg/bee) and the NOEL 2.6 mg/Kg (0.21 µg/bee). Under the ICCB classification scheme, this oral LD50 would be classified as "highly toxic".

3M is not aware of any TSCA 8(e) guidance directly applicable to the reporting of honey bee acute toxicity tests, but is submitting this information as a precautionary measure. Based on all available data, 3M has no reason to believe that the levels of PFOS potentially available for honey bee exposure in the environment would approach the LD50 levels observed in these tests.

Copies of the two test reports are attached. Please contact Dale Bacon, technical director, Environmental Laboratory, 651-778-4736, for further information.

Sincerely,


Enclosures