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Office of Pollution Prevention and Toxics (OPPT)  
US Environmental Protection Agency  
EPA East, Room 6428  
1201 Constitution Avenue, NW  
Washington, D.C. 20460

Attention: Docket No. AR-226 and the FYI Docket

Re: Information on Perfluorooctane  
Sulfonates and Related Compounds

Dear Sir or Madam:

This continues 3M's voluntary submissions of data on perfluorooctane sulfonates and related compounds, as part of our ongoing dialogue with EPA regarding fluorochemicals.

On August 30, 2002, a meeting was held between USEPA personnel and the representatives from the Fluoropolymer Manufacturer's Group of the Society of the Plastics Industry to discuss scientific aspects of the results of two toxicology studies pertaining to ammonium perfluorooctanoate that were previously submitted to AR-226. The studies discussed were the six-month oral toxicity study in male cynomolgus monkeys and the multi-generation reproduction/developmental study in rats. At the meeting, a detailed analysis of raw estrous cycling data from the latter study was presented by Dr. John L. Butenhoff, 3M. As an action item from the meeting, it was agreed that the raw data and its analysis would be submitted formally to AR-226 with additional analyses that may be helpful in understanding the results of the study. The intent of this submission is to provide the raw data and analyses, as agreed on August 30, 2002.

Included in this submission are the following:

- An exact copy of raw estrous cycling data for P and F1 females from Argus Research Protocol 418-020, "Oral (Gavage) Two-Generation (One Litter per Generation) Reproduction Study of Ammonium Perfluorooctanoate (APFO) in Rats".
- A table (two pages) entitled, "Estrous Cycling and Natural Delivery/Litter Observation Data" which, in addition to data on estrous cycling, contains information on mean litter numbers of implantations, liveborn, and stillborn by dose group.
- An analysis of P and F1 generation estrous cycling data made subsequent to the August 30, 2002 meeting and including colored charts which graphically represent the raw estrous cycling data.



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We will continue to provide information as it becomes available. Please feel free to contact me with any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael A. Santoro". The signature is stylized with a large "M" and "S".

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cc: Dr. Charles Auer  
Dr. Oscar Hernandez

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