

313856

AR226 3820

08/27/2008 01:19 PM To: Deena Vann/DC/USEPA/US@EPA
cc: Lcc
Subject: Fw: LOI Submission of August 1, 2008

Hi Deena,

3M sent this to EPA around August 1, 2008. If the submission has not yet been processed into the docket, is it possible to replace the last two pages with the corrected pages attached below?

If it's too late, I can have them submit the correction through the regular submission process.

Thank for your help.

Toni Krasnic
EPA/OPPTS/OPPT/CCD/ECB
EPA East; 1201 Constitution Ave NW, Room 4410L; Washington, DC 20004
Mail: EPA; 1200 Pennsylvania Ave NW; MC-7405H; Washington, DC 20460
Phone: 202-564-0984; Fax: 202-564-4775
PFCA Website: <http://www.epa.gov/oppt/pfca>
TSCA 8(e) Website: <http://www.epa.gov/oppt/tscalr/tscalr>

----- Forwarded by Toni Krasnic/DC/USEPA/US on 08/27/2008 01:09 PM -----

mesentoro@nmm.com

08/27/2008 12:13 PM



To: Toni Krasnic/DC/USEPA/US@EPA
cc:

Subject: LOI Submission of August 1, 2008

Toni, regarding our telephone conversation attached is a copy of the original LOI submission of August 1, 2008, along with the corrected 2 pages of Table 6. These are the last two pages of the report.

Thank you for your assistance in assuring that the corrected version is entered into the Docket.

Sincerely
Mike

Michael A. Santoro
Director, Environmental, Health,
Safety and Regulatory Affairs
3M Enterprise Services
Bldg. 236-1B-10
Tel: 651-733-6374
Fax: 651-733-1958

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To: Toni Krasnic/DC/USEPA/US@EPA
cc: Deena Vann/DC/USEPA/US@EPA
bcc:
Subject: Fw: LOI Submission of August 1, 2008

08 SEP - 01:16:17

Toni,

1. You need to download and print the attached pages
2. Verify that they do not contain CBI
3. Submit them to the CBI Center to get date stamped and a mail receipt number

NOTE: The CBIC staff will then send these to me to be coded and the pages will then be replaced

THANKS!

Pam Moseley
TSCA CBI Access Coordinator
OPPT/IMD/RDMB [7407M]
EPA East Room 6104
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001
202-564-8956
202-564-8955 [FAX #]

----- Forwarded by Pamela Moseley/DC/USEPA/US on 08/28/2008 10:43 AM -----

Deena Vann/DC/USEPA/US

08/28/2008 10:18 AM

To: Toni Krasnic/DC/USEPA/US@EPA

cc: Pamela Moseley/DC/USEPA/US@EPA

Subject: Re: Fw: LOI Submission of August 1, 2008

Hi Toni,

The document hasn't been transferred to NCIC yet, so it is still here in our office.

You should talk to Pam Moseley in RDMB about making changes to the document.

Deena W. Vann
TSCA CBIC Program Manager
(202) 564-8932

Contractor to EPA
ASRC Aerospace Corporation

Toni Krasnic/DC/USEPA/US

Toni Krasnic/DC/USEPA/US

CONTAINS NO CBI

3M General Offices

3M Center
St. Paul, MN 55144-1000
651 733 1110

August 1, 2008

VIA UPS



Document Control Office (DCO)
Office of Pollution Prevention and Toxics (OPPT)
US Environmental Protection Agency
EPA East Room 6428
1201 Constitution Avenue, NW
Washington DC 20460

Attention: Docket No. AR-226 and the PFOA Electronic Docket OPPT-2003-0012

Subject: Submission of Monitoring Data Pursuant to the 3M LOI dated
March 13, 2003 and PFOA Users LOI dated March 14, 2003

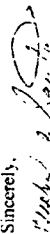
Dear Sir or Madam:

This report is submitted pursuant to the 3M Letter of Intent (LOI) dated March 13, 2003 and the PFOA Users LOI dated March 14, 2003. On August 1, 2007, 3M/Dyneon submitted the final report of the results of groundwater and wastewater monitoring at the 3M manufacturing sites at Cottage Grove, MN and Decatur, AL. However, as stated in that submittal and as indicated in the supplemental letter of May 07, 2003, 3M was to have conducted an additional round of sampling for fish, clams, and Tennessee River water and sediment in the vicinity of the Decatur, Alabama manufacturing facility. This sampling occurred in December of 2006.

In this submittal we are providing the results of the analyses of perfluorooctanoic acid (PFOA) for these samples. The water and sediment data is shown in Table 5 attached, which includes the data from sampling conducted previously. The fish and clam data from sampling in December, 2004 (submitted previously) and from the more recent sampling in December 2006 is shown in Table 6.

In summary, this submittal fulfills all commitments of 3M and Dyneon under the March 13, 2003 3M LOI and the March 14, 2003 APFO Users LOI. If there are any questions, please contact the writer at the address provided below.

Sincerely,



Michael A. Santoro
Director, Environmental, Health,
Safety and Regulatory Affairs
3M - Bldg. 236-1B-10
St. Paul, MN 55144
651 733-6374 (phone)
651 733-1958 (fax)
E-mail: msantoro@3m.com

cc: Toni Krasnic - Room 4410 (w/ attachments)

Table 5. 3M Decatur - Surface Water & Sediment Monitoring Results

Sample Location	Date Sampled	Media	PFOA (ppb)	PFOA Lab Duplicate (ppb)	PFOA Field Duplicate (ppb)	PFOA Avg (ppb)
LOC-3, River Mile 307.5	2002	Surface water	ND	ND	ND	ND
		Surface water	ND	ND	ND	ND
		Sediment, Loc 1	ND	ND	NC	ND
	12/01/04	Sediment, Loc 2	ND	ND	NC	ND
		Sediment, Loc 3	ND	ND	NC	ND
		Surface water	ND	ND	ND	ND
LOC-2, River Mile 301	12/1/2008	Sediment, Loc 1	ND	ND	NC	ND
		Sediment, Loc 2	ND	ND	NC	ND
		Sediment, Loc 3	ND	ND	NC	ND
	2002	Surface water	ND	ND	NC	ND
		Surface water	ND	ND	NC	ND
		Sediment, Loc 1	ND	ND	NC	ND
LOC-1, River Mile 246	12/01/04	Sediment, Loc 2	ND	ND	NC	ND
		Sediment, Loc 3	1.11	ND	NC	<0.86
		Surface water	ND	ND	NC	ND
		Sediment, Loc 1	ND	ND	NC	ND
		Surface water	ND	ND	NC	ND
		Sediment, Loc 2	ND	ND	NC	ND
	2002	Surface water	ND	ND	NC	ND
		Surface water	0.18	0.18	0.20	0.19
		Sediment, Loc 1	ND	ND	NC	ND
		Sediment, Loc 2	1.54	0.835	NC	1.24
		Sediment, Loc 3	1.93	1.80	NC	1.87
		Surface water	0.0831	0.0897	NC	0.0764
12/01/08		Sediment, Loc 1	0.586	0.485	NC	0.539
		Sediment, Loc 2	1.1	0.483	NC	0.782
		Sediment, Loc 3	ND	ND	NC	ND
		Surface water	ND	ND	NC	ND

Table Notes:

ppb, parts per billion (µg/L for water, ng/g (wet wt) for sediment)
ND, not collected
NC, not collected at or above 0.025 µg/L for water, 0.2 ng/g for sediment
ND, not determined, result is between 0.2 and 0.4 ng/g (wet wt)

CONTAINS NO CB

Table 6 Continued - Fish Fillet and Whole Body PFOA Concentrations
December 1, 2006

Sample ID	Species	Sample Type	PFOA (ppb)	PFOA Lab Replicate (ppb)
DL3-F02-IPW001-0-061211	Channel catfish	Fillet	ND	ND
DL3-F02-IPW002-0-061212			ND	ND
DL3-F02-IPW003-0-061212			ND	ND
DL3-F02-IPW004-0-061212			ND	ND
DL3-F02-IPW005-0-061212			ND	ND
DL3-F02-IPW001-0-061212	Channel catfish	Whole body	0.362	0.350
DL3-F02-IPW002-0-061212			0.371	0.301
DL3-F02-IPW003-0-061212			0.385	0.334
DL3-F02-IPW004-0-061212			0.252	0.275
DL3-F02-IPW005-0-061212			0.557	0.482
DL3-F02-IPW001-0-061207	Largemouth bass	Fillet	ND	ND
DL3-F02-IPW002-0-061207			ND	ND
DL3-F02-IPW003-0-061207			ND	ND
DL3-F02-IPW004-0-061207			ND	ND
DL3-F02-IPW005-0-061207			ND	ND
DL3-F02-IPW001-0-061207	Largemouth bass	Whole body	0.291	0.387
DL3-F02-IPW002-0-061207			0.333	0.485
DL3-F02-IPW003-0-061207			0.342	0.463
DL3-F02-IPW004-0-061207			0.351	0.310
DL3-F02-IPW005-0-061207			0.497	0.482
DL3-F02-IPW001-0-061219	Atlantic Clam	Whole body	0.22	0.218
DL3-F02-IPW002-0-061219			ND	ND
DL3-F02-IPW003-0-061209			ND	ND
DL3-F02-IPW004-0-061209			ND	ND
DL3-F02-IPW005-0-061209			ND	ND
DL3-F02-IPW001-0-061209	Channel catfish	Whole body	ND	ND
DL3-F02-IPW002-0-061209			ND	ND
DL3-F02-IPW003-0-061209			ND	ND
DL3-F02-IPW004-0-061209			ND	ND
DL3-F02-IPW005-0-061209			ND	ND
DL3-F02-IPW001-0-061211	Largemouth bass	Fillet	-	-
DL3-F02-IPW002-0-061211			-	-
DL3-F02-IPW003-0-061211			-	-
DL3-F02-IPW004-0-061211			-	-
DL3-F02-IPW005-0-061211			-	-
DL3-F02-IPW001-0-061219	Atlantic Clam	Whole body	0.522	0.231
DL3-F02-IPW002-0-061219			0.591	0.509
DL3-F02-IPW003-0-061219			-	-
DL3-F02-IPW004-0-061219			-	-
DL3-F02-IPW005-0-061219			-	-

Table 6: 38 Decatur - Fish and Clam Monitoring Results
 ND: not detected at or above 0.2 ng/g
 ND: not quantifiable, measured concentration is between 0.2 and 0.5 ng/g

Sample Location	Species	Sample Type	Sample ID	Date Sampled	PFOA (ppb)	PFOA Lab Replicate (ppb)
LOC-3, River Mile 307.5	Channel Catfish	Fillet	DL3-F01-IPW001-0-061207	10/21/04	ND	ND
			DL3-F01-IPW002-0-061207	10/21/04	0.586	ND
			DL3-F01-IPW003-0-061207	10/21/04	ND	ND
			DL3-F01-IPW004-0-061207	10/21/04	ND	ND
			DL3-F01-IPW005-0-061207	10/21/04	ND	ND
	Whole Body	Whole Body	DL3-F01-IPW001-0-061207	10/21/04	ND	ND
			DL3-F01-IPW002-0-061207	10/21/04	ND	ND
			DL3-F01-IPW003-0-061207	10/21/04	ND	ND
			DL3-F01-IPW004-0-061207	10/21/04	ND	ND
			DL3-F01-IPW005-0-061207	10/21/04	ND	ND
LOC-2, River Mile 301	Channel Catfish	Fillet	DL2-F01-IPW001-0-061207	10/21/04	ND	ND
			DL2-F01-IPW002-0-061207	10/21/04	ND	ND
			DL2-F01-IPW003-0-061207	10/21/04	ND	ND
			DL2-F01-IPW004-0-061207	10/21/04	ND	ND
			DL2-F01-IPW005-0-061207	10/21/04	ND	ND
	Whole Body	Whole Body	DL2-F01-IPW001-0-061207	10/21/04	ND	ND
			DL2-F01-IPW002-0-061207	10/21/04	ND	ND
			DL2-F01-IPW003-0-061207	10/21/04	ND	ND
			DL2-F01-IPW004-0-061207	10/21/04	ND	ND
			DL2-F01-IPW005-0-061207	10/21/04	ND	ND
LOC-1, River Mile 296	Channel Catfish	Fillet	DL1-F01-IPW001-0-061207	10/21/04	ND	ND
			DL1-F01-IPW002-0-061207	10/21/04	ND	ND
			DL1-F01-IPW003-0-061207	10/21/04	ND	ND
			DL1-F01-IPW004-0-061207	10/21/04	ND	ND
			DL1-F01-IPW005-0-061207	10/21/04	ND	ND
	Whole Body	Whole Body	DL1-F01-IPW001-0-061207	10/21/04	ND	ND
			DL1-F01-IPW002-0-061207	10/21/04	ND	ND
			DL1-F01-IPW003-0-061207	10/21/04	ND	ND
			DL1-F01-IPW004-0-061207	10/21/04	ND	ND
			DL1-F01-IPW005-0-061207	10/21/04	ND	ND

Table 6: 38 Decatur - Fish and Clam Monitoring Results
 ND: not detected at or above 0.2 ng/g
 ND: not quantifiable, measured concentration is between 0.2 and 0.5 ng/g

Table 6:

RELACE

LOC-1, River Mile 296	DL1-F02-IPF001-0-061212	Channel catfish	Fillet	ND	ND
	DL1-F02-IPF002-0-061212			ND	ND
	DL1-F02-IPF003-0-061212			ND	ND
	DL1-F02-IPF004-0-061212			ND	ND
	DL1-F02-IPW001-0-061212		Whole body	0.282	0.350
	DL1-F02-IPW002-0-061212			0.371	0.301
	DL1-F02-IPW003-0-061212			0.285	0.275
	DL1-F02-IPW004-0-061212			0.252	0.275
	DL1-F02-IPW005-0-061212			0.457	0.492
	DL1-F02-MST001-0-061209	Largemouth bass	Fillet	ND	ND
	DL1-F02-MST002-0-061209			ND	ND
	DL1-F02-MST003-0-061209			ND	ND
	DL1-F02-MST004-0-061209			0.261	ND
	DL1-F02-MST005-0-061209			ND	ND
	DL1-F02-MSW001-0-061209		Whole body	0.291	0.387
	DL1-F02-MSW002-0-061209			0.333	0.485
	DL1-F02-MSW003-0-061209			0.142	0.468
	DL1-F02-MSW004-0-061209			0.151	0.310
	DL1-F02-MSW005-0-061209			0.497	0.482
	D_L-102-CFW001-0-061219	Aquatic Clam	Whole body	ND	0.221

Fish tissue concentrations reported on a wet weight basis.

ND - Not detected at or above 0.2 ng/g.

NP - Not reported due to quality control failures.

Table 6 Continued - Fish Fillet and Whole Body PFOA Concentrations
December 1, 2006

	Sample ID	Species	Sample Type	PFOA (ppb)	PFOA Lab Replicate (ppb)
LOC-3, River Mile 307.5	DL3-F02-IPF001-0-061211	Channel catfish	Fillet	ND	ND
	DL3-F02-IPF002-0-061212			ND	ND
	DL3-F02-IPF003-0-061212			ND	ND
	DL3-F02-IPF004-0-061212			ND	ND
	DL3-F02-IPF005-0-061212			ND	ND
	DL3-F02-IPW001-0-061212		Whole body	ND	ND
	DL3-F02-IPW002-0-061212			ND	ND
	DL3-F02-IPW003-0-061212			ND	ND
	DL3-F02-IPW004-0-061212			ND	ND
	DL3-F02-IPW005-0-061212			ND	ND
	DL3-F02-MSF001-0-061207	Largemouth bass	Fillet	0.434	0.503
	DL3-F02-MSF002-0-061207			ND	ND
	DL3-F02-MSF003-0-061207			0.359	0.381
	DL3-F02-MSF004-0-061207			0.319	0.270
	DL3-F02-MSF005-0-061207			ND	ND
	DL3-F02-MSW001-0-061207		Whole body	ND	ND
	DL3-F02-MSW002-0-061207			ND	0.386
	DL3-F02-MSW003-0-061207			ND	ND
	DL3-F02-MSW004-0-061207			ND	ND
	DL3-F02-MSW005-0-061207			ND	ND
	DL3-102-CFW001-0-061219	Asiatic Clam	Whole Body	0.22	0.218
LOC-2, River Mile 301	DL2-F02-IPF001-0-061209	Channel catfish	Fillet	ND	ND
	DL2-F02-IPF002-0-061209			ND	ND
	DL2-F02-IPF003-0-061209			ND	ND
	DL2-F02-IPF004-0-061209			ND	ND
	DL2-F02-IPF005-0-061209			ND	ND
	DL2-F02-IPW001-0-061209		Whole body	ND	ND
	DL2-F02-IPW002-0-061209			ND	ND
	DL2-F02-IPW003-0-061209			ND	ND
	DL2-F02-IPW004-0-061209			ND	ND
	DL2-F02-IPW005-0-061209			ND	ND
	Not Sampled	Largemouth bass	Fillet	-	-
	Not Sampled			-	-
	Not Sampled			-	-
	Not Sampled			-	-
	Not Sampled			-	-
	DL2-F02-MSW001-0-061211		Whole body	0.522	0.231
	DL2-F02-MSW002-0-061211			0.591	0.509
	Not Sampled			-	-
	Not Sampled			-	-
	Not Sampled			-	-
	DL2-102-CFW001-0-061219	Asiatic Clam	Whole body	0.424	0.295

CONTAINS NO CB

06 SEP - 2 PM 3:32

LOC-1, River Mile 296	DLI-F02-IPF001-0-061212	Channel catfish	Fillet	ND	ND
	DLI-F02-IPF002-0-061212			ND	ND
	DLI-F02-IPF003-0-061212			ND	ND
	DLI-F02-IPF004-0-061212		ND	ND	
	DLI-F02-IPF005-0-061212		ND	ND	
	DLI-F02-IPW001-0-061212	Whole body	0.262	0.350	
	DLI-F02-IPW002-0-061212		0.371	0.301	
	DLI-F02-IPW003-0-061212		0.285	0.334	
	DLI-F02-IPW004-0-061215		0.252	0.275	
	DLI-F02-IPW005-0-061215		0.557	0.492	
	DLI-F02-MSF001-0-061209	Largemouth bass	Fillet	ND	ND
	DLI-F02-MSF002-0-061209			ND	ND
	DLI-F02-MSF003-0-061209			ND	ND
	DLI-F02-MSF004-0-061209		0.201	ND	
	DLI-F02-MSF005-0-061209		ND	ND	
	DLI-F02-MSW001-0-061209	Whole body	0.291	0.387	
	DLI-F02-MSW002-0-061209		0.333	0.485	
	DLI-F02-MSW003-0-061209		0.342	0.468	
	DLI-F02-MSW004-0-061209		0.351	0.310	
	DLI-F02-MSW005-0-061209		0.497	0.482	
	DLI-102-CFW001-0-061219	Asiatic Clam	Whole body	ND	0.221

Fish tissue concentrations reported on a wet weight basis.

ND = Not detected at or above 0.2 ng/g.

NR = Not reported due to quality control failures.