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Re: TSCA 8(e) Substantial Risk Notice: Sulfonate-based and Carboxylic-based
Fluorochemicals, Docket Nos. 8EHQ-1180-374; 8EHQ-0381-0394;
8EHQ-0598-373 [check these numbers] - Results from Analysis of Groundwater,
Sediments, Surface Water, Fish and Clams in the Decatur, Alabama Area

To whom it may concern:

3M is submitting this notice to supplement its previous submissions on sulfonyl and carboxylic-based fluorochemicals. More specifically, the data contained in this submittal have been generated as part of a site-related environmental assessment for fluorochemicals that 3M is performing for its 3M Decatur, Alabama manufacturing facility. As part of this effort, 3M has recently received the enclosed final analytical reports for various sampling activities conducted in the vicinity of our Decatur manufacturing facility:

Property Adjacent to 3M Decatur Facility

3M Environmental Laboratory Report No. E06-0199 - Analysis of PFOA, PFOS, PFHS, and PFBS in Aqueous Samples: 3M Decatur Offsite Sampling Event (BPP Sample Sites)

Oxygen Study No. P0000760, Interim Report #23, E05-0209, Analysis of Sediment Samples

Oxygen Study No. P0001131, Interim Report #23, E05-0210, Analysis of Sediment Samples

Tennessee River Biota Sampling

Oxygen Study No. P0001131, Interim Report #10, E05-0210, Analysis of Fish and Clam Samples

The first three reports contain data for samples collected from property adjacent and immediately to the west of the 3M Decatur site. More specifically, three locations within an open water marsh area were sampled for surface water and sediments. The identification numbers for these locations are:



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Surface Water

DAL-SWS-BPP01-0-060413
DAL-SWS-BPP02-0-060413
DAL-SWS-BPP03-0-060413

Sediments

DAL-SD-BPP01-0-060421
DAL-SD-BPP02-0-060421
DAL-SD-BPP03-0-060421

In general, the BPP01 location represented the eastern end of the marsh, closest to inlet water being supplied by a nearby well. The BPP02 location was towards the northern edge of the marsh and the BPP03 location towards the south and eastern portion of the marsh, near the outlet to adjacent wetlands.

In addition to the samples referenced above, groundwater from a well located on the western adjacent property and used to supply the marsh with water was also sampled. This location is identified as DAL-GWS-BPWELL-0-060413 in the first report listed above.

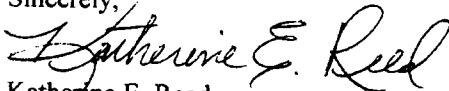
There are two additional items pertaining to Report No. E06-0199 that merit discussion. First, the report represents a subreport for a series of samples collected adjacent to, but off of, the 3M Decatur facility. Analytical results for additional off-site samples are pending but not final at this time. Second, there are several results that have been presented as estimated minimum values based on associated quality control samples that did not demonstrate adequate method performance. We are working to better quantify these results and may have revised values when the entire laboratory report is finalized.

The fourth report listed above contains analytical data for fish and clams collected in late 2004 from the Tennessee River near the Decatur, AL area. Again, these laboratory results were just recently finalized. The enclosed figure provides sample locations corresponding to the results tabulated in the analytical report.

While 3M does not believe that any of these data taken alone or cumulatively meet the "substantial risk" reporting threshold, we nevertheless recognize the ongoing work by U.S. EPA to assess fluorochemical exposure pathways. Therefore, we are placing these results in the 8(e) docket as a supplement to previous submissions.

If you have any questions, please do not hesitate to contact Gary Hohenstein at (651) 778-5150.

Sincerely,



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