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Certified Mail

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EPA East – Room 6428 Attn: Section 8(e)
Office of Pollution Prevention and Toxics
US EPA
1200 Pennsylvania Avenue NW
Washington DC 20460-0001



NO CBI

Re: TSCA 8(e) Docket No. 8EHQ-0598-373; Sulfonate-based and Carboxylate-based
Fluorochemicals

Dear Sir or Madam:

3M is supplementing its previous submissions to the above-referenced docket with the enclosed analytical reports (Exygen Study No. P0001131, E05-0210 Interim Report Nos. 2, 5, 13, 15, 17, 18, and 20). These reports present laboratory analysis results for off-site water samples collected during 2005 and 2006 from the Tennessee River and potable water sources in the vicinity of 3M's manufacturing facility in Decatur, Alabama. These samples were collected as part of a voluntary environmental monitoring initiative by 3M and analyzed for several sulfonate-based fluorochemicals, including for perfluorooctanesulfonate (PFOS).

3M does not believe that these reports contain substantial risk information. Moreover, analytical results for PFOS in many of the same or similar Tennessee River sampling locations have been previously provided by 3M to the Agency and/or presented in the published literature.

In particular, a 2002 publication by Hansen *et al.* (2002)¹ presented data for PFOS collected in the same vicinity. Hansen, *et al.* reported PFOS levels in the Tennessee River averaging 32 +/- 11 ng/L directly upstream and 114 +/- 19 ng/L directly downstream of the Decatur facility. As reflected in the enclosed reports, the data for the 2005 and 2006 samples indicate significantly lower PFOS levels than reported in Hansen, *et al.*, with many levels reported as non-detectable or below the limit of quantitation (LOQ) (typically 0.025 ng/ml).

3M appreciates the opportunity to provide the Agency with this information. If you have any questions, please contact Deanna Luebker at (651) 737-1374 or djluebker@mmm.com.

Sincerely,

Katherine E. Reed (DL)

Katherine E. Reed
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Enclosures (7)

¹ Hansen *et al.*, Quantitative characterization of trace levels of PFOS and PFOA in the Tennessee River., *Environ Sci Technol.*, 2002, 36(8):1681-5.

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