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August 6, 2008

Document Processing Center
EPA East – Room 6428 Attn: Section 8(e)
Office of Pollution Prevention and Toxics
U.S. EPA
1200 Pennsylvania Avenue NW
Washington, DC 20460-0001



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

To whom it may concern:

3M is submitting this notice to supplement its previous submissions on sulfonate and carboxylate-based fluorochemicals. More specifically, the data contained in this submittal have been generated as part of a site-related environmental assessment of 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 sampling activities conducted in the vicinity of our Decatur manufacturing facility:

MPI Research Study No. 0137.0219; Project No. P0003267: Interim Report 3 – Analysis of Fish and Clam Samples; Study title: Analysis of perfluorooctanoic acid (PFOA) in water, soil, sediment, fish, and clams using LC/MS/MS for the 3M Decatur monitoring program.

MPI Research Study No. 0137.0219; Project No. P0003268: Interim Report 3 – Analysis of Fish and Clam samples; Study title: Analysis of perfluorobutanesulfonate (PFBS), perfluorohexanesulfonate (PFHS), and perfluorooctanesulfonate (PFOS) in water, soil, sediment, fish, and clams using LC/MS/MS for the 3M Decatur monitoring program.

These reports contain recently finalized analytical data for fish and clams collected in late 2006 from the Tennessee River near the Decatur, AL area. The enclosed figures provide sample locations corresponding to the results tabulated in the analytical report. These data represent a re-sampling of fish and clams. Results of a 2004 sampling were provided to this TSCA 8(e) docket upon receipt of the final reports in May of 2006.

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.

Contains No CBI

CONTAINS NO

If you have any questions or would like any additional information, please contact Deanna Luebker at (651) 737-1374 or djluebker@mmm.com.

Sincerely,

Jean B. Sweeney (H&S)

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Staff Vice President, 3M Environmental, Health and Safety Operations

Enclosure