

3M Specialty Materials

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December 19, 2000

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For Your Information Docket [Docket AR-226]
Document Processing Center (7407)
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

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 dialog with EPA regarding fluorochemistry.

Contents of this Submission

Initial Assessment Report

We are providing a copy of 3M's draft Initial Assessment Report on Perfluorooctane Sulfonic Acid and Its Salts, dated October 2, 2000 with this submission. This draft document was provided to members of the OECD Existing Chemicals Task Force for their review prior to a technical meeting held at EPA on October 26-27, 2000. The document is still a draft, subject to modification as new data become available. However, we are providing a copy so that this comprehensive document and accompanying robust summaries will be available to the public in EPA's docket along with all of the raw data we have provided in our series of submissions.

The enclosed draft report follows the format outlined in the Screening Information Data Set (SIDS) Manual of the OECD, even though perfluorooctane sulfonic acid (PFOS) is not considered a high production volume chemical, and even though the data set on PFOS is substantially more robust than that covered in most initial assessment reports.



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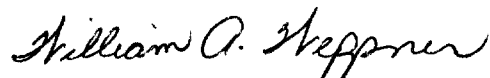
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This draft report summarizes the information available as of July 20, 2000 and presents and evaluates information on PFOS exposure and biological effects in an initial assessment of potential human health and ecological risk. 3M has previously provided a CD set containing the underlying studies relied upon in this draft report. For some studies, reports are still in preparation. The substantial body of data reviewed in this draft report suggests that human serum levels found in occupational and non-occupational populations are not associated with adverse health effects. Similarly, levels found in the environment and in wildlife are not associated with adverse effects.

As with other CDs submitted by 3M, the enclosed CD includes a copy of the original cover letter and the Initial Assessment Report. These electronic documents are for read-only purposes and are not to be modified. 3M will maintain paper copies, and in the event of any discrepancy, the 3M paper copies will be considered controlling.

We will continue to provide information on a regular basis as it becomes available. I will be retiring from 3M effective February 1, 2001. You may feel free to contact me until then, or after that, please contact my successor Michael Santoro (651-733-6374) with any questions.

Very truly yours,



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