

From: US216511--USSP01
To: US230229--USSP01 WEPPNER, WILLIAM

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✓ From: Lael J. Pickett - 3M - SCD Product Responsibility
Phone: 612-778-4538 Fax: 612-778-5397
3M, Benz Bldg. 53-3S-02, St Paul, MN 55144-1000 USA
Subject: FC-143 Issues

Bill, per your request, the following is a summary of the (non testing issues) on FC-143 that I am working on.

1. Hoerst's has been complaining since last summer that our MSDS for FC-143 is incorrect as it only lists the straight chained fluorochemical. Since this product is 70 - 80 % straight chained and the rest is branched, they would like both disclosed on the MSDS.

As you know we consider the branched material an impurity and therefore do not feel that it is necessary to list it on the MSDS. The branched versus straight chain issue goes beyond this one product.

We are in the process of trying to market FC-1015X which is the same fluorochemical, except it is made from telomers, is 100% straight chained. FC-1015X (would be purchased from Hoerst) and sold to ICI for PTFE. The higher "purity" (100% straight chain) is needed for PTFE processing. Note: 1015 is 30% solids.

2. The other issue than we have been working on is the issue of EU labeling for FC-143. Hoerscht believes the product should be labels (R40) "Possible risk of irreversible effects". This is because they got a positive response in a mutagen (?-some kind of similar test). We got a negative on the test and therefore will not put a R40 label on it.

Since we were in the process of testing FC-1015X, Roger suggested we hold off responding to Hoerscht on the labeling issue until we got out test results. We now have the results and they were negative for Solmonella-escherichia coli, mutagenicity and chromosomal aberration.

This data indicates that an R40 label is still not required.

3. There is also another product called FC-118 which is a 20% version of FC-143 in water. (Not an issue, but just so you know).

Hope this helps. Give me a call if you have any questions.

Lael Pickett
SCD

**Exhibit
2553**

State of Minnesota v. 3M Co.,
Court File No. 27-CV-10-28862