Corporate Toxicology and
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October 4, 2004

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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

CONTAINS NO CBI

RE: TSCA 8 (e) SUPPLEMENTAL SUBMISSION:
Docket No. 8EHQ-1180-373, 374

8EHQ-80-373

Dear Docket Coordinators:

On December 4, 2002, 3M provided EPA with preliminary results from repeated dermal contact absorption/toxicology study in rats conducted with four mill-applied and aftermarket carpet/fabric/upholstery protector products that 3M ceased manufacturing as part of its perfluorooctanyl chemistries phase out. The preliminary results indicated that three compounds, believed to be derived from manufacturing residuals of the protector products, were observed in some of the liver and serum samples analyzed post exposure to those products. The three compounds are: **1) PFOS** - perfluorooctanesulfonate ; **2) PFHS** - perfluorohexanesulfonate; and **3) M-570** - N-methyl-perfluorooctanesulfonamide. The final report for this study contains results that are consistent with the previously reported information.

Enclosed please find the following final report and appendices on CD:

- 28-Day Repeated Dermal Contact in Rats (8 test materials); Dated 08-16-04
  T-7088 liquid / T-7338 liquid dried on gauze – FX 1860
  T-7092 liquid / T-7339 liquid dried on gauze – FX 3539
  T-7340 liquid / T-7341 liquid dried on gauze – FC 1395
  T-7342 liquid / T-7343 liquid dried on gauze – FC-288
  Note: Reference page 9 of the final report for detail regarding test materials
- Appendix A-D - Sample Re-analysis, Clinical Observation, Body Weight, Liver Weight
- Appendix E - Histopathological findings
- Appendix F - PFOS in liver samples
- Appendix G - Amendments and Deviations
- Appendix H - Exygen Data (Analytical)

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Please contact John Butenhoff (651-733-1962) if you have any questions or if we can provide additional information.

Sincerely,

Larry R. Johnson

Larry R. Johnson
Director, Corporate Toxicology and Regulatory Services
Enclosure

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