

Katherine E. Reed, Ph.D.
Staff Vice President

3M Environmental, Health and
Safety Operations

p. 1
900 Bush Avenue, Building 42-2E-26
PO Box 33331
St. Paul, MN 55133-3331
651 778 4331

8EHQ-100700373
8EHQ-80-373

3M

52pp.

Certified Mail

September 27, 2007

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

CONTAIN NO CBI

226-3796

NO CBI



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

To whom it may concern:

3M is submitting this notice to supplement its previous submissions on sulfonate-based and carboxylic-based fluorochemicals. Enclosed is a final report detailing the results of a cohort mortality study of workers at the former 3M ammonium perfluorooctanoate (APFO) production facility in Cottage Grove, MN. While 3M does not believe that these data are reportable under the TSCA 8(e) reporting criteria, a decision was made to provide this report to the EPA, recognizing the ongoing work to assess fluorochemical exposure pathways and potential risks.

The purpose of cohort mortality study was to examine possible associations between working in jobs with varying exposure to APFO and specific causes of death. Conclusions of the authors were as follows:

“APFO exposed workers did not have an elevated risk of death when compared to the population of the state of Minnesota, however, within the cohort risk of death from prostate cancer and cerebrovascular disease was elevated for workers with higher estimated exposure. Interpreting the somewhat contradictory results requires caution and consideration of several assumptions. *A priori* causes of death selected based on animal toxicology studies, liver, pancreatic and testicular cancer and cirrhosis of the liver, were not observed to be associated with APFO exposure.”

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

Sincerely,

Katherine E. Reed (NL)

Katherine E. Reed
Staff Vice President, Environmental, Health and Safety Operations

Enclosure

307271