



Certified Mail

March 13, 2008

Document Processing Center
EPA East – Room 6428 Attn: Section 8(e)
Office of Pollution Prevention and Toxic
US 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 sulfonyl-based and carboxylate-based fluorochemicals. More specifically, the data contained in this submission 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 various sampling activities in the vicinity of that site. These reports included data on perfluorooctanoate (PFOA), perfluorobutane sulfonate (PFBS), perfluorohexane sulfonate (PFHS), and perfluorooctane sulfonate (PFOS) and are summarized as follows:

3M Environmental Laboratory Report No. GLP07-01-02 – Analysis of PFOA from 3M Decatur Offsite 600 Series Monitoring wells

3M Environmental Laboratory Report No. GLP07-02-02 – Analysis of PFBS, PFHS and PFOS from 3M Decatur Offsite 600 Series Monitoring wells

3M Environmental Laboratory Report No. GLP07-01-01 – Analysis of PFOA from 3M Decatur Offsite Sediments

3M Environmental Laboratory Report No. GLP07-02-01 – Analysis of PFBS, PFHS and PFOS from 3M Decatur Offsite Sediments

The first two of these reports presents off-site data from sampling of groundwater monitoring wells to the west, south, and east of the 3M Decatur property, and represents a re-sampling of these monitoring wells. The initial data had been provided to this TSCA 8(e) docket previously (October 24, 2006). In this submission we are providing the data from a re-sampling and highlighting data for one specific groundwater well, namely 605L, which now shows the presence of the 4 analytes. (The original sample data were non-detect for these analytes.) A summary of this data is as follows:

<u>Sample Location</u>	<u>Analyte</u>	<u>April 12, 2006</u>	<u>Sept. 8, 2007</u>
605L	PFOA	ND	31.6 ppb
605L	PFBS	ND	18.1 ppb
605L	PFHS	ND	27.7 ppb
605L	PFOS	ND	28.6 ppb

All data from the sampling of the remaining monitoring wells were comparable to the original dataset.

The third and fourth reports provide analytical data for samples of sediment collected from an off-site marsh area to the west of the 3M Decatur site. In the immediate vicinity of this marsh area, the results ranged from 8.47 to 147 ppb for PFOA, from non-detect to 5.39 ppb for PFBS, from 0.35 – 26.2 ppb for PFHS, and from 75.3 – 1480 ppb for PFOS. This marsh area is located on private property, which is not open to the public. In addition, no activities presently occur on the property which would result in human contact with the marsh area. At a distance of about 2200 feet to the southwest, the results for all substances were below detectable limits.

While 3M does not believe that any of these data taken alone or cumulatively meet the “substantial risk” reporting threshold as defined by the EPA, we nevertheless recognize the ongoing work of the 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.

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)

Jean B. Sweeney

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

Enclosure