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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 following two enclosed final analytical reports for sampling activities:

- (1) MPI Project Number: P0001131, Interim Report #6 – Analysis of Liver and Serum Samples: Analysis of perfluorobutane sulfonate (PFBS), perfluorohexane sulfonate (PFHS), and perfluorooctane sulfonate (PFOS) in water, soil, sediment, fish, clams, vegetation, small mammal liver and small mammal serum using LC/MS/MS for the 3M Decatur monitoring program; and
- (2) Exygen Study No. P0001131, Interim Report #12 – Analysis of Vegetation Samples: Analysis of perfluorobutane sulfonate (PFBS), perfluorohexane sulfonate (PFHS), and perfluorooctane sulfonate (PFOS) in water, soil, sediment, fish, clams, vegetation, small mammal liver and small mammal serum using LC/MS/MS for the 3M Decatur monitoring program.

The first of these reports presents analytical data on liver and serum concentrations of PFBS, PFHS, and PFOS in hispid cotton rats, collected on the 3M site. These data indicated liver and serum PFOS concentrations ranging from 303 – 259,500 ppb (0.303 – 259.5 ppm) in serum, and from 828 – 453,500 ppb (0.828 – 453.5 ppm) in liver. These values are higher than the predicted no effect concentrations (PNECs) of 4.71 ppm for serum and 10.7 ppm for liver established for PFOS in mammals based on a 2-generation study in rats¹. The presence of PFOS at these levels does not, based on casual observation, appear to be impairing reproductive capability or survival

¹ 3M, 2003. Environmental and Health Assessment of Perfluorooctane Sulfonic Acid and its Salts. Available on US EPA Administrative Record AR-226.

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of the species. PFBS and PFHS also were detected in some samples at levels ranging from 0.57 – 8.99 ppb for PFBS, and non-detect to 1,610 ppb for PFHS. The levels of PFBS, PFHS, and PFOS found in these rats are likely a result of dietary consumption of the analytes. The second of the two reports included in this submission provides data on levels of these compounds in various vegetation species collected from the same on-site locations as were the hispid cotton rats. Detectable levels of all three analytes were found in the various vegetation species.

Other than the PFOS cotton rat data described above, 3M does not believe that the information in these reports satisfies the reporting criteria set forth in EPA's guidance. We nevertheless recognize the on-going work of the U.S. EPA to assess fluorochemical exposure pathways; therefore, we are placing the full reports 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,

A handwritten signature in cursive script that reads "Jean B. Sweeney" followed by a stylized monogram or set of initials in parentheses.

Jean B. Sweeney
Staff Vice President, 3M Environmental, Health and Safety Operations

Enclosure