

21 pp

8EHQ-0706-00373

AR 226-3669

MR# 296849

3M

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June 29, 2006

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



Re: TSCA 8(e) Substantial Risk Notice: Sulfonate-based and Carboxylic-based
Fluorochemicals, Docket Nos. 8EHQ-1180-374; 8EHQ-0381-0394;
8EHQ-0598-373 - Pilot Study to Assess Serum Fluorochemical Concentrations in
American Red Cross Blood Donors, 2005.

Dear Sirs:

3M is submitting this notice to supplement its previous submissions on sulfonyl and carboxylic
based fluorochemicals. 3M has recently received the enclosed final report for serum
fluorochemical concentrations in a small sample population of American Red Cross blood donors
in 2005.

The purpose of this pilot study was to determine whether general population PFOS and PFOA
concentrations, as measured in 2005 in a small sample of American Red Cross blood donors, may
represent a decline from prior general populations measurements made in 2000. The study found
that there was an approximate 50 percent decline in serum concentrations of PFOS and PFOA
consistently observed across sex and two age categories for both PFOS and PFOA.

3M does not believe that these data indicate a "substantial risk of injury to health or the
environment." Nevertheless, 3M has decided to report these data, recognizing the ongoing work
by U.S. EPA to assess fluorochemical exposure pathways and potential risks.

If you have any questions, please do not hesitate to contact Dayna Blomquist at 651-736-5413.

Sincerely,

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

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