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June 20, 2006

Document Processing Center
EPA East - Room 6428 Attn: Section 8(e)
Office of Pollution Prevention and Toxics
U.S. 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 -- Results from Analysis of Fish from the
Mississippi River

Dear Sir or Madam:

As a supplement to its previous submissions on sulfonyl and carboxylic-based fluorochemicals (FCs), 3M is providing analytical summary sheets recently received from the Minnesota Pollution Control Agency (MPCA). These summary sheets contain FC analyses on fish samples collected by MPCA from the Mississippi River. 3M did not participate in the design, sampling or analysis by MPCA, and hence, we do not have data and information beyond the summary sheets on matters such as sampling rationale(s), field sampling procedures, specific sample locations, analytical techniques, data quality objectives, Quality Assurance/Quality Control outcomes, etc.

By way of background, 3M has been conducting FC environmental monitoring in the vicinity of its FC production facility in Cottage Grove, MN and several related disposal sites. This environmental monitoring has included sampling of fish species from the Mississippi River, and 3M has provided these sampling data in prior submissions to the 8(e) docket. MPCA has engaged in its own FC sampling effort in this same vicinity as well as at various other locations throughout the state. 3M has been coordinating its FC environmental monitoring with MPCA. Through this coordination, 3M received the enclosed summary sheets on May 22, 2006 for MPCA's sampling of various fish species at two general locations along the Mississippi River: (1) Pool 2, which is located between the Ford Lock and Dam and Hastings Lock and Dam and (2) Lake Pepin, which is a large natural impoundment of the River with headwaters located about thirty miles downstream from the Hastings Lock and Dam.

As noted above, 3M was not involved in MPCA's sampling (and hence cannot comment on the validity or representativeness of the data) and does not believe that any of these data taken alone or cumulatively meet the "substantial risk" reporting threshold. We nevertheless recognize the ongoing work by 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, please do not hesitate to contact Gary Hohenstein at (651) 778-5150.

Sincerely,

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

CONTAINS NO CBI

Contains No CBI

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Mississippi River Pool 2 Fish PFC analysis QA'd results, May 22, 2006										
MPCA Species & Sample ID #	Location	Date	Analyzed as Fillet or Whole Fish	Save for PBDE run (Y/N)	Axys ID	Wt (g)	Ln (cm)	Age/sex (yrs/m-f)	PFOA ng/g (ppb)	PFOS ng/g (ppb)
<i>Walleye</i>										
WE-1	Miss R Pool 2	10/3/05	Fillet	Y	L8616-25	3275	70	7/m	<0.581	13.1
WE-2	Miss R Pool 2	10/3/05	Fillet	Y	L8616-26	1079	54	3/f	<0.614	75.5
WE-3	Miss R Pool 2	10/3/05	Fillet	Y	L8616-27	1230	49	2/f	<0.591	180
WE-4	Miss R Pool 2	10/3/05	Fillet	Y	L8616-28	3125	70	7/f	<0.538	45.5
<i>Carp</i>										
Carp-1	Miss R Pool 2	10/3/05	Fillet	Y	L8616-6	1771	53	4/m	1.24	347
Carp-2	Miss R Pool 2	10/3/05	Fillet	Y	L8616-7	2532	55	5/f	<0.602	73.5
Carp-3	Miss R Pool 2	10/3/05	Fillet	Y	L8616-8	2416	57	5/m	<0.590	175
Carp-4	Miss R Pool 2	10/3/05	Fillet	Y	L8616-9	4675	61	6/f	<0.608	420
Carp-5	Miss R Pool 2	10/3/05	Fillet	Y	L8616-10	5175	62	6/f	<0.605	66.4
<i>SM Bass</i>										
SMB-1	Miss R Pool 2	10/3/05	Fillet	Y	L8616-29	285	26	5/m	<0.619	269
SMB-2	Miss R Pool 2	10/3/05	Fillet	N	L8616-30	252	26	4/m	<0.596	336
SMB-3	Miss R Pool 2	10/3/05	Fillet	N	L8616-31	165	22	4/f	<0.607	167
SMB-4	Miss R Pool 2	10/3/05	Fillet	Y	L8616-32	303	28	5/m	<0.615	158
SMB-5	Miss R Pool 2	10/3/05	Fillet	Y	L8616-33	135	22	4/f	<0.591	122
SMB-6	Miss R Pool 2	10/3/05	Fillet	N	L8616-34	215	26	4/f	<0.578	156
<i>White Bass</i>										
WB-1	Miss R Pool 2	10/3/05	Fillet	Y	L8616-20	416	31	2/f	<0.609	510
WB-2	Miss R Pool 2	10/3/05	Fillet	Y	L8616-21	780	37	4/f	<0.600	102
WB-3	Miss R Pool 2	10/3/05	Fillet	Y	L8616-22	441	32	2/f	<0.605	240
WB-4	Miss R Pool 2	10/3/05	Fillet	Y	L8616-23	219	24	1/f	1.17	1860
WB-5	Miss R Pool 2	10/3/05	Fillet	Y	L8616-24	665	38	4/f	<0.602	83.6
<i>Other</i>										
SMBuffalo	Miss R Pool 2	10/3/05	fillet	Y	L8616-11	2633	49	?/f	<0.605	374
Emerald Shiner	Miss R Pool 2	10/3/05	Composite of 16 whole fish	Y	L8616-12	28	3 to 5 cm	na	<0.603	93.5
Gizzard Shad	Miss R Pool 2	10/3/05	Composites of 29 whole fish from L8616-13	Y	L8616-47 A L8616-48 B L8616-49 C	149 166 157	8 to 15 cm	na	A<0.618 B<0.605 C<0.598	52.7 71.5 120

< = less than the detection limit; number following this symbol represents the detection limit (see PFOA column)

The Minnesota Department of Health has reviewed these data on PFCs in fish fillets from Lake Pepin and Pool 2 of the Mississippi River. Based on the review of these data no additions or changes to the current Fish Consumption Advisory are needed at this time. MDH recommends following the current fish advisory available on web at: <http://www.health.state.mn.us/divs/eh/fish/index.html>

For further information please contact Pat McCann 651-201-4915 or Doug Schultz 651-201-4993.

Mississippi River Lake Pepin Fish PFC analysis QA'd results, May 22, 2006										
MPCA Species & Sample ID #	Location	Date	Analyzed as Fillet or Whole Fish	Save for PBDE run (Y/N)	Axys ID	Wt (g)	Ln (cm)	Age/sex (yrs/m-f)	PFOA ng/g (ppb)	PFOS ng/g (ppb)
<i>Walleye</i>										
WE-1	Lake Pepin	10/4/05	Fillet	Y	L8616-14	741	42	1/f?	<0.603	47
WE-2	Lake Pepin	10/4/05	Fillet	Y	L8616-15	861	47	2/f	<0.574	63.1
WE-3	Lake Pepin	10/5/05	Fillet	Y	L8616-16	2483	55	3/f	<0.605	49.4
WE-4	Lake Pepin	10/5/05	Fillet	N	L8616-17	1079	47	2/f	<0.579	83.4
WE-5	Lake Pepin	10/5/05	Fillet	N	L8616-18	2252	60	5/f	<0.907	39.3
WE-6	Lake Pepin	10/5/05	Fillet	N	L8616-19	1180	47	3/m	<0.581	47.4
<i>Carp</i>										
Carp-1	Lake Pepin	9/27/05	Whole Fish	Y	L8616-1	3011	52	4/f	<0.587	65.5
Carp-2	Lake Pepin	9/27/05	Whole Fish	Y	L8616-2	2626	53	4/m	<0.585	90.7
Carp-3	Lake Pepin	9/27/05	Whole Fish	Y	L8616-3	3019	54	4/m	<0.594	99.6
Carp-4	Lake Pepin	9/27/05	Fillet	N	L8616-4	4975	59	6/f	<0.603	46.3
Carp-5	Lake Pepin	9/27/05	Fillet	N	L8616-5	2730	56	6/m	<0.598	59.9
Carp-5 (dup)	Lake Pepin	9/27/05	Fillet(duplicate)	N	L8616-5	2730	56	6/m	<0.607	51.1
<i>SM Bass</i>										
SMB-1	Lake Pepin	9/27/05	Fillet	Y	L8616-35	792	35	3/m	<0.583	103
SMB-1(dup)	Lake Pepin	9/27/05	Fillet (duplicate)	Y	L8616-35	792	35	3/m	<0.647	116
SMB-2	Lake Pepin	9/27/05	Fillet	Y	L8616-36	553	35	4/f	<0.592	66.2
SMB-3	Lake Pepin	9/27/05	Fillet	N	L8616-37	729	36	4/f	<0.673	95.6
SMB-4	Lake Pepin	9/27/05	Whole Fish	Y	L8616-38	303	27	3/m	<0.584	175
SMB-5	Lake Pepin	9/27/05	Whole Fish	N	L8616-39	1205	39	5/f	<0.611	172
<i>White Bass</i>										
WB-1	Lake Pepin	10/4/05	Fillet	N	L8616-42	640	33	4/m	<0.603	114
WB-2	Lake Pepin	10/4/05	Fillet	N	L8616-43	812	36	4/f	<0.605	100
WB-3	Lake Pepin	10/4/05	Whole Fish	N	L8616-44	692	33	3/m	<0.604	223
WB-4	Lake Pepin	10/5/05	Whole Fish	N	L8616-45	446	28	1/f	<0.599	194
WB-4(dupl)	Lake Pepin	10/5/05	Whole fish(dup)	N	L8616-45	446	28	1/f	<0.585	165
WB-5	Lake Pepin	10/5/05	Whole Fish	N	L8616-46	664	33	4/m	<0.576	248
<i>Other</i>										
Gizzard Shad	Lake Pepin	9/23/05	Composites of 38 whole fish	N	L8616-40	1436	~15	na	A<0.672 B<0.581 C<0.588	37.9 33.4 47.1
Emerald Shiner	Lake Pepin	9/27/05	Composites of 40 whole fish	N	L8616-41	117	~8	na	A<0.579 B<0.607 C<0.602	105 107 90.9

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The Minnesota Department of Health has reviewed these data on PFCs in fish fillets from Lake Pepin and Pool 2 of the Mississippi River. Based on the review of these data no additions or changes to the current Fish Consumption Advisory are needed at this time. MDH recommends following the current fish advisory available on web at: <http://www.health.state.mn.us/divs/eh/fish/index.html>

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