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February 9, 2005

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Document Processing Center (Mail Code 7407M)
Room 6428
Attention: TSCA 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1201 Constitution Avenue, N. W.
Washington, D. C. 20460

CONTAINS NO CBI

Re: **TSCA Section 8(e) Supplemental Notice: Sulfonate-based and
Carboxylic-based Fluorochemicals, Docket Nos. 8EHQ-1180-374;
8EHQ-0381-0394; 8EHQ-0598-373**

Dear Sir:

3M is submitting this notice to supplement its previous submissions on sulfonyl and carboxylic-based fluorochemicals.

3M has recently received the enclosed analytical reports with data for water samples taken from municipal wells for three Minnesota cities -- Cottage Grove, Hastings and Oakdale. The sampling of these wells occurred in cooperation with city officials and the Minnesota Department of Health (MDH).

Each sample was analyzed for perfluorooctane sulfonate (PFOS) ($C_8F_{17}SO_3H$) and perfluorooctanoic acid (PFOA) ($C_7F_{15}COOH$). The 3M sampling had a lower detection limit of 0.025 parts per billion (ppb) and a lower quantification limit of 0.050 ppb. Neither PFOS nor PFOA was detected in any of the municipal well samples from Cottage Grove and Hastings with the exception of one sample from Hastings where PFOA was detected below the lower quantification limit. In the municipal well samples from Oakdale, PFOS and PFOA were detected in some of the wells, but not in others. The average PFOS and PFOA levels for the well system were below 1 ppb. Resampling and analysis of the Oakdale wells by both 3M and MDH confirmed this well system average. Limited sampling also occurred from the tap at 3M's Dyneon LLC facility located in Oakdale and indicated similar PFOS and PFOA levels.

MDH, the "primacy agency" in Minnesota for purposes of the federal Safe Drinking Water Act, 42 U.S.C. §§ 300f et seq., has established Health-Based Values (HBVs) of 1 part per billion (ppb) and 7 ppb for PFOS and PFOA respectively. As MDH has explained, "[e]xposure to compounds at concentrations below their HBVs is not



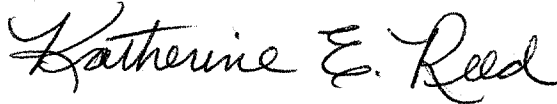
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considered to pose a health risk, even over a lifetime.”¹ In communicating these water data to the public, MDH stated that “the water is considered safe for all users, including infants, children and pregnant women.”²

In view of the MDH’s conclusion that the water is safe -- a conclusion which is supported by our own review of the extensive data base -- 3M does not believe that these data meet the TSCA Section 8(e) “substantial risk” reporting threshold. Nevertheless, 3M has decided to report these data as a precautionary measure, 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 Michael A. Santoro at (651) 733-6374.

Sincerely,



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

Enclosure
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¹ Letter from P. Bloomgren, Director Environmental Health Division, MDH and C. Waldron, City Administrator, City of Oakdale to Oakdale Water System Customer (Jan. 21, 2005), available at <http://www.ci.oakdale.mn.us>.

² MDH “Oakdale Wells FAQs” (Jan. 24, 2005), available at <http://www.ci.oakdale.mn.us>.