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EPA East – Room 6428 Attn: Section 8(e)
Office of Pollution Prevention and Toxics
US EPA
1200 Pennsylvania Avenue NW
Washington DC 20460-0001

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RE: TSCA 8(E) SUBSTANTIAL RISK NOTICE: Supplemental to Docket No. 8EHQ-06-16629 on [TEST SUBSTANCE]

To Whom It May Concern:

3M is providing to the EPA results of a marine algal growth inhibition study performed on [TEST SUBSTANCE] to supplement a previous submission on a related material, [FLUOROALIPHATIC POLYMERIC ESTERS]. The submission on [FLUOROALIPHATIC POLYMERIC ESTERS] was for a marine algal growth inhibition study showing an estimated 72 hour EC₅₀ to *Skeletonema costatum* of 0.62 mg/l using the biomass integral and 3.24 mg/l by growth rate calculation.

Results of the current study on [TEST SUBSTANCE] indicate far less toxicity, with an estimated 72 hour EC₅₀ to *Skeletonema costatum* of 13 mg/l using the biomass integral and 24 mg/l by growth rate calculation. Based on the compositional differences between the two test materials, as detailed below, these results suggest the toxicity observed with [FLUOROALIPHATIC POLYMERIC ESTERS] resulted from the [hydrocarbon moiety] component as opposed to the [fluorocarbon moiety].

Test Substance	[Fluorocarbon moiety] ¹	[Hydrocarbon moiety]	NMP
[FLUOROALIPHATIC POLYMERIC ESTERS] (98% polymer solids)	22%	78%	2%
[TEST SUBSTANCE] (100% polymer solids)	38%	62%	0%

¹Chemical structures of components provided with the original submission.

The final report for the current study is enclosed. Please contact Deanna Luebker at 651-737-1374 if you have any questions or if we can provide additional information.

Sincerely,

Katherine E. Reed (KOR)

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

Enclosure

MR 305035