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November 10, 2005

FEDERAL EXPRESS

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Re: Perfluorochemical Residential Exposure Data For Washington County, Minnesota

Ladies and Gentlemen:

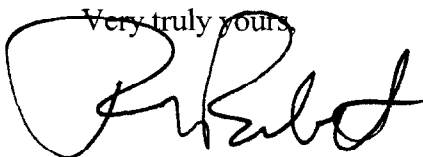
After forwarding to you our letter of October 20, 2005, on the referenced topic, we received from the 3M Company corrections to certain data that we had attached at Exhibit C to that letter. The revised data received from 3M is attached hereto at Exhibit A. In addition, we found two typographical errors in Chart A included in our October 20, 2005, letter. The "212.40"

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Dr. Charles M. Auer
Jennifer Seed
Mary Dominiak
James Kelly
David Douglas
Donald Kriens
November 10, 2005
Page 2

ppb total PFCs referenced on the tenth line of Chart A on page 4 of the letter should read "296.26" ppb total PFCs. In addition, the "29.64/36.80" ppb total PFCs referenced on the 4th line of Chart A on Page 6 of the letter should read "39.08/36.80" ppb total PFCs. Please include these corrected data in USEPA Administrative Record 226 and OPPT-2003-0012. Thank you.

Very truly yours,

Robert A. Bilott

RAB/mdm
Enclosures

cc: Timothy J. Keane, Esq. (w/ encl.)(City of Oakdale Counsel)
Jerome P. Filla, Esq. (w/ encl.)(City of Lake Elmo Counsel)
Dr. Helen Goeden (w/ encl.)(MHD)
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Larry A. Winter, Esq. (w/o encl.)
Gerald J. Rapien, Esq. (w/o encl.)

INTERROGATORY NO. 3:

Identify each human drinking water supply in Minnesota or Wisconsin where any PFCs have ever been detected, specifying the dates of each such detection for each such water supply, the level and/or concentration of each PFC detected, and the identity of the entity(s) who conducted and/or arranged for the sampling and analysis.

ANSWER:

See 3M's General Objections and specific objections in its Answers to Plaintiffs' Discovery Requests, which are incorporated in this response by reference. Subject to and without waiving its general objections and the objections to this interrogatory stated below, 3M states as follows:

3M incorporates by reference its response to Interrogatory No. 3 from its Answers to Plaintiffs' Discovery Requests in its entirety with the corrections and amendments provided below.

3M is correcting a typographical error in the title of the data table presented on Page 16 of 3M's Answers to Plaintiffs' Discovery because the date cited in the title is incorrect. The title should read "Oakdale December 22, 2004 Sampling Results (ug/L)" instead of "Oakdale December 22, 2005 Sampling Results (ug/L)." Additionally, 3M is correcting the analytical results reported in the table because of a transcription error. The corrected table is as follows:

Oakdale December 22, 2004 Sampling Results (ug/L)

Well Number	PFOA					
	Exygen Result	Exygen Duplicate	Exygen Average	MDH Measured Value	MDH Measured Value Duplicate	MDH Average
1	0.0891	0.0965	0.0928	NA	NA	NA
2	0.0764	0.0999	0.0882	NA	NA	NA
3	ND	ND	ND	NA	NA	NA
5	0.815	0.900	0.858	NA	NA	NA
7	0.322	0.317	0.320	NA	NA	NA
8	0.676	0.677	0.677	NA	NA	NA
9	NS	NS	NS	NA	NA	NA
Well Number	PFOS					
	Exygen Result	Exygen Duplicate	Exygen Average	MDH Measured Value	MDH Measured Value Duplicate	MDH Average
1	0.0561	0.0566	0.0564	NA	NA	NA
2	NQ	NQ	NQ	NA	NA	NA
3	ND	ND	ND	NA	NA	NA
5	0.861	1.07	0.966	NA	NA	NA
7	0.250	0.262	0.256	NA	NA	NA
8	0.895	0.869	0.882	NA	NA	NA
9	NS	NS	NS	NA	NA	NA

All results in ug/L (parts per billion or ppb).

NS - Not sampled.

ND - Not detected.

NC - Not calculated.

NA - Not analyzed.

For Exygen data:

ND - Not detected at or above 0.025 ug/L (25 parts per trillion).

NQ - Not quantifiable = Response at concentration between 0.025 ug/L and the Limit of Quantitation (LOQ) of 0.050 ug/L (50 parts per trillion).

For MDH data:

Report level is 0.5 ppb for PFOS and 1.0 ppb for PFOA. Where data is reported at less than these values, it represents Measured Values.

3M presented data in a table on page 19 for March 2005 and on page 20 for April 2005

Oakdale Municipal Well sampling results. The values listed as Exygen results are actually the MDH results for March. Thus, the April results on page 20 should be deleted. There are no April 2005 results from either MDH or Exygen.

3M previously provided MDH results for the August 2005 Oakdale Municipal Well sampling episode. Results from 3M's Environmental Laboratory for August 2005 are now available and provided below:

**Oakdale August 12, 2005 Sampling Results (ug/L)
3M Environmental Laboratory Results**

Well Number	PFOA		
	3M Result	3M Duplicate	3M Average
1	NS	NS	NS
2	NS	NS	NS
3	NS	NS	NS
5	0.815	0.876	0.846
7	0.305	0.272	0.288
8	0.544	0.540	0.542
9	0.874	0.837	0.856
Well Number	PFOS		
	3M Result	3M Duplicate	3M Average
1	NS	NS	NS
2	NS	NS	NS
3	NS	NS	NS
5	1.10	1.15	1.12
7	0.264	0.231	0.248
8	0.653	0.638	0.646
9	0.559	0.599	0.579

All results in ug/L (parts per billion or ppb).

NS - Not sampled.

ND - Not detected.

NC - Not calculated.

NA - Not analyzed.

For Exygen data:

ND - Not detected at or above 0.025 ug/L (25 parts per trillion).

NQ - Not quantifiable = Response at concentration between 0.025 ug/L and the Limit of Quantitation (LOQ) of 0.050 ug/L (50 parts per trillion).

For MDH data:

Report level is 0.5 ppb for PFOS and 1.0 ppb for PFOA. Where data is reported at less than these values, it represents Measured Values.

3M is correcting the 3M Cottage Grove Plant Building 116 Sampling Results for May 16, 2003 presented on Page 33 of 3M's Answers to Plaintiffs' Discovery Requests because of a typographical error. The result for the Bldg 116 Outlet duplicate sample value for PFOS is 0.634 ug/L instead of the reported 0.517 ug/L. The corrected table is as follows:

**Building 116 Sampling Results for May 16, 2003
Exygen Results**

Sample ID	PFOS (ug/L or parts per billion)	PFOA (ug/L or parts per billion)
Bldg 116 Outlet	0.596	5.29
Bldg 116 Outlet*	0.634	5.58

ND = Not detected = Response between 0 and 0.025 ug/L

NQ = Not quantifiable = Response between 0.025 ug/L and LOQ (0.050 ug/L)

*Laboratory Duplicate

3M also is supplementing the Cottage Grove Plant Building 116 Sampling Results discussion on Pages 33 and 34 of 3M's Answers to Plaintiffs' Discovery Requests to add MDH sampling results for December 7, 2004 and Exygen sampling results for February 14, 2005 and April 18, 2005 that have recently been located. Data summary tables for these dates are as follows:

**Building 116 Sampling Results for December 7, 2004
MDH Results, ug/L or parts per billion**

Sample ID	Field ID	PFOS		PFOA	
		Measured Value (ug/L)	Reported Level (ug/L)	Measured Value (ug/L)	Reported Level (ug/L)
200432759	04-646	0.0	< 0.5	0.0	<1.0
200432760	04-647	0.0	< 0.5	0.0	<1.0

Note: The reporting level is 0.5 ppb for PFOS and 1.0 ppb for PFOA.

**Building 116 Sampling Results for February 14, 2005
Exygen Results**

Sample ID	PFOS (ug/L or parts per billion)	PFOA (ug/L or parts per billion)
Effluent	ND	ND
Effluent*	ND	ND
Effluent Dup	ND	ND

ND = Not detected = Response between 0 and 0.025 ug/L

NQ = Not quantifiable = Response between 0.025 ug/L and LOQ (0.050 ug/L)

*Laboratory Duplicate

**Building 116 Sampling Results for April 18, 2005
Exygen Results
ug/L or parts per billion**

Sample ID	PFOS (ug/L)	PFOA (ug/L)
Effluent	ND	ND
Effluent*	ND	ND
Effluent Dup	ND	ND

ND = Not detected = Response between 0 and 0.025 ug/L

NQ = Not quantifiable = Response between 0.025 ug/L and LOQ (0.050 ug/L)

*Laboratory Duplicate

Additional data for Building 116's water distribution system can be found in 3M's submissions to EPA pursuant to the Letter of Intent, which are publicly available in the EPA PFOA docket. Data for the water distribution system from 2001 through June 21, 2005 can be found in the most recent Letter of Intent submission dated August 1, 2005.

3M is correcting PFOA sampling results reported for the Trap Range on the Cottage Grove site on Pages 34 and 35 of 3M's Answers to Plaintiffs' Discovery Requests because of typographical errors. The PFOA result for the laboratory duplicate and field duplicate discussed on Page 35 was incorrectly reported as "0.0565 ug/L" and "0.0571 ug/L" respectively. The

correct PFOA results are 0.565 ug/L for the laboratory duplicate and 0.571 ug/L for the field duplicate. The corrected discussion reads as follows:

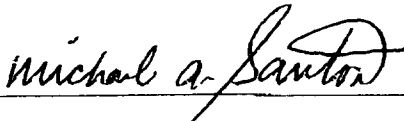
“PFOA was measured at 0.541 ug/L (parts per billion), with 0.565 ug/L in the laboratory duplicate and 0.571 ug/L in the field duplicate.”

VERIFICATION

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

Michael A. Santoro, being Director of Environmental, Health, Safety, and Regulatory Affairs for Defendant 3M Company, and being duly sworn states:

That he is the Director of Environmental, Health, Safety, and Regulatory Affairs for Defendant 3M Company (3M), and that he verifies the foregoing Answers to Interrogatories for and on behalf of 3M, and is duly authorized to do so; that certain of the matters stated in the foregoing answers are not within his personal knowledge; and that the facts stated in said answers have been assembled by employees and/or legal counsel of 3M, who have informed him that the facts stated herein are true and correct.



Michael A. Santoro

SUBSCRIBED AND SWORN
to before me this 4th day of
November, 2005.



Notary Public

