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Re: TSCA 8(e) Substantial Risk Notice: Supplemental to Docket No. 8EHQ-0598-373;
Sulfonate-based and Carboxylic-based Fluorochemicals

To whom it may concern:

3M is submitting this notice to supplement its previous submissions on sulfonate-based and carboxylic-based fluorochemicals. 3M has recently received the enclosed analytical report (3M Environmental Laboratory Report No. 06-0302) for water samples taken from five groundwater wells and from the water distribution system at the 3M plant site in Cordova, Illinois. Presently, the well water is used for production and non-contact cooling water purposes and not for drinking.

Sampling of five 3M Cordova wells and the water distribution system was done by Weston Solutions. The 3M Environmental Laboratory subsequently prepared and analyzed the samples for PFOS and PFOA. Both of these analytes were detected in all five wells and in the water distribution system. The concentrations of PFOS and PFOA in the wells ranged from 0.16 to 12 ppb and 0.22 to 4.6 ppb, respectively. The concentrations of PFOS and PFOA in the water distribution system were 3.11 ppb and 1.30 ppb, respectively. The employees have been notified of this information, because previously the water had been used for drinking. There were other reasons that use of the water for drinking was discontinued.

While 3M 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 Deanna Luebker at (651) 737-1374.

Sincerely,

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



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