

ATTACHMENT A

**Exhibit
1737**

State of Minnesota v. 3M Co.,
Court File No. 27-CV-10-28862

3MA01220047

1737.0001



August 21, 2000

Document Processing Center (7407)
Office of Pollution, Prevention and Toxics
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460
Attention: Section 8(e) Coordinator

Re: **TSCA Section 8(e) Supplemental Submissions:
Docket Nos. 8EHQ-1180-373 and 8EHQ-1180-374**

Dear Sir/Madam:

3M Company ("3M") requests that EPA redesignate, to the TSCA Section 8(e) docket, thirty studies which 3M previously submitted to EPA and are presently contained in "For Your Information" (FYI) docket number 1378. These studies and information supplement 3M's previous 8(e) submissions in Docket Numbers 8EHQ-1180-373 and 8EHQ-1180-374.

Attachment One lists the studies for which 3M requests redesignation. We have endeavored to include sufficient identifying information to facilitate the redesignation, including date of study submission; study title; study date; study type; and chemical. These studies consist of health and environmental effects data, environmental fate information, and human and environmental exposure data on various fluorochemicals; these data are consistent with information already included in the TSCA Section 8(e) docket for these or related compounds, but 3M has concluded these data may not be, strictly speaking, "corroborative" of previously reported or published information as defined in EPA's reporting guidance.

3M appreciates EPA's attention to this matter. Please do not hesitate to contact the undersigned if you have any questions or require further information regarding this submission.

Very truly yours,
Katherine E. Reed (9/7)
Dr. Katherine E. Reed, Ph.D.
Executive Director
3M Environmental Technology
And Safety Services

Studies To Be Moved to 8(e) Docket

<i>EPA Submission Date</i>	<i>Chemical/ Product Name</i>	<i>Study Title</i>	<i>Laboratory</i>	<i>Study No.</i>	<i>Study Date</i>	<i>Study Type</i>
04/21/2000	K PFOS	Oral (Stomach Tube) Developmental Toxicity Study of PFOS in Rabbits	Argus Research Laboratories, Inc.	418-012	01/11/1999	Health Effects: Developmental Toxicity
04/21/2000	K PFOS; T-6246; FC-95	Single Dose Intravenous Pharmacokinetic Study of T-6246 in Rabbits. 3M Environmental Laboratory Study #AMDT-042095.1	3M Technical	AMDT-042095.1	11/11/1995	Health Effects: Pharmacokinetic & Metabolism Studies
04/21/2000	PFOS; PFHS; PFOA; N-EtFOSAA; FOSA; N-MeFOSAA; PFOSAA; M570; M556	Fluorochemical Exposure Assessment of Decatur Chemical and Film Plant Employees	Medical Department, 3M Company	EPI-0006	08/11/1999	Human Data & Incidents: Medical Surveys, Clinical Studies, Reports or Allegations of Worker or Consumer Effects
05/04/2000	DEA PFOS; FC-99 New Formula; T-2509 CoC	Two Week Oral Rangefinding Toxicity Study of T-2509 CoC in Rats	Riker Laboratories, Inc.	179RR023	02/25/1980	Health Effects: Acute Toxicity
05/04/2000	K PFOS	Acute Oral Toxicity (LD50) Study in Rats	International Research and Development Corporation	137-083	05/31/1978	Health Effects: Acute Toxicity
05/04/2000	K PFOS	PFOS: A Dietary LC50 Study with the Northern Bobwhite	Wildlife International	454-103	04/26/2000	Environmental Fate & Toxicity Data: Avian & Other Wildlife
05/04/2000	K PFOS; T-6295	104 Week Dietary Chronic Toxicity and Carcinogenicity Study with PFOS Potassium Salt in Rats	Covance Laboratories, Inc.	6329-183		Health Effects: Carcinogenicity Studies
05/04/2000	K PFOS; T-6295	26 Week Capsule Toxicity Study with PFOS; T-6295 in Cynomolgus Monkeys (Volume I and II)	Covance Laboratories, Inc.	6329-223	04/12/2000	Health Effects: Chemical-Tissue Observations
05/04/2000	K PFOS; T-6295; Telomer Alcohol; Telomer Acrylate; PFBS; PFHS	Exploratory 28-Day Oral Toxicity Study with Telomer Alcohol, Telomer Acrylate, PFBS, PFHS, and PFOS (positive control) By Daily Gavage In The Rat Followed by a 14/28 Day Recovery Period	3M Environmental Laboratory (FACT)	FACT-TOX-120.3	06/11/1999	Health Effects: Subchronic Toxicity
05/04/2000	Perfluoroethylcyclohexyl sulfonate DEA Salt; FC-90; T-2960 CoC	Acute Ocular Irritation Test with T-2960 CoC in Albino Rabbits	Safety Evaluation Laboratories, Riker Laboratories, Inc.	0880EB0598	02/18/1981	Health Effects: Dermal/Eye Irritation

<i>EPA</i> Submission Date	<i>Chemical/ Product Name</i>	<i>Study Title</i>	<i>Laboratory</i>	<i>Study No.</i>	<i>Study Date</i>	<i>Study Type</i>
05/04/2000	PFOS	Fluorochemical (FC) Levels in Naive Rats - Further Investigation of Rat Chow	3M	T-6316.9; DT21	05/14/1999	Environmental Fate & Toxicity Data; Other Environmental Information
05/04/2000	PFOS	Fluorochemical (FC) Levels in Naive Rats, T-6316.9	3M Medical Department, Toxicology Services	T-6316.9	05/14/1999	Health Effects: Pharmacokinetic & Metabolism Studies
05/04/2000	PFOS; PFHS; PFDS; PFOA; PFOSAA; M556; M570; M463; M513	Analysis of FCs in Samples of Children's Sera	3M Environmental Technology & Services	FACT-GEN-011	05/21/1999	Human Data & Incidents: Medical Surveys, Clinical Studies, Reports or Allegations of Worker or Consumer Effects
05/04/2000	Potassium perfluoroethylcyclohexyl sulfonate; FC-98; T-2308 CoC	Acute Inhalation Toxicity Study of T-2308 CoC in the Rat	Bio/dynamics, Inc.	78-7187	04/12/1979	Health Effects: Acute Toxicity
05/12/2000	PFOS; FOSA; PFOA; PFHS	Quantitative Analysis of FCs in Environmental Samples	3M Environmental Laboratory (FACT)	FACT Gen021, Gen024, Gen030, Gen033	05/10/2000	Environmental Fate & Toxicity Data: General
05/18/2000	FOSA; T-3421	Acute Oral Toxicity Screen with T-3421 in Albino Rats	Riker Laboratories, Inc.	0883AR0287	01/17/1984	Health Effects: Acute Toxicity
05/18/2000	N-EtFOSA	A Developmental Toxicity Study of 313401 in Rats	WL Research Laboratories, Inc.	157016	05/30/1997	Health Effects: Developmental Toxicity
05/18/2000	N-EtFOSA	Primary Eye Irritation	Product Safety Labs	3871	11/03/1995	Health Effects: Dermal/Eye Irritation
05/18/2000	N-EtFOSA; N-EtFOSE Alcohol; N-MeFOSE Alcohol	Bioaccumulation of FC in Tennessee River Fish	3M Environmental Laboratory	78-2740	05/22/1979	Environmental Fate & Toxicity Data: Bioaccumulation/Persistence
05/18/2000	N-EtFOSE Alcohol	Absorption and Biotransformation of N-ethyl FOSE and Tissue Distribution and Elimination of Carbon 14 after Administration of N-ethyl FOSE14C in Feed	Riker Laboratories, Inc.		01/19/1983	Health Effects: Pharmacokinetic & Metabolism Studies
05/18/2000	N-EtFOSE Alcohol	Oral (Gavage) Developmental Toxicity Study of N-EtFOSE in Rats		T-6316.7; 418-011	12/17/1998	Health Effects: Developmental Toxicity
05/18/2000	N-EtFOSE Alcohol	Oral (Stomach Tube) Developmental Toxicity Study of N-EtFOSE in Rabbits	Argus Research Laboratories, Inc.	418-010; 6316.8	01/11/1999	Health Effects: Developmental Toxicity

<i>EPA</i> Submission Date	Chemical/ Product Name	Study Title	Laboratory	Study No.	Study Date	Study Type
05/18/2000	N-EiFOSE Alcohol; FM-3422	Evaluation of the Bioconcentration Potential of FM 3422	3M Environmental Laboratory (FACT)	9970612623	08/16/1978	Environmental Fate & Toxicity Data: Bioaccumulation/Persi- stence
05/18/2000	N-EiFOSE Alcohol; T-5874	Determination of the Partition Coefficient (n- octanol/water) of T-5874 by high performance liquid chromatography (HPLC)	NOTOX	121275	04/07/1994	Environmental Fate & Toxicity Data: Bioaccumulation/Persi- stence
05/18/2000	N-EiFOSEA	Determination of Physico- Chemical Properties of Sample D-1	Mitsubishi Chemical Safety Institute, Ltd.	4B223-4B227	02/14/1996	Environmental Fate & Toxicity Data: Bioaccumulation/Persi- stence
05/18/2000	N-EiFOSEA; T- 6322	Twenty-eight-day Repeated Dose Oral Toxicity Study of Sample D-1 in Rats, T-6322	Bio-Medical Research Laboratories	BMR 143C	02/16/1993	Health Effects: Subchronic Toxicity
05/18/2000	N-MeFOSE Alcohol; FM-3925	Distribution Coefficient of FM- 3925 in N-Octanol Water	3M Environmental Laboratory (FACT)	9970012600	01/10/1979	Environmental Fate & Toxicity Data: Bioaccumulation/Persi- stence
05/18/2000	N-MeFOSEA; T- 5869	Determination of the Pollution Coefficient (n- octanol/water) of T-5869.4 by high performance liquid chromatography (HPLC)	NOTOX	T-5869.4	04/07/1994	Environmental Fate & Toxicity Data: Bioaccumulation/Persi- stence
05/18/2000	PFOSAA; T-3290 CoC	Acute Oral Toxicity Screen with T-3290 CoC in Albino Rabbits	Riker Laboratories, Inc.	0882AR0362	11/05/1982	Health Effects: Acute Toxicity
05/25/2000	NH4 PFOA; T- 3974; FC-126	Primary Eye Irritation In Rabbits, T-3974	Hazelton Laboratories	61005209	01/14/1987	Health Effects: Dermal/Eye Irritation
05/25/2000	PFOA emulsifier; T-6564; FC-1015	Primary Eye Irritation/Corrosion Study of T-6564 in Rabbits (OECD Guidelines)	Corning Hazelton Inc.	CHW 60504574	09/05/1996	Health Effects: Dermal/Eye Irritation