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March 17, 2000

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Mr. Richard H. Hefter, Chief
High Production Volume Chemicals Branch
Document Control Office (7407)
Room G99 East Tower Attn: Section 8(e)
US Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460-001

8EHQ-00-373

MR 33755

Dear Mr. Hefter:

This is a response to your letter of February 25, 2000 regarding EPA Office of Pollution Prevention and Toxics request for additional information on 3M's perfluoroalkyl submissions.

With regard to your first question on 8EHQ-1180-00374, the composition of the test material FC-95 (a/k/a T-3351) is a homologous mixture of potassium perfluoroalkyl sulfonates, but is primarily potassium perfluorooctane sulfonate. 3M does not wish to maintain its TSCA confidentiality claim for the homologues of potassium salts of perfluoroalkyl sulfonate.

With regard to your second question, the original 8(e) submission (8EHQ-1180-00373) and the 5/15/84 supplementary submission (8EHQ-0584-00373) described toxicology studies done using a test material that was a mixture of two perfluoroalkyl alcohols. The principal component of the test material was CAS #1691-99-2 [1-Octanesulfonamide, N-ethyl-1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-heptadecafluoro-N-(2-hydroxyethyl)-].

Please feel free to contact me if you have any additional questions.

Best regards,

William A. Weppner

EPA-OTS
000811780P

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