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MR 280349

3M

October 26, 2004

CBI

8EHQ-1004-15989

[redacted]

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Office of Pollution, Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N. W.
Washington, DC 20460
Attention: Section 8(e) Coordinator

Re: **TSCA Section 8(e) Submissions**

Dear Sir/Madam:

3M Company ("3M") requests that EPA place the attached studies in the TSCA Section 8(e) docket. We have included a master index for these studies identifying the study title, test substance and CAS number. A Confidential Business Information (CBI) version of this index and the studies also is being submitted today pursuant to EPA procedures. 3M has not provided CBI substantiation with this submission, but would be willing to do so at the Agency's request.

3M has concluded that data in these studies may not be, strictly speaking, "corroborative" of previously reported or published information as defined in EPA's reporting guidance or otherwise potentially may warrant 8(e) submission based on EPA's reporting guidance.

3M appreciates EPA's attention to this matter. Please 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
Staff Vice President
Environmental Technology and Safety Services
(651) 778-4331
kereed@mmm.com

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- [ ] FedEx First Overnight — Earliest next business morning delivery to select locations
- [ ] FedEx 2Day — Second business day
- [ ] FedEx Express Saver — Third business day
- [ ] NEW FedEx Extra Hours — Later drop off with next business afternoon delivery for select locations

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Master Index to Studies Submitted Under TSCA 8(e) by 3M Company on October 26, 2004
(Confidential Business Information Redacted)

Title	Substance Information	CAS Information
Aquatic Toxicity Data Sheet: 48hr *Daphnia Magna*	1,4-dioxane; heptadecafluoro-1-octanesulfonic acid; linear n-ethyl perfluorooctanesulfonamide; n-ethylperfluorooctanesulfonamidoethyl alcohol; poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl[(heptadecafluorooctyl)sulfonyl]amino]ethyl]-.omega.-hydroxy-; poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl[(nonafluorobutyl)sulfonyl]amino]ethyl]-.omega.-hydroxy-; poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl[(pentadecafluoroheptyl)sulfonyl]amino]ethyl]-.omega.-hydroxy-; poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl[(tridecafluorohexyl)sulfonyl]amino]ethyl]-.omega.-hydroxy-; poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl[(undecafluoropentyl)sulfonyl]amino]ethyl]-.omega.-hydroxy-; polyethylene glycol; water	1,4-dioxane (123-91-1); heptadecafluoro-1-octanesulfonic acid (1763-23-1); linear n-ethyl perfluorooctanesulfonamide (4151-50-2); n-ethylperfluorooctanesulfonamidoethyl alcohol (1691-99-2); poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl[(heptadecafluorooctyl)sulfonyl]amino]ethyl]-.omega.-hydroxy- (29117-08-6); poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl[(nonafluorobutyl)sulfonyl]amino]ethyl]-.omega.-hydroxy- (68298-79-3); poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl[(pentadecafluoroheptyl)sulfonyl]amino]ethyl]-.omega.-hydroxy- (68298-81-7); poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl[(tridecafluorohexyl)sulfonyl]amino]ethyl]-.omega.-hydroxy- (56372-23-7); poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl[(undecafluoropentyl)sulfonyl]amino]ethyl]-.omega.-hydroxy- (68298-80-6); polyethylene glycol (25322-68-3); water (7732-18-5)
Multigeneration Daphnid Life Cycle Test	1,4-dioxane; heptadecafluoro-1-octanesulfonic acid; linear n-ethyl perfluorooctanesulfonamide; n-ethylperfluorooctanesulfonamidoethyl alcohol; poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl[(heptadecafluorooctyl)sulfonyl]amino]ethyl]-.omega.-hydroxy-; poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl[(nonafluorobutyl)sulfonyl]amino]ethyl]-.omega.-hydroxy-; poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl[(pentadecafluoroheptyl)sulfonyl]amino]ethyl]-.omega.-hydroxy-; poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl[(tridecafluorohexyl)sulfonyl]amino]ethyl]-.omega.-hydroxy-; poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl[(undecafluoropentyl)sulfonyl]amino]ethyl]-.omega.-hydroxy-; polyethylene glycol; water	1,4-dioxane (123-91-1); heptadecafluoro-1-octanesulfonic acid (1763-23-1); linear n-ethyl perfluorooctanesulfonamide (4151-50-2); n-ethylperfluorooctanesulfonamidoethyl alcohol (1691-99-2); poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl[(heptadecafluorooctyl)sulfonyl]amino]ethyl]-.omega.-hydroxy- (29117-08-6); poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl[(nonafluorobutyl)sulfonyl]amino]ethyl]-.omega.-hydroxy- (68298-79-3); poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl[(pentadecafluoroheptyl)sulfonyl]amino]ethyl]-.omega.-hydroxy- (68298-81-7); poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl[(tridecafluorohexyl)sulfonyl]amino]ethyl]-.omega.-hydroxy- (56372-23-7); poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl[(undecafluoropentyl)sulfonyl]amino]ethyl]-.omega.-hydroxy- (68298-80-6); polyethylene glycol (25322-68-3); water (7732-18-5)
Aquatic Invertebrate Testing - Alkyltins LR 8024-1	Alkyltins: dibutyltin laurate and dibutyltin-di(2 ethylhexoate)	Dibutyltin laurate (CAS 77-58-7); Dibutyltin-di(2 ethylhexoate) (CAS 2781-10-4)
Aquatic Invertebrate Testing - Decosheen Material (LR-8052)	Decosheen Ribbon Materials and pigments: Decosheen Blue in Green Ceres Blue ZV; Decosheen Gold Paste Pigment; Decosheen Royal Blue, Solvent Blue	Decosheen Blue in Green [redacted] Blue ZV (CAS 61814-09-3); Decosheen Royal Blue, Solvent Blue [redacted]-86-6); Decosheen Gold Paste Pigment (CAS Number [redacted]
R Scratch Remover (Fathead Minnow)	55-65% Water; 20-30% Stoddard Solvent; 1-5% Sodium Silicate; 1-5% Potassium Hydroxide; 0.1-3% Nonylphenoxypoly(oxyethylene)ethanol	Water (CAS 7732-18-5); Stoddard Solvent (CAS 8052-41-3); Sodium Silicate (CAS 1344-09-8); Potassium Hydroxide (CAS 1310-58-3); Nonylphenoxypoly(oxyethylene)ethanol (CAS 9016-45-9)
S Scratch Remover (Fathead Minnow)	60-70% Water; 20-30% Stoddard Solvent; 1-5% Sodium Silicate; 0.1-3% Turgitol NP-33	Water (CAS 7732-18-5); Stoddard Solvent (CAS 8052-41-3); Sodium Silicate (CAS 1344-09-8); Turgitol NP-33 (CAS 9016-45-9)
Octanol Water Partition Coefficient	N-methylperfluorooctane sulfonamidoethanol	CAS 24448-09-7

Master Index to Studies Submitted Under TSCA 8(e) by 3M Company on October 26, 2004
(Confidential Business Information Redacted)

Title	Substance Identification	CAS Information
CoCl2.6H2O as Co2+ Toxicity to Microtox Reagent	Cobalt (as Co2+ ion) (CoCl2.6H2O)	CAS 7791-13-1
Activated Sludge Respiration Inhibition Test on CoCl2.6H2Q as Co ion	Cobalt (as Co2+ ion) (CoCl2.6H2O)	CAS 7791-13-1
Acute Toxicity of CoCl2.6H20 as Co ion to Daphnia magna under Static Exposure Conditions	Cobalt (as Co2+ ion) (CoCl2.6H2O)	CAS 7791-13-1
Acute Toxicity of CoCl2.6H20 as Co ion to Fathead Minnow under Static Exposure Conditions	Cobalt (as Co2+ ion) (CoCl2.6H2O)	CAS 7791-13-1
Freshwater Algae Growth Inhibition Test	Cobalt (as Co2+ ion) (CoCl2.6H2O)	CAS 7791-13-1
Daphnia magna 21-Day Chronic Reproduction Study	N-ethylperfluorooctane sulfonamidoethanol	CAS 1691-99-2
Plant Growth Effects of [ ]	[ ]	[ ]
Final Report (*Daphnia* and Microtox)	Monomethyl ether of hydroquinone	CAS 150-76-5
Microtox Test Results	2 Ethylhexyl Acrylate; Isooctyl Acrylate Monomer; 2-Methylbutyl acrylate; Methyl isoamyl acrylate; Isooctyl Acrylate	2 Ethylhexyl Acrylate (CAS 103-11-7); Isooctyl Acrylate Monomer (CAS 29590-42-9) 2-Methylbutyl acrylate (CAS 44914-03-6); Methyl isoamyl acrylate (CAS 18993-92-1); Isooctyl Acrylate (CAS 29590-42-9)
Phytotoxicity Test Results	[ ]	[ ]

Master Index to Studies Submitted Under TSCA 8(e) by 3M Company on October 26, 2004
(Confidential Business Information Redacted)

Title	Substance Information	CAS Information
Isooctyl acrylate: Fish, Acute Toxicity Test	Isooctyl Acrylate Monomer	CAS 29590-42-9
Isooctyl Acrylate: *Daphnia sp.* Acute Immobilization Test	Isooctyl Acrylate Monomer	CAS 29590-42-9
Isooctyl Acrylate: Alga, Growth Inhibition Test	Isooctyl Acrylate Monomer	CAS 29590-42-9
Isooctyl Acrylate: *Daphnia sp.* Reproduction Test	Isooctyl Acrylate Monomer	CAS 29590-42-9
Acute Toxicity of [ ] to the mysid, *Mysidopsis bahia*	[ ]	[ ]
Final Report (Microtox)	[ ]	[ ]
Determination of the Partition Coefficient (N-Octanol/Water) of T-5896 by High Performance Liquid Chromatography (HPLC)	N-methyl perfluorooctane sulfonamido ethanol; N-methyl perfluorooctane sulfonamidethyl acrylate	N-methyl perfluorooctane sulfonamido ethanol (CAS 25268-77-3); N-methyl perfluorooctane sulfonamidethyl acrylate (CAS 24448-09-7)
OECD Activated Sludge Respiration Inhibition Test Results	N-Dodecyltrimethylammonium chloride	CAS = 112-00-5
Final Report (Fish Acute Toxicity)	Mirataine CB (30% Cocamidopropyl betaine = Amides, coco, N-(3-(dimethylamino)propyl), alkylation products with chloroacetic acid, sodium salts, 70% Water and Inerts); Mirataine COB (30% Coco/Oleamidopropyl Betaine = 1-Propanaminium, 3-amino-N-(carboxymethyl)-N,N-dimethyl-, N-coco acyl derivs., inner salt)	Cocamidopropyl betaine (CAS 70851-07-9); Coco/Oleamidopropyl Betaine (CAS 61789-40-0)
A Flow-Through Life-Cycle Toxicity Test With the Saltwater Mysid (*Mysidopsis bahia*)	Perfluorooctane sulfonate	CAS 1763-23-1
Lithium: Alga, Acute toxicity Tests	Lithium Chloride	CAS 7447-41-8
An Early Life-Stage Toxicity Test With the Fathead Minnow (*Pimephales promelas*)	Perfluorooctane sulfonate	CAS 1763-23-1
Lithium: Fish, Acute toxicity Tests	Lithium Chloride	CAS 7447-41-8
Lithium: *Daphnia*, Acute toxicity Tests	Lithium Chloride	CAS 7447-41-8
Summary of Toxicity Testing on OSCI and OSF	Octane sulfonyl chloride and Octane sulfonyl fluoride	Octane sulfonyl fluoride (CAS 7795-95-1), Octane sulfonyl chloride (CAS 4063-63-5)
Toxicity to Microtox Test	Lauryldimethylamineoxide	CAS 1643-20-5

Master Index to Studies Submitted Under TSCA 8(e) by 3M Company on October 26, 2004
(Confidential Business Information Redacted)

Title	Substance Information	CAS Information
Ecotoxicological Testing of CoCl2.6H2O as Co2+ ion (Seed Germination and Root Elongation)	Cobalt (as Co2+ ion) (CoCl2.6H2O)	CAS 7791-13-1

G1699
S4B

Lauryldimethyl amine oxide (LAO) and Decyldimethyl amine oxide (DAO)

Toxicity to Microtox

Percent Light Loss

Test Conc. mg/L	LAO 5 min	LAO 15 min	LAO 30 min
1.25	52	67	76
2.5	68	80	86
5.0	81	89	93
10	89	93	96
EC_{50} (95% CL)	1.1 (1.0-1.3)	0.56 (0.49-0.69)	0.37 (0.25-0.55)

Test Conc. mg/L	DAO 5 min	DAO 15 min	DAO 30 min
6.25	51	59	62
12.5	68	73	76
25	77	81	84
50	85	88	91
EC_{50} (95% CL)	5.5 (4.7-6.5)	3.9 (3.4-4.5)	3.6 (3.1-4.3)

LR G1649-1

Pg 1 of 3

ENVIRONMENTAL LABORATORY

MICROBICS MICROTOX® SYSTEM

RAW DATA

TEST SUBSTANCE: LAC (Lauryl dimethyl amine oxide)

TEST DATE: 4-19-89

ANALYST: Susan A Beach

SAMPLE CUVETTE	FINAL ASSAY CONCENTRATION mg/L	INITIAL READING I(0)	FINAL READINGS 5-MIN. I(5)	15-MIN. I(15)	30-MIN. I(30)
B1	BLANK CONTROL	90	64	50	48
C1	DUPLICATE	~~110~~ 103	77	62	60
B2	1.25	98	35	18	13
C2	Duplicate	103	36	20	14
B3	2.5	98	23	12	8
C3	Duplicate	104	24	12	9
B4	5.0	106	14	7	4
C4	Duplicate	97	14	6	4
B5	Duplicate	90	8	4	2
C5	10	98	8	4	3

Test Substance: Stock solution, 20 mg/L Each 1 mL = 0.02 mg
Initial pH = 6.4, adjusted to pH 6.7 with dilute NaOH
Solution clear, no color apparent
Osmotic adjustment: Added 200 mg NaCl to 10 mL stock soln

Diluent: Microbics 2% NaCl soln.

Initial Dilutions: Initial concentrations were double the final assay concentrations mentioned above. The initial dilutions were introduced into the top row (Row A) and were then transferred (w/ 50) into the middle and the lower rows (Row B, C)

% Light Loss (1)
51
52
68
65
82
80
88
89

$$\% \text{ Light Loss} = \frac{G \cdot \text{cm}}{(1 + G \cdot \text{cm})} \times 100$$

% Light Loss
65
66
79
80
89
89
92
93

[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	% Light Loss (1)
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	76
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	76
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	85
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	86
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	93
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	93
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	96
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	95

(1) % Light Loss = $\frac{\text{Gr obs}}{(1 + \text{Gr obs})} \times 100$