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CERTIFIED MAIL



Document Processing Center
EPA East – Room 6428 Attn: Section 8(e)
Office of Pollution Prevention and Toxics, U.S. EPA
1200 Pennsylvania Avenue NW
Washington, DC 20460-0001

Re: TSCA 8(e) Substantial Risk Notice: Sulfonate-based and Carboxylic-based
Fluorochemicals, Docket 8EHQ-0598-373 - Results from Analysis of Soils,
Sediments, Surface Water and Groundwater in the Decatur, Alabama Area

Dear Sir or Madam:

3M is submitting this notice to supplement its previous submissions on sulfonate and carboxylic-based fluorochemicals. More specifically, the data contained in this submittal have been generated as part of a site-related environmental assessment for fluorochemicals that 3M is performing for its 3M Decatur, Alabama manufacturing facility. As part of this effort, 3M has recently received the enclosed final analytical reports and summary figures for various sampling activities conducted in the vicinity of our Decatur manufacturing facility (due to the size of some of the files pertaining to this submittal, they have been placed on a CD for the reader's convenience):

Property Adjacent to 3M Decatur Facility

- 3M Environmental Laboratory Report No. GLP10-01-01 Interim Report 03: Analysis for PFOA in Decatur, AL Wetlands Edge Environmental Center (WEEC) Soils and Sediments Collected June/July 2010 and 3M Environmental Laboratory Report No. GLP10-01-02 Interim Report 03: Analysis for PFBS, PFHS and PFOS in Decatur, AL Wetlands Edge Environmental Center (WEEC) Soils and Sediments Collected June/July 2010.

These reports contain data for soil and sediment samples collected from property adjacent and immediately to the west of the 3M Decatur site. More specifically, sediment samples were collected from within a designated swamp area and upland soil samples were taken immediately adjacent to the swamp. The enclosed figure of the area illustrates the sampling locations and provides a cross-reference of sample identification numbers and corresponding PFOA analytical results to the data provided in the respective analytical report.

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- 3M Environmental Laboratory Report No. GLP10-01-01 Joint Interim Report 04 and 08: Analysis for PFOA in Decatur Field-8, Field-14 and Off-Site Soils, Collected June/July 2010.

This report contains data for shallow soil samples collected from ten locations in close proximity to the 3M Decatur facility. The enclosed figure of the area illustrates the sampling locations and provides a cross-reference of sample identification numbers and corresponding analytical results to the data provided in the analytical report. (It should be noted that the analytical report also contains data for two on-site fields (Field-8 and Field-14) that are not the subject of this submittal. The off-site soils are clearly identified by the designation "OSS" within the Sample Identification Number.)

- 3M Environmental Laboratory Report No. GLP10-01-01 Interim Report 12: Analysis for PFOA in Decatur, AL Off-Site Soils Collected in September/October 2010 and 3M Environmental Laboratory Report No. GLP10-01-02 Interim Report 12: Analysis for PFOS, PFHS and PFBS in Decatur, AL Off-Site Soils Collected in September/October 2010.

These reports contain data for soil boring samples collected as part of the process of installing new monitoring wells in three distinct locations within one mile of the 3M Decatur site. The enclosed figure of the area illustrates the sampling locations and provides a cross-reference of sample identification numbers and corresponding PFOA analytical results to the data provided in the analytical report. It also provides sample depth below grade for each sample.

- 3M Environmental Laboratory Report No. GLP10-01-01 Interim Report 10: Analysis of PFOA in Groundwater Samples Collected at Off-Site Wells located in Decatur, AL in October 2010 and 3M Environmental Laboratory Report No. GLP10-01-02 Interim Report 10: Analysis of PFBS, PFHS and PFOS in Groundwater Samples Collected at Off-Site Wells located in Decatur, AL in October 2010.

These reports contain data for groundwater samples collected at the aforementioned new monitoring well locations in addition to four locations where monitoring wells had previously been installed. Multiple samples were collected at each location, from different water-bearing units. The enclosed figure of the area illustrates the sampling locations and provides a cross-reference of sample identification numbers and corresponding PFOA analytical results to the data provided in the respective analytical report. On the figure, the designations "R", "S" and "L" refer to the residuum unit, the epikarst and the shallow limestone bedrock units, respectively.

Regional Landfill

- 3M Environmental Laboratory Report No. GLP10-01-01 Interim Report 13: Analysis of PFOA in Groundwater Samples Collected at the Morgan County Landfill located in Decatur, AL in November 2010 and 3M Environmental Laboratory Report No. GLP10-01-02 Interim Report 13: Analysis of PFBS, PFHS and PFOS in Groundwater Samples Collected at the Morgan County Landfill located in Decatur, AL in November 2010.

These reports contain data for groundwater samples collected at a nearby municipal/industrial landfill, the Morgan County Landfill. The enclosed figure of the area illustrates the sampling locations and provides a cross-reference of sample identification numbers and corresponding PFOA analytical results to the data provided in the respective analytical report. On the figure, the designations "S", "I" and "B" refer to shallow, intermediate and bedrock water-bearing units, respectively, and are equivalent to the previously described "R", "S" and "L" nomenclature.

Summary

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 contact Deanna Luebker at 651-737-1374 or djluebker@mmm.com.

Sincerely,



Jean B. Sweeney
Vice President
Environmental, Health and Safety Operations

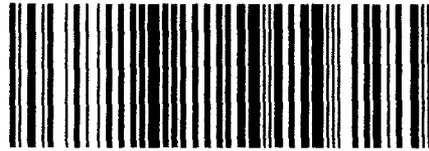
Enclosure

cc: Glenda Dean, ADEM

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