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3M

October 26, 2004

8EHQ-1004-15865

COMPANY SANITIZED

By Hand Delivery
Document Processing Center (7407)
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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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 Ceres Blue ZV (CAS 61814-09-3); Decosheen Royal Blue, Solvent Blue ([illegible]-86-6); Decosheen Gold Paste Pigment (CAS Number [illegible])
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

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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
CoCl2.6H2O as Co2+ Toxicity to Microtox Reagent	Cobalt (as Co2+ ion) (CoCl2.6H2O)	CAS 7791-13-1
Activated Sludge Respiration Inhibition Test on CoCl2.6H2O 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
Plant Toxicity Comparison, Young Seedling Growth	[ ]	[ ]
Ceriodaphnia dubia Survival and Reproduction exposed to Opequon Creek Water Spiked with BETZ 1110 Polymer (November 4, 1987 sample) for seven days under static renewal conditions	BETZ 1110: Non-3M Product - Chemical composition not provided to 3M by manufacturer	MSDS provided by manufacturer states product is "not hazardous" and not "considered to be a carcinogen"
Ceriodaphnia dubia Survival and Reproduction exposed to Opequon Creek Water Spiked with Betz 1138 Polymer (November 4, 1987 sample) for seven days under static renewal conditions	BETZ 1138: Non-3M Product - Chemical composition not provided to 3M by manufacturer	MSDS provided by manufacturer states product is "not hazardous" and not "considered to be a carcinogen"
Toxicity of 1,6 - Hexanediol Diacrylate to *Daphnia magna*	1,6 Hexanediol diacrylate	CAS 13048-33-4
Daphnia magna Chronic Bioassay Under Static Renewal Conditions	Methyl isoamyl acrylate	CAS 18993-92-1
Estimating the Chronic Toxicity of Nalclear 7177 to *Ceriodaphnia* Survival and Reproduction Using Short-Term Tests	Nalclear 7177 wastewater treatment acrylamide/acrylate polymer - Chemical composition not provided to 3M by manufacturer	CAS Information not provided to 3M by manufacturer
Acute Toxicity of Isooctyl Acrylate to *Daphnia magna*	Isooctyl Acrylate Monomer	CAS 29590-42-9
Static Acute Toxicity of [ ] to the Daphnid, *Daphnia magna*	Tolyltriazole	CAS 29385-43-1
Static Acute Toxicity of [ ] to the Alga, *Selenastrum capricornutum*	Tolyltriazole	CAS 29385-43-1
Static Acute Toxicity of [ ] to the Daphnid, *Daphnia magna*	[ ]	[ ]
Static Acute Toxicity of [ ] to the Fathead Minnow, *Pimephales promelas*	[ ]	[ ]
Static Acute Toxicity of [ ] to the Daphnid, *Daphnia magna*	water; propylene-tetrafluoroethylene polymer; tert-butyl alcohol	water (7732-18-5); propylene-tetrafluoroethylene polymer (27029-05-6); tert-butyl alcohol (75-65-0)

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

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Title	Substance Information	CAS Information
Ecotoxicological Testing of $CoCl_2.6H_2O$ as Co^{2+} ion (Seed Germination and Root Elongation)	Cobalt (as Co^{2+} ion) ($CoCl_2.6H_2O$)	CAS 7791-13-1

CONFIDENTIAL BUSINESS INFORMATION
SUBJECT TO PROTECTION UNDER THE
TOXIC SUBSTANCES CONTROL ACT
AND OTHER LAWS HAS BEEN
REDACTED FROM THIS DOCUMENT

Product Environmental Data

3M

Environmental Laboratory
Environmental Engineering and Pollution Control
900 Bush Avenue
PO Box 33331
St. Paul, MN 55133
612/778 5104

[ ] POLYMER PROCESSING ADDITIVE [ ]

DESCRIPTION: ~~Solid Elastomer Processing Aid~~ Fluorochemical

APPEARANCE: Light tan, waxy flakes

COMPOSITION (Weight %):

Fluoroaliphatic alcohol	100

USE:

[ ] is used as a processing agent for elastomers. Approximately 0.5-1.0% [ ] is milled into a batch of elastomers prior to molding. Mold/cure tempertures are 200°-~~32~~ 400°F.

ENVIRONMENTAL DATA:

Chemical Oxygen Demand (COD)	0.16 g/g
Biodegradation (BOD_{20}) (at concentrations up to 1,000 mg/l in water)	Nil
Aquatic toxicity to *Daphnia magna*, 48-hr EC_{50}	Exceeds water solubility
Aquatic toxicity to bluegill sunfish, 96-hr LC_{50}	Exceeds water solubility
Solubility in water	0.82 mg/l
n-Octanol/water distribution coefficient, K_{ow}	56,800
Soil adsorption coefficient (Brill Sandy Loam), K_{oc}	77

DISPOSAL:

Dispose of waste product in a facility permitted to accept chemical wastes. Disposal alternative: Mix with flammable material and incinerate in an industrial or commercial facility. Combustion products will include HF. Since regulations vary, consult applicable regulations or authorities before disposal.

U.S. EPA Hazardous Waste Number: None.

Date: 3/26/85 (Supersedes 11/8/83)

These data are intended for the use of a person qualified to evaluate environmental data.

All statements, technical information and recommendations contained herein are of a general nature and are based on laboratory tests or literature information we believe to be reliable, but the accuracy, completeness or applicability to particular circumstances is not guaranteed. 3M makes no representation that the customer's use and disposal of the product will comply with all applicable environmental laws, regulations and rules.