3M Corporate Toxicology and
Regulatory Services

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March 29, 2005

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3M **Certified Mail** 8EHQ-0405-15933

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EPA EAST – Room 6428 Attn: Section 8(e)
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1201 Constitution Avenue, NW
Washington, D.C. 20460-0001

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[redacted]

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RE: 8EHQ-04-15859A et seq.

Dear Mr. Terry O'Bryan,

This letter is intended to clarify the confidentiality claims being made by 3M in its October 26 submission of 46 studies. Please find the following attachments:

1. Corrections: Revised submission, titled *March 11, 2005 Revision to 46 Studies provided in Master Index to Studies Submitted Under TSCA 8(e) by 3M Company on October 26, 2004 (Contains Confidential Business Information)*. As the 8EHQ numbers are not available at the time of this letter, please note the corrections (in red) to the description of the chemistry. These include the 14th, 17th, 18th, 27th and 28th listed study entries.

2. Claims for Confidentiality: Revised submission, titled *March 11, 2005 Revision to 46 Studies provided in Master Index to Studies Submitted Under TSCA 8(e) by 3M Company on October 26, 2004 (Contains Confidential Business Information Redacted)*. The only studies for which 3M is requesting the chemistry to be kept confidential are on the 14th, 17th, 18th, 27th and 28th listed study entries. Non-CBI generic names are provided inside the brackets. Substantiation for these five studies will be sent under separate cover once the EPA provides 8EHQ numbers.

3. Release of Prior Claims for Confidentiality: 3M is no longer requesting confidentiality for the chemistry on the 34th and 35th study entries. Claims for CBI were based on a misinterpretation of TSCA §14.

4. Clarification of Redacted Information on Studies: Within the content of any study (not exclusive to the studies listed under item 2 and 3, above), 3M maintains its proprietary ID #s and names of 3M personnel unless it was that of the study director. Such studies are marked as having information redacted, however, this does not reflect a claim for confidentiality of the chemistry of the test substance.

8EHQ-05-15933

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3M appreciates EPA's attention to this submission. Please contact the undersigned if you have any questions or require further information.

Sincerely,

Teri K. Fick, MPH
3M TSCA 8(e) Coordinator
3M Corporate Toxicology and Regulatory Services
651-575-3182
tkfick@mmm.com

Enclosure

March 11, 2005 Revision to 16 Studies provided in Master Index to Studies Submitted Under TSCA 8(e) by 3M Company on October 26, 2004

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(Confidential Business Information Redacted)

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 (CAS 1325-86-6); Decosheen Gold Paste Pigment (CAS Number Unavailable)
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)

March 11, 2005 Revision to 16 Studies provided in Master Index to Studies Submitted Under TSCA 8(e) by 3M Company on October 26, 2004

(Confidential Business Information Redacted)

Octanol Water Partition Coefficient	N-methylperfluorooctane sulfonamidoethanol	CAS 24448-09-7
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 [ ]	81% water (7732-18-5); 12% diethylene glycol butyl ether (112-34-5); [fluorochemical surfactants, hydrocarbon surfactants, other materials]	81% water (7732-18-5); 12% diethylene glycol butyl ether (112-34-5); [fluorochemical surfactants, hydrocarbon surfactants, other materials]
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 16993-92-1); Isooctyl Acrylate (CAS 29590-42-9)
Phytotoxicity Test Results	81% water (7732-18-5); 12% diethylene glycol butyl ether (112-34-5); [fluorochemical surfactants, hydrocarbon surfactants, other materials]	81% water (7732-18-5); 12% diethylene glycol butyl ether (112-34-5); [fluorochemical surfactants, hydrocarbon surfactants, other materials]
Plant Toxicity Comparison, Young Seedling Growth	81% water (7732-18-5); 12% diethylene glycol butyl ether (112-34-5); [fluorochemical surfactants, hydrocarbon surfactants, other materials]	81% water (7732-18-5); 12% diethylene glycol butyl ether (112-34-5); [fluorochemical surfactants, hydrocarbon surfactants, other material]
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"

March 11, 2005 Revision to 16 Studies provided in Master Index to Studies Submitted Under TSCA 8(e) by 3M Company on October 26, 2004

(Confidential Business Information Redacted)

[redacted]	[redacted]	[redacted]
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*	59% Water (7732-18-5); 2% ethoxylated hydrogenated tallow alkylamine, quarternized (68187-69-9); <1% ethyl acetate (141-78-6); <1% Polysorbate 80 (9005-65-6); [proprietary mixture of alkyl copolymer, perfluoroalkylsulfonamido polyester and perfluorosulfonamido acrylate copolymer]	59% Water (7732-18-5); 2% ethoxylated hydrogenated tallow alkylamine, quarternized (68187-69-9); <1% ethyl acetate (141-78-6); <1% Polysorbate 80 (9005-65-6); [proprietary mixture of alkyl copolymer, perfluoroalkylsulfonamido polyester and perfluorosulfonamido acrylate copolymer]
Static Acute Toxicity of [ ] to the Fathead Minnow, *Pimephales promelas*	59% Water (7732-18-5); 2% ethoxylated hydrogenated tallow alkylamine, quarternized (68187-69-9); <1% ethyl acetate (141-78-6); <1% Polysorbate 80 (9005-65-6); [proprietary mixture of alkyl copolymer, perfluoroalkylsulfonamido polyester and perfluorosulfonamido acrylate copolymer]	59% Water (7732-18-5); 2% ethoxylated hydrogenated tallow alkylamine, quarternized (68187-69-9); <1% ethyl acetate (141-78-6); <1% Polysorbate 80 (9005-65-6); [proprietary mixture of alkyl copolymer, perfluoroalkylsulfonamido polyester and perfluorosulfonamido acrylate copolymer]
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)
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*	n-coco alkyl-2,2'-iminobisethanol; octylphenoxypolyethoxyethylphosphate; sodium carbonate; sodium hydroxide; sodium lauryl ether sulfate; trisodium edta; water	n-coco alkyl-2,2'-iminobisethanol (cas 61791-31-9); octylphenoxypolyethoxyethylphosphate (cas 52623-95-7); sodium carbonate (cas 497-19-8); sodium hydroxide (1310-73-2); sodium lauryl ether sulfate (9004-82-4); trisodium edta (150-38-9); water (7732-18-5)

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(Confidential Business Information Redacted)

Final Report (Microtox)	n-coco alkyl-2,2'-iminobisethanol; octylphenoxypolyethoxyethylphosphate; sodium carbonate; sodium hydroxide; sodium lauryl ether sulfate; trisodium edta; water	n-coco alkyl-2,2'-iminobisethanol (cas 61791-31-9); octylphenoxypolyethoxyethylphosphate (cas 52623-95-7); sodium carbonate (cas 497-19-8); sodium hydroxide (1310-73-2); sodium lauryl ether sulfate (9004-82-4); trisodium edta (150-38-9); water (7732-18-5)
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 OSCl 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
Ecotoxicological Testing of CoCl2.6H2O as Co2+ ion (Seed Germination and Root Elongation)	Cobalt (as Co2+ ion) (CoCl2.6H2O)	CAS 7791-13-1