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EPA East – Room 6428 Attn: Section 8(e)
Office of Pollution Prevention and Toxics
US EPA
1200 Pennsylvania Avenue NW
Washington DC 20460-0001

RE: TSCA 8(E) SUBMISSION ON: ammonium perfluorobutanoate (CASRN 10495-86-0) and ammonium perfluorooctonate (CASRN 3825-26-1)

To Whom It May Concern:

3M has received preliminary data for a 28-day repeat dose oral toxicity study in Sprague Dawley rats conducted on ammonium perfluorobutanoate (CASRN 10495-86-0), a research and development chemical. The positive control used in this study was ammonium perfluorooctonate (CASRN 3825-26-1).

All tested males receiving the highest dose of ammonium perfluorobutanoate (150 mg/kg-d), and all tested males receiving the positive control dose of 30 mg/kg-d of ammonium perfluorooctonate demonstrated an absence of pupillary reflex to light stimulation in both eyes. This effect was not observed in females with either test compound, nor was it observed in males at lower ammonium perfluorobutanoate doses. The mode of action causing this effect is unclear. All other parameters evaluated as part of a functional observation battery were normal.

The study is on-going at NOTOX Safety and Environmental Research Laboratory. Upon receipt, the final report will be forwarded to the EPA.

Please contact Deanna Luebker at 651-737-1374 if you have any questions or if we can provide additional information.

Sincerely,

Katherine E. Reed (KOR)

Katherine E. Reed
Staff Vice President, Environmental Health and Safety Operations

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