

### Introduction

This worksheet contains a bioaccumulation model to predict the concentration of PFOS in fish tissue, including the quantification of the proportion of exposure derived from surface sediment versus the water column.

The model makes the following primary assumptions:

- 1. Water and surface sediment are at steady state and that concentrations in water and sediment are independent of one another.
- 2. Fish diets are derived from epibenthic and/or benthic invertebrates that absorb PFOS directly from sediment or sediment porewater, and/or accumulate PFOS through ingestion of surface sediment.
- 3. Bioaccumulation constants derived from laboratory data (steady state) from water-only and food-only exposures to fish, and from data from laboratory exposures of benthic invertebrates to sediment are applicable to field organisms.
- 4. Fish are restricted to the area modeled in each of the three modeling scenarios and/or the accumulation kinetics for PFOS in fish are such that fish would reach steady state with respect to different exposures when moving to a new location exhibiting different concentrations if PFOS in sediment, water, and/or surface sediment invertebrates.
- 5. Water and surface sediment data obtained from the various studies reflect PFOS exposure conditions to fish at the time of fish sampling (2009).

Three modeling scenarios were investigated. Each scenario is represented by two tables: 1) raw data used to derive the average concentrations of PFOS in surface sediment (generally 0-10 cm in depth for most samples) and water, which are entered into the fish bioaccumulation model; and 2) the fish bioaccumulation model itself.

The following tables are included in this file:

- Table 1. Concentrations of PFOS in surface sediment and water samples obtained from Sections 1, 2, 3, and 4 upstream of 3M Cottage Grove.
- Table 2. Fish bioaccumulation model for Sections 1, 2, 3, and 4 upstream of 3M Cottage Grove.
- Table 3. Concentrations of PFOS in surface sediment and water samples obtained from Section 4 adjacent to 3M Cottage Grove shoreline, excluding East Cove and West Cove.
- Table 4. Fish bioaccumulation model for Section 4 adjacent to 3M Cottage Grove shoreline.
- Table 5. Concentrations of PFOS in surface sediment and water samples obtained from Section 4 downstream of 3M Cottage Grove.
- Table 6. Fish bioaccumulation model for Section 4 Section 4 downstream of 3M Cottage Grove.
- Table 7. Tabular and figure symmary of the results of the three modeling scenarios.
- Table 8. References cited.

### Conclusions

- 1. Model-predicted concentrations of PFOS in fish compare well with observations from the MPCA (2010) study (Table 7).
- 2. The model suggests that the modeling scenario for the Mississippi River upstream of 3M Cottage Grove is not expected to result in concentrations of PFOS in fish above 200 ng/g, wet weight (ww) (Table 2), as supported by MPCA (2010) observations.
- 3. The model suggests that the modeling scenarios for the Mississippi River at and downstream of 3M Cottage Grove is expected to result in concentrations of PFOS in fish above 200 ng/g, wet weight (ww) (Tables 4 and 6), as supported by MPCA (2010) observations.
- 4. The model predicts that a majority of PFOS accumulated by fish is derived from ingesting sediment invertebrates (Tables 2, 4, 6 and 7); thus, the majority of PFOS in fish tissue is derived from sediment-associated PFOS.

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Exhibit 2304

State of Minnesota v. 3M Co., Court File No. 27-CV-10-28862

Table 1. Concentrations of PFOS in surface sediment and water samples obtained from Sections 1, 2, 3, and 4 upstream of 3M Cottage Grove.

			(119/9), 417/				(ng/g. dw)
			[PFOS Water]				[PFOS Surface
		4.5	Mean			0.69	Mean
of 3M Cottage Grove							
from Section 4 upstream							
detection limit; Sample							
	2.5 MPCA, 2010	2.5	10				
Section 3							
2.54 MPCA, 2010 Value represents 1/2 DL;	MPCA, 2010	2.54	9				
	8.51 MPCA, 2010	8.51	8				
Section 3	10.3 MPCA, 2010	10.3	7	Section 3	0.524 Weston, 2007	0.524	LS-824
				Section 3			
Section 2	7.71 MPCA, 2010 Section 2	7.71	6	Value represents 1/2 DL;	0.125 Weston, 2007	0.125	LS-821
Section 2				Cottage Grove			upstream
2.52 MPCA, 2010 Value represents 1/2 DL;	MPCA, 2010	2.52	5	Section 4 upstream of 3M	1.57 MPCA, 2006	1.57	Sediment
Section 2				Cottage Grove			
Value represents 1/2 DL;	2.53 MPCA, 2010	2.53	4	Section 4 upstream of 3M	0.472 Weston, 2007	0.472	XS-01e
Section 1				Cottage Grove			
2.53 MPCA, 2010 Value represents 1/2 DL;	MPCA, 2010	2.53	ပ	Section 4 upstream of 3M	0.343 Weston, 2007	0.343	XS-01d
Section 1				Cottage Grove			
Value represents 1/2 DL;	2.53 MPCA, 2010	2.53	2	Section 4 upstream of 3M	0.289 Weston, 2007	0.289	XS-01c
Section 1				Cottage Grove			
Value represents 1/2 DL;	2.56 MPCA, 2010	2.56	_	Section 4 upstream of 3M	1.34 Weston, 2007	1.34	XS-01b
				Cottage Grove			
Section 4	5.14 MPCA, 2006   Section 4	5.14	Miss-up	Section 4 upstream of 3M	0.837 Weston, 2007	0.837	XS-01a
Note	Reference	(ng/L)	Sample	Note	Reference	(ng/g, dw)	Sample
		PFOS	Water			PFOS]	Sediment
		[Water				[Sediment	

Abbreviations
DL: Detection Limit
dw: dry weight g: gram L: Liter

Note Sediment samples reported at "NR" (Not Reported) and/or "NQ" (Not Quantifiable) by Weston were not included due to lack of numerical values. ng: nanogram
PFOS: perfluorooctane sulfonate ww: wet weight



Table 2. Fish bioaccumulation model for Sections 1, 2, 3, and 4 upstream of 3M Cottage Grove.

Model Input Variables				
ltem	Abbre-	Value	Units	Note
	viation			
Measured [Water PFOS]	Wat	4.5	ng/L	Average of water samples in Sections 1-4,
				upstream of Cottage Grove.
Measured [Sediment PFOS]	Sed	0.69	ng/g, dw	Average of Section 3 and 4 surface sediment
				samples upstream of Cottage Grove.
Total organic carbon (OC) in	TOC	0.01	g, OC/g, dw	Organic carbon not measured or data
sediment				unavailable for sediment samples from Pool 2
				investigations of PFOS in sediment. 0.01 (i.e.,
				1% TOC) represents a standard default
				modeling assumption for sediment.

ltem	Abbre- viation	Value	Units	Note
Biota-Sediment Accumulation Factor (BSAF)	BSAF	1.22	g, OC/g, ww	Lab-derived steady state estimate with invertebrates and spiked sediment.
Bioaccumulation factor (BAF)	BAF	1	kg prey, ww/kg predator, ww	Lab-derived steady state estimate (fish carcass) for trout and PFOS-spiked food only exposure.
Bioconcentration Factor (BCF)	BCF	1,100	L/kg, ww	Lab-derived steady state estimate with trout (fish carcass) and PFOS-spiked water only exposure.

Model Predictions				
Item	Abbre- viation	Value	Units	Note
[Sediment PFOS], OC- normalized	SedOC	69	ng/g, OC	Sed + TOC
Predicted [Sediment invertebrate PFOS]	Inv	84	ng/g, ww	SedOC × BSAF
[Fish PFOS] from Dietary (Sediment invertebrate) Source	Fsed	27	ng PFOS/g, ww	Inv × BAF
Predicted [Fish PFOS] from Direct Absorption from Water	Fwat	4.9	ng PFOS/g, ww	Wat × BCF ÷ 1,000 g, ww/kg, ww
Total [PFOS Fish]	F	32	ng PFOS/g, ww	Fsed + Fwat
Percentage of [Fish PFOS] from sediment	%Fsed	84	%	100% × Fsed / F
Percentage of [Fish PFOS] from water	%Fwat	16	%	100% × Fwat / F

# <u>Abbreviations</u>

dw: dry weight g: gram kg: kilogram



L: Liter ng: nanogram OC: organic carbon

PFOS: perfluorooctane sulfonate

ww: wet weight



Reference
Table 1
Table 1

## Reference

Higgins et al., 2007

Martin et al., 2003a

Martin et al., 2003b

excluding East Cove and West Cove. Table 3. Concentrations of PFOS in surface sediment and water samples obtained from Section 4 adjacent to 3M Cottage Grove shoreline,

Sediment	PFOS1			Water	Water PFOSI		
Sample	(ng/g, dw)	Reference	Note	Sample	ng/L)	Reference	Note
IW01	0.458	0.458 Weston, 2007		LOVAI	25	MPCA, 2006	Value represents 1/2 DL; The DL (50 ng/L) for water analysis in
							Weston (2007) is 10X higher than other studies examined in
							this modeling effort.
IW02	0.321	0.321 Weston, 2007		IW01	25	2007	Value represents 1/2 DL
IW03	0.363	0.363 Weston, 2007		IW02	25	2007	Value represents 1/2 DL
IW04	0.23	0.23 Weston, 2007		1W02	25	2007	Value represents 1/2 DL
IW05	0.32	0.32 Weston, 2007		IW03	25	25 Weston, 2007	Value represents 1/2 DL
IW06	0.469	0.469 Weston, 2007		IW03	25	2007	Value represents 1/2 DL
IW07	0.502	0.502 Weston, 2007		IW04	25	2007	Value represents 1/2 DL
80WI	0.753	0.753 Weston, 2007		IW04	25	2007	Value represents 1/2 DL
60/MI	0.589	0.589 Weston, 2007		1W05	25	2007	Value represents 1/2 DL
IW09a	27	27 Weston, 2007		IW05	25	2007	Value represents 1/2 DL
1W09b	1.6	1.6 Weston, 2007		IW06	25	2007	Value represents 1/2 DL
IW09c	0.802	0.802 Weston, 2007		90/MI	25	2007	Value represents 1/2 DL
IW09d	0.358	0.358 Weston, 2007		IW07	25	2007	Value represents 1/2 DL
IW09e	0.279	0.279 Weston, 2007		IW07	25	25 Weston, 2007	Value represents 1/2 DL
IW09f	0.737	0.737 Weston, 2007		80/MI	25	2007	Value represents 1/2 DL
IW10	1.37	1.37 Weston, 2007		80/WI	25	2007	Value represents 1/2 DL
IW11	4.84	4.84 Weston, 2007		1W09	162	62 Weston, 2007	
IW12	4.12	4.12 Weston, 2007		IW09	183	83 Weston, 2007	
IW13	3.62	3.62 Weston, 2007		IW09a	25	2007	Value represents 1/2 DL
IW14	4.2	Weston, 2007		IW09a	25	2007	Value represents 1/2 DL
IW14a	74.5	Weston, 2007		IW09b	25	2007	Value represents 1/2 DL
IW14c	10.4	10.4 Weston, 2007		1W09b	25	25 Weston, 2007	Value represents 1/2 DL
IW14d	0.125	Weston, 2007	Value represents 1/2 DL	IW09c	25	2007	Value represents 1/2 DL
IW14e	0.125	0.125 Weston, 2007	Value represents 1/2 DL	1W09c	25	2007	Value represents 1/2 DL
IW14f	0.513	0.513 Weston, 2007		P60/MI	25	25 Weston, 2007	Value represents 1/2 DL
IW15	1.31	Weston, 2007		P60/MI	25	25 Weston, 2007	Value represents 1/2 DL
IW16	0.654	0.654 Weston, 2007		IW09e	25	25 Weston, 2007	Value represents 1/2 DL
IW17	1.47	1.47 Weston, 2007		IW09e	25	25 Weston, 2007	Value represents 1/2 DL
IW18	3.17	3.17 Weston, 2007		W09f	25	2007	Value represents 1/2 DL
IW19	3.53	3.53 Weston, 2007		W09f	25	25 Weston, 2007	Value represents 1/2 DL

																						SAB08	SAB07	SAB06	SAB05	SAB04	SAB03	SAB01	R3	IW24	IW23	IW21	IW20	IW19f	IW19e	IW19d	IW19c	IW19b	IW19a
																						0.125 Weston, 2009	0.125 Weston, 2009	0.125 Weston, 2009	0.125 Weston, 2009	219 Weston, 2009	0.125 Weston, 2009	0.125 Weston, 2009	8.28 Weston, 2008	30.7 Weston, 2007	17.4 Weston, 2007	1.35 Weston, 2007	1.42 Weston, 2007	1.42 Weston, 2007	0.535 Weston, 2007	0.295 Weston, 2007	1.81 Weston, 2007	6.86 Weston, 2007	44.3 Weston, 2007
IW20	IW20	IW19f	IW19f	IW19e	IW19e	IW19d	IW19d	IW19c	IW19b	IW19b	IW19a	IW19a	IW19	IW19	IW18	IW18	IW17	IW17	IW16	IW15	IW15	IW14f	IW14f	IW14e	IW14e	IW14d	IW14d	IW14c	IW14b	IW14b	IW14a	IW14a	IW14	IW13	IW13	IW12	IW12	IW11	IW/10
	112 Weston, 2007	2007	25 Weston, 2007 Value represents 1/2 DL	2007	2007	2007	2007	54.5 Weston, 2007	88.9 Weston, 2007	127 Weston, 2007	206 Weston, 2007	214 Weston, 2007	96.6 Weston, 2007	105 Weston, 2007	110 Weston, 2007	115 Weston, 2007	122 Weston, 2007	116 Weston, 2007	2007		2007	2007	2007	2007	2007	25 Weston, 2007  Value represents 1/2 DL	2007	25 Weston, 2007  Value represents 1/2 DL	57.8 Weston, 2007	63.1 Weston, 2007	130 Weston, 2007	2007		59.4 Weston, 2007	2007	2007		2007	

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Sediment] (ng/g, dw) Surface Mean [PFOS 6 Water] (ng/g, dw) R3 R2 R4 IW25 IW25 IW24 IW23 IW21 IW21 IW22 IW22 Mean [PFOS 323 Weston, 2007 350 Weston, 2007 114 Weston, 2007 466 Weston, 2007 94.5 Weston, 2007 102 Weston, 2007 25 Weston, 2008 25 Weston, 2008 90.07 MPCA, 2010 436 Weston, 2007 523 Weston, 2007 539 Weston, 2007 413 Weston, 2007 88 25 Weston, 2008

# <u>Abbreviations</u>

g: gram L: Liter dw: dry weight **DL: Detection Limit** 

ng: nanogram

ww: wet weight PFOS: perfluorooctane sulfonate

Sediment samples reported at "NR" (Not Reported) and/or "NQ" (Not Quantifiable) by Weston were not included due to lack of numerical values



Table 4. Fish bioaccumulation model for Section 4 adjacent to 3M Cottage Grove shoreline.

Model Input Variables				
Item	Abbre-	Value	Units	Note
	viation			
Measured [Water PFOS]	Wat	88	ng/L	Average of water samples in Section 4 adjacent to
				3M Cottage Grove shoreline.
Measured [Sediment PFOS]	Sed	10	ng/g, dw	Average of surface sediment samples in Section 4
				adjacent to 3M Cottage Grove shoreline
Total organic carbon (OC) in	TOC	0.01	g, OC/g, dw	Organic carbon not measured or data unavailable
sediment				for sediment samples from Pool 2 investigations of
				PFOS in sediment. 0.01 (i.e., 1% TOC) represents
				a standard default modeling assumption for
				sediment.

ltem	Abbre- viation	Value	Units	Note
Biota-Sediment Accumulation Factor (BSAF)	BSAF	1.22	g, OC/g, ww	Lab-derived steady state estimate with invertebrates and spiked sediment.
Bioaccumulation factor (BAF)	BAF	0.32	kg prey, ww/kg predator, ww	Lab-derived steady state estimate (fish carcass) for trout and PFOS-spiked food only exposure.
Bioconcentration Factor (BCF)	BCF	1,100	L/kg, ww	Lab-derived steady state estimate with trout (fish carcass) and PFOS-spiked water only exposure.

Model Predictions				
Item	Abbre-	Value	Units	Note
	viation			
[Sediment PFOS], OC-	SedOC	1,006	ng/g, OC	Sed ÷ TOC
normalized				
Predicted [Sediment	Inv	1,227	ng/g, ww	SedOC × BSAF
invertebrate PFOS]				
[Fish PFOS] from Dietary	Fsed	393	ng PFOS/g,	Inv × BAF
(Sediment invertebrate)			ww	
Source				
Predicted [Fish PFOS] from	Fwat	97.0	ng PFOS/g,	Wat × BCF ÷ 1,000 g, ww/kg, ww
Direct Absorption from Water			ww	
Total [PFOS Fish]	F	490	ng	Fsed + Fwat
			PFOS/g,	
			ww	
Percentage of [Fish PFOS]	%Fsed	80	%	100% × Fsed / F
from sediment				
Percentage of [Fish PFOS]	%Fwat	20	%	100% × Fwat / F
from water				

Abbreviations dw: dry weight g: gram kg: kilogram



L: Liter ng: nanogram OC: organic carbon

PFOS: perfluorooctane sulfonate

ww: wet weight



# Reference Table 3 Table 3

## Reference

Higgins et al., 2007

Martin et al., 2003a

Martin et al., 2003b

Table 5. Concentrations of PFOS in surface sediment and water samples obtained from Section 4 downstream of 3M Cottage Grove.

	Sediment						
Sediment	PFOSJ			Water	[Water PFOS]		
Sample	(ng/g, dw)	Reference	Note	Note Sample	(ng/L)	Reference	Note
XS-02a	2.31	2.31 Weston, 2007		Miss-down	14.5	14.5 MPCA, 2006	
				#1			
XS-02a	2.66	2.66 Weston, 2007		Miss-down	6	6 MPCA, 2006	
				#2			
XS-02b	0.603	0.603 Weston, 2007		Miss-down	2.555	2.555 MPCA, 2006	Value represents 1/2 DL
				#3			
XS-02c	0.798	0.798 Weston, 2007		12	15	15 MPCA, 2010	
XS-02d	0.702	0.702 Weston, 2007		R5	98	98   Weston, 2008	
XS-02e	1.24	1.24 Weston, 2007					
Sed-Miss-	27.9	27.9 MPCA, 2006					
down							
#1							
Sed-Miss-	8.26	8.26 MPCA, 2006					
down							
#2							
Sed-Miss-	1.71	1.71 MPCA, 2006					
down							
#3							
R5	6.13	6.13 Weston, 2008					
R6	1.35	1.35 Weston, 2008					

Sediment] (ng/g, dw) Surface

Mean [PFOS

Water] Mean [PFOS

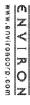
27

(ng/g, dw)

Abbreviations
DL: Detection Limit

L: Liter g: gram dw: dry weight

ng: nanogram
PFOS: perfluorooctane sulfonate



ww: wet weight

Note Sediment samples reported at "NR" (Not Reported) and/or "NQ" (Not Quantifiable) by Weston were not included due to lack of numerical values.



Table 6. Fish bioaccumulation model for Section 4 Section 4 downstream of 3M Cottage Grove.

Model Input Variables				
Item	Abbre-	Value	Units	Note
	viation			
Measured [Water PFOS]	Wat	27	ng/L	Average of water samples in Section 4 adjacent to
				3M Cottage Grove shoreline.
Measured [Sediment PFOS]	Sed	5	ng/g, dw	Average of surface sediment samples in Section 4
				adjacent to 3M Cottage Grove shoreline
Total organic carbon (OC) in	TOC	0.01	g, OC/g, dw	Organic carbon not measured or data unavailable
sediment				for sediment samples from Pool 2 investigations of
				PFOS in sediment. 0.01 (i.e., 1% TOC) represents
				a standard default modeling assumption for
				sediment.

ltem	Abbre- viation	Value	Units	Note
Biota-Sediment Accumulation Factor (BSAF)		1.22	g, OC/g, ww	Lab-derived steady state estimate with invertebrates and spiked sediment.
Bioaccumulation factor (BAF)	BAF		kg prey, ww/kg predator, ww	Lab-derived steady state estimate (fish carcass) for trout and PFOS-spiked food only exposure.
Bioconcentration Factor (BCF)	BCF	1,100	L/kg, ww	Lab-derived steady state estimate with trout (fish carcass) and PFOS-spiked water only exposure.

Model Predictions					
Item	Abbre-	Value	Units	Note	
	viation				
[Sediment PFOS], OC-	SedOC	488	ng/g, OC	Sed ÷ TOC	
normalized					
Predicted [Sediment	Inv	595	ng/g, ww	SedOC × BSAF	
invertebrate PFOS]					
[Fish PFOS] from Dietary	Fsed	190	ng PFOS/g,	Inv × BAF	
(Sediment invertebrate)			ww		
Source					
Predicted [Fish PFOS] from	Fwat	29.9	ng PFOS/g,	Wat × BCF ÷ 1,000 g, ww/kg, ww	
Direct Absorption from Water			ww		
Total [PFOS Fish]	F	220	ng	Fsed + Fwat	
			PFOS/g,		
			ww		
Percentage of [Fish PFOS]	%Fsed	86	%	100% × Fsed / F	
from sediment					
Percentage of [Fish PFOS]	%Fwat	14	%	100% × Fwat / F	
from water					

Abbreviations dw: dry weight g: gram kg: kilogram



L: Liter ng: nanogram OC: organic carbon

PFOS: perfluorooctane sulfonate

ww: wet weight



# Reference Table 5 Table 5

## Reference

Higgins et al., 2007

Martin et al., 2003a

Martin et al., 2003b



Table 7. Tabular and figure symmary of the results of the three modeling scenarios.

	Predicted [Fish PFOS]				Observed [Fish			Observed co
	Sediment	Water		% from	Minimum	Maximum		Midpoint
Model Scenario	Source	Source	Total	Sediment	Average	Average	Note	
Pool 2	27	4.9	32	84	24	100	Fish from	62
Upstream of 3M Cottage Grove							Sections 1-3	
Pool 2	393	97	490	80	160	740	Fish from	450
Section 4: 3M Cottage Grove							Section 4	
(Shoreline)								
Pool 2	190	30	220	86	160	740	Fish from	450
Section 4: Downstream of 3M							Section 4	
Cottage Grove								

For Graphing Pool 2 Upstream of 3M Cottage Grove

Pool 2 Section 4: 3M Cottage Grove (Shoreline)

Pool 2 Section 4: Downstream of 3M Cottage Grove

### **Abbreviations**

g: gram ng: nanogram

PFOS: perfluorooctane sulfonate

ww: wet weight



oncentratio	ns (for
Low (-)	High (+)

38 38

290 290

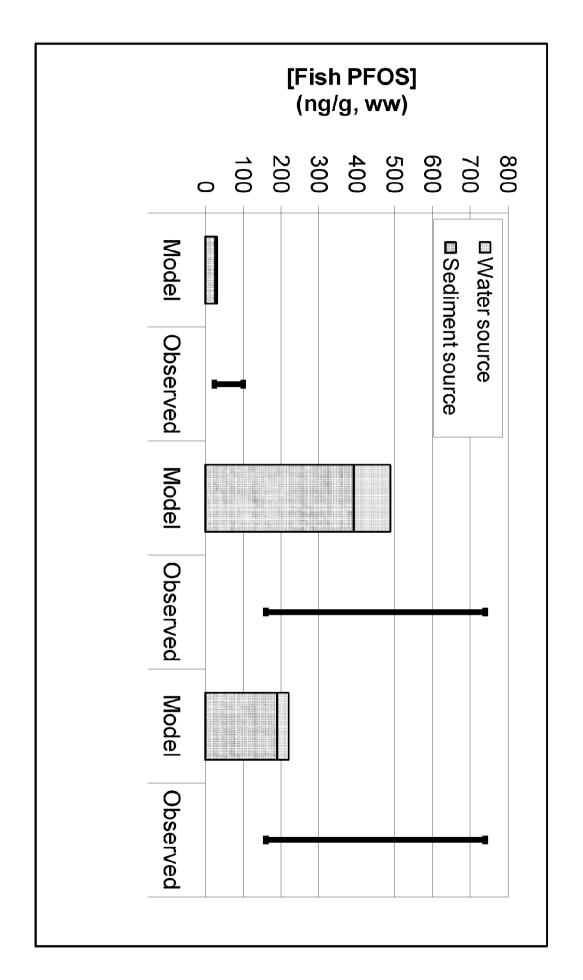
290 290

Model 27 5

Observed 0 62 38 Model 393 97

Observed 0 450 290 Model 190 30

Observed 0 450 290





### Table 8. References cited.

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Martin, J.W., Mabury, S.A., Solomon, K.R., Muir, D.C.G. 2003b. Bioconcentration and tissue distribution of perfluorinated acids in rainbow trout (*Oncorhynchus mykiss*). Environ. Toxicol. Chem. 22:196-204

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