June 13, 2001

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651 733 1110 AR 226 - 1028

Document Processing Center (7407) Office of Pollution, Prevention and Toxics U.S. Environmental Protection Agency

401 M Street, S.W.

Washington, DC 20460 Attention: Section 8(e) Coordinator

Contain NO CBI

Re: TSCA Section 8(e) Supplemental Submissions: Docket Nos. 8EHQ-1180-373 and 8EHQ-1180-374

Dear Sir/Madam:

3M Company ("3M") requests that EPA redesignate, to the TSCA Section 8(e) docket, three studies which 3M previously submitted to EPA and are presently contained in "For Your Information" (FYI) docket number 1378 (also known as AR-226). These studies and information supplement 3M's previous B(e) submissions in Docket Numbers 8EHQ-1180-373 and 8EHQ-1180-374.

Attachment One lists the three studies for which 3M requests redesignation. We have endeavored to include sufficient identifying information to facilitate the redesignation, including date of study submission; study title; study date; study type; and chemical. These studies consist of a range finding rat teratology study on one fluorochemical and two eye irritation studies on fluorochemical mixtures containing di-ethyl glycol butyl ether; these data are consistent with information already included in the TSCA Section 8(e) docket or in the published literature for these or related compounds, but 3M has concluded these data may not be, strictly speaking, "corroborative" of previously reported or published information as defined in EPA's reporting guidance.

3M appreciates EPA's attention to this matter. Please do not hesitate to contact the undersigned if you have any questions or require further information regarding this submission.

Very truly yours,

Dr. Katherine E. Reed, Ph.D

Executive Director

3M Environmental Technology

And Safety Services

Exhibit 2785

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

Studies To Be Moved To 8(e) Docket

EPA Submission Date	Chemical/ Product Name	Study Title	Laboratory	Study No.	Study Date	Study Type
06/28/2000	K PFOS mixture; T-1328; AFFF; FC- 600; 12% DEGBE	Primary Eye Irritation Study - Rabbits (T-1328)	Biosearch, Inc		10/06/1975	Health Effects: Dermal/Eye Irritation
06/28/2000	T-5293; FC-95; K PFOS Mixture; AFFF; FC-206CF; 10% DEG(M)BE	Primary Eye Irritation/Corrosion Study of T-5293 in Rabbits	Hazelton Laboratories	01102305	01/25/1991	Health Effects: Dermal/Eye Imitation
08/31/2000	T-3352; FM-3422; N-EtFOSE Alcohol	Pilot Rat Teratology Study T- 3352	Hazelton Laboratories	154-159	05/11/1983	Health Effects: Developmental Toxicity

Tuesday, June 12, 2001

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