

- Structure of the paper could be improved to look at non-cancer and cancer in terms of: 1) lab animal studies; 2) human studies; 3) MoA studies; and 4) weight of evidence.
- Writing needs improvement for clarity.
- Misrepresents use of PFOA.
- Statements and data require primary citations and quite often are absent.
- In several areas, important studies are missing or treated in a cursory fashion.
- Factual representations are incorrect in several places.
- Lack of clear summary of information discussed relative to use in risk assessment.
- Cite 2005 Draft EPA risk assessment when it is marked DRAFT, DO NOT COPY OR CITE.
- Poor job discussing evidence for liver toxicity.
- Developmental endpoints from the 2-gen study are missing in developmental section.
- Poor discussion of meaningfulness of skeletal variation in rabbits.
- Treat full-litter reabsorption as a developmental effect rather than a maternal effect.
- Do not give ample discussion of human data and even downplay significance and value of this data.
- Missing the pathology working group report.
- Inaccurately portray Riker CA study to have increase in hepatocellular carcinoma in high dose group males, contrary to finding of study.
- Could do more thorough job on modes of action.
- Body burden and PK treated too lightly.
- No mention of 6-mo monkey study re bile acids.
- RSC of 20% but no thorough discussion of references, in fact not cited in RA.

**Exhibit
2516**

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

3M_MN02329964