

February 12, 2007



The Honorable William Hargis
Mayor of Woodbury
City of Woodbury
8301 Valley Creek Road
Woodbury, Minnesota 55125

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Dear Mayor Hargis:

As you know, the Minnesota Department of Health's (MDH) recent testing of municipal wells in your community shows the presence, at trace amounts measured in the low parts per billion, of a chemical that 3M once manufactured called PFBA. We regret that PFBA is present, even in such low levels, in your community's drinking water. 3M is writing this letter to you and to the leaders of the other nearby communities to explain what we are doing about this situation.

Some background that you may find useful:

3M manufactured PFBA at our facility in 3M Cottage Grove for many years for sale to an industrial customer for its use in making photographic film. We stopped manufacturing this product at Cottage Grove in 1998 because of reduced demand for this product, not because of any environmental or health concern. Our decision in 2000 to phase out of the production of other fluorochemical compounds, including PFOS and PFOA, was unrelated to PFBA.

During the 1950's and 60's, 3M disposed of various waste materials generated by our Cottage Grove facility in area landfills, including the Woodbury disposal site. This was the common practice at the time. We think it is very likely that some of that waste contained PFBA.

Presently, the federal EPA has not issued any drinking water limits for PFBA. Similarly, the MDH has not issued any regulatory Health Risk Limit for PFBA, or for that matter, for any fluorochemical found in drinking water, such as PFOS or PFOA. Instead, MDH has issued interim or advisory values, called Health Based Values, for PFOS and PFOA. The current Health Based Value for PFOA is 7 parts per billion, though MDH has used, as a cautious public health approach, a "well advisory guideline" of 1 part per billion while it reevaluates the Health Based Value for PFOA. MDH uses well advisory guidelines to determine drinking water advice. MDH has not yet issued a Health Based Value for PFBA, but again as a cautious public health approach, is using a 1 part per billion well advisory guideline until additional studies on PFBA are completed and reviewed. At such time, MDH has indicated it will revise its advice for PFBA.

Health Based Values and Health Risk Limits are calculated pursuant to Minnesota law and include large margins of safety for a lifetime of exposure. MDH's website defines

Health Risk Limits as “the concentration of a groundwater contaminant, or a mixture of contaminants, that can be safely consumed daily for a lifetime” and its definition of Health Based Values is essentially the same. More helpful information on Health Based Values and Health Risk Limits can be found on MDH’s website at <http://www.health.state.mn.us/divs/eh/groundwater/hrlrule.html> and <http://www.health.state.mn.us/divs/eh/groundwater/hbvs.html>

We firmly believe that, based on preexisting and new data we have generated and which MDH is currently evaluating, the presence of PFBA at the levels detected in your community’s drinking water does not pose a health risk. These new data include (1) a laboratory animal study designed with input from MDH scientists, and (2) a study on the effects of PFBA conducted in an EPA laboratory on development of newborn laboratory animals. These new data currently indicate that PFBA does not cause developmental effects, and when compared to data for PFOA, indicate that it would take much more PFBA to cause any adverse effect in laboratory animals. Preexisting data on elimination of PFBA from the body also indicates that it is eliminated much more rapidly than PFOA. Taken together, this information would indicate that a Health Based Value for PFBA is likely to be higher than a well advisory guideline or Health Based Value currently existing for PFOA (1 and 7 parts per billion, respectively).

For more information on fluorochemicals, visit our 3M website at: www.3M.com/pfos-pfoa

What we’re doing about the situation:

We pledge to you and your community that we’ll do the following:

1. We recognize that MDH seeks additional laboratory test data concerning PFBA and we have committed to sponsoring further research on PFBA and will share the results of that research with the Minnesota Department of Health, just as we have done with our scientific studies in the past.
2. One important way to address the current situation is to identify and then seek to control the source of the PFBA. 3M has agreed to work cooperatively with the Minnesota Pollution Control Agency to determine the source of PFBA and address the issue. As part of this commitment 3M will be submitting detailed work plans to the MPCA over the next few weeks. Additional proposed work will include an expanded hydrogeologic investigation and an assessment of additional containment measures that may be appropriate at the Woodbury disposal site. This is part of 3M’s overall comprehensive program to assess fluorochemicals in the environment around the 3M Cottage Grove manufacturing facility and at historical disposal sites.

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3. As you probably know, when PFOS and PFOA were detected in some of Oakdale's municipal wells and in some private residential wells in Lake Elmo at levels that were at or slightly above the Health Based Values issued by MDH, 3M voluntarily committed to those two communities to develop and implement solutions at our expense to assure that the amounts would be reduced to levels that would be consistently and reliably below the Health Based Values for PFOS and PFOA. As Oakdale's and Lake Elmo's civic leaders will confirm, we have made substantial progress against that commitment. We make a similar commitment to you: when the MDH issues a Health Based Value or Health Risk Limit for PFBA under the criteria now described on the MDH website, and in the event the PFBA in your community's drinking water exceeds that level, 3M will work with you and your community to develop and implement at our expense feasible solutions that will ensure that your community's drinking water remains consistently and reliably below the level finally determined for PFBA.

We will keep you updated on our progress. If you have any questions at any time, please feel free to contact me at 651 733-6374.

Sincerely,



Michael A. Santoro
Director,
3M Regulatory Affairs

cc: Paul Rebholz (City Council)
Mary Giuliani (City Council)
Julie Ohs (City Council)
Amy Scoggins (City Council)
Clinton P. Gridley (City Administrator)