



Via Online Submission

<https://ntp.niehs.nih.gov/go/36051>

November 19, 2019

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Deputy Division Director for Policy
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530 Davis Drive
Durham, NC 27713

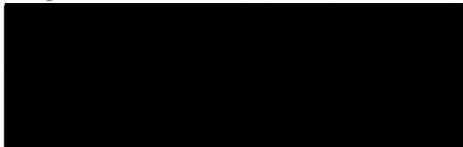
Re: Draft NTP Technical Report No. 598 on the Toxicology and Carcinogenesis Studies of Perfluorooctanoic Acid (CAS No. 335-67-1) Administered in Feed to Sprague Dawley (Hsd: Sprague Dawley® SD® Rats)

Dear Dr. Wolfe:

The 3M Company (3M) appreciates this opportunity to provide the enclosed comments to the Draft National Toxicology Program (NTP) Technical Report No. 598 on the Toxicology and Carcinogenesis Studies of Perfluorooctanoic Acid (CAS No. 335-67-1) (PFOA). As a science-based company, 3M encourages NTP to use the best available science when assessing this chemical and the referenced studies. As our comments reflect, 3M has substantial experience and expertise regarding PFOA, PFOS and other PFAS, informed in part by the fact that 3M scientists are authors or contributors to many of the studies cited in the references listed in the draft Technical Report. As a result of this expertise, 3M has significant concerns with the draft Technical Report and the underlying toxicology and carcinogenesis studies under the NTP's consideration.

Please let us know if you have any questions.

Regards,



Oyebode A. Taiwo, MD, MPH

Enclosure