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ONE HUNDRED SIXTEENTH CONGRESS

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Congress of the United States

House of Representatives

COMMITTEE ON OVERSIGHT AND REFORM
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October 16, 2019

Ms. Denise Rutherford
Senior Vice President of Corporate Affairs
The 3M Company
3M Center
St. Paul, MN 55144

Dear Ms. Rutherford

Enclosed are questions that have been directed to you and submitted for the official record for the hearing on Tuesday, September 10, 2019, titled "The Devil They Knew: PFAS Contamination and the Need for Corporate Accountability, Part III."

Please return your written responses to these questions by Wednesday, October 30, 2019, including each question in full as well as the name of the Member. Your response should be addressed to the Committee office at 2157 Rayburn House Office Building, Washington, D.C. 20515. Please also send an electronic version of your response by email to Amy Stratton, Deputy Clerk, at Amy.Stratton@mail.house.gov.

Thank you for your prompt attention to this request. If you need additional information or have other questions, please contact Elisa LaNier, Chief Clerk, at (202) 225-5051.

Sincerely,

Elijah E. Cummings

Elijah E. Cummings
Chairman

cc: The Honorable Jim Jordan, Ranking Member

Questions for Ms. Denise Rutherford
Senior Vice President of Corporate Affairs, The 3M Company

Questions from Subcommittee Chairman Harley Rouda

September 10, 2019, Hearing: "The Devil They Knew: PFAS Contamination and the Need for Corporate Accountability, Part III"

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1. In your written testimony submitted to the Subcommittee, you stated: "Importantly, the weight of scientific evidence has *not* established that PFOS, PFOA, or other PFAS cause adverse human health effects." In addition, you testified at the hearing that "there's no cause and effect for adverse human health effects."

    a. Can you explain what type of scientific study would be necessary to establish causality in humans?
    b. What level of statistical significance, if any, in an associative relationship between PFAS chemicals and health effects would you believe is suitable for inferring causality?
    c. Since establishing true causality in humans would require experimental conditions that are highly unethical and unfeasible with human subjects, why does 3M believe that causality is the standard that must be met before conceding the harmful health effects of PFAS?
    d. Are you aware of studies that establish "cause-and-effect" for adverse health effects in animal subjects? If the answer is yes, please cite those studies and explain why the evidence of adverse health effects in animals is insufficient for making inferences about human health effects.

2. You also testified the following before the Subcommittee when asked about the link between adverse health effects and PFAS chemicals: "I do appreciate that links and associations are indicated in those scientific studies."

    a. Is it the 3M Company's position that the benefits of no regulations on PFAS chemicals outweigh the potential consequences for human health indicated by the "links and associations" you mentioned? If so, why?

3. You also testified before the Subcommittee that 3M is "continuing our studies, and we will work proactively with scientific bodies. …We do agree additional study is required."

    a. Please provide a complete list to the Subcommittee of the current studies 3M is conducting or funding (either wholly or partially) regarding PFAS, including the researchers conducting each study and a description of each study.

4. You also testified before the Subcommittee that, "as we moved forward, we saw that [PFOA and PFOS] did bioaccumulate, meaning that they would build up

over time with continued exposure, for these two particular materials."

a. Please explain why and how 3M decided that bioaccumulation was a health risk sufficient to justify voluntary phase-out of these chemicals?
b. Would 3M agree that the health risks associated with bioaccumulation justifies regulation of PFOA and PFOS by the federal government? If no, why are the dangers of bioaccumulation sufficient to justify a voluntary phase-out but insufficient to justify federal regulation?

Questions for Ms. Denise Rutherford
Senior Vice President of Corporate Affairs, The 3M Company

Questions from Subcommittee on Environment: Rep. Comer

September 10, 2019, Hearing: "The Devil They Knew: PFAS Contamination and the Need for Corporate Accountability, Part III"

1. In your testimony, you stated that the weight of scientific evidence today doesn't support a finding that PFAS cause harmful human health effects. Some of my colleagues suggested that this statement was inconsistent with testimony and documents in the public record. Can you clarify 3M's position on the state of scientific knowledge about the impacts of PFAS, and explain the support for that position?

2. In your testimony, you referenced studies of 3M workers who had occupational exposure to PFAS. How should the results of those studies inform policymaking concerning PFAS?

3. In your testimony, you stated that 3M announced its phase out of PFOS and PFOA in 2000. Could you provide us with more information about how that decision was implemented?

4. The regulatory requirements around the production and use of chemicals in commerce have evolved substantially over time. How does that relate to 3M's production and use of PFAS chemicals?

5. Your testimony suggested that there are significant differences in exposure levels between animal toxicology studies and the level of PFAS generally found in the environment. Could you provide us with additional information on that?

6. In your testimony, you discussed five commitments that 3M was making to address PFAS. Please tell us more about them.