

Interoffice Correspondence



*file
Chemolite
incinerator*
File: CHEM 1c
(Staff.Mfg)

Subject: Incinerator Ash and Wastewater
Treatment Sludge Disposal

Confidential

March 22, 1978

cc: L.R. Cramer - 21-2W, #58
G.J. Frazier - 21-2W, #58
D.W. Johnson - 21-2E, #71
J.C. Juettner - 21-2W, #9
J.T. Ling - 21-2W, #58
D.E. Pederson - 42-5W, #18
B.C. Sweet - 220-11E, #18
Meeting Attendees

MEETING MINUTES

Location: 21-2W Conference Room

Time & Date: 9:00 a.m., March 17, 1978

MEETING ATTENDEES: M. C. Goldsmith - 42-4W, #45
B. A. James - 42-5W, #18
L. F. Ludford - 224-4SW
J. M. Osborne - 21-2W, #58
R. A. Paschke - 21-2E, #71
M. A. Santoro - Chemolite 22
R. H. Susag - 21-2W, #58
H. J. Van Noordwyk - 21-2W, #58
C. R. Weber - Chemolite 22
D. C. Weinke - 220-11E
G. L. Weum - Chemolite 47

- PURPOSES:
- 1) To bring meeting attendees up to date on status of Chemolite plant's disposal of incinerator ash and wastewater treatment sludge.
 - 2) To gain approval of meeting attendees on what should be done with the ash and sludge immediately.
 - 3) To discuss longer range considerations of the ash and sludge disposal.

DISCUSSION:

1. The attendees were informed that the Pine Bend Sanitary Landfill in Dakota County would soon refuse to dispose of Chemolite plant's ash and sludge. This refusal was to have occurred shortly after 3M representatives (Santoro and Van Noordwyk) met with the MPCA, Mr. Douglas Coy of Phoenix, Inc. (owners of the



Exhibit
1162

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

Pine Bend landfill), and Mr. John Curry, Dakota County engineer, on March 15, 1978. The exact refusal date was not ascertained at that meeting but was expected to be on or about Monday, March 21, 1978.

The reasons for refusal were motivated more by politics than technology. Mr. Coy stated that under no circumstances would the Pine Bend landfill accept waste materials that might possibly be designated as hazardous. He based this decision on past experience and problems with the media and environmentalists. Mr. Curry said that it would be next to impossible to get the Dakota County Board of Commissioners to approve a permit modification for the Pine Bend landfill to accept the ash and sludge.

Key
short
3M, as will the MPCA, believes that the ash and sludge can be landfilled in a routine manner, i.e., without clay lining and leachate collection and treatment, as long as the ash and sludge are disposed separately, not co-disposed with municipal refuse, and are kept in an alkaline state. Monitoring wells might possibly be required. However, because of Mr. Coy's concerns, the Pine Bend landfill will not be available to even determine if Dakota County would allow this disposal method.

Immediate, interim, and final disposal plans were next discussed at the MPCA meeting. It was agreed that 3M would get back to the MPCA shortly after the March 15, 1978, meeting with an immediate plan. Further, it was agreed that an interim plan would be submitted to the MPCA about the middle of April, 1978, and a final plan about the middle of July, 1978. Nothing specific was agreed upon, and it was made clear that other key 3M personnel would have to participate in whatever decisions were made.

2) It was agreed by the meeting attendees that the ash and sludge could be disposed of on an immediate basis in an area just east of the incinerator. This area is currently used for boiler ash disposal and drum salvage operations. Furthermore, the boiler ash would be mixed with the sludge to insure that alkaline conditions would be maintained. A letter to this effect would be submitted to the MPCA.

3. At this time without adequate study it is difficult to discuss all the options open for the interim and final disposal plans for the ash and sludge. Many were brought up at the meeting. These included incineration of the sludge, land farming of the sludge, outstate disposal of the ash and sludge, etc.

Other technical areas have to be addressed also. These include investigation of the ash and sludge buffer potentials, boiler ash studies (regardless if whether the boiler ash is added to the sludge or not), etc. These other areas somewhat depend on the disposal option.

ACTION ITEMS: 1) The MPCA was sent a letter on March 21, 1978, describing what 3M's immediate disposal plan will entail (re: Discussion item 2). We are awaiting MPCA response to this letter.

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- 2) Mike Santoro will prepare and submit an RFEES to Staff Manufacturing Division Engineering that will enable a study program to be initiated by Bruce James.

Please do not hesitate to call me if there are any questions. My extension is 3-7854.

Hugh Van Nondwygh

HJVN/vmp