

PRESENT OPERATIONS

The 3M Company waste materials consist of the following: (1) acids, (2) dry scrap, (3) liquid scrap, (4) unpumpable residue. These materials result from manufacturing operations. The composition of this material is as follows:

Acids: Consists of H F tars and small amounts of sulphuric acid. These materials will be disposed in a lined and monitored lime slurry pit at 3M's Chemolite plant location. The pit has been approved by the Minnesota Water Pollution Control Commission.

Dry Scrap: Consists of paper, pallets, production scrap and cardboard. These materials are compacted by an independent contractor and currently disposed at the St. Paul municipal sanitary land fill area.

Liquid Scrap: Consists of solvents of aliphatic compounds, such as acetone, heptane and methyl ethyl ketone and of aromatic compounds, such as xylol, haphtha and toluol. These materials are currently disposed by an independent contractor (Commercial Chemical Co.) by incineration.

Unpumpable Residue: Certain waste materials are of such consistency that they cannot be pumped and thus cannot be incinerated. These materials consist of resins such as acrylates and alkyds and rubber like compounds, which have settled from the liquid scrap. The unpumpable residue is sorted from the pumpable materials (liquid scrap) and disposed in lined pits at the Woodbury site.

THE PROBLEM

The problem of waste disposal is common to all manufacturing

Exhibit
1046

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

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concerns. The problem is most acute with liquids or semi-solid materials (unpumpable residue). With the current level of technology there is no proven, satisfactory method of incinerating this unpumpable residue, although there are some promising developments which may prove to be the solution to this problem.

Over the years 3M has continually sought more efficient methods of waste disposal. Within the past few months, 3M personnel have visited installations at Upjohn, Oldsmobile, Union Carbide, the City of Atlanta and others and have had technical discussions with personnel at the University of Minnesota. None of the foregoing installations have completely solved the problem of the "unpumpable residue". In fact, some of these installations have proved to be almost valueless in incinerating unpumpable residue. 3M hopes to avoid this situation.

GOALS

Of course, the ultimate goal would be to incinerate all waste materials in a smokeless incinerator. This is not possible at the present time. The most immediate goal is to incinerate the unpumpable residue which is being disposed at the Woodbury site. To achieve this immediate goal involves consideration of many alternatives and factors.

The determination of whether 3M would construct its own incinerator will depend in large measure upon (1) whether an incinerator can be designed to successfully burn unpumpable residue, (2) whether an independent commercial firm or municipality may construct such an incinerator in this area, and (3) high cost. There is presently indication that an incinerator facility may be located on a St. Paul Port Authority site. More investigation is required to determine whether this facility, if constructed, would be capable of successfully accommodating part or all of the unpumpable residue.

Realizing that a long-range program aimed at solving this problem is not only desirable but necessary, 3M is presently designing an incinerator pilot plant facility to experiment, test and develop methods of incineration. This incinerator is also being designed to incinerate liquid scrap in the event the independent contractor currently burning liquid scrap discontinues its operations.

FUTURE USE OF WOODBURY SITE

Until such time as an industrial incinerator capable of burning the unpumpable residue is constructed in this area by 3M or by an independent operator, 3M must continue to dispose of its unpumpable residue by the land-fill method. In this connection, 3M is applying to the Water Pollution Control Commission for approval to utilize the pits on the Woodbury site to dispose of unpumpable residue. If such approval is granted by the state, 3M requests that the Township concur in such action. 3M also requests that recognition be given to the fact that unpumpable residue may be sorted and hauled to the Woodbury site by firms under contract with 3M. It should also be emphasized that no acids would be disposed at the Woodbury site.

It is difficult, if not impossible, to set a definite time at which a commercial incinerator will be constructed and available in this area. At the same time, 3M recognizes the necessity of proceeding expeditiously to find other methods of disposal. Present estimates are that it would be approximately two years before an incinerator could be installed by 3M or another commercial operator.

As a consideration to the continued use of the Woodbury site, 3M would, of course, agree to keep the Township periodically advised of the progress being made toward incineration.

Upon implementation of a successful incineration program, it is contemplated that the Woodbury site would be retained by 3M as a stand-by

area for unpumpable residue and dry scrap as well as for use by Woodbury Township residents.