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ENVIRONMENTAL ENG.
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MAY 6 1981

B. H. DAVIS

Minnesota Pollution Control Agency

May 4, 1981

Dr. Russell H. Susag, P.E.
Director
Environmental Regulatory Activities
3M Company
P.O. Box 3331
St. Paul, Minnesota 55133

Dear Dr. Susag:

The Minnesota Pollution Control Agency (MPCA) is in the process of conducting an investigation of a disposal site that allegedly existed along the Mississippi River at the Chemolite Plant. I am writing this letter to ask for your assistance and cooperation in this particular investigation, as well as to ask that 3M review and report on its overall past hazardous waste disposal practices.

The alleged disposal site was utilized by 3M during 1950 to 1955 for the burial of drums containing isocyanates, fluorocarbons, benzenes, acroleins and polymerizable materials. The wastes buried at the site were to have originated from 3M's Central Research and Pilot Plants in Maplewood, Minnesota, the Benz Building on Lafayette Street in St. Paul, Minnesota and the Busch Building just off Highway 35W.

The Agency originally became aware of the disposal site as the result of an anonymous complaint received on the MPCA's "hotline." Since the complaint was received, members of the Agency's staff have been reviewing aerial photographs dating back to the time when the disposal site was used and have found sufficient evidence to indicate the presence of a disposal site.

The Agency is concerned that this dump site may have the potential for contaminating the ground water and surface water in the area depending upon the types and volumes of waste material that were disposed of at the site.

The Agency is therefore requesting that 3M research its files and interview relevant present and past employees to determine what specific 3M wastes were or were likely to have been disposed of at the aforementioned burial site; the approximate volume of waste that would have been disposed of at the site; the duration of time the site was utilized; and submit this information in writing to the Agency by May 29, 1981.

Phone: 297-3717

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**Exhibit
2599**

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

2599.0001

3MA00334164

Dr. Russell H. Susag, P.E.
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A point from which 3M may wish to initiate their investigation would be to discuss this matter with Mr. Irwin Brown, an Executive for 3M. The complainant alleged that Mr. Brown was in charge of the disposal area during the time of its operation.

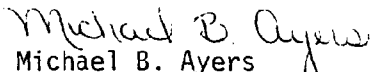
3M should also already be in the process of compiling this type of information on all past hazardous waste disposal sites as required under the Federal "Comprehensive Environmental Response, Compensation, and Liability Act" which was signed into law in December of 1980. In Section 103(c) of the law it states in part:

"(c) Within one hundred and eighty days after the enactment of this Act, any person who owns or operates or who at the time of disposal owned or operated, or who accepted hazardous substances for transport and selected, a facility at which hazardous substances (as defined in section 101(14)(c) of this title) are or have been stored, treated, or disposed of shall, unless such facility has a permit issued under, or has been accorded interim status under subtitle C of the Solid Waste Disposal Act, notify the Administrator of the Environmental Protection Agency of the existence of such facility, specifying the amount and type of any hazardous substance to be found there, and any known, suspected, or likely releases of such substances from such facility."

With this letter, the Agency is formally requesting that 3M also provide the MPCA with this type of information for all of its past hazardous waste disposal other than the already known Oakdale, Woodbury and Kerrick sites. Please do so within the same timeframe you are required to report to the Environmental Protection Agency.

The Agency looks forward to 3M's cooperation concerning these matters. If you have any questions, please feel free to contact me at your convenience.

Sincerely,


Michael B. Ayers
Regulatory Compliance Section
Solid and Hazardous Waste Division

MBA/dc
cc: Paul Brandt, Washington County Solid Waste Officer