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Subject: Investigation of Woodbury
Dump Site

December 5, 1963

M E M O R A N D U M

An investigation of 3M's Woodbury Dump Site was made on Friday, November 22, 1963, by a representative of the Minnesota Department of Health at the request of the Woodbury Township officials. The investigation was made by Mr. Lovell Richie, Geologist, Section of Water Pollution Control, Minnesota Department of Health. Representing the township were Messrs. Bielenberg and Waltersdorf, Board Members, Mr. Lyle Eckberg, Township Attorney, and Mr. Otto Bonestroo, Township Engineer. Representing 3M were Messrs. J. A. Brown, Geology Department, C. Dietz, Office of General Counsel, H. J. Wessel, and the writer.

Mr. Richie and the township representatives were shown the existing trench that is presently being used for disposal of the wet scrap. This material contains solvents, rags, sludge, etc. It was pointed out that this trench was lined with a 12-inch layer of bentonite. This layer is 10 percent bentonite, by weight, mixed with the natural soil in the area. It was not clearly stated to the officials that other unlined trenches had been used in this area, filled with wet scrap, and then back-filled.

The township officials and Mr. Richie were also shown the two new trenches and the existing acid pit. These people were told the sludge was made up of about 25 percent hydrofluoric acid and 75 percent tars and that about 4000 gallons were discharged each year. The township representatives were assured that we had not dumped any acid sludge since their last investigation and that plans had been made for disposal of this material on our Chemolite site. Mr. Richie verified that plans and specifications had been submitted by 3M to the Water Pollution Control Commission and the Commission formally approved the plans for construction of the pit November 21, 1963.

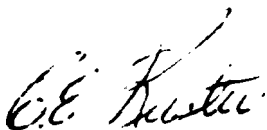
We told Mr. Bonestroo and Mr. Eckberg, who are also representatives of Cottage Grove Township, that we would submit to the township for their records, plans and specifications and copies of the applications that were sent to the Water Pollution Control Commission for construction and operation permits. Mr. Bonestroo said that he had no objection to construction of this pit on our Chemolite site.

The two new wet scrap trenches were shown to Mr. Richie and the township representatives and told that they were lined with 12-inches of clay compacted to 95 percent modified Proctor Density. They were told that we would like to request temporary

approval for using these trenches until our plans for ultimate disposal of the wet scrap can be finalized and actual facilities built and put into operation. It was quite strongly indicated that incineration was being considered. Mr. Richie said that he could not speak for the Commission, but he was quite sure that they would approve this operation for a short time in so far as 3M showed that they had a positive program for design and construction of new facilities. He was quite positive, however, that the Commission would not approve this trench disposal as a permanent solution. It appeared that the representatives of the township would go along with this operation on a temporary basis.

The township representatives indicated that a number of communities in South Washington County are investigating the idea of building an incinerator to serve all of their needs. The intimation was that 3M might be interested in working with these communities in providing a common means for disposing of all wastes. We indicated that 3M would take this proposal under consideration.

3M is to prepare a memorandum for the Woodbury Township Board listing our present use of the dump site, the kind and quantity of wet scrap and dry scrap that is presently being dumped, and our long-range program for ultimate disposal of this waste. This should be ready for the township by Monday, December 2, 1963, for a special meeting. The same type of information also has to be prepared and submitted to the Water Pollution Control Commission for their review.



C. E. Kiester
Water & Sanitary Engineering Dept.

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