
From: James Kelly [James.Kelly@state.mn.us]
Sent: Thursday, July 29, 2004 3:28 PM
To: Williams, Alan ; Barb.Jackson@state.mn.us; Bruce.Brott@state.mn.us;
Dann.White@state.mn.us; David.Douglas@state.mn.us; Don.Kriens@state.mn.us;
Douglas.Day@state.mn.us; Fardin.Oliaei@state.mn.us; Gerald.Stahnke@state.mn.us;
Karen.Everstine@state.mn.us; Laura.Solem@state.mn.us; Mark.Ferrey@state.mn.us;
Mike.Connolly@state.mn.us
Subject: RE: 3M Cottage Grove/Call from Bob Paschke

MDH staff will include this information in the final Health Consultation for the 3M Cottage Grove site, as it seems to confirm information provided to us earlier by PCA that perfluorochemical wastes from Cottage Grove were dumped at other sites. We are certainly available to discuss this information further with regards to the 3M-Woodbury disposal site, and any follow-up that may take place.

Jim K.

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>>> "Douglas, David" <David.Douglas@state.mn.us> 07/27/04 08:10AM >>>
This morning I received a fax from Todd Fasking of 3M summarizing the test results from the 3M Woodbury Site combined effluent sampling of May 1, 2004. Bruce had requested that 3M conduct this testing earlier this year.
The results in ug/l are as follows:

Compound	Result	Duplicate Result
PFOA	2.2	2.4
PFOS	0.8	0.9
FSOA	ND	ND
PFBS	2.4	2.6
PFHS	7.8	8.1

FSOA is perfluorooctanesulfonamide; PFBS is perfluorobutanesulfonate; and PFHS is perfluorohexanesulfonate. These results would indicate that an estimated 220 pounds/year of the four PFCs are being discharged into the Mississippi River if the system is pumping out 5 mgd combined effluent as Bob Pashke indicated to me. Undoubtedly there are more PFCs in the effluent as methods to detect specific PFCs are limited. The fact that these are combined effluent results means that the levels from the pumpout well or wells near the burial site are higher. Dave

> -----Original Message-----

> From: Douglas, David
> Sent: Thursday, July 22, 2004 11:14 AM
> To: Jim Kelly (E-mail); Brott, Bruce; Ferrey, Mark; Kriens, Don; White, Dann; Stahnke, Gerald; Connolly, Mike; Oliaei, Fardin; Solem, Laura; Everstine, Karen; Day, Douglas; Williams, Alan

**Exhibit
2572**

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

> Subject: 3M Cottage Grove/Call from Bob Paschke

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> Bob Paschke called me today to talk about the draft 3M Cottage Grove Health Consultation report and expressed concerns about MDH's first recommendation about considering conducting a 3M Cottage Grove remedial investigation under the consent order addendum similar to the 3M Decatur, Alabama facility investigation being conducted under EPA authority. I stated that nothing has changed here regarding what Bruce Brott told 3M regarding proceeding at 3M Cottage Grove with a phased approach starting with ground water under the facility. Bob expressed concerns about doing a mammalian study and a vegetation study. I stated that we had not talked about these types of studies but had talked about a stream and Mississippi River sediment study and a Mississippi River fish study. Also I stated that we had concerns about second generation human effects from PFCs. He said that he did not know much about second generation human effects from PFCs, but said that John Butenhoff at 3M was the toxicologist who knows most about the toxicology of PFCs. I emphasized several times that 3M needs to respond directly the MDH about their concerns about MDH's first recommendation and anything else in the document.

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> I asked Bob if 3M had test results back for the ground water pump out well effluent from the 3M Woodbury site (where PFC wastes were buried) and he said that the results indicated that there was 1 ppb PFOS and 2 ppb PFOA in the effluent. (The HBV for PFOS is 1 ppb and the HBV for PFOA is 7 ppb.) He said that the volume of Woodbury site effluent (discharged directly to the Mississippi River) is approximately 5 million gpd. I estimate that this is equivalent to a discharge of 33 pounds of PFOA per year and 16 pounds of PFOS per year or about 50 pounds per year of the two PFCs. Because these are just two of many PFCs in the effluent, it is difficult to say how many pounds of PFCs are discharged into the Mississippi River per year. This effluent is not treated by the 3M Cottage Grove WWTF and there are no plans for this effluent to be routed through the new carbon filtration system. I asked for a copy of the lab data and Bob said that he would fax a copy to me. If you are interested in copy of the data, please let me know.

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