



Dean Graham

07/12/2000 08:17 PM

To: Shawn Kruse/US-Corporate/3M/US@3M-Corporate
cc: Perry W. Logan/US-Corporate/3M/US@3M-Corporate
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Subject: Re: Draining C8 Acid to Sewer

Shawn

you are correct with the note below. However, there are steps being taken for the current lot in BC-34 to drain the bottoms to drums (if possible. it may not be possible to drain the bottoms cool enough to keep from melting the drum liners). In the worst case some methanol may need to be added to the bottoms, then cool the mixture, then drain it to drums. However there are problems with doing this as well. The next step would be to clean the empty reactor with methanol. The methanol cleaning solution would be scrapped out instead of draining it to the sewer. **The goal is to keep all FC's out of the sewer system.** The Bottoms do contain some C8 acid but have never been analyzed to get a %. This is very difficult do to the nature of the material. The cleaning solution would also contain some trace amounts of C8 acid as well. This has not been analyzed either.

Thanks,
Dean Graham.

From: Shawn Kruse on 07/12/2000 01:54 PM

3M Internal

From: Shawn Kruse on 07/12/2000 01:54 PM
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Subject: Draining C8 Acid to Sewer

Dean,

Perry asked me about whether or not you guys drain C8 acid to the sewer in Building 15. I looked at the detailed exposure assessment worksheet you put together and it looks like you do (the tasks are called "drain bottoms to sewer", and "drain cleaning solution"). As noted in your document, these are "exposure significant tasks", especially since the bottoms and the water rinse are likely hot. The controls listed in your worksheet are to provide a water flush in the sewer during draining and local exhaust on the sewer grate. Maybe this is adequate, but would it be a better idea to drum the reactor bottoms and water rinses from reactors? Assuming spot exhaust is available, it might be easier to contain and control the vapors. (Obviously, you would then be generating a hazardous waste, which potentially creates another set of issues.)

**Exhibit
1728**

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

On a related note, and as a "heads up": The other thing to consider is the environmental impact of draining to the sewer. Although no one from 3M Environmental has been out to view the Building 15 processes recently, I know there is a growing interest within this and other 3M groups regarding environmental releases of C8/PFOA from Building 15.

Shawn