



Minnesota Pollution Control Agency

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. Todd Fasking
3M Environmental Technology and Services
P.O. Box 33331
St. Paul, MN 55133-3331

RE: 3M Chemolite Superfund Site

The Minnesota Pollution Control Agency (MPCA) staff has reviewed the draft document entitled, "Facility-wide Fluorocarbon Investigation Work Plan, 3M Cottage, Grove," October 6, 2003 (Report). The Report was submitted pursuant to the Response Order by Consent dated May 30, 1985 between 3M and the MPCA.

The MPCA staff hereby approves the Report with modifications pursuant to Attachment I. The MPCA staff requests 3M provide a final Report that includes the modifications identified in Attachment I for MPCA staff review and approval within 30 days of receipt of this letter.

Please call me at (612) 296-7818 if you have any questions regarding this letter.

Sincerely,

David N. Douglas
Superfund Unit 2
Superfund Section
Majors and Remediation Division

DND:csa

Enclosure

cc: Paul Book, ERG
James Kelly, Minnesota Department of Health

St. Paul

**Exhibit
1920**

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

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Attachment I

Modifications to the Draft Document Entitled, "Facility-Wide Fluorocarbon Investigation Work Plan, 3M Cottage, Grove," Dated October 6, 2003

Manufacturing Section

3M states that "3M records show that manufacturing began at the site in 1947 and that perfluorochemical (FC) production began about 1976." This statement conflicts with information in published studies indicating that FC production began much earlier, in the late 1940s or early 1950s. Specifically, large scale production of perfluorooctanoic acid (PFOA) was said to have begun in 1951 (Gilleland, 1992, "3M Fluorochemical, EPA Submissions," Disk 2, submitted to MDH). The MPCA staff requests that 3M address this discrepancy and if production began in the 1940s or early 1950s, identify any other areas that could be FC source areas or disposal areas unique to earlier production.

Remedial Investigation Section

Target Analyte List

At the present time human risk associated with perfluorochemicals (FCs) at the 3M Cottage Grove facility (Site) will be evaluated by comparing analytical results generated for perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS) to associated Minnesota Department of Health (MDH) Health-Based Values (HBVs) for these FCs as these are the only FCs for which there are HBVs. However, the MPCA staff requests that with regard to the scope of the investigation, that the target analyte list include the entire suite of FCs for which analytical methods are available. It is the MPCA staff's understanding that at present time this suite of FCs is limited to those FCs identified in the analyte list in the document entitled "Subsurface Investigation Work Plan, Neutralized HF Tar (D1) Disposal Area, 3M Cottage Grove Facility" dated October 17, 2002 (October 2002 D1 Work Plan). Information on the magnitude and extent of other FCs could be important for assessing risk in the future when more is known concerning the toxicity of other FCs.

Monitoring Wells

The MPCA staff requests that 3M sample all existing Site ground water monitoring wells for the target analyte list identified in the October 2002 D1 Work Plan to establish the magnitude and extent of FCs in Site ground water. Any subsequent sampling will focus on known source areas and other potential sources on Site as indicated by the first sampling event. The MPCA staff requests that 3M clarify which wells serve the water distribution system, and which wells serve the fire protection system and the incinerator.

Air Releases

The MPCA staff requests that 3M provide information on air releases of FCs, specifically locations, dates, and known or estimated quantities per year.

Disposal of FC Wastes from Wastewater Treatment Plant

The MPCA staff requests that 3M provide information on the treatment and disposal of FC wastes through the wastewater treatment plant, i.e., dates, and known or estimated quantities per year.

Collection of Sample from Water Distribution System

The MPCA staff requests that 3M collect a sample from the water distribution system whenever samples from the pumping or monitoring well are collected. The Building 116 cafeteria would be a logical location for this sample.

Geoprobe Work in Fire Training Area

The MPCA staff requests that 3M conduct geoprobe work in the vicinity of the Fire Training Area (FTA) to delineate contamination in the immediate vicinity of the FTA focusing on and evaluating contaminant transport to the river and the production well. This information can be used to assess the need and location of future monitoring wells in this area.

Updated Schedule

The MPCA staff requests that 3M provide a schedule for conducting the work as described by the Remedial Investigation Work Plan as modified by this attachment.