

Environmental Engineering
and Pollution Control/3M

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May 29, 1981

Mr. Louis Breimhurst,
Executive Director
Minnesota Pollution Control Agency
1935 West County Road B2
Roseville, Minnesota 55113

Dear Mr. Breimhurst:

This letter is in response to Michael Ayers written request of May 4, 1981, for information on the alleged disposal of industrial wastes at the 3M Chemolite plant in Cottage Grove, Minn. between 1950 and 1955.

A 3M investigation, begun last year and as yet incomplete, indicates that industrial wastes, both liquid and solid, generated at the Chemolite plant from its initial operations in 1947 until about 1956, were handled on-site in accordance with commonly accepted disposal practices of the time. That is, these wastes generally were moved to an area or areas on plant property and were burned, with the residue occasionally pushed to the side and eventually covered or mixed with surface soil. The burning practice was stopped in the mid-1950s, when burning bans were instituted.

Examples of solid industrial wastes that may have been burned are paper, scrap lumber, plastic film and reflective sheeting that did not meet product specifications, and solvent contaminated materials such as old rags, work gloves, etc. Examples of semi-solid and liquid wastes that may have been burned are adhesives, resins, heptane, toluene, various alcohols and other industrial solvents. Our investigation also indicates there may have been some limited burial of certain wastes such as hydrofluoric acid tars that were neutralized with lime prior to or at the time of disposal. It is impossible to identify all specific industrial wastes that were handled because disposal records were not maintained in those years. However, our investigation has revealed no indication that wastes other than those generated at the Chemolite plant were handled at this plant.

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Exhibit
1256

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

3MA00468743

1256.0001

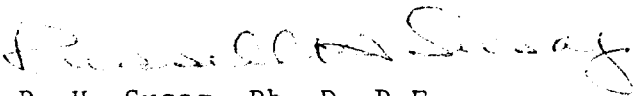
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Since the mid 1950s, the Chemolite plant production area has expanded in all directions with the construction of additional buildings. The suspected waste handling area or areas have been landscaped and a large, advanced wastewater treatment facility has been built in the vicinity. Thus, there is no visual evidence at the present time of exactly where waste handling/disposal took place, or the physical dimensions of the area or areas involved. Our investigation to date is based upon the recollections of management personnel who worked at the Chemolite plant in the early 1950s.

In an attempt to identify specific former waste handling areas, to determine what residues may be in the ground, and to learn whether there has been a migration of any such residues to the groundwater or toward the Mississippi River, 3M is developing a hydrogeologic investigative program that would include various soil borings and sample analysis. Representatives of our environmental engineering and geology staffs would like to meet with you and your staff at a convenient time in the near future to discuss the technical details of our planned hydrogeologic study. As you know, investigations of this type require several months, so the results would not be available until sometime next year. Meanwhile, in accordance with your request, 3M will copy your agency on information concerning Minnesota that is submitted under requirements of the Federal Comprehensive Environmental Response, Compensation and Liability Act.

In conclusion, I would like to assure you that it is our formal company policy that 3M will resolve in a responsible manner any environmental concerns involving its own property or facilities, and that 3M will continue to assist and cooperate with state, federal and other environmental agencies, including the MPCA.

Sincerely,



R. H. Susag, Ph. D, P.E.
Director Environmental Operations

dpc: Mr. Paul Brandt
Mr. Carl Meisner
Mr. Michael Ayers