

File: CHEM 30

bcc: M. Santoro - 21-2W-05  
L. Hoffmeier - Chemolite-22  
B. Bracht - 42-4W-05  
G. Hohenstein/W. Newmann - 21-2W-05  
G. Weum/F. Robinette - Chemolite-47

May 19, 1983

Re: MPCA Letter dated March 15, 1983, concerning the March 3, 1983, MPCA inspection of the 3M Chemolite Incinerator (SW-9) and the Boiler Ash Disposal Site (SW-224)

Certified Mail

Mr. Michael J. Tibbetts  
Compliance and Enforcement Unit  
Regulatory Compliance Section  
Solid & Hazardous Waste Division  
Minnesota Pollution Control Agency  
1935 West County Road B2  
Roseville, Minnesota 55133

Dear Mr. Tibbetts:

In your March 15, 1983, letter concerning the results of the MPCA inspection of the 3M Chemolite waste facilities, the following concerns were listed:

1. Stockpiling of Phase III sludge, incinerator ash, and scrap refractory on the boiler ash landfill.
2. Processing of partially combusted drummed wastes in the same area.
3. Boiler ash landfill capacity.

We feel that the following actions and changes in the Chemolite operations address your concerns. On a point by point basis, they are as follows:

**Exhibit  
1281**

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

3MA0020063

1281.0001

Mr. Chael J. Tibbetts

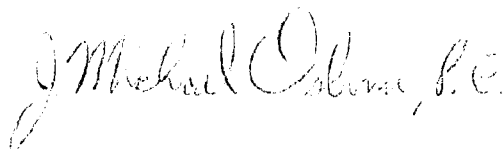
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1. The stockpiled Phase III sludge will be removed from the boiler ash landfill by June 1, 1983. Changes to the sludge handling building to allow direct loading into trailers are being investigated. At a minimum, Phase III sludge will no longer be stockpiled on the boiler ash landfill.
2. Another site, near the coal pile and southwest of the incinerator is being investigated as a processing area for the incinerator ash. The area will be designed with a bentonite sealed base. It will be diked and sloped for run-off control. All run-off will be channeled to the existing coal-pile run-off pond. Completion would be expected by late summer.
3. Matt Straus, EPA Washington, recommended that we await the publication of the delisting guidelines before applying. Therefore, as soon as the guidelines for delisting incinerator ash are published by the EPA, we will gather the required data and file for delisting.
4. The scrap refractory is a nonhazardous waste since only 1 to 5% of the material is incinerator slag. We are currently running leach tests to verify this contention.
5. We intend to apply to the MPCA in the near future for an expanded landfill permit both in terms of volume and material to be landfilled. In addition to the boiler ash, we will be requesting permission to landfill construction debris, such as the scrap refractory, and other nonhazardous fairly inert wastes generated at Chemolite.
6. Partially combusted drums will be stored in large steel containers until they can be processed. Until the new site is finished, the incinerator ash and partially combusted drum processing operations will have to continue at the boiler ash landfill.

If a permit is required for the new incinerator ash processing area, please let me know as soon as possible. If you have any other questions or comments concerning the contents of this letter, my telephone number is 778-6135.

Sincerely,



J. Michael Osborne, P.E.  
Environmental Specialist

JMO/mb