

3M Environmental, Health and  
Safety Operations

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July 26, 2004

Mark Rys  
Minnesota Pollution Control Agency  
520 Lafayette Road  
St. Paul, MN 55155-4194

**Re: Oakdale Disposal Site**

Dear Mark:

Thank you for meeting with us to discuss MPCA's June 7, 2004 letter requesting groundwater sampling for perfluorooctanoic acid (PFOA) and perfluorooctanesulfonate (PFOS) at the Oakdale Disposal Site. As we discussed during our July 8 meeting, 3M plans to conduct the sampling in a phased approach starting this August as summarized below.

As you know, MPCA has also requested that 3M collect samples at our Woodbury site and analyze the samples for PFOA/PFOS. The agreed upon approach at Woodbury is to first collect a combined effluent sample from the groundwater pump-out system at the site. The sample results will be reviewed and the need for an expanded sampling program will be determined based on these results. We believe this phased screening approach should also be implemented at the Oakdale site.

The Oakdale site monitoring results demonstrate that the pump-out system has effectively captured and reduced the extent of contaminated groundwater at the site. The existing pump-out wells remove water and VOCs from across the historic disposal area and ultimately produce a combined effluent that is discharged to the sanitary sewer. If FC disposal occurred at the Oakdale site, it would be expected to coincide with the same areas where VOC-related disposal occurred and it is appropriate to screen for the potential presence of PFOA/PFOS in the combined effluent of the pump-out system. We understand that MPCA's main concern is related to potential discharges into the municipal wastewater system. If the effluent results warrant further assessment, the next phase of sampling would include collecting groundwater samples from a combination of pump out and monitoring wells in historic disposal areas.

Sample collection will be performed consistent with methods previously submitted by 3M to the MPCA in the Cottage Grove D-1 Work Plan. We understand that at this time MPCA does not want to split samples. We will notify you 5 days ahead of the scheduled sample collection date. If you have any questions, please contact me at 651-778-5344.

Sincerely,



Todd Fasking

Senior Environmental Engineer

Cc. Dan Fetter, Barr



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