Following is a short update on the Woodbury project.

The response to the MPCA's comments on the original report was submitted on December 4, 1992. To date we have had no response from the Agency.

The drilling and additional hydrogeological work is on schedule. Five of the six wells will be completed this week. One well is being completed using a cable tool rig and will be finished next week. Development and sampling should take place the week of December 28 so by mid to late January we should have a better handle on the hydrogeology in the area of the acid pits and the barrier wells.

I met yesterday with David Rowe, a local contractor, to discuss removal of the trees and brush that are growing in the trenches and on the soil piles. While reviewing the site David said that he had worked on the Woodbury Township landfill when it was operating and that his brother had worked for McNeilly and had done most of the excavating at the on the 3M portion of the site. He remembered some of the activities and I asked if there had ever been any wet scrap disposed of in the acid trenches. He said that he remembered it being hauled up there for disposal a number of times. This seems to fit with the groundwater contamination we are finding in the area and the scrap that remains in the dirt piles adjacent to the pits.

We then talked about the township landfill and he pointed out an area that is located a long way from where it is on the maps we have. Apparently waste disposed of in the general area I have outlined it in dotted lines on the attached map. This area is in addition to the site we knew about that was on the south side of the site road. I asked if was sure and he said he operated the equipment that was used to cover the waste about once per week. We then walked over this area and found evidence of rolls of plastic and resin protruding from the ground which would indicate that 3M waste may have also been disposed of in this area. If this is true it would be contrary to our statement to the state that the township and 3M wastes were always segregated.

There were also a couple of holes dug in the same general area and I looked in these and again found rolls of plastic, jumbos of tape, etc. sticking out of the ground indicating that disposal may have occurred in this area. This is outside of the existing trenches and the waste does not look as if it was burned. I have outlined this area on the attached map as Additional Waste.
At this point I do not have any solid information on the actual extent of the two township landfills or the additional 3M waste disposal area. To try and narrow these down I am arranging a meeting with David Rowe's brother on the site to see if he can recall more clearly where the disposal actually took place. I have also requested that CRA find old aerial photos to see if we can more closely locate all of the areas where activity took place. We are also getting information on the original contours that we will be able to compare to the current profiles.

I would like to get together to talk about these findings. I will be taking vacation from the 23rd through the 3rd of January. Please drop me an "E" mail and let me know your availability.

TGA

TGA

File: Woodbury