



Todd  
Fasking/US-Corporate/3M/US  
10/27/2003 08:52 PM

To "Rys, Mark" <Mark.Rys@state.mn.us>  
cc David.Douglas@state.mn.us  
"James Kelly" <James.Kelly@state.mn.us>  
"Paul Book (E-mail)" <prbook@ergltd.com>  
Virginia Yingling <Virginia.Yingling@state.mn.us>  
bcc Michael A. Santoro/US-Corporate/3M/US  
Subject RE: PFOA production in Cottage Grove

Mark,

The following was prepared to help clarify Cottage Grove FC production history.

The Draft Cottage Grove FC Work Plan states in paragraph two on page one that "3M records show that manufacturing began at the site in 1947 and that FC production began about 1976". This is essentially what ERG said during the facility tour. This is consistent with what has been reported to the EPA in our **Letter of Intent and Submission of Monitoring Data Pursuant to the 3M LOI dated March 13, 2003 and APFO Users LOI dated March 14, 2003**. In the Submittal of Monitoring Data document, 3M stated "Manufacturing operations began at the site in 1947 and existing records indicate that PFOA production began about 1976."

3M did begin general manufacturing activities at the Cottage Grove facility in 1947. As stated above, our existing production records indicate that commercial production of PFOA began in 1976. Our company wide production records indicate PFOA was manufactured on a commercial basis as early as 1969 at the 3M Decatur, AL site. Preceding this time, 3M has no commercial production records and 3M's understanding, based on anecdotal evidence, is that any PFOA production was on a smaller research/pilot scale.

We would be interested in seeing the PhD. thesis you reference. Please forward a copy to me so that 3M may assess the information for accuracy.

Thanks,

-Todd

Todd Fasking  
42-2E-27  
ET&SS  
Direct 651-778-5344  
Fax 651-778-7203  
"Rys, Mark" <Mark.Rys@state.mn.us>



"Rys, Mark"  
<Mark.Rys@state.mn.us>

To: "Todd Fasking (E-mail)" <tfasking@mmm.com>  
"Paul Book (E-mail)" <prbook@ergltd.com>  
cc: Virginia Yingling <Virginia.Yingling@state.mn.us>



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10/21/2003 12:15 PM

"James Kelly" <James.Kelly@state.mn.us>  
David.Douglas@state.mn.us  
Subject: RE: PFOA production in Cottage Grove

Todd/Paul:

FYI. May need to modify workplan. We will likely make comment but keep this in mind. If you have info which can clarify please provide.

Mark

-----Original Message-----

From: James Kelly [mailto:James.Kelly@state.mn.us]  
Sent: Tuesday, October 21, 2003 11:59 AM  
To: David.Douglas@state.mn.us; Mark.Rys@state.mn.us  
Cc: Virginia Yingling  
Subject: PFOA production in Cottage Grove

Hi guys,

I wanted to clarify something that was said at the site visit at 3M's Cottage Grove facility regarding PFOA production. The workplan submitted by ERG states on page 1 that "manufacturing began at the site in 1947 and that FC production began about 1976." Paul Book from ERG stated this as well. This suggests that FC production (primarily PFOA) did not begin until the mid-70's. It bothered me at the time, but I could not put my finger on it.

I went back and reviewed some of the peer-reviewed epi studies that have been published (some of which I had read before), as well as some of the information submitted to EPA by 3M. The published studies indicate that PFOA production began much earlier, when the facility opened in the late 1940s. Also, a PhD thesis from a student at the U of M who worked on some of the epi studies with 3M describes PFOA production at Cottage Grove (Gilleland, 1992, page 30) as follows: "In October 1951, large-scale commercial PFOA production facilities became operational."

I guess I wanted to point this out to indicate that releases were occurring to the air, water, and perhaps soil much earlier than described by ERG.

I would still like to meet at some point to discuss the scope of our activities, and to discuss the ERG workplan. Thanks,

Jim

James Kelly  
Site Assessment & Consultation Unit  
Environmental Health Division  
Minnesota Dept. of Health  
(651) 215-0913

james.kelly@health.state.mn.us

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