P		bcc	Michael A. Santoro/US-Corporate/3M/US@3M-Corporate Sara J. Ethier/US-Corporate/3M/US@3M-Corporate Fred J. Luden/US-Corporate/3M/US@3M-Corporate Michael A. Nash/LA-Legal/3M/US@3M-Corporate John L. Butenhoff/US-Corporate/3M/US@3M-Corporate John P. Pilney/US-Corporate/3M/US@3M-Corporate Richard H. Renner/US-Corporate/3M/US@3M-Corporate Dana M. Schnobrich/US-Corporate/3M/US@3M-Corporate Dale L. Bacon/US-Corporate/3M/US@3M-Corporate Thomas J. DiPasquale/US-Corporate/3M/US@3M-Corporate Larry A. Wendling/US-Corporate/3M/US@3M-Corporate
	Sub	ject	Phone conversation with Dave Douglas, MPCA

The following is a summary of my recent phone conversation with Dave Douglas (MPCA project manager for the 3M Cottage Grove site) concerning the upcoming FC investigation at the Cottage Grove site and how the recently published draft Health Consultation Report (HCR) dated June 24, 2004 may impact the

1. The MPCA is expecting to approve the FC Work Plan for the Cottage grove site in the early to mid August time frame. This work plan is being implemented through an addendum to the original Consent Agreement (1983) for the Cottage Grove site. Their primary goals for the work plan is to assess FC source areas both on-site and off-site and determine potential migration pathways and potential receptors.

2. Dave did provide some insights on the MPCA data needs and potential for additions to the current draft work plan. Key points brought up were: (1) The Agency will likely request sample collection and analysis of FCs in fish, sediment, and surface water near the Cottage Grove discharge point; (2) Data should be collected/generated to confirm that ground water pumping at Cottage Grove is creating a sufficient cone of depression to contain FC releases from source areas. If the groundwater is not captured in the source areas, the MPCA may require remedial measures; (3) Other potential off-site disposal sites for FC waste from the Cottage Grove site should be reviewed as part of this investigation (specifically he mentioned Oakdale, Woodbury and Lake Jane landfills).

3. Dave indicated that the MPCA had an opportunity to review a draft of the HCR and provided comments to the MDH prior to the release of the draft document.

4. The MPCA may be making additional comments on the HCR during the comment period. Dave did say that for HCR reports the MPCA considers the recommendations but may not always follow them.

5. The MPCA (also the MDH) has concerns about the impact of FCs on off-springs of Cottage Grove workers exposed to FCs. Dave suggested that a joint meeting with 3M, MPCA, and MDH would be constructive to review and discuss 3M and other studies relating to generational effects.

Please contact me if you have any questions about my discussions with Dave Douglas.

Bob

scope of that investigation:



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