To: Fred J. Palensky/US-Corporate/3M/US@3M-Corporate
Jerry L. Walker/US-Corporate/3M/US@3M-Corporate
cc: Brian H. Davis/LA-Legal/3M/US@3M-Corporate
Dean D. Dworak/US-Corporate/3M/US@3M-Corporate
Mark A. Gaetz/US-Corporate/3M/US@3M-Corporate
Fred J. Luden/US-Corporate/3M/US@3M-Corporate
Jeffrey H. Mandell/US-Corporate/3M/US@3M-Corporate
Michael A. Nash/LA-Legal/3M/US@3M-Corporate
Robert A. Paschke/US-Corporate/3M/US@3M-Corporate
Richard H. Renner/US-Corporate/3M/US@3M-Corporate

Subject: Cottage Grove Wells

There was a meeting today to discuss the recent findings of fluorochemicals in the wells at the Cottage Grove site. The results of that meeting follow:

1. Presence of FC's

Well water samples from four wells at the plant have shown varying levels of FC's. The highest levels were found in Well No. 5, which is located very near the fire training site at the plant. The levels of PFOS and PFOA do exceed the drinking water health advisory level for these compounds, but at the levels found, do not pose an imminent risk. The wells have been re-sampled and analysis is underway to verify the results. In addition, tap water itself will be analyzed to determine the effect of any mixing of the water from the 4 wells. (We need to validate the PFOA advisory as this was not calculated by 3M.)

2. Exposure and health considerations

About 80% of the plant is using bottled water for drinking. This has been the case since about the mid-1980's. The well water is used for food preparation in the main cafeteria, and likely in other of the satellite food service areas. Given the relatively low concentrations in the water, and low exposure potential, there is no reason at this time to take immediate action relative to ceasing use of the water in the areas it is being used.

3. Ground water investigation

A plan is being developed to determine the potential movement of the groundwater to the north at the Cottage Grove city treatment plant site. There is a well water supply at this location and we need to verify that this well has not been impacted. This will be done through site assessment and possible installation of additional monitoring wells. It is important to note that the pumping of the on-site wells does act to contain any on-site residuals because of the significant draw down of groundwater.

4. Reporting and Communications

We are verifying that 8e reporting will not likely be required, because the finding is for a relatively localized area, and thus would not constitute widespread distribution or presence. At some point 3M will need to inform the Minnesota Pollution Control Agency of the finding as part of the ongoing facility assessment. There is also a need to develop a strategy for plant site communications.

5. Next Steps

-- The plan moving forward is to re-sample and analyze the well water, including Wells No. 2, 3, 4, 5, and 6, and tap drinking water. (Underway)

-- Establish an investigation strategy to understand the movement of groundwater and to assure that there is on-site containment.
-- Verify the reporting obligations under TSCA 8e.

-- Begin to develop a communications plan for the Cottage Grove site.

-- Determine the basis for the PFOA drinking water advisory.

A meeting will be held during the week of July 16 to review the repeat analyses, assess exposure potential and characterize the potential impact, if any, of FC's in the well water. If necessary, a plan to provide the plant with another source of drinking water may be necessary for the areas in which the well water is presently be used for human consumption.

Please contact me with any questions or if you need additional information at this time.

Mike