

Settlement Agreement and Consent Order
3M and MPCA, May 22, 2007

QUARTERLY PROGRESS REPORT #20

January 1 – March 31, 2012

On May 22, 2007, 3M and the Minnesota Pollution Control Agency (MPCA) entered into a Settlement Agreement and Consent Order (Settlement Agreement) for the investigation and assessment of perfluorochemicals (PFCs) at sites in Washington County and for the execution of certain other related matters. This report is provided to fulfill the requirement outlined in Part XIII.A of the Settlement Agreement.

REPORTING PERIOD: January 1 – March 31, 2012

ACTIVITIES COMPLETED:

Response Action Plan and Response Action Implementation (Part VIII)

Cottage Grove

Backfilling activities in the East Cove area were completed in January. In addition, all sheet-piling and equipment used to conduct the response action was removed, decontaminated and shipped off-site during this reporting period.

Planning activities continued relative to the East Cove restoration slated to commence in Spring 2012.

Activities related to the design of the new groundwater treatment facility continued. These included information exchanges and discussions with Minnesota Department of Health (MDH) and MPCA personnel intended to facilitate obtaining necessary approvals. Completion of this project, targeted for the end of 2012, will enable the conducting of the extended pilot test of the groundwater extraction system installed in the eastern portion of the Cottage Grove site that was the subject of the March 10, 2010 submittal to the MPCA. This new facility will be capable of treating groundwater generated from the aforementioned new extraction system, the Woodbury Disposal Site and additional water sources at 3M Cottage Grove.

A site-wide PFC monitoring plan was drafted and will be submitted to the MPCA for review and approval once finalized

Oakdale

On December 1, 2011, 3M submitted a *Construction Completion Report (CCR)* to the MPCA for the soil removal response action at the site. MPCA responded with questions and comments in correspondence dated December 22, 2011. To address the agency's review, 3M arranged a telephone conference call with MPCA and AECOM staff on January 6, 2012, provided an electronic mail response on January 17, 2012 and submitted a written response on February 27, 2012.

The first round of routine groundwater and surface water samples were collected during the weeks of March 5, 2012 and March 12, 2012, respectively. These were collected in accordance with the previously approved monitoring plan for the site.

Woodbury

The groundwater monitoring program continued at a monthly sampling frequency to confirm groundwater capture and evaluate trends in constituent concentrations. Results continued to be shared with MPCA and MDH staff as soon as final reports were available.

Per agreement with MPCA staff, quarterly status reports will be submitted to the MPCA to summarize investigatory and response actions taken at the site. The most recent report was submitted on February 29, 2012.

In order to collect additional hydrogeological information, a work plan to complete the following actions has been drafted: 1) monitor wells MW-B and MW-G to be rehabilitated and reconstructed; 2) an additional shallow monitor well to be installed in the uppermost water-bearing zone near monitor well MW-G; and 3) an additional well couplet to be installed to evaluate conditions between B-2 and sentinel wells S02DR/PC/JS. Once finalized, the plan will be submitted to MPCA for review, comment and approval.

Significant progress was made on development of a three-dimensional geologic model of the site. Results from this effort were presented at a meeting attended by MPCA and MDH personnel on March 15, 2012.

Health and Toxicological Studies (Part XIII.C)

3M continued to cooperate with the Minnesota Department of Health (MDH) in providing health and toxicological information relative to PFCs. The process established in May-June of 2007 to share specific updates on various studies as they are underway has continued with 3M providing monthly written summaries to the MDH. For informational purposes, copies of these updates are also provided to the MPCA.

ACTIVITIES UNDERWAY &/OR PLANNED FOR APRIL - JUNE 2012:

Response Action Plan and Response Action Implementation (Part VIII)

Cottage Grove

A *Construction Completion Report* for the East Cove remedial response action will be completed and submitted to the MPCA on or before June 23, 2012.

Execution of the restoration plan for the East Cove area will continue. A site visit involving MPCA, MN DNR and U.S. Army Corps of Engineers staff to review baseline conditions and to discuss detailed refinements to the plan is scheduled for April 26, 2012. Planting of vegetation suitable to spring conditions will be completed in the next several months with additional fall plantings anticipated towards the end of the year.

Following receipt of necessary approvals, construction of the new groundwater treatment facility will commence.

A site-wide PFC monitoring plan will be prepared and submitted for MPCA review and approval.

Oakdale

Routine operation and maintenance activities will continue at the site. These include, but are not limited to, operation of the groundwater treatment system and execution of scheduled monitoring activities.

Woodbury

The groundwater monitoring program will continue at a monthly sampling frequency to confirm groundwater capture and evaluate trends in constituent concentrations. Results will continue to be shared with MPCA and MDH staff as soon as final reports are available.

A quarterly status report will be submitted to the MPCA to summarize investigatory and response actions taken.

Pending MPCA approval of a work plan that 3M submitted on April 24, 2012, additional hydrogeological information will be collected through the following actions: 1) rehabilitation and reconstruction of monitor wells MW-B and MW-G; 2) installation of an additional shallow monitor well in the uppermost water-bearing zone near monitor well MW-G; and 3) installation of an additional well couplet to evaluate conditions between B-2 and sentinel wells S02DR/PC/JS.

As significant new and/or additional information becomes available, the three-dimensional geologic model developed of the site will be refined.

Regular update meetings, conversations and correspondence will continue with MPCA staff.

Health and Toxicological Studies (Part XIII.C)

3M will continue to share health and toxicological information on perfluorochemicals with MDH as it becomes available. Monthly summary reports as previously described will continue to be provided.

Recovery of Expenses (Part XXIII)

In a letter dated March 30, 2012, the MPCA requested reimbursement for oversight costs related to the three Sites under the Settlement Agreement. Pending review of this request, including support documentation, appropriate payment will be submitted by June 1, 2012.