

June 22, 2020

Wisconsin Department of Natural Resources
Eau Claire Service Center
1300 W Clairemont Ave, Eau Claire, WI 54701

RE: Request for information Dated 6/18/2020

Dear Mr. Lindstrom,

On behalf of 3M Menomonie, we are writing to provide a description of a release of ethylene glycol solution to the sanitary sewer which occurred on June 17, 2020. We sincerely thank the WI DNR for sharing our concern for the environment. 3M Menomonie takes all spills and releases very seriously and has investigated this incident so that we can promptly respond and appropriately mitigate any hazards or effects.

In response to your request for information regarding the release 3M is providing the following:

- **The date and location of the spill.** 3M Menomonie is located at 1425 Stokke Pkwy, Menomonie, WI. The release to the sewer occurred in our utility room on June 17, 2020.
- **The duration of the spill and an estimate of the volume of the release.** Upon investigation it was determined that the spill happened over an approximately 25-hour timeframe June 16 through June 17, 2020. Based on calculations of volume lost in our heat exchanger recharge tank the total volume released was 260 gallons of a 1/1 mix of ethylene glycol/water solution. Therefore approximately 130 gallons (1205 lbs) of ethylene glycol was released to the sanitary sewer over that period.
- **A description of the system, equipment, or component from which the discharge occurred.** 3M Menomonie's Air Handling Unit (AHU) #5 recirculating pump experienced a seal failure. This failure allowed the leaked ethylene glycol/water mixture to flow across the floor in the utility room and enter a floor drain which is in place to drain accumulated condensate from the equipment.
- **The estimated date and time when the spill began and stopped.** Based on the data from the recirculation tank level indicators, the volume began to drop at 07:40 on June 16, 2020 and the leak was identified and stopped at 08:30 on June 17, 2020.
- **Steps taken or planned to reduce, eliminate and prevent reoccurrence of the spill and a schedule of major milestones for those steps.** This pump was locked out immediately and will not be returned to service until all necessary repairs have taken place. 3M Menomonie has a preventive maintenance program for all pumps and other AHU equipment. As a part of all spill/release incident investigations, the preventive maintenance schedule for the involved equipment (as

well as similar equipment across the site) and the events leading up to the incident were reviewed and evaluated for changes as appropriate. If any changes to preventive maintenance procedures are recommended, they are completed and implemented in a timely manner.

- **Steps taken or planned to mitigate the impacts of the spill and a schedule of major milestones for those steps.** As part of 3M Menomonie's responsibility under our discharge wastewater to the Menomonie Wastewater Treatment Plant, their operations were notified immediately upon discovery of the release. During the first phone call they were advised that a release of ethylene glycol/water mixture to the sanitary sewer had occurred. We again contacted them and updated them on the details when the volume and duration of the release had been determined. No impacts on the operations of the wastewater treatment plant were expected based on the chemical properties, volume, and duration of the release.

The 3M Menomonie investigation of this event is complete and all identified actions are currently being implemented.

Again, 3M Menomonie shares WI DNRs concern for the safety of the environment, and we sincerely appreciate your participation in documenting and responding to this release.

If you have any questions regarding these responses, please contact me at 715-578-2370.

Sincerely,

Brad Luedtke
Environmental Engineer
3M Menomonie

Attachments (2)

Attachment 1

Ethylene Glycol Safety Data Sheet

Attachment 2

Completed Work Order for Equipment Repair



20200617WC17-1 3M



Legend

- Open Site
- Closed Site
- Continuing Obligations Apply
- Facility-wide Site



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1: 15,840



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Notes

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