From: Schrank, Jayson S - DNR
Sent: Thursday, March 23, 2023 4:15 PM
To: Britta Chambers
Cc: Kristin Colberg; LiJane Brunner; Carman, Eric
Subject: 3M Spill BRRTS #02-17-590808 SIWP Response
Attachments: 2023_0323_WDNR_SIWP_Response.pdf

Good afternoon Britta,

Attached is the Wisconsin DNR's response letter to 3M and Tetra Tech's Site Investigation Work Plan (SIWP) submitted on Wednesday, January 25, 2023. Within the response letter are the following comments to consider and respond to:

- Have there been other releases from the fire suppression systems in the past, or in other locations?
- Please review, locate, and confirm with WDNR any other spills or discharges on the property not discussed or depicted in this SIWP.

The DNR approves your SIWP and looks forward to receiving answers to the above mentioned questions, status updates or a completed Site Investigation Report when ready. Please contact me with any questions you may have in the future.

Thank you,
Jayson

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-Sent via Email-

March 23, 2023

Ms. Britta Chambers
3M
3M Center, 225-1N-22
St. Paul, MN 55144

Subject: Review of Site Investigation Work Plan
3M Spill
1425 Stokke Pkwy, Menomonie, WI
BRRTS #: 02-17-590808, FID #: 617056660

Dear Ms. Chambers:

On January 25th, 2023, the Wisconsin Department of Natural Resources (DNR) received the "Submittal of Work Plan for Soil and Groundwater Investigation" (Report) prepared for 3M by Tetra Tech, Inc. The Report was submitted with a fee for DNR review and response. The submittal of a Site Investigation Work Plan (SIWP) is required per Wis. Admin. Code § NR 716.09, as this site is subject to regulation under Wis. Stat. § 292. The DNR reviewed the Report for consistency with Wis. Admin. Code §§ NR 716.07 and 716.09 and has determined that the general code requirements have been met with additional comments as provided in this response letter.

Background

The Site was part of a larger tract of land developed for agricultural use from at least 1938 to 1974. The Site was acquired by 3M in 1974 and was redeveloped with the original portion of the manufacturing building, which consisted of office space, process areas, a maintenance area, and a utility room. Multiple additions were constructed between 1974 and 2017, bringing the total manufacturing building footprint into its current configuration, with additional process areas, warehouse space and cooler/chiller rooms. From approximately 1974 to at least 1992, a wetland and the unnamed tributary on the west side of the Site was the discharge point of the former Site stormwater drainage system. Between 1992 and 2005, the two stormwater retention ponds were constructed on-site. Operations by 3M since 2005 have remained consistent with the current operations.

Two releases of fire suppression water containing AFFF foam have been reported:

The first release occurred on November 3, 2021, where routine maintenance of the fire suppression system in Building 3 resulted in suppression water being released from an outdoor sprinkler valve with foam being observed. An estimated 100 to 400 gallons of water containing AFFF was discharged onto a concrete pad and grass adjacent to the building. The WDNR was notified of the release and a response action was immediately initiated by 3M. On November 8, 2021, 3M's contractor, Bay West, removed the concrete pad and excavated a total of 7.5 cubic yards of grass and soil in a 17 ft semi-circle around the release point to a maximum depth of 14 inches. Four samples were collected at the base of the excavation which confirmed the presence of per- and polyfluoroalkyl substances (PFAS).

The second release occurred on May 16, 2022, where a 3M contractor was capping and removing fire suppression line in preparation for a building expansion project at Building 11, a cap and pipe failed and resulted in 700-800 gallons of fire suppression water released within a construction trench. The WDNR was notified of the release and additional response actions were initiated by 3M. Soil was excavated on May 17, 2022 and a total of approximately 125 cubic yards of soil were removed. Tetra Tech collected a total of 14 confirmatory samples, including 13 samples at or below the base of the excavation and one sidewall sample. The depth of the excavation ranged from 10 ft to 17 ft. Samples were submitted for laboratory analysis of PFAS; Concentrations of perfluorooctane sulfonic acid ranged from 1.8 micrograms per kilogram (µg/kg) to 98 µg/kg and Perfluorohexane sulfonic acid concentrations ranged from 1.1 to 5.9 µg/kg.

On October 21, 2022, 3M representatives communicated soil sample results with detections of PFAS from a stockpile from various facility operations.

A Responsible Party (RP) Notification letter was sent on October 25th, 2022, requiring additional investigations to be completed in these areas to include further defining the extent and depth of impacts from the releases.

SIWP Summary

This SIWP provides sampling methodology and rationale, and proposed soil boring and groundwater sampling locations across the property and highlighted areas of concern. Analyzed parameters include PFAS, VOCs, PAHs, and RCRA 8 metals.

To delineate the environmental impacts of the reported discharge, the Report recommended completion of the following activities: List activities.

- Preparing a site-specific health and safety plan and job safety analyses for the field activities that will be implemented under this work plan.
- Clearing utilities prior to conducting field activities.
- Completing shallow hand auger borings to depths of approximately 2 ft bls.
- Completing deeper soil borings to depths of 10 ft bls or deeper.
- Collecting soil samples for field screening and laboratory analysis.
- Installing groundwater monitoring wells.
- Collecting groundwater samples for laboratory analysis.
- Collecting quality control samples.
- Handling of investigation derived waste (IDW).

Following the DNR's review of the Report, the DNR requests that you proceed with the proposed work, while considering the following comments:

- Have there been other releases from the fire suppression systems in the past, or in other locations?
- Please review, locate, and confirm with WDNR any other spills or discharges on the property not discussed or depicted in this SIWP.

Schedule

The submitted Report does include a schedule for conducting the field investigation and reporting the results, per Wis. Admin. Code § NR 716.09(2)(h). Furthermore, the DNR is requesting implementation of the following schedule:

- Per Wis. Admin. Code § NR 716.11(1)(2g), field investigation activities shall be initiated within 90 days of submittal of the work plan response, by June 23rd, 2023.
- Results of the site investigation activities must be submitted to the DNR in a comprehensive Site Investigation Report (SIR) that meets the requirements in Wis. Admin. Code § NR 716.15. The SIR shall be submitted to the DNR within 60 days after completion of the field investigation and receipt of laboratory data. The DNR suggests that the SIR be submitted with a fee for review and response.
- NR 700 semi-annual progress reports will be required until the case is closed.

The DNR appreciates the efforts you are taking to address the contamination at this site. If you have any questions about this letter, please contact me, the DNR Project Manager, at 715-410-8841 or Jayson.Schrank@wisconsin.gov .

Sincerely,

Jayson Schrank
Project Manager – Hydrogeologist
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources

cc: Eric Carman, Tetra Tech (email)
Kristen Colberg, 3M Corporate Environment (email)
LiJane Brunner, 3M Menomonie (email)