



April 30, 2024

Britta Chambers
3M
3M Center, 225-IN-22
St. Paul, MN 55144-1000

SUBJECT: Groundwater Investigation Work Plan Approval
3M Menomonie, 1425 Stokke Parkway, Menomonie, WI
DNR BRRTS Activity #: 02-17-590808

Dear Ms. Chambers:

On April 12, 2024, the Department of Natural Resources (DNR) received a Submittal of Recent Sampling Results and Groundwater Investigation Work Plan (GIWP) prepared for 3M by Tetra Tech, Inc. (Tetra Tech). The GIWP was submitted with a \$700.00 review fee in accordance with Wisconsin Administrative Code (Wis. Admin. Code) ch. NR 749. The DNR reviewed the GIWP for consistency with Wis. Admin. Code §§ NR 716.07 and 716.09 and determined that the general code requirements are met.

Background

The 3M Menomonie facility (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, two stormwater retention ponds were constructed on-site. Both retention ponds serve as infiltration basins and there are currently no longer storm water discharges from the 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 ($\mu\text{g}/\text{kg}$) to 98 $\mu\text{g}/\text{kg}$ and Perfluorohexane sulfonic acid concentrations ranged from 1.1 to 5.9 $\mu\text{g}/\text{kg}$.

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 25, 2022, requiring additional investigations to be completed in these areas to include further defining the degree and extent of impacts from the releases.

On October 3, 2023, the DNR received a Phase II CESA – Site Investigation Report (SIR) prepared for 3M by Tetra Tech. The SIR documented activities completed at the Site from November 2022 through May 2023.

GIWP Summary

The GIWP activities are proposed to further characterize the horizontal and vertical extent of PFAS impacts to groundwater and to perform confirmation sampling of the adjacent surface waters of the unnamed tributary to Lake Menomin located west of the 3M facility.

This proposed scope of work (SOW) includes:

- Clearing utilities prior to conducting field activities.
- Installing shallow and deep groundwater monitoring wells.
- Installing shallow groundwater sampling points near seeps discharging to the unnamed tributary to Lake Menomin.
- Collecting groundwater samples for laboratory analysis.
- Collecting creek surface water samples.
- Collecting quality control samples.
- Handling investigation derived waste (IDW).

Determination

The DNR approves the proposed SOW outlined in this GIWP and requests that 3M proceed with the activities listed above. The fieldwork for the GIWP SOW is scheduled to take place between May 6, 2024, and May 22, 2024.

Thank you for your efforts to protect Wisconsin's environment. If you have any questions regarding this letter, please contact me at 608-219-2240 or Timothy.Zeichert@wisconsin.gov.

Sincerely,



Tim Zeichert
Hydrogeologist
West Central Region
Remediation and Redevelopment Program

cc: Chris Bonniwell, Tetra Tech (via email)