



September 28, 2000

Federal Express

Ms. Julie Spyers
U. S. EPA
The Performance Track Information Center
C/O Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

Dear Ms. Spyers:

Enclosed are applications from four (4) 3M facilities for participation in U. S. EPA's National Environmental Achievement Track Program. Those four facilities are:

- 1) 3M Dental Products Division Facility in Irvine, CA *A04-0016*
- 2) 3M Electrical Products Division Facility in New Ulm, MN *A05-0039*
- 3) 3M Traffic Control Materials Division Facility in Brownwood, TX *A06-008*
- 4) 3M Traffic Control Materials Division Facility in Guin, AL ~~*A04-0042*~~ *A04-0045*

These facilities have achieved and continue to achieve positive environmental results through a series of environmental management programs such as environmental management systems (EMS's), 3M's Pollution Prevention Pays (3P) Program and our Corporate research and development efforts. They represent only a few of 3M's facilities, all of which are good corporate citizens in the communities in which 3M employees live, work and play. As such, we believe them to be excellent candidates for participation in your National Environmental Achievement Track Program. As the program develops several more of our facilities may want to become involved.

I am the main contact person for coordination of 3M's participation in the Program however; you may also contact any of the individuals listed on the front of the application forms for information concerning each of the facilities for which they have responsibility. 3M looks forward to being a part of this important program and to bringing about even better environmental performance at all of our facilities.

Sincerely,
Jeffrey C. Muffat
Senior Environmental Regulatory Specialist



December 14, 2000

Certified Mail

Emily Levin
The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

Subject: National Environmental Achievement Track Application.

Ms. Levin:

Find enclosed initialed copies of modifications to the 3M New Ulm N.E.A.T. application and checklist. Per several discussions with Mr. Mark Messersmith of the U.S. EPA and as a follow up from faxes sent 11/17/00, I am sending pages 6, 9, and 10 from the application and page A4 from the checklist. Clarifications were requested on our 2nd aspect in "past achievements", our 4th aspect from "future commitments", annual report media, and TSCA regulation applicabilities.

If you have any further questions, please feel free to contact me at (651) 778-6692.

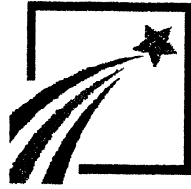
Regards,

A handwritten signature in black ink that reads "B. Wright".

Brian D. Wright
Environmental Engineer
Bldg 42-2E-27
bdwright@mmm.com

cc: Mark Messersmith via FAX (312) 353-5374
Attachments-4

AOS-0039



***National
Environmental
Achievement Track***

Application Form

3M New Ulm

Name of facility

Minnesota Mining and Manufacturing

Name of parent company (if any)

1700 North Minnesota Street

Street address

Street address (continued)

New Ulm, MN 56073

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Brian D. Wright

Title Advanced Environmental Engineer

Phone (651) 778-6692

Fax (651) 778-7203

E-mail bdwright@mmm.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

Section A

Tell us about your facility.

1 What do you do or make at your facility?

Power Products: Electrical terminators, rubber splices, electrical tape, mastic pads.

Wire / Cable: Flat and round ribbon cable, round discrete twisted pair

Powdered Resins: Rebar coating, pipeline, construction, and OEM powdered resins

Plastic Molding: Wire nuts, telephone connectors, pluggable modules, sealant tubes.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC

3643 3357 3089

NAICS

335931 331319 3261

3 Does your company meet the Small Business Administration definition of a small business for your sector?

Yes

No

4 How many employees (full-time equivalents) currently work at your facility?

Fewer than 50

50-99

100-499

500-1,000

More than 1,000

Section A, continued

- 5 Does your facility have an EPA ID number(s)? Yes No

If yes, list in the right-hand column.

MND079723979

- 6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right *or* enclose a completed Checklist with your application.

-- Checklist enclosed --

- 7 Check the appropriate box in the right-hand column.

I've listed the requirements above.

I've enclosed the Checklist with my application.

- 8 Optional: Is there anything else you would like to tell us about your facility?

The plant has done exceptionally well in meeting the 3M "Year 2000 Environmental Goals" in which 3M plants strived to reduce releases to the environment by 90% based on a 1990 baseline.

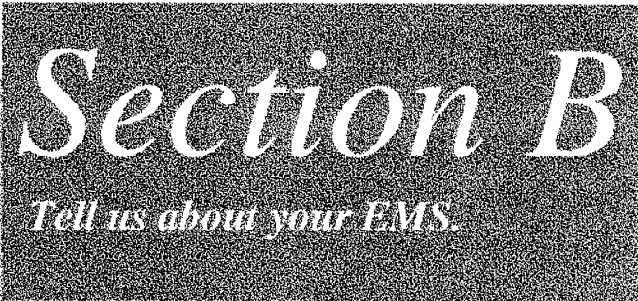
The plant went from 1950 tons released in 1990 to 174 tons in 2000 -- a reduction of 93%. The solid waste reduction extended the life of the county landfill by 15 years.

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.



1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

- a. Environmental policy Yes
- b. Planning Yes
- c. Implementation and operation Yes
- d. Checking and corrective action Yes
- e. Management review Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? Yes

3 Did this cycle include both an EMS and a compliance audit? Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? Yes

If yes, what method of EMS assessment did you use?

- Self-assessment
 - GEMI Other
 - CEMP Internal EMS audit
- Third-party assessment
 - ISO 14001 Certification
 - Other

Section C

Tell us about your past achievements and future commitments.

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the Instructions to answer questions 1 and 2.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Emissions of Ozone-Depleting Chemicals. Genesolv (CFC-113) solvent usage.	11 (0.016)	Tons (MMTCE)	0 (0.00044)	Tons (MMTCE)

- i. How is the current level an improvement over the previous level?

Genesolv is an ozone depleting chemical and a greenhouse gas. Genesolv has an Ozone Depletion Potential (ODP) of 0.8 whereas the replacement solvent, HFE-71DE, is zero. Also, the global warming potential of Genesolv is 6000 compared to the replacement's 160.
- ii. How did you achieve this improvement?

Alternative chemicals were investigated and experiments were run. Once suitable replacements were found, a phase-in / phase-out process eliminated Genesolv usage.



Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Solid Waste. Powdered Resin Landfill Disposal	259	Tons	0	Tons

i. How is the current level an improvement over the previous level?

By eliminating the solid waste disposal to the landfill, not only was landfill loading reduced, but 47% of the waste was converted to energy (incineration), and 53% was recycled.

ii. How did you achieve this improvement?

Some of the material was sent to a vendor who recycled the powdered resin into automotive fiber mats. Some of the material was sent to an incinerator for energy recovery. Current efforts are aimed at increasing the percentage recycled vs. incinerated.

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

KBS FOR EEB
11/17/2000

First aspect you've selected

- a. What is the aspect? **Toxic Releases to Land. Zinc Sludge Disposal.**
- b. Is this aspect identified as significant in your EMS? Yes No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- Option A:
Absolute value (Quantity/Units)
- Option B:
In terms of units of production or output **0.12 lbs / 1000 units**
(Quantity/Units)
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- Option A:
Absolute value (Quantity/Units)
- Option B:
In terms of units of production or output **0.08 lbs / 1000 units**
(Quantity/Units)
- e. How will you achieve this improvement?
- The ultimate goal is to reduce the ~20 tons of sludge per year to zero by reclaiming the zinc. However, within the next three years, new plating chemicals are being researched. Promising preliminary information indicates that different chemicals will improve the plating efficiency and therefore decrease the amount of zinc sludge generated per unit product.

Second aspect you've selected

- a. What is the aspect? **Release History. Chiller Freon (R-22) releases.**
- b. Is this aspect identified as significant in your EMS? Yes No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- Option A:
Absolute value **575 lbs; 2 releases**
(Quantity/Units)
- Option B:
In terms of (Quantity/Units)

- units of production or output
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- Option A:
Absolute value 0 lbs; 0 releases
(Quantity/Units)
- Option B:
In terms of units of production or output (Quantity/Units)
- e. How will you achieve this improvement?
- Addition of new preventive maintenance beyond normal contractor scope.
 - Addition of tracking system to monitor Freon charges; establish thresholds that trigger additional inspections.
 - Increase training of contractors.

Third aspect you've selected

- a. What is the aspect?
- Emissions of VOCs
- b. Is this aspect identified as significant in your EMS?
- Yes No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- Option A:
Absolute value 30 tons/year
(Quantity/Units)
- Option B:
In terms of units of production or output (Quantity/Units)
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- Option A:
Absolute value 22.5 tons/year
(Quantity/Units)
- Option B:
In terms of units of production or output (Quantity/Units)
- e. How will you achieve this improvement?
- Installation of a control feed system to better control the use of lubricants.
 - Introduce recycling program for the HFE solvents.
 - Improve procedures for handling to minimize releases.

Fourth aspect you've selected

a. What is the aspect?

Total Energy Use

b. Is this aspect identified as significant in your EMS?

Yes No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

Option A:
Absolute value

(Quantity/Units)

Option B:
In terms of
units of production
or output

3,750,000 BTU / 1000
lbs product
(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

Option A:
Absolute value

(Quantity/Units)

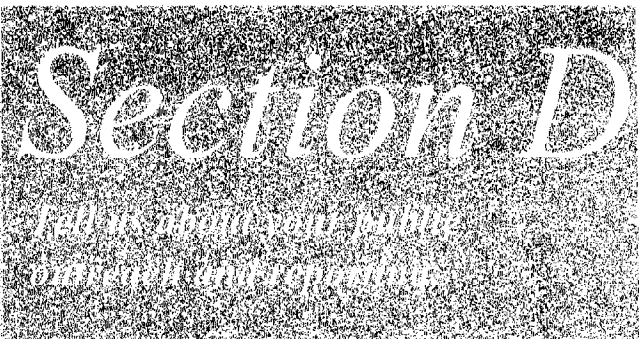
Option B:
In terms of
units of production
or output

3,420,000 BTU / 1000
lbs product
(9% reduction)
(Quantity/Units)

e. How will you achieve this improvement?

- Upgrade chiller systems to more efficient motors.
- Computerize heating and cooling system
- Introduce program to find air leaks. Air leaks require over use and extra energy to run air compressors.
- Upgrade steam traps.

KBF FOR EEB
11/17/2000



Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

Community concerns have been identified by the telephone calls which the public has made. The plant manager is responsible for communication with the press and the public.

Depending on the nature of concern, the plant manager and EMS coordinator are involved and may involve Human Resources, Corporate Public Relations, or Community Affairs Department when appropriate.

2 How do you inform community members of important matters that affect them?

- Press Releases
- Written letters
- Notifications to the Local Emergency Planning Commission (LEPC).

3 How will you make the Achievement Track Annual Performance Report available to the public?

- Website
www.3m.com/profile/envt/news/index.html
- Newspaper
- Open Houses
- Other

*KB for EEB
11/17/2000*

4 Are there any ongoing citizen suits against your facility? Yes No

If yes, describe briefly in the right-hand column.

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/Citizen Group</i>	Minnesota River Restoration Action Team	Scott Sparlin	(507) 354-1336
<i>State/Local Regulator</i>	New Ulm Municipal Waste Water Treatment Facility	Del Senst, Treatment Plant Operator	(507) 359-8360
<i>Other community/local reference</i>	Public Utilities of New Ulm	Bob Stevenson, Director of Utilities	(507) 359-8360

Section E

Application and Participation Statement

On behalf of
[my facility],

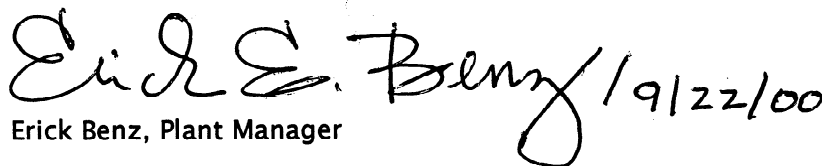
I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

 1/9/22/00

Printed Name/Title Erick Benz, Plant Manager

Facility Name 3M New Ulm

Facility Street Address 1700 North Minnesota Street
New Ulm, MN 56073

Facility ID Numbers MND079723979

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Facility Name 3M New Ulm
Facility Location: 1700 North Minnesota Street, New Ulm, MN 56073
Facility ID Number(s): MND079723979
(attach additional sheets if necessary)

Air Pollution Regulations

Check All
That Apply

- | | |
|---|-------------------------------------|
| 1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61) | <input type="checkbox"/> |
| 2. Permits and Registration of Air Pollution Sources | <input checked="" type="checkbox"/> |
| 3. General Emission Standards, Prohibitions and Restrictions | <input checked="" type="checkbox"/> |
| 4. Control of Incinerators | <input type="checkbox"/> |
| 5. Process Industry Emission Standards | <input type="checkbox"/> |
| 6. Control of Fuel Burning Equipment | <input checked="" type="checkbox"/> |
| 7. Control of VOCs | <input checked="" type="checkbox"/> |
| 8. Sampling, Testing and Reporting | <input type="checkbox"/> |
| 9. Visible Emissions Standards | <input checked="" type="checkbox"/> |
| 10. Control of Fugitive Dust | <input type="checkbox"/> |
| 11. Toxic Air Pollutants Control | <input type="checkbox"/> |
| 12. Vehicle Emissions Inspections and Testing | <input type="checkbox"/> |

Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)

- | | |
|--|-------------------------------------|
| 13. Air Emission Restrictions, Permits, Fees, Emission Inventories. (MN Rules 7001-7035, 7019) | <input checked="" type="checkbox"/> |
| 14. | <input type="checkbox"/> |

Hazardous Waste Management Regulations

- | | |
|---|-------------------------------------|
| 1. Identification and Listing of Hazardous Waste (40 CFR 261) | |
| - Characteristic Waste | <input checked="" type="checkbox"/> |
| - Listed Waste | <input checked="" type="checkbox"/> |
| 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262) | |

- Manifesting
- Pre-transport requirements
- Record keeping/reporting
- 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - Transfer facility requirements
 - Manifest system and record-keeping
 - Hazardous waste discharges
- 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
 - General facility standards
 - Preparedness and prevention
 - Contingency plan and emergency procedures
 - Manifest system, Record keeping and reporting
 - Groundwater protection
 - Financial requirements
 - Use and management of containers
 - Tanks
 - Waste piles
 - Land treatment
 - Incinerators
- 5. Interim Status Standards for TSD Owners and Operators (40 CFR 265)
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)
- 7. Administered Permit Program (Part B) (40 CFR 270)

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

- 8. State of Minnesota Standards Applicable to Generators of Hazardous Waste (MN Rules 7045-7046).
- 9.

Hazardous Materials Management

- 1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153)
- 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)
- 3. Hazardous Materials Transportation Regulations (49 CFR 172-173)
- 4. Worker Right-to-Know Regulations (29 CFR 1910.1200)
- 5. Community Right-to-Know Regulations (40 CFR 350-372)

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)

- 6. Toxic Pollution Prevention Act (MN Statute 115D)
- 7.

Solid Waste Management

- 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)

- 2. Permit Requirements for Solid Waste Disposal Facilities
- 3. Installation of Systems of Refuse Disposal
- 4. Solid Waste Storage and Removal Requirements
- 5. Disposal Requirements for Special Wastes

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)

- 6.
- 7.

Water Pollution Control Requirements

- 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)
- 2. Designation of Hazardous Substances (40 CFR 116)
- 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)
- 4. NPDES Permit Requirements (40 CFR 122)
- 5. Toxic Pollutant Effluent Standards (40 CFR 129)
- 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)
- 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)
- 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)
- 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)
- 10. Water Quality Standards
- 11. Effluent Limitations for Direct Dischargers
- 12. Permit Monitoring/Reporting Requirements
- 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants
- 14. Collection, Handling, Processing of Sewage Sludge
- 15. Oil Discharge Containment, Control and Cleanup
- 16. Standards Applicable to Indirect Discharges (Pretreatment)

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

- 17. Metal Finishing Point Source Category Effluent Limitations (40 CF4 433)
- 18. State Disposal Effluent Limitations (MN Rules 7001)
- 19. Water Effluent to POTW Limitations (New Ulm POTW Regulation 600)

Drinking Water Regulations

- 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146)
- 2. National Primary Drinking Water Standards (40 CFR 141)
- 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)

- 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources
- 5. Underground Injection Control Requirements
- 6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)

- 7.
- 8.

Toxic Substances

- 1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704)
- 2. Import and Export of Chemicals (40 CFR 707)
- 3. Chemical Substances Inventory Reporting Requirements (40 CFR 710)
- 4. Chemical Information Rules (40 CFR 712)
- 5. Health and Safety Data Reporting (40 CFR 716)
- 6. Pre-Manufacture Notifications (40 CFR 720)
- 7. PCB Distribution Use, Storage and Disposal (40 CFR 761)
- 8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)
- 9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)

- 10.
- 11.

Pesticide Regulations

- 1. FIFRA Pesticide Use Classification (40 CFR 162)
- 2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165)
- 3. Certification of Pesticide Applications (40 CFR 171)
- 4. Pesticide Licensing Requirements
- 5. Labeling of Pesticides
- 6. Pesticide Sales, Permits, Records, Application and Disposal Requirements
- 7. Disposal of Pesticide Containers
- 8. Restricted Use and Prohibited Pesticides

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)

- 9.
- 10.

Environmental Clean-Up, Restoration, Corrective Action

BDW for EEB 12/14/00

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify)

2. RCRA Corrective Action (identify)

Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, Corrective Action Regulations Not Listed Above (identify)

3.

4.