



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:

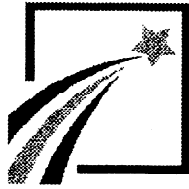
Enclosed are applications from four (4) 3M facilities for participation in U. S. EPA's National Environmental Achievement Track Program. Those four facilities are:

- 1) 3M Dental Products Division Facility in Irvine, CA ~~A09-0016~~
- 2) 3M Electrical Products Division Facility in New Ulm, MN ~~A05-0039~~
- 3) 3M Traffic Control Materials Division Facility in Brownwood, TX ~~A06-0018~~
- 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



A06-0018

**National  
Environmental  
Achievement Track**

**Application Form**

**3M Brownwood**

Name of facility

**3M (Minnesota Mining and Manufacturing) Company**

Name of parent company (if any)

**U.S. Highway 377**

Street address

Street address (continued)

**Brownwood, Texas 76801**

City/State/Zip code

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

Name James R. Kotsmith

Title Advanced Environmental Engineer

Phone 651-778-4263

Fax 651-778-7203

E-mail jrkotsmith@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?

3M Brownwood is a manufacturing facility located in Brownwood, Texas. The facility began operation in 1965 and produces an array of reflective products for the global transportation safety industry. These products include reflective sheeting for traffic signing, vehicle registration, and personal safety applications.

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  
2851 3081 3992 3229

NAICS

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.

TXD001806868 - Hazardous Waste ID #  
TXR05F373 - Plant NPDES (Storm)  
TXR05F374 - Landfill NPDES (Storm)

- 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. See attached form

- 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?

3M worldwide, including 3M Brownwood, has long been involved and committed to pollution prevention and emissions reduction programs. Since 1975, 3M worldwide has developed over 3,000 projects that have prevented over 1 billion pounds per year of pollution with a corresponding savings of over \$500 million. Since 1977, 3M Brownwood has developed over 32 major projects, as a part of 3M's Pollution Prevention Pays (3P) Program, to prevent over 16 million pounds per year in air emissions and almost 8 million pounds per year in the generation of solid and/or hazardous waste. 3M Brownwood has reduced its air emissions by over 87 percent since 1990, as the result of voluntarily installing a thermal oxidizer on its major grandfathered air emission sources, at a cost of over \$10 million.

3M Brownwood is also a charter member of the Texas CLEAN Industries 2000 Program.

***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.

# Section B

*Tell us about 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

Third-party assessment

ISO 14001 Certification

(Recommended on 8/11/2000)

Other

**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.

# Section C

*Tell us about your past achievements and future*

**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 waste/total material throughput	Quantity	Units waste/total material throughput
L/V Waste Generation	0.17		0.06	
<p>i. How is the current level an improvement over the previous level?</p> <p>This waste ratio decrease indicates that the amount of waste generated per total material throughput has decreased. This resulted in improved use of landfill space and material resources.</p> <p>ii. How did you achieve this improvement?</p> <p>These improvements were achieved by the implementation of yield improvements and process optimization.</p>				

**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 waste landfilled/ total waste	Quantity	Units waste landfilled/ total waste
Solid waste generation from SLE 1	0.42		0.19	
<p>i. How is the current level an improvement over the previous level?</p> <p>This resulted in an improved use of landfill space and natural resources.</p>				
<p>ii. How did you achieve this improvement?</p> <p>These improvements were achieved by increasing recycling efforts and developing new material reuse projects.</p>				

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.

**First aspect you've selected**

- a. What is the aspect? VOC emissions from TF manufacturing
- 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  
 Option B: In terms of units of production or output
- 0.35  
 VOC applied/  
 total material used  
 (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

Option B:  
In terms of  
units of production  
or output

0.16  
VOC applied/  
total material used  
(Quantity/Units)

e. How will you achieve this improvement?

The facility has developed a water-based coating and 100% solids adhesive.

***Second aspect you've selected***

a. What is the aspect?

**Bead Waste Generation**

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

Option B:  
In terms of  
units of production  
or output

1.63 %  
waste landfilled/  
process throughput  
(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

Option B:  
In terms of  
units of production  
or output

0.50 %  
waste landfilled/  
process throughput  
(Quantity/Units)

e. How will you achieve this improvement?

The facility is developing a plan to reuse/recycle the bead material within the process, or reclaim at an outside commercial facility.



*Third aspect you've selected*

**Section C, continued**

- a. What is the aspect? Solid waste generation on CSLR
- 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  
 Option B: In terms of units of production or output **0.171 waste generated/total material use (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  
 Option B: In terms of units of production or output **0.086 waste generated/total material use (Quantity/Units)**
- e. How will you achieve this improvement? The facility will develop a process to eliminate the generation of scrap liners.
- 

*Fourth aspect you've selected*

- a. What is the aspect? Hazardous material usage in M/M (Cleaning Solvent)
- 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  
 Option B: In terms of units of production or output **0.192 cleanup solvent used/total material throughput (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

Option B:  
In terms of  
units of production  
or output

0.096  
cleanup solvent used/  
total material  
throughput  
(Quantity/Units)

e. How will you achieve this improvement?

The facility will implement an enclosed self-cleaning system that will capture and reuse cleaning solvents.

***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.

# Section D

*Tell us about your public outreach and reporting.*

***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?

All community communications are received and/or documented by the EHS department during business hours or the security guard during non-business hours. These communication records are then forwarded to the plant manager, human resources manager, and/or public relations department. These parties are responsible for all community and media communications.

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

Plant management informs the community and business leaders about plant matters at local Citizen Advisory Committee meetings, held at least annually.

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

Website www.

Newspaper

Open Houses

Other

Radio and/or Citizen Advisory Committee

**Section D, continued**

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>	Texas State Representative	Robert Turner	(915) 625-3596
	Brown County Water Improvement District #1	Stuart Coleman	(915) 643-2547
<i>State/Local Regulator</i>	Texas Natural Resource Conservation Commission	R.B. "Ralph" Marquez	(512) 239-1000
<i>Other community/local reference</i>	City of Brownwood, Mayor	Bert Massey	(915) 643-3631
	Executive V.P. Brownwood Chamber of Commerce	LaNita Richmond	(915) 646-9535
	Brownwood Bulletin, Publisher	Robert Brincefield	(915) 646-2541

On behalf of 3M Brownwood  
[my facility],

I certify that

# Section E

*Application and  
Participation Statement.*

- 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 *Larry Lair 9-8-00*

Printed Name/Title Larry L. Lair, Plant Manager

Facility Name 3M Brownwood

Facility Street Address U.S. Highway 377

Facility ID Numbers TXD001806868, TXR05F373, TXR05F374

**3M Brownwood Applicable Environmental Regulations  
National Environmental Achievement Track Application**

***Applicable Federal Rules***

Applicable Regulation	Regulation Title - Description (where necessary)
29 CFR 1926.62	OSHA Construction Standards for Lead - This facility is subject to construction work where an employee may be exposed to lead.
40 CFR 51 40 CFR 52	PSD - This facility is located in an attainment area and construction/modification projects may trigger a PSD review
40 CFR 61	NESHAP - This facility is subject to the general provisions and subpart M related to demolition and renovation of asbestos containing areas.
40 CFR 63	NESHAP - This facility is subject to 40 CFR 63 Subpart KKK for Printing and Publishing and Subpart M for Dry Cleaners.
40 CFR 68	RMP - This facility is subject to the general duty clause this rule. This facility does not have any processes containing regulated substances above designated threshold quantities and is not required to submit a risk management plan to the EPA.
40 CFR 70	Title V Operating Permit - This facility is in the process of obtaining a Title V Permit.
40 CFR 82.150	Refrigerant Management - This facility is subject to the service, maintenance, repair, and disposal requirements of this rule.
40 CFR 112	Oil Pollution Prevention - SPCC Plan
40 CFR 122.26	NPDES Stormwater Discharges - This facility has a stormwater permit.
40 CFR 261	Identification and Listing of Hazardous Waste
40 CFR 262	Standards Applicable to Generators of Hazardous Waste
40 CFR 264/ 40 CFR 265	Standards for Owners and Operators of TSD facilities - This facility is subject to subparts J, BB and CC related to tank systems, air emission standards for equipment leaks and air emission standards for tanks and containers.
40 CFR 268	Land Disposal Restrictions
40 CFR 273	Standards for Universal Waste Management
40 CFR 279	Standards for the Management of Used Oil
40 CFR 302 40 CFR 355	EPCRA 304 - This facility has listed chemicals on site subject to the reporting obligations for releases of the listed chemicals.
40 CFR 355	EPCRA 302 - This facility stores materials on site that are listed by the EPA as an extremely hazardous substance (EHS) above the threshold planning quantities.
40 CFR 370	EPCRA 311/312 - This facility has reportable quantities of chemicals on-site subject to submission of 311 and 312 reports to the LEPC, SERC, and local fire departments.
40 CFR 372	EPCRA 313 - This facility manufactures, processes, or otherwise uses listed chemicals that require submission of a Form R report.

**3M Brownwood Applicable Environmental Regulations  
National Environmental Achievement Track Application**

***Applicable State (Texas) Rules***

<b>Applicable Regulation</b>	<b>Regulation Title - Description (where necessary)</b>
30 TAC 101.3	Circumvention
30 TAC 101.6	Upset Reporting and Recordkeeping Requirements
30 TAC 101.7	Maintenance, Start-up and Shutdown Reporting, Recordkeeping, and Operational Requirements
30 TAC 101.8 30 TAC 101.9 30 TAC 101.14	Sampling - This facility is subject to source testing when required by the state.
30 TAC 101.10	Emission Inventory Requirements
30 TAC 101.11	Exemptions from Rules and Regulations - This section applies to this facility during upset conditions, maintenance, start-up, or shutdown periods.
30 TAC 101.21	National Primary and Secondary Ambient Air Quality Standards (NAAQS)
30 TAC 101.24 30 TAC 101.27	Fees - This facility is required to pay emission fees.
30 TAC 106	Exemptions From Permitting - This facility is subject to regulations found in subpart C, D, G, I, K, P, R, S.
30 TAC 111.111	Requirements for Specified Sources; Visible Emissions
30 TAC 111.201	Outdoor Burning
30 TAC 112	Sulfur Compounds - This facility is subject to the regulations from fuel combustion and general process industries.
30 TAC 113	HAP - This facility is subject to parts of 40 CFR 63 and is thus subject to this rule as incorporated by reference.
30 TAC 116	New Source Review Permits
30 TAC 122	Federal Operation Permits
30 TAC 307	Texas Surface Water Quality Standards
30 TAC 324	Used Oil Standards; Recycling
30 TAC 328	Recycling - This facility is subject to the general provisions of this rule related to the discharge of oil into soil or water.
30 TAC 335	Hazardous Waste

***Applicable Local (City of Brownwood) Rules***

<b>Applicable Regulation</b>	<b>Regulation Title - Description (where necessary)</b>
Chapter 19, Section 64	Revocation of Permit
Chapter 19, Section 66	Right of Entry - This regulation applies as defined in the Significant Industrial User Sewer Use Permit. The City or duly authorized representative may enter all properties for the purpose of inspection, observation, measurement, sampling, testing, and examination and/or copying of documents.
Chapter 19, Section 70	Liability for Damages
Chapter 19, Article III	Industrial Discharge Limitations - This regulation applies as defined in the Significant Industrial User Sewer Use Permit. The City of Brownwood has developed effluent limitations for distribution to non-residential establishments discharging wastewater's to the sanitary sewer system.



November 10, 2000

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:

This letter is to provide you some updated information regarding our applications for the National Environmental Achievement Track for the 3M Traffic Control Materials Division Facilities in Guin, AL and Brownwood, TX.

Subsequent to the completion and submission of our applications for those facilities, 3M completed a self-assessment of its program under the RCRA Subpart BB/CC regulations. This self-assessment was conducted pursuant to the U. S. EPA Audit Policy. On Friday, November 3, 2000, 3M submitted the results of that assessment to U. S. EPA. Included in the results were findings indicating that both Guin's and Brownwood's programs had minor deficiencies in need of corrective action. Those deficiencies have either already been addressed or will be shortly.

We provide this information to you in the spirit of full disclosure regarding our applications. Please contact me should you need further information.

Sincerely,

A handwritten signature in cursive script that reads "Jeffrey C. Muffat".

Jeffrey C. Muffat  
Senior Environmental Regulatory Specialist