

This email message, along with additional attachments that are found on the website, serve as 3M Prairie du Chien's Letter of Intent and Application for Tier 2. Based on review of environmental enforcement information and on meetings and conversations with 3M Prairie du Chien, the Wisconsin Department of Natural Resources understands that a waiver of the enforcement record is requested and will be addressed with consideration to input received during the 30-day comment period.

From: jfmetzger@mmm.com

Sent: Thursday, August 04, 2011 8:11 AM

To: McDermid, Mark - DNR

Cc: Hart, Kristin L - DNR; mmanninen@mmm.com; Harings, Mark W - DNR; rstutzki@mmm.com; rorymeisner@mmm.com; Zentner, Sonny - DNR; sjolson1@mmm.com

Subject: Request To Negotiate Green Tier, Tier 2

By this electronic communication, 3M requests the opportunity to negotiate under WI DNR's Green Tier program a Tier 2 agreement for the 3M plant at Prairie du Chien, WI. This request is follow-up to some initial discussion of the subject on July 29, 2011, at Eau Claire, WI, involving you, Mark Harings, Kristin Hart, and Sonny Zentner of WI DNR, and Mark Manninen and myself of 3M.

The 3M facility at Prairie du Chien employs an ISO-14000 based environmental management system (EMS) and accomplishes environmental performance which is, in a number of ways, beyond what is required by state and federal environmental regulations. Externally, the plant was a designated facility under EPA's National Environmental Performance Track. Internal to 3M, the plant has a long history and ongoing involvement in 3M's 3P (Pollution Prevention Pays) program as well as in programs such as Environmental Targets 2010 (ET'10) which targets reduction of waste, VOC emissions, and energy usage. The Prairie du Chien facility has also been a leader in energy management within 3M, resulting in, among other accomplishments, reductions in greenhouse gas emissions. In 2010, for the third time in the past six years, the Prairie du Chien facility was recognized with the highest 3M award (Platinum) for energy management. Similar recognition in 2010 was extended to only 11 other 3M facilities globally (more than 150 facilities).

A key need of the Prairie du Chien facility, and one which we hope to address as part of a Tier 2 agreement, is how quickly certain types of manufacturing changes can be made at the plant. We envision adding provisions to the facility's Title V operating permit similar to what are presently in the Title V operating permit for the 3M plant at Menomonie, WI. The Menomonie permit was originally issued under WI DNR's Environmental Cooperation Pilot Program and was subsequently renewed in 2008. During the period of the permit, the plant has expanded with additional manufacturing lines while at the same time overall emissions have declined. 3M has found that increased manufacturing flexibility tends to foment development of processes which result in lower unit and/or overall emissions. For example flexible permits at a number of other 3M facilities have supported replacing solvent-based coatings with low-VOC or water-based coatings. Where such changes are feasible, VOC emissions and utilization of petroleum-based raw materials both decline. Also typically reduced is energy usage due to reduced reliance on energy-intensive control devices such as thermal oxidizers, with corresponding reduction of greenhouse gas emissions.

We look forward to additional discussion of this subject with you and others with WI DNR. As you have requested, we are also assembling a list of potential stakeholders for the project and will provide these for your review at the time of our next meeting.



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