



**A07-0022 01-13-03**

*Application Form*

3M Company - Valley

Name of facility\*

3M Company

Name of parent company (if any)

600 East Meigs Street

Street address

P.O. Box 368

Street address (continued)

Valley, Nebraska 68064

City/State/Zip code

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

Name Mr./Mrs./Ms./Dr. Mr. Tommie Lee

Title Safety General Supervisor

Phone 402-359-2131 Ext. 1290

Fax 402-359-2971

E-mail tnlee@mmm.com

Facility/Company Website www.3M.com

\* If you are applying for multiple facilities, you must call 1-888-339-PTRK(7875)

# Section A

*Tell us about your facility.*

## ***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.

**1** What do you do or make at your facility?

3M Company, Valley Plant, began operation in 1979. It manufactures positive and negative pressure and air-supplied respirators, disposable masks, electrodes, acoustical insulation, sorbent materials and first aid dressings.

**2** List the North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

NAICS  
339113    313230    \_\_\_\_\_

**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? If you checked "Yes" in question 3 and have fewer than 50 employees at your facility, then you are considered a "small facility" by the Performance Track Program.

- Fewer than 50  
 50-99  
 100-499  
 500-1,000  
 More than 1,000

**5** Complete the Environmental Requirements Checklist on pages 32-38 of the instructions and enclose it with your application.

## Section A, continued

- 6 Optional: Is there anything else you would like to tell us about your facility? Do you participate in other voluntary programs at the local, tribal, State, or Federal level?

3M Worldwide, including 3M Valley, has long been involved and committed to pollution prevention and emission reduction programs. Since 1975, 3M worldwide has developed over 3,000 products that have prevented over 1.6 billion pounds per year of pollution with a corresponding savings of over \$800 million. Since the opening of the facility, 3M Valley received 20 3M's Pollution Prevention Pays (3P) Program awards, to prevent 1.90 million pounds per year of solid waste, 113,000 pounds of air pollutants, and 204,000 pounds of waste water. 3M Valley is a Small Quantity Generator for hazardous waste and Low Emitter status for air emissions. 3M Valley participates on the Nebraska State Recycling Association and helps to promote the America Recycles Day and Earth Day. 3M Valley is an ISO 14001 Certified and OSHA VPP Program participant.

**Why do we need this information?**

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

**What do you need to do?**

- ◆ Confirm that your EMS meets the Performance 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.*

Read the EMS requirements on page 9-12 of instructions.  
Tell us if your EMS meets these requirements for:

- 1 Environmental policy \_\_\_\_\_  Yes  No
- 2 Planning \_\_\_\_\_  Yes  No
- 3 Implementing and operation \_\_\_\_\_  Yes  No
- 4 Checking and corrective action \_\_\_\_\_  Yes  No
- 5 Management review \_\_\_\_\_  Yes  No
- 6 Have you done a comprehensive review of all activities conducted at your facility that could impact the environment? (i.e., have you done an aspect analysis?)  Yes  No
- 7 Have you classified your aspects based on their potential harm to the environment, on community concerns, and/or on other objective factors? (i.e., have you determined your significant aspects?)  Yes  No
- 8 When did you last update your aspect analysis? (mo/yr) 9/23/02
- 9 Have you completed at least one EMS cycle (plan-do-check-act)?  Yes  No
- 10 Did this cycle include both an EMS and a compliance audit?  Yes  No
- 11 Have you completed an objective self-assessment or third-party assessment of your EMS?  Yes  No

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

Self-assessment

Third-party assessment

GEMI

ISO 14001 Certification

CEMP

Other

Other

**Why do we need this information?**

Facilities need to 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.

# Section C

*Tell us about your past achievements and future commitments.*

**Part 1** You must report past achievements for at least two environmental aspects, and you must choose these aspects from the Environmental Performance Table on pages 29-31 of the instructions. Please quantify each of your aspects using the units listed for that aspect in the Environmental PTrack Information Hotline at 1-888-339-PTRK.

**Note to small facilities:** If you are a small facility, you must report past achievements for only one environmental aspect.

**First achievement**

1	What aspect have you selected from the Table on page 29-31?	Total Solid Waste - Trimming waste in Medical department.	
2	What units are you using to quantify this aspect? (See Table, page 29-31.)	Pounds	
		PAST	CURRENT
3	List the past annual quantity of the aspect (from two years ago) and the current annual quantity of the aspect (from the most recent year for which you have data).	360,043	279,029
4	What are the years for which you are reporting these quantities?	2000	2001
5	Estimate your past normalizing factor (Page 18 of the Instructions will help you calculate this.)	0.752	1.0
6	What is your normalizing factor based on (e.g., production, employment)?	Production	
7	You reported an improvement in the quantity of the aspect in Question 3. How did you achieve this improvement?	Waste reduction was a result of process equipment modification to reduce trim waste.	

## Section C, continued

### Second achievement

1 What aspect have you selected from the Table on page 29-31?	Recycle/Reused Material Use - Fiber waste in Extrusion department	
2 What units are you using to quantify this aspect? (See Table, page 29-31.)	Pounds	
	PAST	CURRENT
3 List the past annual quantity of the aspect (from two years ago) and the current annual quantity of the aspect (from the most recent year for which you have data).	245,132	397,000
4 What are the years for which you are reporting these quantities?	1998	2001
5 Estimate your past normalizing factor (Page 18 of the Instructions will help you calculate this.)	0.99	1.0
6 What is your normalizing factor based on (e.g., production, employment)?	Production	
7 You reported an improvement in the quantity of the aspect in Question 3. How did you achieve this improvement?	The reduction in solid waste was achieved by reformulating and recycling fiber material back into finished product.	

**Part 2** You must make future commitments for at least four environmental aspects, and you must choose these aspects from the Environmental Performance Table on pages 29-31 of the Instructions. The aspects you select for your future commitments should be related to the objectives and targets in your EMS. Where possible, they also should be identified as having a significant environmental impact in your EMS. No more than two of your aspects can be from the same environmental category. If you're not sure how your objectives and targets fit into our aspects or whether your aspects are significant, call the PTrack Information Hotline at 1-888-339-PTRK.

Once you have chosen your four environmental aspects, then fill in all the necessary information for these aspects in the tables on pages 7-10 of this form. Please quantify each of your aspects using the units listed for that aspect in the Environmental Performance Table. Each table that you must fill in corresponds to one of the environmental aspects you have chosen.

We will assume that your performance commitments are based on a constant production or employment level. If you would like to base your commitment on changing production or employment, please fill out optional questions 6a and 6b.

**Note to small facilities:** If you are a small facility, you must report future commitments for only two environmental aspects.

*Section C, continued*

**First commitment**

<b>1</b> What aspect have you selected from the Table on pages 29-31?	Recycled/Reused Material Use - Total plant	
<b>2</b> What units are you using to quantify this aspect?	Pounds	
<b>3a</b> Is this aspect considered significant in your EMS?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>3b</b> If no, please explain why you believe this aspect should be included as a performance commitment.	NA	
	CURRENT	FUTURE
<b>4</b> List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	890,000	1,000,000
<b>5</b> What are the years for which you are reporting these quantities?	2002	2005
<b>6a</b> (Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	1.1
<b>6b</b> (Optional) What is your normalizing factor based on (e.g., production, employment)?	Production	
<b>7</b> You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	The amount of recycled/reused materials will be increased by continuing to investigate ways to recycle/reuse all waste types throughout the facility. Attached is a copy of previous improvement efforts.	
<b>8a</b> Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<b>8b</b> If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.	NA	

*Section C, continued*

**Second commitment**

<b>1</b>	What aspect have you selected from the Table on pages 29-31?	Total Solid Waste	
<b>2</b>	What units are you using to quantify this aspect?	Pounds/Total Output	
<b>3a</b>	Is this aspect considered significant in your EMS?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>3b</b>	If no, please explain why you believe this aspect should be included as a performance commitment.	NA	
		CURRENT	FUTURE
<b>4</b>	List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	4,928,000	3,824,000
<b>5</b>	What are the years for which you are reporting these quantities?	2002	2005
<b>6a</b>	(Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	1.1
<b>6b</b>	(Optional) What is your normalizing factor based on (e.g., production, employment)?	Production	
<b>7</b>	You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	To reduce total solid waste by improving operations, process improvements, and product reformulation. This includes all waste that are landfilled. Examples of wastes being landfilled from the facility includes general trash and nonhazardous scrap (e.g. trim waste).	
<b>8a</b>	Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<b>8b</b>	If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.	NA	

**Section C, continued**

**Third commitment**

<b>1</b> What aspect have you selected from the Table on pages 29-31?	Hazardous Solid Waste	
<b>2</b> What units are you using to quantify this aspect?	Pounds	
<b>3a</b> Is this aspect considered significant in your EMS?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>3b</b> If no, please explain why you believe this aspect should be included as a performance commitment.	NA	
	CURRENT	FUTURE
<b>4</b> List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	14000	14000
<b>5</b> What are the years for which you are reporting these quantities?	2002	2005
<b>6a</b> (Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	1.1
<b>6b</b> (Optional) What is your normalizing factor based on (e.g., production, employment)?	Production	
<b>7</b> You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	The total hazardous solid waste will be maintained at small quantity generator status by source reduction.	
<b>8a</b> Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>8b</b> If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.	Nebraska Department of Environmental Quality Title 128, Ch. 9. Note: NDEQ Title 128 does not require specific improvements.	

**Section C, continued**

**Fourth commitment**

<b>1</b> What aspect have you selected from the Table on pages 29-31?	Total Material Use	
<b>2</b> What units are you using to quantify this aspect?	Pounds	
<b>3a</b> Is this aspect considered significant in your EMS?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>3b</b> If no, please explain why you believe this aspect should be included as a performance commitment.		
	CURRENT	FUTURE
<b>4</b> List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	10,493,540	10,150,000
<b>5</b> What are the years for which you are reporting these quantities?	2002	2005
<b>6a</b> (Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	1.03
<b>6b</b> (Optional) What is your normalizing factor based on (e.g., production, employment)?	Production. Note: The normalizing factor of 1.03 included products related to fibers, resins, and carbon products only and not the total plant products.	
<b>7</b> You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	The material use will be improved by implementing yield improvements projects for fibers, resins, and carbons. Tracking of this aspect is specifically for raw material usage of our larger OH & ES Division processes in the plant and set up to track the improvement progress. Reduction in these areas would decrease releases to the environment specifically air emissions, Special Waste landfilling, and TRI reporting.	
<b>8a</b> Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<b>8b</b> If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.	NA	

**Why do we need this information?**

Facilities need to 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.

# Section D

*Tell us about your public outreach and reporting.*

**1** How do you identify and respond to community concerns?

Through our annual Right-to-Know meetings, participation with the City of Valley Planning Board by a plant management member, and contacts with community leaders by the Plant Manager, 3M Valley receives community concerns. In addition, 3M Valley sponsors an Open House approximately every 5 years to celebrate milestones such as our a recent 20<sup>th</sup> Anniversary. Tours of the facility can be arranged with management approval. All community communications are responded to by the Plant Manager. The Plant Manager may direct environmental questions to the EHS department. The Environmental Management Coordinator will research and respond to external environmental communications.

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

The Plant Manager will contact local community leaders on important matters that affect them by phone call or meetings. On an annual basis, 3M Valley sponsors a Community Right-To-Know meeting for local community leaders and fire department to share environmental information and to tour the facility.

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

Website  
[www.EPA.gov/performancetrack/precip/index.htm](http://www.EPA.gov/performancetrack/precip/index.htm)

Newspaper

Open Houses

Other

Plant quarterly newsletter, Megaphone, which is sent to employees

**Section D, continued**

- 4 Are there any ongoing citizen suits against your facility?  Yes  No  
 If yes, describe briefly in the right-hand column. NA

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/ Citizen Group</i>	City of Valley	Mayor Joseph Roberts	402-359-2251
	City of Valley Police Department	K. C. Bang, Police Chief	402-359-2251
<i>State/tribal/local regulator</i>	Nebraska Department of Environmental Quality	Donnie Zach	402-471-2186
<i>Other community/local reference (e.g., emergency management official or business associate)</i>	Local Emergency Planning Commission	Eric Swanson	402-444-5040
	City of Valley, Peoples Service Inc. (Sewer Treatment)	Duane Grashorn	402-359-4307

# Section E

## Application and Participation Statement.

On behalf of 3M Company - Valley  
[my facility],

I certify that

I have read and agree to the terms and conditions for Application and Participation in the National Environmental Performance Track, as specified in the *National Environmental Performance Track Program Guide* and in the *Application Instructions*;

- I have personally examined and am familiar with the information contained in this Application, including 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 Performance 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 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 Performance 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	_____
Printed Name/Title	<u>Mr./Mrs./Ms./Dr. Ms. Marilyn Schullo, Plant Manager</u>
Phone Number/E-mail	<u>402-359-2131</u>
Facility Name	<u>3M Company - Valley</u>
Facility Street Address	<u>600 East Meigs Street</u>
City/State/Zip Code	<u>Valley, Nebraska 68064</u>

## **Paperwork Reduction Act Notice**

The public reporting and recordkeeping burden for this collection of information is estimated to average 40 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

**3M Valley, NE Applicable Environmental Regulations  
 National Environmental Performance Track Application**

***Applicable Federal Rules***

Applicable Regulation	Regulation Title - Description (where necessary)
29 CFR 1926.1101	OSHA Construction Standards for Asbestos - This facility is subject to construction work where an employee may be exposed to asbestos.
40 CFR 60	NSPS - This facility is subject to Subpart RR, Pressure-Sensitive Tape and Label Surface Coating Operations.
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 A, the general provisions
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 82.150	Refrigerant Management - This facility is subject to the service, maintenance, repair, and disposal requirements of this rule.
40 CFR 102 CERCLA 103	CERCLA 103 - Facility is subject to the general requirements of this rule in the event of a spill.
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 B, C, D and I related to general requirements, contingency planning, preparedness, and container management
40 CFR 266	Recyclable Materials - This facility is subject to subparts C, F and G, which address reclamation and recycling of materials
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 has reportable quantities of chemicals on-site that are above applicable thresholds

**3M Valley, NE Applicable Environmental Regulations  
 National Environmental Performance Track Application - Checklist**

***Applicable State (Nebraska) Rules***

<b>Applicable Regulation</b>	<b>Regulation Title - Description (where necessary)</b>
Title 119	NPDES - The facility is subject to Federal NPDES requirements, as it does have general stormwater permits
Title 126, Ch 18	Release of Oil / Hazardous Waste Substance
Title 127	National Categorical Pretreatment Standards - The facility is subject to general requirements. No specific pretreatment standards are applicable
Title 129, Ch 2	Definition of Major Source
Title 129, Ch 3	Regions and Sub-Regions: How Met
Title 129, Ch 4	Ambient Air Quality Standards
Title 129, Ch 5	Operating Permits, When Required - The facility is subject to the requirements under (001.03B1 - 001.03B5), "Low Emitter" status permitting
Title 129, Ch 9	Requirements for Small Quantity Generator of Hazardous Waste
Title 129, Ch 20	Particulate Emissions, Limitations and Standards
Title 129, Ch 24	Sulfur Compound Emissions - Standards pertaining to the burning of fossil fuel products
Title 129, Ch 25	Nitrogen Oxides - Standards for existing stationary sources
Title 129, Ch 32	Duty to Prevent Escape of Dusts and Particulate Matter
Title 129, Ch 38	Emergency Episodes, Occurrence and Control, Contingency Plans
Title 132, Ch 13	Special Wastes - Regulations pertaining to landfilling special waste streams

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

<b>Applicable Regulation</b>	<b>Regulation Title - Description (where necessary)</b>
Chapter 3, Article 1	Water Department - This regulation details the governing body for the City of Valley's Municipal Water Department.
Chapter 3, Article 2	Sewer Department - This regulation details the governing body of the City of Valley's Municipal Sewer System
Resolution No. 1999 - 28	Sewer Use Memorandum of Understanding - General requirements regarding the sewer agreement between facility and municipality

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK (7875) or e-mail [ptrack@indecon.com](mailto:ptrack@indecon.com).

To submit your application:

- 1) E-mail the completed application to [ptrack@indecon.com](mailto:ptrack@indecon.com),  
**and**
- 2) Fax the completed and signed Section E (**not** the entire application) to  
(617) 354-0463.

If you cannot e-mail the application, mail a hard copy of the entire completed application to:

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