



Annual Performance Report

OMB No. 2010-0032
Expiration Date: 06/30/03

Facility Name: 3M Brownwood
Performance Track ID #: A060018
Annual Performance Report #: 1
Reporting Year: 2001
Due Date: 07/01/2002

Section A. General Facility Information

Please supply or revise information in A.1 – A.8 as is necessary to ensure that it is accurate, complete, and up-to-date. Items A.9 and A.10 cannot be pre-completed; please respond as directed in A.9 and A.10 below.

- A.1 Name of your facility:** 3M Brownwood
- A.2 Name of your parent company:** 3M Company
- A.3 Facility contact person for the Performance Track program:**
Name: Mr. James Kotsmith
Title: Advanced Environmental Engineer
Phone: (651) 778-4263
Fax: (651) 778-7203
E-mail: jrkotsmith@mmm.com
- A.4 Facility's location**
Street Address: US Highway 377

Address (cont.):

City: Brownwood

State: TX

Zip Code: 76801

A.5 Facility's Website address (if any):

A.6 Number of employees (full-time equivalents) who currently work in the facility:

500-1000

A.7 Does your company meet the Small Business Administration definition of a small business for your sector?

No

A.8 North American Industrial Classification System (NAICS) Code(s) that are used to classify business at the facility:

326113 327212

A.9 In your application and, perhaps, in previous annual performance reports, you described what your facility does or makes. Have there been any (additional) changes to your facility's list of products and/or activities? If so, please list them here:

No

A.10 Please update the list of environmental requirements that apply to your facility by listing any changes that have taken place during this reporting period. If you have no changes to report, please enter "No changes".

No Changes

**Section B.
Environmental Management System**

B.1 Environmental Management System Assessment. Please summarize EMS assessments conducted during the year.

a. Was an EMS audit or other assessment done by an independent third party?

Yes

If yes, please provide the type (e.g., ISO 14001 certification), the scope, and the dates (mo/yr) of each assessment.

Type	Scope	Dates (mo/yr)
ISO 14001	UL conducted a continuance audit at the 3M Brownwood facility.	3/01
ISO 14001	UL conducted a continuance audit at the 3M Brownwood facility.	9/01

b. Was an internal or corporate EMS audit conducted? Yes

If yes, please provide the scope and dates (mo/yr) of each audit.

Scope	Date (mo/yr)
A 3M Corporate EMS audit was conducted at the 3M Brownwood facility.	11/01
Safety and security (1/01), durable signing, bead area and VSRI.	2/01
Diamond grade (3/01), plant engineering (3/01), mix and mill (3/01), EHS department, security, landfill and materials handling (7/01).	6/01
Solvent recovery, engineering, contract workers, quality assurance, internal auditing and management (9/01).	7/01

c. Was a compliance audit conducted?

Yes

If yes, please provide the scope and the dates (mo/yr) of each audit, and indicate who conducted the audit(s) (e.g., facility staff, corporate groups, third party).

Scope	Dates	Who conducted the audit
An internal compliance audit was conducted at the 3M Brownwood facility.	9/01	3M Brownwood EHS Department
A corporate compliance audit was conducted at the 3M Brownwood facility.	11/01	3M Corporate environmental auditing

d. (Optional) If you would like to describe any other audits or inspections that were conducted at your facility, please do so here.

The following agency inspections were conducted in 2001:

- City of Brownwood, Waste Water Pretreatment, February 2001.
- TNRCC, Water Section, April 2001.

e. Briefly summarize corrective actions taken and other improvements made as a result of your EMS assessments and compliance audit

- Modified storage and containment structures.
- Updated plastic bottle recycling procedure.
- Improved housekeeping procedure for bead areas.
- Provided additional training to all affected employees in waste handling techniques.
- Updated EMS document control procedures.
- Developed procedures to improve employee access to EMS related documentation and reviewed system with affected employees.
- Improved training tracking system for sending notifications/reminders and adding new courses.
- Updated EMS documents relating to management of change procedures.
- Implemented additional procedures for operations affecting storm water containment areas.
- Modified log forms, document retention schedule and associated procedures.
- Added additional employees to emergency contact list.

f. Has your facility corrected all instances of potential non-compliance and EMS non-conformance identified during your audits and other assessments?

Yes

If no, please explain your plans to correct these instances.

g. When was the last Senior Management review of your EMS completed?

3/02

Who headed the review? Name: Mr. Fred B. Kely **Title:** Environmental Specialist

B.2 ISO 14001 Certification. Is your facility currently certified to ISO 14001?

Yes

B.3 Environmental Aspects Identification. When did your facility last conduct a systematic identification and/or review of your environmental aspects?

3/02

B.4 Progress Toward Achieving Objectives and Targets. In the table below, please provide a narrative summary of progress made toward EMS objectives and targets. You may limit the summary to environmental aspects that are *significant* and towards which progress has been made during the *reporting year*. In cases where *progress* relates specifically to a Performance Track performance commitment, complete the Environmental Aspect column, but in the *Progress* column simply refer to the performance commitment tables in Section C, i.e. "See Section C."

<i>Environmental Aspect</i>	<i>Progress Made This Year</i> (e.g., quantitative or qualitative improvements, activities conducted)
Emissions of VOCs	The plant reduced more than 140,000 lbs. of VOC emissions through product reformulation. See Section C, Commitment 1.
Total Energy Use	Energy consumption was reduced by 30,000 MMBTU/yr through the optimization of the thermal oxidizer.
Hazardous Material Usage	The facility implemented an improved solvent cleaning system in one of four units. This system resulted in a normalized savings of over 400,000 lbs. of cleanup solvent usage in 2001. See Section C, Commitment 4.
Total Energy Use	Energy consumption was reduced by 25,000 MMBTU/yr through the optimization of process heating equipment.
Total Solid Waste/Total Energy Use	The facility converted VOC to hot melt coating and improved yield, resulting in a reduction of 8 tpy VOC and 380 tpy of solid waste.

Total Solid
Waste/Total Energy
Use

The facility completed a yield improvement project that required less converting. The project resulted in a savings of 16 tpy VOC and 54 tpy of solid/hazardous waste.

**Section C.
Environmental Performance Commitments**

Please use the tables below to summarize your facility's environmental performance against your Performance Track performance commitments. Complete only those boxes related to the baseline, current year, and performance commitment.

C.1 Performance Commitment 1

a. Use this table to report data related to your first performance commitment.

Category:	Air Emissions				
Aspect :	Emissions of VOCs				
	Aspect Specifics (Optional):				
	Baseline (as stated in your application)	Year 1	Year 2	Year 3	Performance Commitment (the goal stated in your application)
Calendar Year	2000	2001	2002	2003	2003
Actual Quantity (per year)	618000	333000			Optional:
Measurement Units	lbs				
Normalizing Factor	1.0	0.7			Optional:
Basis for your Normalizing Factor	production of safety products				
Normalized Quantity* (per year)	618000	476000			310000
*Calculated for you					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

The facility conducted several experiments and small scale production runs to test new product construction, resulting in a normalized VOC emissions reduction of over 140,000 pounds. Additional experimentation will continue this year to verify scale-up and increase yield opportunities. It is expected that the facility will meet the performance commitment for this aspect by 2003.

If you have additional information that you would like to include please attach it here:

Any attachments will be located at the end of the report.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g. Energy Star, Project XL).

C.2 Performance Commitment 2

- a. Use this table to report data related to your second performance commitment.

Category :	Waste				
Aspect :	Total Solid Waste				
	Aspect Specifics (Optional):				
	Baseline (as stated in your application)	Year 1	Year 2	Year 3	Performance Commitment (the goal stated in your application)
Calendar Year	2000	2001	2002	2003	2003
Actual Quantity (per year)	95000	88000			Optional:
Measurement Units	lbs				
Normalizing Factor	1.0	0.93			Optional:
Basis for your Normalizing Factor	production of reflective media				
Normalized Quantity* (per year)	95000	95000			9000
*Calculated for you					

- b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

The plant has originally intended to satisfy this aspect using recycling and reclaim opportunities for reflective media (glass beads) used in the production of reflective sheeting. After extensive experimentation, it was determined that such an approach was not technically or economically feasible. The plant continued to pursue other opportunities in 2002 and has since made yield improvements that have reduced solid waste. These improvements will translate into reduced solid waste toward the stated performance commitment for this aspect.

Attach:

Any attachments will be located at the end of the report.

- c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g. Energy Star, Project XL).

C.3 Performance Commitment 3

a. Use this table to report data related to your third performance commitment.

Category :	Waste				
Aspect :	Total Solid Waste				
	Aspect Specifics (Optional):				
	Baseline (as stated in your application)	Year 1	Year 2	Year 3	Performance Commitment (the goal stated in your application)
Calendar Year	2000	2001	2002	2003	2003
Actual Quantity (per year)	1140000	1478000			Optional:
Measurement Units	lbs				
Normalizing Factor	1.0	1.3			Optional:
Basis for your Normalizing Factor	production of reflective sheeting				
Normalized Quantity* (per year)	1140000	1137000			565000
*Calculated for you					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

The facility has completed experiments over the past year to finalize the approach for the reduction of reflective sheeting solid wastes (paper, films); these experiments identified changes that will significantly reduce solid waste over the next several years. Currently, the facility is verifying product quality and, pending positive results, expects to begin implementation in the next six months. These reductions are expected to be in line with the stated performance commitment.

Attach:

Any attachments will be located at the end of the report.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g. Energy Star, Project XL).

C.4 Performance Commitment 4

a. Use this table to report data related to your fourth performance commitment.

Category :	Materials Use				
Aspect :	Hazardous Materials Use				
	Aspect Specifics (Optional):				
	Baseline (as stated in your application)	Year 1	Year 2	Year 3	Performance Commitment (the goal stated in your application)
Calendar Year	2000	2001	2002	2003	2003
Actual Quantity (per year)	3234000	2643000			Optional:
Measurement Units	lbs				
Normalizing Factor	1.0	0.94			Optional:
Basis for your Normalizing Factor	production of coating solutions				
Normalized Quantity* (per year)	3234000	2812000			1617000
*Calculated for you					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

The facility implemented an improved solvent cleaning system in one of four units. This system resulted in a normalized savings of over 400,000 lbs. of cleanup solvent usage in 2001. The second system has been installed and is expected to be operational in 3rd quarter 2002. Two additional systems will be installed in the next two years.

Attach:

Any attachments will be located at the end of the report.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g. Energy Star, Project XL).

**Section D.
Public Outreach and Performance Reporting**

D.1 Please briefly summarize the public outreach and reporting activities that your facility has conducted during the year. Feel free, but not obligated, to attach supporting materials (e.g., meeting agendas, public announcements).

The facility hosted a reception for local community members and officials, state and federal regulatory employees and site employees in February 2001. The 3M Brownwood Citizens Advisory Committee also participated in the event. The reception included a facility tour and a discussion of projects that lead to environmental improvements.

Communications regarding ISO 14001 and environmental progress were presented in the Brownwood Bulletin in December 2001.

The facility also donated time and materials to Brownwood High School for the Cyberway and Waterways water quality monitoring program.

Attachment:

Any attachments will be located at the end of the report.

D.2 Please indicate which of the following methods your facility plans to use to make its Performance Track Annual Report available to the public. Please check as many as appropriate.

Web Site
Press Releases
Community Advisory Panel

URL: www.epa.gov/performancectrack

Other:

**Section E.
Self-Certification of Continued Program Participation**

On behalf of **3M Brownwood,**
(name of my facility)

I certify that

- I have read and agree to the terms and conditions as specified in the *National Environmental Performance Track Program Guide*. This facility, to the best of my knowledge, continues to meet all program criteria;
- I have personally examined and am familiar with the information contained in this Annual Performance Report. The information contained in this report is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete;
- My facility has an environmental management system (EMS), as defined in the Performance Track EMS criteria, 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 assessments 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 Environment 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 manager with responsibility for the facility and am fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is part of the National Environmental Performance Track program.

Signature/Date

Printed Name

Mr. Robert D. Ringgenberg

Title

Plant Manager

Phone Number

(915) 646-3551

E-mail Address

Facility Name

3M Brownwood

Facility Street Address

US Highway 377

Brownwood, TX 76801

Performance Track ID#

A060018

Appendix:**Do you want to add Appendix?****When adding additional comments, please refer to question number.****Comments:****Attachment:**

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The public reporting and recordkeeping burden for this collection information is estimated to average 188 hours per respondent annually. 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.