

# Flexible Permitting at 3 Company

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# History of Flexible Permitting at 3M

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- Minnesota – March 1993
- California/Oklahoma – June 1996/7
- 3MCenter - 1998
- Missouri – August 2004
- Wisconsin – December 2004
- Texas – Still in progress
- Alabama – End of 2005

# St. Paul Tape Plant Issues Leading to Flexible Permit Request

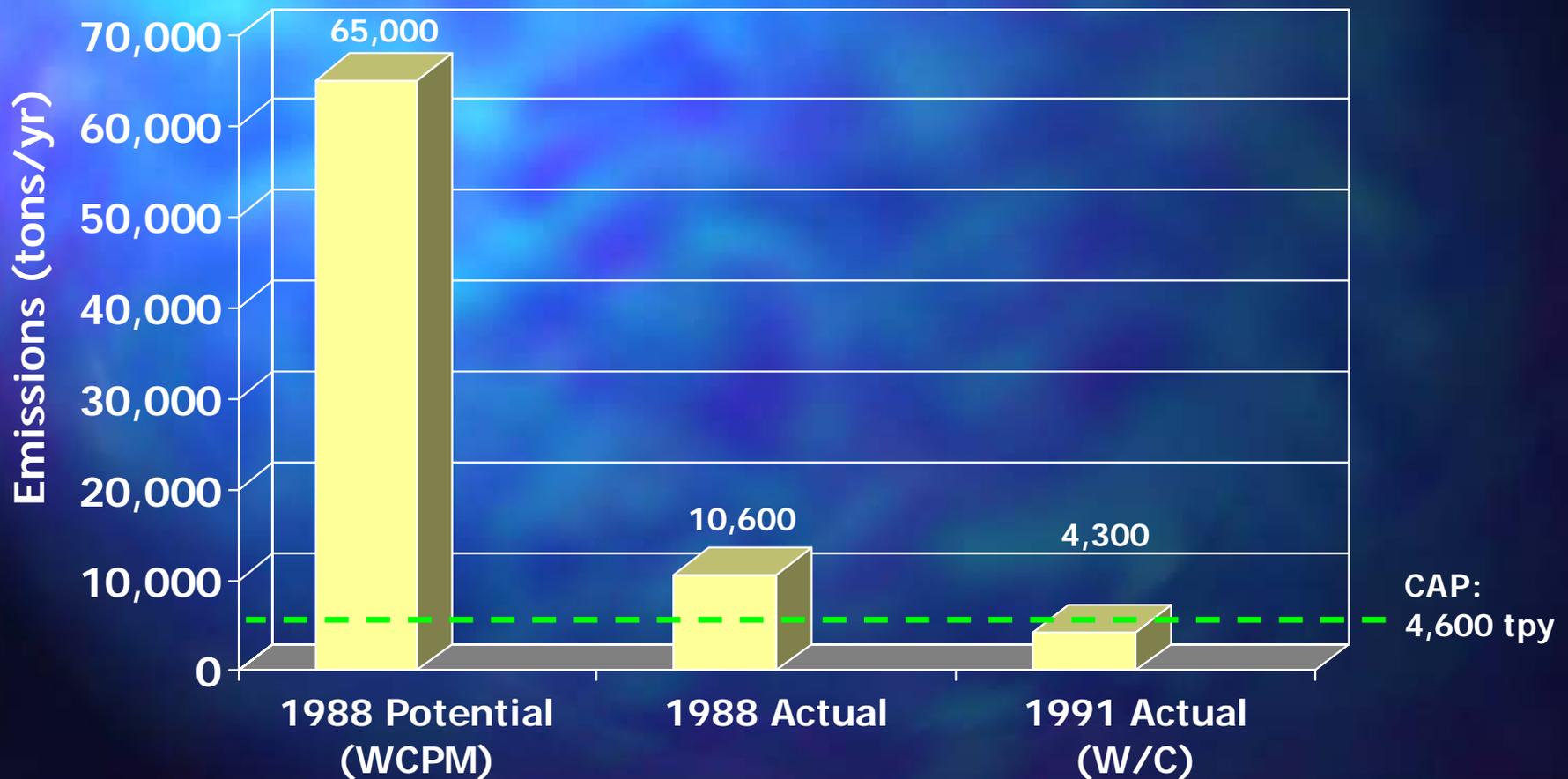
- Attainment area
- Older facility with growth problems
- Plant modernization (rapid manufacturing changes)
- Need for high degree of certainty of requirements for future facility changes
- Installed voluntary control system
- Ability to cap emissions with certainty
- Air toxics study in progress

# What Flexible Permit Accomplished

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- Up front PSD review/protection against degradation of the environment
- Preapproved/flexible modifications
- Predetermined control requirements
- Extensive MRRR Requirements
- 7 day/21 day notifications
- Significantly reduced and “capped” emissions
- Provided air toxics study

# Emissions Summary



# Benefits of a Flexible Permit for St. Paul Tape Plant

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- Permitted entire facility
- No permitting delays
- Reduced burden on agency
- Increased transparency (public has knowledge of the nature and scope of manufacturing changes approved for the permit term)
- Mandatory operation of control equipment
- CAP's emissions
- Eliminated PSD issues
- Provided credible emissions tracking system

# Benefits of a Flexible Permit for St. Paul Tape Plant (cont.)

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- Promoted 3P
- Provided Title V experience (agency and 3M)
- Potential for multi-plant use
- Reduced resource demands
- Air toxics study (10 years early)
- Practical enforceability [verified during review by OECA]
- Public/Agency/3M protection and trust

# Disadvantages of a Flexible Permit

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- Caps facility emissions
- Resource commitment for up-front permitting (agency & industry)
- Additional MRRR requirements
- Difficult to get divisions to commit

# Future of Flexible Permitting

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- Potential 3P proliferation
- Facilitates global competition
- Potential for early reductions
- Better understanding of air toxics by community
- Possible Performance Track tie-in
- Everyone will want one!!!!!!!!!!!!!!!

# Quantum Leap to Better Air Quality

- 3 flexible permits/3 different states/3 different EPA Regions
- Resources are always an issue
- Beyond compliance
- Performance Track facilities
- Track record for:
  - Performance
  - Beyond compliance
  - EMS