



United States Environmental Protection Agency
Region 7
Enforcement and Compliance Assurance Division

Air Branch

Air Branch Inspection Report
Unannounced Partial Compliance Evaluation
3M Nevada-Commercial Graphics
2120 East Austin Boulevard
Nevada, MO 64772
FRS ID : 110000443805

Inspection Date(s):
February 22, 2022

Christopher Appier, Inspector, ECAD, Air Branch

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- A Confidential Business Information (1)
- B Documents Received (1)

**This Contents page shows all the sections contained in this report
and provides a clear indication of the end of this report.**

INSPECTION OVERVIEW

INSPECTION OBJECTIVE

The objective of the partial compliance evaluation inspection was to determine the compliance of the facility with the Clean Air Act (CAA), specifically those requirements located in the code of federal regulations at 40 C.F.R. Part 63, Subpart FFFF, National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing. According to §63.2480 in Subpart FFFF, the facility is required to comply with the requirements of 40 C.F.R. Part 63, Subpart UU, for equipment that is in organic HAP service. This inspection was part of the U.S. Environmental Protection Agency's Creating Cleaner Air for Communities National Enforcement Compliance Initiative.

Table 1 lists the inspection team members.

Table 1. PROJECT TEAM MEMBERS		
Team Member	Organization	Project Role
Christopher Appier	EPA, Region 7, ECAD, Air Branch	Inspector
Treavor Bussard	Missouri Department of Natural Resources	Inspector

FACILITY CONTACT INFORMATION

Table 2 lists the primary facility contacts.

Table 2. FACILITY CONTACT INFORMATION		
Name, Title	Phone No.	Email Address
Jennifer Whiteside, EHS Manager	417-283-0295	jwhiteside@mmm.com
Rick Campbell, Environmental Engineer	417-283-0309	rcampbell@mmm.com
Lynn Deweese, Plant Manager	417-283-0281	ldeweese@mmm.com

FACILITY OVERVIEW

3M Nevada (3M) produces an array of graphics products for the global graphics industry. These products include decorative and specialty films for architectural, sign, fleet, commercial, and automotive applications. The installation has surface coating lines controlled by regenerative thermal oxidizers, film extruders, various coating mixing equipment, solvent storage tanks, and boilers.

The facility currently operates under a Part 70 Permit to Operate (OP2017-040) issued by the Missouri Department of Natural Resources (MoDNR) on April 17, 2017. The facility is a major source for volatile organic compounds, carbon monoxide, oxides of nitrogen, greenhouse gases, and hazardous air pollutants. On October 13, 2021, 3M submitted a renewal permit application to the MoDNR.

On February 7, 2022, 3M and EPA entered into a Consent Agreement and Final Order to settle a civil action against 3M for alleged violations of the CAA. 3M disclosed that it failed to comply with the emission limits and work practice standards found in 40 C.F.R. Part 63, Subpart HHHHH National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing. 3M corrected the violations and was required to pay a civil penalty of \$170,000.

According to the 3M Title V operating permit, the facility is subject to the following regulations and standards subject to review during this inspection (**Table 3**):

Table 3. APPLICABLE REGULATIONS AND STANDARDS	
Code of Federal Regulation	Standard Name
40 CFR Part 60	Subpart A, General Provisions
40 CFR Part 63	Subpart FFFF, National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing
40 CFR Part 63	Subpart UU, National Emission Standards for Equipment Leaks – Control Level 2 Standards

FACILITY OPERATIONS SUMMARY

NESHAP FFFF applies to the Mix and Mill operations when coatings or solvents are produced in the 2000-gallon and 250-gallon kettles for shipment offsite and are not an affected source under another part of 40 C.F.R. Part 63. The only applicable product is the T-15111, which is shipped to another 3M owned plant for use. The production consists of two steps. In the first, the vessel is filled with liquid material while it is purged with carbon dioxide (CO₂) to maintain an inert atmosphere. In the second step, materials are mixed, and a CO₂ purge is maintained. The kettle is under negative pressure except when additions to the kettle are made. The kettle exhaust is routed to a recuperative thermal oxidizer during this time through a flexible hose connected to the kettle lid.

FIELD ACTIVITIES SUMMARY

I arrived at the facility on February 22, 2023 and completed a drive by surveillance inspection. This included using a forward looking infrared (FLIR) camera to observe the exhaust of the thermal oxidizers. I made entry into the visitors center and introduced myself, presented my credentials, and provided my business card to Ms. Whiteside. I was given a facility safety briefing by Ms. Whiteside. I conducted an opening conference with the persons listed in Table 2, during which I explained that the purpose of the visit was to conduct an inspection to determine compliance with the CAA specifically to determine compliance with the conditions listed in Table 3. I explained that after asking for some general business information, I would observe work practices, process units, emission units, control equipment and review associated

records demonstrating compliance with the regulations. I explained to Mr. Deweese that the facility could make a claim of business confidentiality and provided them with a Confidential Business Information form (Appendix A). Mr. Deweese did not make a claim of confidentiality.

I was given a facility tour by Ms. Whiteside and Mr. Campbell. I was asked to wear a hardhat, earplugs, and shock resistant steel toe boots during the tour.

I reviewed the condition of the 250-gallon and the 2000-gallon kettles, the associated duct work, the operating status of the equipment, and any required record keeping for the equipment for compliance with the regulations and permit conditions noted in Table 3 only. I obtained copies of the records by electronic mail on March 8, 2023. The records received are listed in Appendix B. I did not leave a Receipt for Documents form. A confirmation email was sent after the documents were received.

I conducted a closing conference with Ms. Whiteside, Mr. Campbell, and Mr. Deweese. I received the signed Confidential Business Information form from Mr. Deweese.

Observations from the facility tour, and records review are noted in the Investigation Observation and Potential Findings section below.

INVESTIGATION OBSERVATIONS AND POTENTIAL FINDINGS

I made the following observations during the inspection. I discussed all observations with facility representatives during the closeout meeting unless otherwise noted in the observation description.

These observations are not final compliance determinations. The EPA Region 7 Air Branch case review team will make the final compliance determinations based on its review of this report and other technical, regulatory, and facility information.

I used a FLIR camera to view the exhaust from the facility's thermal oxidizers and observed no thermal signatures that would indicate any anomalies in the operation of the equipment.

The facility appears to meet the reporting requirements for the regulations listed in Table 3 via semiannual compliance reports.

The facility appears to keep the required records for the regulations listed in Table 3.

The facility submitted a timely permit renewal application to MDNR on October 13, 2021.