**From:** Shelley Koehn
**To:** Gray, Ashley P - DNR; Hon, David F - DNR
**Cc:** Andrea Russell; Connor Doede; Troy Jordan; Mark Meurette; Joseph Baregi; Mario Diaz
**Subject:** March 2022 Progress Report - 3M Wausau Downtown
**Date:** Tuesday, March 1, 2022 3:30:06 PM
**Attachments:** image002.png
image003.png
image004.png
image005.png
image007.png
2022-03-01_3M_Wausau_DT_Malfunction_Prevention_and_Abatement_Plan.pdf
P-0002985 3M Wausau Downtown VE Report_[SECURED].pdf
3M Wausau Downtown Operation Permit Revision Application.msg
2022-0301_3M_Wausau_DT_2021_WDNR_CA_Tracker.pdf

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Hi David and Ashley-

Please find attached the March 2022 progress report in response to Notice of Violation #2021-WCEE-3M Company for the 3M Wausau Downtown facility (facility ID #737009460). Notes on any findings with March 1, 2022 deadlines are included, below.

1. AV 1.2 – NSPS OOO Fugitive Test Report Submittal
    a. The NSPS OOO fugitive test report was submitted via WDNR Switchboard on 2/25/2022, prior to the 60 day submittal deadline of 2/26/2022. The test report is included as an attachment to this email for reference.
2. AV 4.1 – Update MPAP to include C19 and update pressure drop ranges to reflect current permit.
    a. The MPAP was reviewed and updated to reflect the current permit, and was uploaded to the WDNR Switchboard on 3/1/2022. A copy of the updated MPAP is included as an attachment to this email for reference. *Please let us know if you have any questions, concerns, or requested changes to the updated MPAP.*
3. AV 4.3 – Review the correct calibration frequencies with the responsible operators.
    a. Ongoing conversations have been had with site EHS and responsible operators for calibrations.
4. AV 6.2 – Update Table 1 of the current operating permit to reflect the proposed modeled stack height of S65.
    a. 3M submitted an operation permit revision on February 28, 2022 requesting S65 stack height be conservatively updated to 44 ft in Table of the facility's current air permit. A copy of the email submittal is attached to this email for reference.

With these updates, 3M believes that we have resolved each of the Alleged Violations for the 3M Wausau Downtown facility. *However, please let us know if you have any questions on the attached documents, or if you disagree with this statement*. If the WDNR concurs that 3M has resolved the Alleged Violations to date, this will be our last monthly update, and we will wait for further

communications from the Wisconsin DOJ.

Please let us know if you have any questions or thoughts on this email, the attached MPAP, or our proposed path forward on next steps for NOV resolution.

Thank you!

**Shelley Koehn** | Senior Environmental Engineer
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****Please note my new phone number****