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: January 2022 Mid-Month Progress Report - 3M Wausau Downtown
Date: Friday, January 14, 2022 4:00:24 PM
Attachments: image002.png
image003.png
image004.png
image005.png
image007.png
DT SAMR July-December 2020 - Amended 1-14-22.pdf
2022-0114_Wausau_Downtown_1H-2021_Next_Day_Deviation_Report.pdf
2022-0114_Wausau_Downtown_2H-2020_Next_Day_Deviation_Report.pdf
2022-0114_Wausau_Downtown_2H-2021_Next_Day_Deviation_Report.pdf
DT SAMR January-June 2021 - Amended 1-14-22.pdf

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Hi David and Ashley-

We are reaching out to provide an update on the proposed 1/15/2022 deadlines outlined in our corrective actions for Notice of Violation #2021-WCEE-3M Company for the 3M Wausau Downtown facility (facility ID #737009460). Please see a summary, below.

- Corrective Action 2.1 - Revise and resubmit first half 2021 semi-annual monitoring report to include deviations that were not reported.
    - This deviation was included in an updated semi-annual monitoring report that was submitted via Switchboard today, 1/14/2022. A copy of the report is attached for reference.
- Corrective Action 3.1 - Revise and resubmit first half 2021 semi-annual monitoring report to include CAM excursions that were not reported
    - 3M has reviewed the pressure drop ranges from July 2020 to present, and noted that the only pressure drop recorded outside of the listed CAM range was the record noted in the Full Compliance Evaluation. This record was included in the updated semi-annual monitoring report that was submitted via Switchboard today, 1/14/2022. Additionally, this was included in a next day deviation report, also uploaded to Switchboard today, 1/14/2022. A copy of the monitoring and next day deviation reports are attached for reference.
- Corrective Action 4.1 - Update MPAP to include C19 and update pressure drop ranges to current permit limits
    - 3M is still in the process of reviewing and updating the MPAP with our consultant. We request an extension of this deadline to 3/1/2022.
- Corrective Action 4.2 - Review current calibration frequency and compare frequency with regulatory requirement for calibrations. If needed, update MPAP to conform with regulatory requirement for calibrations.
    - The MPAP calibrations have been reviewed, and several additional calibrations that were not originally provided during the inspection have been located. ***Please confirm***

if you would like us to submit these calibrations, and if so, by what means (e.g., via Switchboard, email).

  - Any MPAP calibrations that were not able to be located were included in the updated semi-annual monitoring report that was submitted via Switchboard today, 1/14/2022. Additionally, these were included in a next day deviation report, also uploaded to Switchboard today, 1/14/2022. A copy of the monitoring and next day deviation reports are attached for reference.

- Corrective Action 4.3 - Review with the responsible operators the correct calibration frequency
  - 3M is continuing this review, and requests an extension of this deadline to 3/1/2022.
- Corrective Actions 7.1 - Review cooler water flowrate tracking methodology and 7.2 - Review alternative compliance demonstration methods, such as stack testing
  - 3M has reviewed the cooler water flowrate tracking, and upon review of the compliance demonstration listed in the permit, 3M believes that our records demonstrate that the cooler water flowrate has remained in compliance with the permit. The permit requires measurements to be taken once per shift or once per production run, whichever is more frequent, and our documentation shows compliance with the permit limit during each shift or production run. 3M would like to discuss this finding further with the WDNR. Currently, we have availability during the following times for a call:
    - Wednesday, January 19: 11-12
    - Monday, January 24: 9-10
    - Tuesday, January 25: 9-10, 11-12, 1-2, 3-4
    - Wednesday, January 26: 11-12; 1-2; 3:30-4:30
  - ***Please let us know if any of these times work for relevant WDNR parties (Ashley, perhaps Dave Minkey and/or Quinton LeSage?) to discuss, and I can send a Microsoft Teams meeting invite.*** If none of these times work, I can check our calendars for additional availability.

Please let us know if you have any questions here, and please provide your input on the ***bold/italic*** questions, above.

Thank you, and have a good weekend!

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****Please note my new phone number****