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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 14 1992
OFFICE OF
AIR AND RADIATION

MEMORANDUM

SUBJECT: 3M Tape Manufacturing Division
Minnesota

FROM: John B. Rasnic, Director
Stationary Source Compliance Division

TO: David Kee, Director
Air and Radiation Division

This is in response to your memorandum of June 8, 1992, regarding a proposed renewal project at the Industrial Specialties Division Tape plant in St. Paul, Minnesota owned by the 3M corporation. The company desires to enter into a federally enforceable state construction permit under which it would be required to operate such that current emissions levels would not be exceeded in order to lawfully avoid being treated as a major modification under the PSD program for a period of five years. My staff has reviewed the letter dated May 14, 1992 from the Minnesota Pollution Control Agency (MPCA) and the accompanying draft permit outline. Based on the information submitted to us, we believe that the draft permit, with some minor changes, is sufficient to allow 3M to make the changes as specified in the permit without triggering a major modification under the PSD program.

In general, a permit application must be sufficiently detailed so as to allow the permitting agency to be certain of the nature of the physical or operational changes proposed, and to accurately account for any resulting increase or decrease in emissions. In this case, we recognize that 3M is accepting an emission limitation which reflects its historically low current level of actual emissions. Further, the source plans to undertake a five-year renewal project that may cause it to deviate, during the project, from the level of normal source operations 2

established following installation of the thermal oxidizers. We agree that 3M may use the 1990 and 1991 years as representative of normal source

operation for any changes during the five year period of the renewal project. Please note, however, that should 3M deviate from changes allowed under the permit, this may result in another period being deemed more representative of normal operations relative to that change. Accordingly, we suggest: that you advise 3M to check with your office if its plans change substantially in the future in order to reaffirm that 1990-1991 continues to be the appropriate baseline period. Further, we agree that a federally enforceable emissions limit may be used in this case to limit the potential to emit as long as a continuous emissions monitor (CEM) or an acceptable alternative is used. A CEMs alternative is one that is demonstrated as providing information with the same precision, reliability, accessibility, and timeliness as that provided by CEMS. Considering 3M's baseline and the emissions limitations that restrict the plant's potential to emit, we recognize that more specificity in this permit would serve little purpose beyond that which the notification requirements already ensure for the permitting agency.

MPCA presently has no reason to believe that the National Ambient Air Quality Standard (NAAQS) for ozone is threatened by this source or any other sources in the area. It also believes that there will be no need for ambient impact analysis since the emissions cap in the draft permit will prevent the 3M renewal project from resulting in emissions increases over the 1990-1991 levels. As discussed above, with the presumption that 3M will not change its renewal plans so as to alter our conclusion that the 1990-1991 period is representative of normal source operations, changes at this source during the five year period of the permit will not be considered a major modification for New Source Review (NSR) purposes. Important to this conclusion is that the authority to construct the modifications authorized by the proposed permit will expire five years from the date of the permit's issuance, and the emissions cap will remain in place thereafter. This means that there will be contemporaneity between the acceptance of an emissions cap and the proposed modification, thereby providing assurance that any significant increases will be offset by equivalent decreases during the life of the permit.

Thus, the permit should be revised to reflect the most current two years of actual emissions. The permit must also require the use of a acceptable CEM equivalent. In addition, the permit must make it clear that any deviation from the permit requires notification to MPCA and may result in NSR applicability or another period being considered representative.

Lastly, we would like to review any other permits that take a similar approach to ensure that the goals of PSD are met.

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If you have any questions, please contact me or have your staff contact Clara Poffenberger at (703) 308-8709.

cc: Greg Foote, OGC
Jeff Renton, OGC
Julie Domike, AED
John Calcagni, AQMD
David Solomon, NSRS→

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