

From: [Air.Pollution Control](#)
To: [APC Permitting](#)
Subject: FW: 3M Clinton MACT JJJJ Notification of Compliance Status (NOCS)
Date: Thursday, March 28, 2024 10:56:49 AM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image007.png](#)
[3M Clinton MACT JJJJ Notification NOCS.pdf](#)

From: Michael Thrun <mthrun@mmm.com>
Sent: Thursday, March 28, 2024 6:51 AM
To: Air.Pollution Control <Air.Pollution.Control@tn.gov>
Subject: [EXTERNAL] FW: 3M Clinton MACT JJJJ Notification of Compliance Status (NOCS)

***** This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. *****

To whom it may concern,

Attached is the 3M Clinton MACT JJJJ Notification of Compliance Status for its Nonwoven Web Converting Line #7 (EU042), which meets the emission limitations of the rule through the use of compliant coatings. This document is also being sent certified mail as well.

If you have questions regarding this notification, please contact me at mthrun@mmm.com.

Sincerely,

From: Michael Thrun
Sent: Wednesday, March 27, 2024 7:47 AM
To: air.pollution.control@TN.go; Trent Parker <tparker@mmm.com>
Cc: Jodi Stickler-Morris <jsticklermorris@mmm.com>; Troy Jordan <tjordan@mmm.com>
Subject: 3M Clinton MACT JJJJ Notification of Compliance Status (NOCS)

To whom it may concern,

Attached is the 3M Clinton MACT JJJJ Notification of Compliance Status for its Nonwoven Web Converting Line #7 (EU042), which meets the emission limitations of the rule through the use of compliant coatings. This document is also being sent certified mail as well.

If you have questions regarding this notification, please contact me at mthrun@mmm.com.

Sincerely,



Michael Thrun | EHS Manager

Enterprise Supply Chain

1308 New Lair Road Cynthiana, KY 41031 United States

Mobile: +1 515-450-7989

mthrun@mmm.com



[3M.com](https://www.3m.com)



March 26, 2024

US EPA Region 4
Sam Nunn Atlanta Federal Center (SNAFC)
61 Forsyth Street SW
Atlanta, GA 30303-8960

Tennessee Dept. of Environment and Conservation
Division of Air Pollution Control Permitting Program
William R. Snodgrass TN Tower, 15th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243

Submitted via certified mail to US EPA Region 4
Submitted via e-mail to Air.Pollution.Control@TN.gov
[Submitted via CEDRI](#)

Subject: 3M Clinton MACT JJJJ Notification of Compliance Status (NOCS) – Nonwoven Web Converting Line #7 (40 CFR 63.9(h))

To Whom It May Concern:

3M Clinton provides this MACT JJJJ Notification of Compliance Status for its Nonwoven Web Converting Line #7 (EU042), which meets the emission limitations of the rule through the use of compliant coatings.

If you have questions regarding this notification, please contact me at mthrun@mmm.com.

Sincerely,

Michael Thrun
EHS Manager
3M CBG

Encl.: MACT JJJJ Notification of Compliance Status (NOCS) - Nonwoven Web Converting Line #7

ATTACHMENT

3M Clinton

MACT JJJJ Notification of Compliance Status

Nonwoven Web Converting Line #7

40 CFR 63 Subpart JJJJ (MACT JJJJ)

National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating Notification of Compliance Status

Facility ID: 3M Clinton
400 JD Yarnell Industrial Parkway
Clinton, TN 37716

TVOP No: 580826

Date of Notification: March 26, 2024

Notification Purpose: Pursuant to 40 CFR 63.3400(e) and 63.9(h)(2)(i), 3M Clinton submits a Notification of Compliance Status (NOCS) for Nonwoven Web Converting Line #7 (EU042) which started operations October 25, 2021.

Affected Source Description: The MACT JJJJ affected source at 3M Clinton consists of The Command Coating Line, Nonwoven Web Coating Line #3, Nonwoven Web Converting Line #6, and Nonwoven Web Converting Line #7. As the lines were constructed after September 13, 2000, they are a new affected source under the rule.

Notification Justification: Per 40 CFR 63.9(h)(2)(ii), an NOCS "must be sent before the close of business on the 60th day following completion of the relevant compliance activity specified in the relevant standard."

40 FR 63.9(h)(2)(i) Notification of Compliance Status Required Information:

(A) Methods used to determine compliance:

3M Clinton currently uses "Formulation Data" for Nonwoven Web Converting Line #7 to determine the organic HAP fraction and demonstrate compliance with the HAP emission limits in 40 CFR 63.3320. (40 CFR 63.3360(c)(3)) However, the site may elect to demonstrate that each line or group of lines within the affected source meets one of the rule's emission limit options. The grouping(s) and emission limit option used may change from month to month.

(B) Results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted:

Not applicable; compliance with subpart JJJJ emission limits for Nonwoven Web Converting Line #7 is demonstrated as described in (A) above.

(C) Methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods:

Formulation and organic HAP mass fraction information will be maintained for each coating used on Nonwoven Web Converting Line #7. Any coating additions or changes will be similarly reviewed and documented prior to implementation.

(D) The type and quantity of hazardous air pollutants emitted by the source (or surrogate pollutants if specified in the relevant standard), reported in units and averaging times and in accordance with the test methods specified in the relevant standard:

Nonwoven Web Converting Line #7 demonstrates compliance by using "as applied" compliant coating materials (§63.3370(a)(2)). The line has the potential to emit up to 0.16 tons per year of vinyl acetate.

(E) If the relevant standard applies to both major and area sources, an analysis demonstrating whether the affected source is a major source (using the emissions data generated for this notification):

40 CFR 63 Subpart JJJJ applies to major sources of HAPs only.

(F) A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method):

3M Clinton will use "Formulation Data" for each coating used on Nonwoven Web Converting Line #7 to determine the organic HAP mass fraction and demonstrate compliance with the HAP emission limits in 40 CFR 63.3320. (40 CFR 63.3360(c)(3)).

(G) A statement by the owner or operator of the affected existing, new, or reconstructed source as to whether the source has complied with the relevant standard or other requirements:

With my signature below, I attest that to the best of my knowledge, the source described above has complied with the relevant standard as described above.



Dave Cox, Plant Director

3-26-24

Date