TSD File Inventory Index

Date: October 25, 2000

Initial: C M Genevro

Facility Name:	3M Company (Tape Manufacturing Plant)
Facility Identification Number:	MND 000 824 029

A.1 General Correspondence		**B.2 Permit Docket (B.1.2)**	
A.2 Part A / Interim Status A.2	1	.1 Correspondence	
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	Y	**C.1 Compliance - (Inspection Reports)** See C.2	
.3 Part A Application and Amendments	Y	**C.2 Compliance/Enforcement** C.2	1
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		**C.3 FOIA Exemptions - Non-Releasable Documents** C.3	1
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence		.4 RFA Reports D.1.4	1
.2 Closure/Post Closure Plans, Certificates, etc		**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total - 5

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		**D.5 Corrective Action/Enforcement**	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		**D.6 Environmental Indicator Determinations**	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		**E. Boilers and Industrial Furnaces (BIF)**	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report D.3.4	✓	**F Imagery/Special Studies** (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		**G.1 Risk Assessment**	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
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.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.
Comments:_____

EPA United States Environmental Protection Agency

Advanced Searches

RCRA Help

Select the options with which to search: All searches are based on an ***and*** condition. Hint

Basic	Wildcard	Owner / Operator

Handler ID:	Handler Name: 3M	
Location Street Number:	Location Street Name: 900 BUSH	
Location City:	Location State: MINNESOTA	Location Zip:
Location County: Select	State District:	
☐ Check this box to search on active sites only.	☐ Click this box to also Search Other IDs.	☐ Click this box to do a historical name search.

Search **Reset Form** **Back to Main Menu**

Page: 1

There are **2** records, displaying **1** - **2**. Select the handler to process.

	Act Loc	Handler ID	Handler Name	Address	City	State	County	Active Status	In a Universe	Controls in Place
1	MN	MND000824029	3M - STPM	900 BUSH AVE	ST. PAUL	MN	RAMSEY	-----	N	N
2	MN	MND000824037	3M BUILDING 47 BS&CP	900 BUSH AVE BUILDING 47-B	ST PAUL	MN	RAMSEY	-----	N	N

nothing

Page: 1

URL: /rcrainfo/searches/search.jsp

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

2 4 MAR 2005

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

DE-9J

Wendy Reno
Advanced Environmental Engineer
Building 42-2E-27
3M Environmental, Health and Safety Operations
3M – St. Paul Tape Plant
St. Paul, MN 55133-3331

Re: 3M – St. Paul
MND 000 824 029

Dear Ms. Reno:

On October 22, 2003, a representative of the United States Environmental Protection Agency (U.S. EPA), accompanied by inspectors from the Ramsey County Department of Public Health, inspected the 3M – St. Paul facility ("3M" or "you") located in St. Paul, Minnesota. In response to violations of Minnesota Rules Part 7045 and 40 Code of Federal Regulations Part 262, 265 and 270 identified during the inspection, U.S. EPA issued a Notice of Violation to 3M on October 4, 2004. By letter dated April 30, 2004, 3M submitted information in response to U.S. EPA's April 6, 2004 Request for Information pursuant to Section 3007 of the Resource Conservation and Recovery Act. Also, subsequent to our Notice of Violation you submitted additional information regarding the identified violations in correspondence dated November 7, 2004

This letter is to inform you that U.S. EPA has reviewed the referenced responses, and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. U.S. EPA and the Minnesota Pollution Control Agency will continue to evaluate 3M in the future.

Recycled/Recyclable . Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

Waste, Pesticides and Toxics Division

✓ RTC letter

Type of Document:
- ☐ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☐ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☐ State Notification of Enforcement Action

Facility Name : 3M - St. Paul Tape Plant

Facility Location: 900 Bush Avenue

City: St. Paul **State:** MN

U.S. EPA ID# MND 000 824 029

Assigned Staff M. Valentino **Phone:** 886-4582

Name	Signature	Date
Author	Michael Valentino	3-23-05
Regional Counsel		
Section Chief	Michael Valentino for LJ	3-23-05
Branch Chief		

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.
   Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

RANDY A NORTON
LOGISTICS MANAGER
3M- ST PAUL 900 BUSH AVENUE
FACILITY
BUILDING 24-2E-03
751 MENDOTA AVENUE
ST PAUL MN 55144-1000

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)*

B. Date of Delivery

C. Signature

X

☐ Agent
☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

ST. PAUL, MN BOX SECTION
APR 14 2004
55164-5002

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Transfer from service label)* 7001 0320 0006 1452 0108

PS Form 3811, March 2001 Domestic Return Receipt 102595-01-M-1424

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece or on the front if space permits.

1. Article Addressed to:

WENDY RENO
ADVANCED ENVIRONMENTAL ENGINEER
BUILDING 42-2E-27
3M ENVIRONMENTAL HEALTH AND SAFETY OPERATIONS
3M - ST PAUL TAPE PLANT
ST PAUL MN 55133-3331

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)*

B. Date of Delivery

C. ...ature

☐ Agent
☐ Addressee

...ry address different from item 1? ☐ Yes
...nter delivery address below: ☐ No

ST. PAUL, MN 55164
MAR 28 2005
5002 BOX SECTION

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Transfer from service label)* 7001 0320 0006 1563 0189

PS Form 3811, March 2001 Domestic Return Receipt 102595-01-M-1424

Lorna Jereza/R5/USEPA/US

10/01/2004 12:06 PM

To Rita Cestaric/R5/USEPA/US

cc Michael Valentino/R5/USEPA/US, Harriet Croke/R5/USEPA/US, Ronza Jordan/R5/USEPA/US

bcc

Subject Enforcement Action Communication (NOVs)

This is to inform you that on October 4, 2004, U.S. EPA will send by certified mail, the attached notices of violation (NOV) to the G.E. Osmonic, Inc. facility (G.E) located in Minnetonka, MN and the 3 M -St. Paul Tape Plant (3M), located in St.Paul, MN The alledged violations were found during U.S. EPA's October 20, 2003 compliance evaluation inspection (CEI) of G.E. and an October 22, 2003 CEI of 3M.

Contact: Michael Valentino (312) 886-4582

3M-NOV_Sept2004.wpd

GE-Osmonics-NOV_Sept2004.wpd

3M Environmental, Health and
Safety Operations

PO Box 33331
St. Paul, MN 55133-3331
651 778 6442

3M

April 30, 2004

CERTIFIED MAIL

Mr. Michael Valentino
U.S. EPA
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590

RE: Response to Hazardous Waste Inspection Letter – April 6, 2004
EPA ID No. MN000824029
3M St. Paul Tape Plant
900 Bush Avenue
St. Paul, MN 55106

Dear Mr. Valentino:

This submittal is being sent in response to your request for information in the letter dated April 6, 2004, as a result of the RCRA Compliance Evaluation Inspection (CEI) at the subject facility on October 22, 2003.

For your convenience, general information about the St. Paul Tape Plant has been provided, in addition to the detailed response to your specific requests.

3M believes that limited portions of the submittal should be handled as confidential business information. As such, the confidential items have been placed in a sealed envelope stamped "3M Confidential". A detailed basis for confidentiality claim has been provided to substantiate our confidential request.

GENERAL INFORMATION:

1. Description of the St. Paul Tape Plant:

The St. Paul Tape Plant makes various types of tapes used in the consumer, industrial, and medical markets. In 2002 it was announced that the facility would be downsized. Appendix M provides additional details. As the fabric of the facility changed, the standard operating procedures and systems at the facility were continuously reviewed and updated, including the management of hazardous waste. Presently, there are 3 processes that remain at the site and they are detailed below:

IMF (Bldg 24): The IMF maker produces foam tapes in jumbo for the flexographic printing industry. The IMF process has a converting area used to make the jumbos into finished products.
Type of Waste Generated: Non-hazardous Articles (e.g. tapes)
Method of Accumulation of Waste: Satellite

5F Compounding (Bldg 20): 5F prepares, mixes and delivers urethane foam ingredients, to the 4F Maker. This compounding area provides products to the 4F Maker only. For your convenience, a process flow diagram has been included in Appendix N. The flow diagram details the process and areas where waste is generated.

Type of Waste Generated: Minnesota Regulated
Method of Accumulation of Waste: 90-day Storage

4F Maker (Bldg 20): 4F makes vinyl and urethane foam jumbo rolls for conversion at 3M manufacturing plants, including 3M's Tape, Medical, Stationary and Office Supply Division manufacturing plants that make the Nexcare bandages, Foam Mounting Tapes, etc. For your convenience a process flow diagram has been included in Appendix N. The process flow diagram details the process as well as the areas where waste is generated.

Type of Waste Generated: Minnesota Regulated and two small volume waste streams (Corrosive and Flammable)
Method of Accumulation of Waste: Satellite

2. 3M Corporate Waste Management Program

3M Company has a Corporate Waste Management Program that is designed to provide each 3M US facility with the guidance and tools necessary to implement an effective and environmentally sound waste management program. With the support of the Waste Management Program, each 3M facility assigns a Waste Management Coordinator, an individual specifically trained to the task of coordination, implementation and maintenance of their facility's Waste Management Program. Each year the facility Waste Management Coordinator receives annual training provided by 3M's corporate waste program.

In addition to implementation and training support, the 3M Corporate Waste Group provides technical support by managing and maintaining a corporate waste management database, the Waste Stream Profile System (WSP). The WSP database stores information about each waste stream generated at all 3M U.S. facilities. Each time a new waste stream is created, it is reviewed, properly classified and approved by 3M Corporate Disposal Services personnel.

RESPONSE TO SPECIFIC REQUESTS:

The following itemized list represents the response to your requests in the letter dated 4-6-04 as required. Each response is prefaced with an item number identical to the request and includes the description of the area or request and references the corresponding photo (if any).

Item 1: Persons consulted for answering requests.

Appendix M lists all persons consulted in preparing the answers to this request for information.

Item 2: 4F Maker Coating Head (Photo No. 2)

The 55-gallon drum containing Minnesota regulated hazardous waste (13-0055-9542-9) should have had a closed lid. The 4F Maker is a satellite accumulation area and the 55-gallon drum should not have been dated. Operators have been trained to ensure that all containers are closed with lids and properly labeled. In addition, an updated hazardous waste procedure containing instructions for lid closure has been developed. This procedure is attached in Appendix E.

(a) Appendix B, Profile 1 contains a copy of the waste profile (13-0055-9542-9). Appendix C contains a statement from 3M's Corporate Waste Management organization regarding our waste characterization, analytical report, and test result. Appendix D contains the appropriate hazardous waste shipping manifest(s).
(b) Appendix C contains the statement of test method.
(c) The area is satellite accumulation area.
(d) N/A, as the 4F Maker is in a satellite accumulation area.
(e) The 55-gallon drum should not have been dated. Training has been provided.

Item 3: 4F Maker RM Pumping Station (Photo No. 3)
The 55-gallon drum containing Minnesota regulated waste (13-0059-8342-7) had a lid that was not latched down properly. The operators have been trained to ensure that all containers are closed properly. In addition, an updated hazardous waste procedure containing instructions for latching the lid has been developed. This procedure is attached in Appendix E.

(a) Copies of the waste profile (13-0059-8342-7) can be found in Appendix B, Profile 2, a statement from 3M's Corporate Waste Management Division regarding waste characterization, analytical report, test result can be found in Appendix C, and the hazardous waste shipping manifests can be found in Appendix D.
(b) See Appendix C

Item 4: 5F Compounding Area – Static Mixer (Photo No. 4)
The open 5-gallon pail next to the drum is a 5-gallon pail liner. The 5-gallon pail liner is used to collect small amounts of product drippings from the process and should have been placed inside the 55-gallon drum for waste stream 13-055-9542-9. An updated hazardous waste procedure containing instructions for collecting product drippings and working with maintenance has been developed. This procedure is attached in Appendix E.

The bung on the 55-gallon drum lid should have been in place. The pale-colored solid residue on the 55-gallon drum lid is a prepolymer resin that is used by the 4F Maker to produce urethane foam rolls. The operators have been trained and a procedure has been developed to interchange the lids when residue is found on the lids. This procedure is attached in Appendix E.

(a) Appendix B, Profile 1 contains copies of the waste profile (13-0055-9542-9). Appendix C contains a statement from 3M's Corporate Waste Management organization regarding our waste characterization, analytical report, and test result. Appendix D contains the appropriate hazardous waste shipping manifest(s). does not tell which manifest
(b) Appendix C contains the statement of test method
(c) The 55-gallon drum in 5F Compounding is not satellite accumulation.
(d) The 5F Compounding area is a 90-day storage area. cf. CONTINGENCY PLAN
(e) The 55-gallon drum was properly dated 10/13/03, as the 5F area is a 90-day storage area.

Item 5: 5F Compounding Area – Sampling Port Before Pin Mixer (Photo Nos. 5 & 6)
The pale solidified residue on the 55-gallon drum lid was a prepolymer resin that is used by the 4F Maker to produce urethane foam rolls. The operators have been trained and an updated procedure has been developed to interchange the lids when residue is found on the lids. This procedure is attached in Appendix E. Please note that the 5F Compounding area is a 90-day storage area. TOI

(a) Appendix B, Profile 1 contains copies of the waste profile (13-0055-9542-9). Appendix C contains a statement from 3M's Corporate Waste Management organization regarding our waste characterization, analytical report, and test result. Appendix D contains the appropriate hazardous waste shipping manifest(s).
(b) Appendix C contains the statement of test method.

Greg Lehnes Ramsey Co.: noted lid prior to photo being shot; it was open ~4" prior

Item 6: 5F Compounding Area – Under Flush Down Valve 1 (Photo No. 7)
The picture shown in photo 7 does not appear to have a 4" gap, however, the goal in all areas of 4F and 5F is to ensure that all drum lids are properly placed on each drum.

(a) Appendix B, Profile 1 contains copies of the waste profile (13-0055-9542-9). Appendix C contains a statement from 3M's Corporate Waste Management organization regarding our waste characterization, analytical report, and test result. Appendix D contains the appropriate hazardous waste shipping manifest(s).
(b) Appendix C contains the statement of test method.
(c) The 55-gallon drum in 5F Compounding is not satellite accumulation.
(d) The 5F Compounding area is a 90-day storage area.
(e) The 55-gallon drum was properly dated 09/29/03, as the 5F area is a 90-day storage area.

neg practice?

Item 7: 5F Compounding Area – Flex Hose On Scrap Line (Photo Nos. 8 & 9)

All drums or containers that require a flexible hose use a small hole cut into the drum lid. In all cases the drum lid is placed properly on the drum, the cut hole is minimized in size, and the area around the hole is enclosed except during filling and observation.

(a) Appendix B, Profile 1 contains a copy of the waste profile (13-0055-9542-9). Appendix C contains a statement from 3M's Corporate Waste Management organization regarding our waste characterization, analytical report, and test result. Appendix D contains the appropriate hazardous waste shipping manifest(s).
(b) Appendix C contains the statement of test method.
(c) The 55-gallon drum in 5F Compounding is not satellite accumulation.
(d) The 5F Compounding area is a 90-day storage area.
(e) The 55-gallon drum was properly dated 10/17/03, as the 5F area is a 90-day storage area.

Item 8: 5F Compounding Area - TDI/Resin Mixture In Kills Solution (Photo No. 10)

The 5-gallon pail contained a flammable liquid that is used for neutralizing un-reacted TDI. Maintenance personnel had recently replaced a TDI pump. The 5-gallon pail should have been labeled according to WSP 13-0055-9542-9 and properly covered. An updated procedure has been developed to work with maintenance on the proper handling and labeling of this type of waste. This procedure is attached in Appendix E.

(a) Appendix B, Profile 1 contains copies of the waste profile (13-0055-9542-9). Appendix C contains a statement from 3M's Corporate Waste Management organization regarding our waste characterization, analytical report, and test result. Appendix D contains the appropriate hazardous waste shipping manifest(s).
(b) Appendix C contains the statement of test method.
(c) The 5-gallon pail in 5F Compounding is not satellite accumulation.
(d) The 5F Compounding area is a 90-day storage area.
(e) N/A, as the 5F Compounding area is a 90-day storage area.
(f) This waxy material on the floor was cleaned off the floor using a rag with a small amount of mineral spirits and a scraper. The dirty rag and scrapped material were placed in waste profile (13-0055-9542-9). Appendix B, Profile 1 contains a copy of the waste profile (13-0055-9542-9). After the inspection this material was immediately placed in the appropriate waste drum and was shipped out on one of the three manifests listed in Appendix D.

Item 9: 5F Compounding Area – 5-Gallon Container (Photo No. 11)

The dry, hardened, straw-colored waxy substance in the 5-gallon pail was prepolymer resin that is used by the 4F Maker to produce urethane foam rolls. The 5-gallon pail should have been labeled according to WSP 13-0055-9542-9 and properly covered. An updated procedure for collecting product drippings has been developed. This procedure is attached in Appendix E.

(a) Appendix B, Profile 1 contains a copy of the waste profile (13-0055-9542-9). Appendix C contains a statement from 3M's Corporate Waste Management organization regarding our waste characterization, analytical report, and test result. Appendix D contains the appropriate hazardous waste shipping manifest(s).
(b) Appendix C contains the statement of test method.
(c) A 5-gallon pail is used to collect material drippings from the maintenance of pumps and piping.

Item 10: 5F Compounding Area – 5-Gallon Container (Photo Nos. 12 & 13)

The brownish liquid material in the 5-gallon pail was Diester, a non-regulated raw material. The 5-gallon pail was used as containment for the Diester pump pressure relief valve. The 5-gallon pail should have been labeled with a raw material product label and poured back into the diester system. There should not have been a hazardous waste label on the 5-gallon pail. An updated procedure for collecting product drippings and container labeling has been developed. This procedure is attached in Appendix E.

(a) An MSDS sheet for the Diester 41-4100-0691-4 is attached in Appendix F. The material that is collected from the pump pressure relief valve is Diester. Diester is non-regulated raw material and not waste.
(b) NA, as the liquid material was Diester, a non-regulated raw material.
(c) A 5-gallon pail is used to collect the Diester raw material drippings from the pump pressure relief valve.

Item 11: 5F Compounding Area – Spill (Photo No. 14)

The solidified waxy milk colored material on the floor as shown in Photo 14, is urethane resin that is reacted and is similar in characteristic to the foam tape. The procedure for cleanup of a material spill is attached in Appendix G. The spill should have been cleaned up promptly and disposed of in WSP 13-0055-9542-9.

(a) Appendix B, Profile 1 contains copies of the waste profile (13-0055-9542-9). Appendix C contains a statement from 3M's Corporate Waste Management organization regarding our waste characterization, analytical report, and test result. Appendix D contains the appropriate hazardous waste shipping manifest(s).
(b) Appendix C contains the statement of test method.
(c) The spill material was cleaned off the floor using a rag with a small amount of mineral spirits and a scraper. The dirty rag and scrapped material was placed in WSP 13-0055-9542-9.
(d) N/A, as the material was removed.

Item 12: 5F Compounding Area – Sheared Off 55-Gallon Drum (Photo No. 15)

Photo 15 shows a tool that is used to empty the remaining materials out of 3 different types of non-regulated raw materials. The nearly empty raw material drums are tipped by a drum tipper so that the remaining material will pour into the 5-gallon pail located in the middle of the sheared off drum. The sheared off drum acts as a drip collector. The material captured in a pail is recovered immediately and disposed of in WSP 13-0055-9542-9. In the instance pictured, the procedure developed was not followed. This procedure is attached in Appendix E. Appendix H contains the MSDS sheets for the 3 raw materials used in this procedure.

(a) Appendix B, Profile 1 contains a copy of the waste profile (13-0055-9542-9). Appendix C contains a statement from 3M's Corporate Waste Management organization regarding our waste characterization, analytical report, and test result. Appendix D contains the appropriate hazardous waste shipping manifest(s).
(b) Appendix C contains the statement of test method.
(c) Nearly empty raw material drums are tipped by a drum tipper and the remaining material is drained into a 5-gallon pail.

Item 13: Toluene Di-isocyanate (TDI) Information

(a) The flashpoint of TDI is 260.0 Deg. F.
(b) Pensky-Martens Closed Cup (ASTM D-93).
(c) According to the MSDS the % Volatile by Volume is negligible.
(d) We use the MSDS and the vendor as our basis of knowledge of the material.
(e) The MSDS for TDI is attached in Appendix I.

Item 14: Arrangements with Local Emergency Response Agencies/Contractors

The arrangements made with local emergency response agencies and our contractors is in Appendix J. Please note that the local response agencies (St. Paul Police Dept., Regions Hospital, 3rd Dist. Fire Station #7) have received copies of the facility's RCRA contingency plan. In addition, Representatives from the local Fire Department have inspected the facility on a number of occasions and are aware that the facility uses TDI in its processes. Although 3M Company has a number of corporate contracts with qualified spill contractors, the primary firm used by the St. Paul Site is Bay West.

Item 15: List of Emergency Responders
A list of the local emergency response agencies and contractors is attached in Appendix K.

Item 16: Description of Flooring

(a) The floor is reinforced concrete and is 11 inches thick.
(b) To our knowledge, no sealer has been applied to specifically protect from spills
(c) On an as needed basis we fix all damaged floors using our Corporate Maintenance Management System (CMMS).
(d) The general clean-up procedure employed for all spills is attached in Appendix G.

Item 17: 3M Company Ownership Information

(a) 3M Company built the facility in 1947 and has been the sole occupant of the facility as it relates to hazardous waste generation and accumulation operation.
(b) There have been no prior owners or operators of the facility as it relates to hazardous waste generation and accumulation operation.

Item 18: Certification of Responsible Corporate Officer
Appendix A contains the certification of responsible corporate officer.

Photo No. 1: Bldg. 24-1 Knife Setup Room - Used Rags
Photo 1, although included in the pictures, was however not included in your itemized request. The photo was taken in the Bldg. 24 Knife setup room, rather than Bldg. 20 as listed. The Bldg. 24 Knife setup room is a satellite accumulation area. The container in the middle of the picture should have had a waste label because the contents of the containers are rags with lubricating oil and are described in WSP 13-0075-7810-0. This waste is regulated only in the State of Minnesota and requires a state waste number of MN04. A copy of the profile is attached in Appendix B, Profile 3.

We trust that this provides the requested information and answers to your questions regarding hazardous waste management at the facility. If you have any additional questions or concerns, please contact me at (651) 778-7674 or Belinda Wirth at (651) 778-6014.

Sincerely,

Wendy Reno

Wendy Reno
Advanced Environmental Engineer
Building 42-2E-27

Attachments

cc: Mr. Daryl Weakley, MPCA
Major Facilities Section
Minnesota Pollution Control Agency
520 Lafayette Road N.
St. Paul, MN 55155-4194

Mr. Greg LaMere, Dept. of Public Health
Solid and Hazardous Waste Compliance
St. Paul – Ramsey County
1670 Beam Avenue, Suite A
Maplewood, MN 55109-1176

3M Company – St. Paul - M.D. Mckenzie - 24-1W-21, C.W. Cox – 20-5-29, B.M. Wirth – 42-2E-27

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

4/6/04

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

DE-9J

IN THE MATTER OF:

3M — St. Paul 900 Bush Avenue Facility
Building 24-2E-03
751 Mendota Avenue
St. Paul, MN 55144-1000

U.S. EPA ID No.: MND 000 824 029

ATTENTION: Randy A. Norton
Logistics Manager

REQUEST FOR INFORMATION

By this letter, the United States Environmental Protection Agency (U.S. EPA) requests information under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of U.S. EPA to require you to submit certain information.

This request requires 3M to submit certain information relating to its operations at its 3M — St. Paul 900 Bush Avenue Facility in St. Paul, Minnesota. We are requiring this information for purposes of enforcing Sections 3002, 3004 or 3005 of RCRA and its implementing regulations. Attachment 1 specifies the information you must submit. You must submit this information within twenty-one (21) calendar days of receiving this request to the U.S. EPA, Attention: Michael Valentino, 77 West Jackson Boulevard, DE-9J, Chicago, Illinois 60604.

You may, under 40 C.F.R. Part 2 Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 C.F.R. 2.203(b). We will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 C.F.R. Part 2, Subpart B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

Recycled/Recyclable . Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

3M must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should notify us. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341.

We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject Joyner's to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

You should direct questions about this request for information to Michael Valentino, of my staff, at (312) 886-4582.

4-6-04
Date

Michael Valentino
for Lorna M. Jereza, P.E., Chief
Enforcement and Compliance Branch
Compliance Section 1

Attachments (2)

cc: Darryl Weakley, MPCA
Wendy Reno, 3M
Jeffrey J. McComas, 3M

ATTACHMENT 1

Instructions: You must respond separately to each of the questions or requests in this attachment. Unless otherwise specified, each of the following requests, and the term "facility," relates or refers to the 3M facility located at 900 Bush Avenue, St. Paul, Minnesota, whose U.S. EPA ID No. is MND 000 824 029. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds. For purposes of facilitating your response to this Request for Information, U.S. EPA is enclosing the photo log from its October 22, 2003, inspection of the facility. (*See* ATTACHMENT 2, "Photo Log," enclosed with this Request for Information.)

Requests

1. Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name and title for each person identified, business telephone number for each individual identified, and the number of years that each identified individual has worked for or at 3M.

2. On October 22, 2003, a RCRA compliance evaluation inspection (CEI) was conducted at the facility by inspectors from U.S. EPA and the Saint Paul - Ramsey County Department of Public Health. At the time of the CEI, one 55-gallon drum was observed near Machine No. 4-F (Floor No. 4F) in Bldg No. 20. (*See* Photo #2.) The drum was affixed with a "HAZARDOUS WASTE" label, dated 10/22/03, and identifying its contents as Toluene-2,4-Diisocyanate (TDI). The drum was open, with a flexible hose (approx. 4" diameter) placed into the open drum. Provide the following:

   (a) a copy of each and every documents in 3M's possession or control which identifies, describes, or contains information about, the contents of the drum described above, including but not limited to each:

      i. waste profile;
      ii. waste characterization;
      iii. analytical report;
      iv. test result;
      v. hazardous waste shipping manifest which accompanied off-site transport of the contents of this drum;

   (b) a statement of the test method used to make or determine each waste profile, characterization, analysis, or test documented in each document submitted in response to 2(a)(i) through (iv) above;

   (c) a statement of whether the purpose of this drum is for satellite accumulation of hazardous waste;

(d) if the purpose stated in response to 2(c) above was not for satellite accumulation, a statement of the purpose;

(e) a statement of the reason that 3M had labeled the drum with a date.

3. During the CEI, one 55-gallon drum was observed in the same general area of Bldg No. 20 as the drum identified in Request No. 2 above. (*See* Photo #3.) The drum was affixed with a "HAZARDOUS WASTE" label also identifying its contents as N,N-Diethanolamine, polyethylene glycol and glycerine. The drum was equipped with a spring-loaded lid device, which was not entirely latched down. Provide the following:

(a) a copy of each and every document in 3M's possession or control which identifies, describes, or contains information about, the contents of the drum described above, including but not limited to each:

i. waste profile;
ii. waste characterization;
iii. analytical report;
iv. test result;
v. hazardous waste shipping manifest which accompanied off-site transport of the contents of this drum;

(b) a statement of the test method used to make or determine each waste profile, characterization, analysis, or test documented in each document submitted in response to 3(a)(i) through (iv) above.

4. During the CEI, one 55-gallon drum was observed in the TDI Room, Floor 5F of Bldg No. 20. (*See* Photo #4.) The drum was affixed with a "HAZARDOUS WASTE" label also identifying its contents as TDI. An accumulation start date of 10/13/03 was identified on the label. The drum was lined with a plastic liner and situated next to the drum on the floor was an open 5-gallon pail, with no label or markings. The drum's bung was open, and a pale-colored solid residue was found on the drum's lid. Provide the following:

(a) a copy of each and every document in 3M's possession or control which identifies, describes, or contains information about, the contents of the drum described above, including but not limited to each:

i. waste profile;
ii. waste characterization;
iii. analytical report;
iv. test result;
v. hazardous waste shipping manifest which accompanied off-site transport of the contents of this drum;

(b) a statement of the test method used to make or determine each waste profile, characterization, analysis, or test documented in each document submitted in response to 4(a)(i) through (iv) above;

(c) a statement of whether the purpose of this drum is for satellite accumulation of hazardous waste;

(d) if the purpose stated in response to 4(c) above was not for satellite accumulation, a statement of the purpose;

(e) a statement of the reason that 3M had labeled the drum with a date.

5. During the CEI, one 55-gallon drum was observed in the same general area of Bldg No. 20 as the drum identified in Request No. 4 above. (*See* Photos #5 and #6.) This drum was also affixed with a "HAZARDOUS WASTE" label also identifying its contents as TDI. The drum had an accumulation start date of 9/29/03. This drum was also equipped with a plastic liner. The lid was covered with a pale, solidified residue which rendered a section of the DOT label on the drum's lid illegible. Provide the following:

(a) a copy of each and every document in 3M's possession or control which identifies, describes, or contains information about, the contents of the drum described above, including but not limited to each:

i. waste profile;
ii. waste characterization;
iii. analytical report;
iv. test result;
v. hazardous waste shipping manifest which accompanied off-site transport of the contents of this drum;

(b) a statement of the test method used to make or determine each waste profile, characterization, analysis, or test documented in each document submitted in response to 5(a)(i) through (iv) above.

6. During the CEI, one 55-gallon drum was observed along a wall, in the same general area of Bldg No. 20 as the drum identified in Request No. 5 above. (*See* Photo #7.) This drum was also affixed with a "HAZARDOUS WASTE" label also identifying its contents as TDI. The drum had an accumulation start date of 9/29/03. A pipe (approx. 3" diameter) had been inserted into the lid's larger bunghole. The drum was found with a lid open, exposing a gap of roughly 4". This drum was also lined with a plastic liner. Provide the following:

(a) a copy of each and every document in 3M's possession or control which identifies, describes, or contains information about, the contents of the drum described above, including but not limited to each:

i. waste profile;
ii. waste characterization;
iii. analytical report;
iv. test result;
v. hazardous waste shipping manifest which accompanied off-site transport of the contents of this drum;

(b) a statement of the test method used to make or determine each waste profile, characterization, analysis, or test documented in each document submitted in response to 6(a)(i) through (iv) above;

(c) a statement of whether the purpose of this drum is for satellite accumulation of hazardous waste;

(d) if the purpose stated in response to 6(c) above was not for satellite accumulation, a statement of the purpose;

(e) a statement of the reason that 3M had labeled the drum with a date.

7. During the CEI, four 55-gallon drums were observed situated on a pallet. (*See* Photos #8 and #9.) Each of the four drums were affixed with "HAZARDOUS WASTE" labels which identified the contents of each drum as TDI. All four drums were marked with an accumulation start date of 10/17/03. One drum on the pallet was found to have an open lid, with a flexible hose (approx. 1" diameter) extending into the drum. Provide the following:

(a) a copy of each and every document in 3M's possession or control which identifies, describes, or contains information about, the contents of the drum described above, including but not limited to each:

i. waste profile;
ii. waste characterization;
iii. analytical report;
iv. test result;
v. hazardous waste shipping manifest which accompanied off-site transport of the contents of this drum;

(b) a statement of the test method used to make or determine each waste profile, characterization, analysis, or test documented in each document submitted in response to 7(a)(i) through (iv) above;

(c) a statement of whether the purpose of this drum is for satellite accumulation of hazardous waste;

(d) if the purpose stated in response to 7(c) above was not for satellite accumulation, a statement of the purpose;

(e) a statement of the reason that 3M had labeled the drum with a date.

8. During the CEI, a blue 5-gallon lined pail was observed in the same general area as where the four drums identified in Request No. 7 above were located. (*See* Photo #10.) The 5-gallon container was open and unlabeled. It was sitting on the floor near the TDI pump. EPA was informed that the container held TDI in an ammonia-alcohol solution. The pail was sitting atop an apparent spill of a hardened, straw-colored, waxy material, measuring approximately 18" by 3". Provide the following:

(a) a copy of each and every document in 3M's possession or control which identifies, describes, or contains information about, the contents of the drum described above, including but not limited to each:

i. waste profile;
ii. waste characterization;
iii. analytical report;
iv. test result;
v. hazardous waste shipping manifest which accompanied off-site transport of the contents of this drum;

(b) a statement of the test method used to make or determine each waste profile, characterization, analysis, or test documented in each document submitted in response to 8(a)(i) through (iv) above;

(c) a statement of whether the purpose of this drum is for satellite accumulation of hazardous waste;

(d) if the purpose stated in response to 8(c) above was not for satellite accumulation, a statement of the purpose;

(e) if the purpose stated in response to 8(c) above was satellite accumulation, a statement of the facility process with which the satellite accumulation was associated;

(f) a description of the nature of the above-referenced waxy material apparently spilled on the floor beneath this container, including but not limited to:

i. a copy of each and every waste profile, waste characterization, analytical report and test result regarding the material;
ii. a copy of the hazardous waste shipping manifest which accompanied shipment of this material, if it was collected and sent off-site;
iii. a description of how the material was removed from the floor;
iv. if the material was not cleaned up, a statement of that fact.

9. During the CEI, a black 5-gallon pail was observed in the same general area as where the four drums identified in Request No. 7 above were located. (*See* Photo #11.) The 5-gallon container was open and unlabeled. It was on the floor, along a wall and near a 55-gallon lined drum. The contents of the pail, which was approximately 1/3 full, was a dry, hardened, straw-colored, waxy substance. Provide the following:

(a) a copy of each and every document in 3M's possession or control which identifies, describes, or contains information about, the contents of the drum described above, including but not limited to each:

i. waste profile;
ii. waste characterization;
iii. analytical report;
iv. test result;
v. hazardous waste shipping manifest which accompanied off-site transport of the contents of this drum;

(b) a statement of the test method used to make or determine each waste profile, characterization, analysis, or test documented in each document submitted in response to 9(a)(i) through (iv) above;

(c) a description of how the material was placed into this container.

10. During the CEI, another black 5-gallon pail was observed in the same general area as identified in Request No. 9 above. (*See* Photos #12 and #13.) The drum was open and contained a liquid material, brownish in color, with a consistency and sheen similar to a polyurethane. The label identified the waste code as MN01. The outside of the pail was coated with a solidified, waxy, straw-colored substance. 3M employee Chris Cox indicated to EPA that the contents were diester. Provide the following:

(a) a copy of each and every document in 3M's possession or control which identifies, describes, or contains information about, the contents of the drum described above, including but not limited to each:

i. waste profile;
ii. waste characterization;
iii. analytical report;
iv. test result;
v. hazardous waste shipping manifest which accompanied off-site transport of this drum or the contents of this drum;

(b) a statement of the test method used to make or determine each waste profile, characterization, analysis, or test documented in each document submitted in response to 10(a)(i) through (iv) above;

(c) a description of how the material was placed into this container.

11. During the CEI, EPA observed a spill on the floor in the same general area as the four drums identified in Request No. 7 above. (*See* Photo #14.) The spill encompassed approximately one-square foot. The material was solidified, apparently waxy and milk-colored. There was a spattering of the same material in several locations, each of which was several inches in diameter, in proximity to the larger spill. 3M employees informed EPA at the time of the CEI that the material was a urethane which contained TDI. Provide the following:

(a) a copy of each and every document in 3M's possession or control which identifies, describes, or contains information about, the contents of the drum described above, including but not limited to each:

i. waste profile;
ii. waste characterization;
iii. analytical report;
iv. test result;
v. hazardous waste shipping manifest which accompanied off-site transport of this drum or the contents of this drum;

(b) a statement of the test method used to make or determine each waste profile, characterization, analysis, or test documented in each document submitted in response to 11(a)(i) through (iv) above;

(c) a description of how the material was removed from the floor;

(d) If the material was not removed, a statement of that fact.

12. During the CEI, an open 5-gallon container situated inside a sheered-off 55-gallon steel drum (such that approximately the lower 1/3 of the drum remained) was in the same general area of the facility as that identified in Request No. 7 above. (*See* Photo #15.)

The smaller container was affixed with a "HAZARDOUS WASTE" label that was partially covered over with a hardened, yellow residue. The 5-gallon container was lined with a plastic liner. Provide the following:

(a) a copy of each and every document in 3M's possession or control which identifies, describes, or contains information about, the contents of the drum described above, including but not limited to each:

i. waste profile;
ii. waste characterization;
iii. analytical report;
iv. test result;
v. hazardous waste shipping manifest which accompanied off-site transport of the contents of this drum;

(b) a statement of the test method used to make or determine each waste profile, characterization, analysis, or test documented in each document submitted in response to 12(a)(i) through (iv) above;

(c) a description of how the material was placed into this container.

13. Provide the following:

(a) the flashpoint of the TDI used at the facility;

(b) a statement and complete description of the flashpoint test method used to determine the flashpoint stated in response to 13(a) above;

(c) the total concentration of volatile organic matter (VOM) of the TDI used at the facility;

(d) a statement and complete description of the test method used to determine the total concentration of VOM stated in response to 13(c) above;

(e) the Material Safety Data Sheet (MSDS) for the TDI used at the facility.

14. Describe what arrangements are in place with local fire departments, police departments, hospitals and emergency response agencies and/or spill contractors such that these entities are aware of the presence of TDI at the facility, and appropriate response measures have been considered and are in place should there be an exposure to and/or release of TDI at the facility.

15. Identify each entity with whom the arrangements described in response to 14 above had been made by October 22, 2003.

16. With regard to questions 8 and 11 above, describe the floor in the room in which the spills were observed. Provide the following:

    (a) material of construction and thickness of the floor;

    (b) description of any coating or sealant applied to the floor to provide protection against chemical spills, and date(s) of application;

    (c) description of any floor repair program employed by 3M to address cracks and other signs of deterioration;

    (d) description of general clean-up procedures employed by 3M to respond to spills which would not result in execution of the Contingency Plan.

17. Provide the following information:

    (a) the first date(s) upon which began 3M's ownership and operation of hazardous waste generation and accumulation processes at the facility;

    (b) if known, state whether any prior owner(s) or operator(s) of the facility conducted hazardous waste generation and accumulation operations at the facility.

18. Provide the following certification by a responsible corporate officer:

    I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

ATTACHMENT NO. 2
PHOTO LOG

Photo No: 1 **Date:** 10/22/03 1:42 pm **Site:** 3M (Bush Avenue)
Description: SAA container in center (used rags). No HW label. Lid not entirely closed. Clean rags container to left of photo. Bldg 20, Floor 4F, Knife Set-up Room.

Photo No: 2
Date: 10/22/03 1:55 pm
Site: 3M (Bush Avenue)
Description: 55-gallon SAA drum serving Machine 4-F (Urethane & Vinyl Foamer). Drum is open, with 4" flexible hose inserted into drum. Contents: TDI. Drum is dated 10/22/03. Bldg 20, Floor 4F.

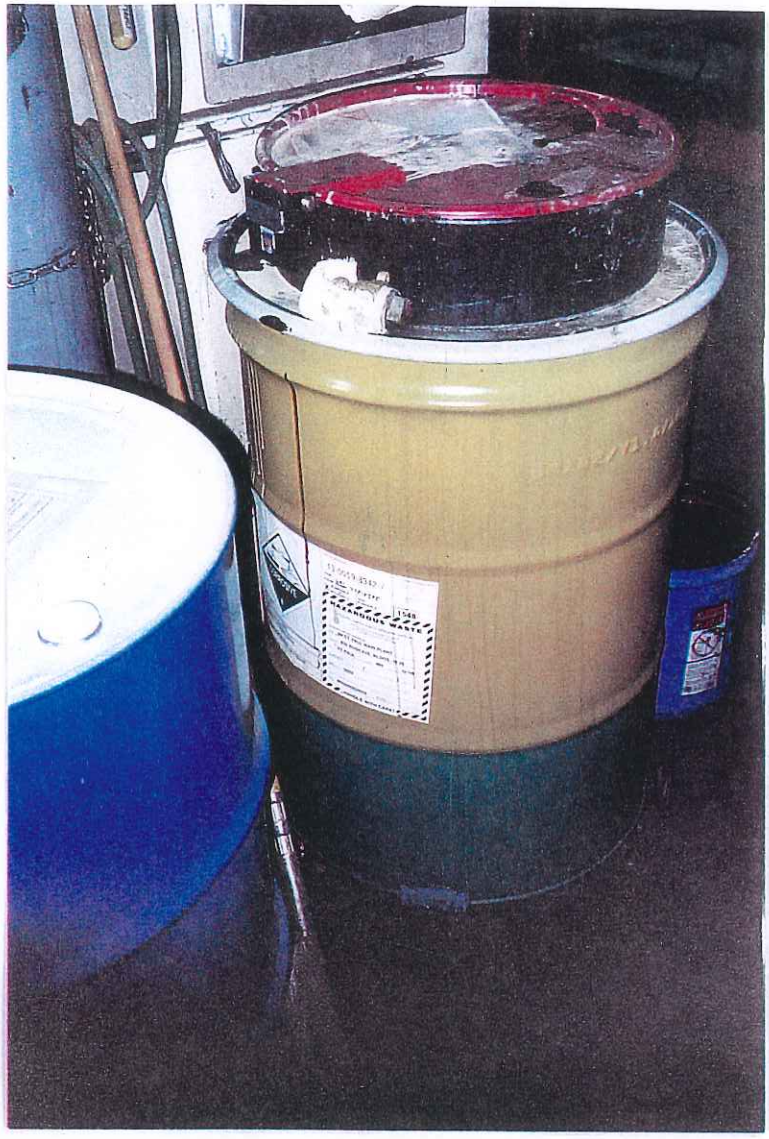

Photo No: 3
Date: 10/22/03 2:03 pm
Site: 3M (Bush Avenue)
Description: 55-gallon SAA drum containing N,N-Diethylethanolamine, polyethylene glycol, glycerine. Lid was not latched down completely. Bldg 20, Floor 4F.

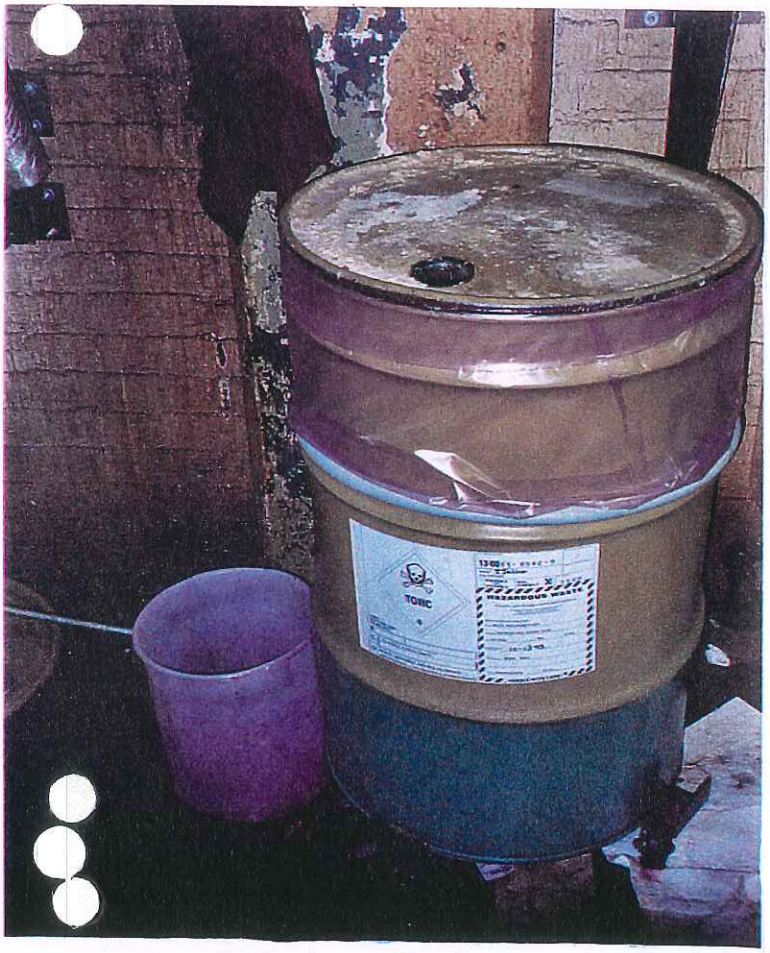

Photo No: 4
Date: 10/22/03 2:12 pm
Site: 3M (Bush Avenue)
Description: 55-gallon SAA drum. Open bung. Contents: TDI. Dated 10/13/03. Residue on top of lid. Bldg 20, Floor 5F, TDI Room.

Photo No: 5 **Date:** 10/22/03 2:19 pm **Site:** 3M (Bush Avenue)
Description: 55-gallon SAA drum. Contents: TDI. Dated 9/29/03. Solidified material accumulated on lid. Bldg 20, Floor 5F, TDI Room.

Photo No: 6
Date: 10/22/03 2:19 pm
Site: 3M (Bush Avenue)
Description: 55-gallon SAA drum. Contents: TDI. Dated 9/29/03. Solidified material accumulated on lid. Bldg 20, Floor 5F, TDI Room.

Photo No: 7
Date: 10/22/03 2:19 pm
Site: 3M (Bush Avenue)
Description: 55-gallon SAA drum.
Contents: TDI. Dated 9/29/03.
Pipe inserted into larger bung.
Bldg 20, Floor 5F, TDI Room.

Photo No: 8 **Date:** 10/22/03 2:22 pm **Site:** 3M (Bush Avenue)
Description: 4 55-gallon SAA drums. Contents: TDI. Dated 10/17/03. Drum to rear, left is open w/ flexible hose inserted. Bldg 20, Floor 5F, TDI Room.

Photo No: 9 **Date:** 10/22/03 2:22 pm **Site:** 3M (Bush Avenue)
Description: 4 55-gallon SAA drums. Contents: TDI. Dated 10/17/03. Drum in center of photo is open w/ flexible hose inserted. Bldg 20, Floor 5F, TDI Room.

Photo No: 10 **Date:** 10/22/03 2:24 pm **Site:** 3M (Bush Avenue)
Description: 5-gallon SAA container. Contents: TDI/ammonia-alcohol solution. Container is open; unlabeled. Bldg 20, Floor 5F, TDI Room.

Photo No: 11
Date: 10/22/03 2:27 pm
Site: 3M (Bush Avenue)
Description: 5-gallon SAA container. Contents unknown. Container open; unlabeled. Bldg 20, Floor 5F, TDI Room.

Photo No: 12 **Date:** 10/22/03 2:29 pm **Site:** 3M (Bush Avenue)
Description: 5-gallon SAA container. Contents: TDI or diester. Container is open; unlabeled. Hardened residue on outside of container. Bldg 20, Floor 5F, TDI Room.

Photo No: 13
Date: 10/22/03 2:29 pm
Site: 3M (Bush Avenue)
Description: 5-gallon SAA container. Contents: TDI or diester. Container is open; unlabeled. Hardened residue on outside of container. Bldg 20, Floor 5F, TDI Room.

Photo No: 14 **Date:** 10/22/03 2:42 pm **Site:** 3M (Bush Avenue)
Description: Spill on floor. Urethane containing TDI. Bldg 20, Floor 5F, TDI Room.

Photo No: 15 **Date:** 10/22/03 2:43 pm **Site:** 3M (Bush Avenue)
Description: 5-gallon SAA container. Contents: unknown. Container is open. Hardened residue on outside of container. Bldg 20, Floor 5F, TDI Room.

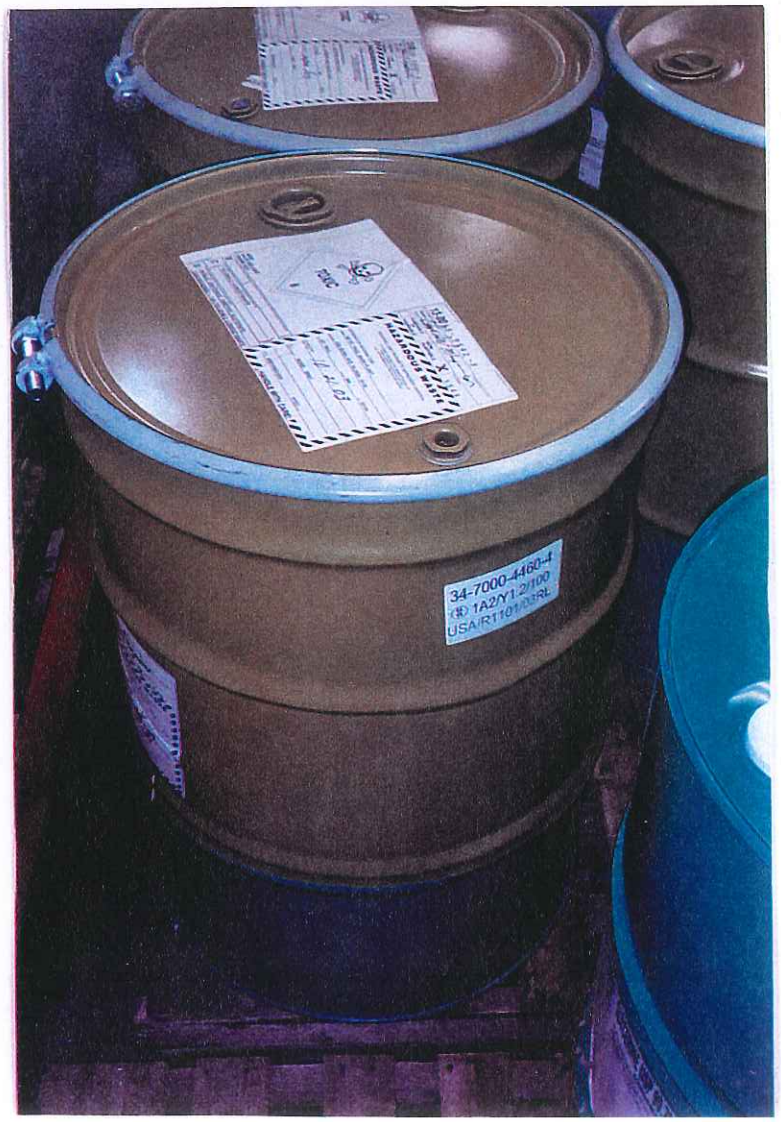

Photo No: 16
Date: 10/22/03 2:45 pm
Site: 3M (Bush Avenue)
Description: 55-gallon TDI drums. Labeled and closed. Awaiting shipment.
Bldg 20, 1st Floor, 90-Day Area.

Photo No: 17 **Date:** 10/22/03 2:59 pm **Site:** 3M (Bush Avenue)
Description: 55-gallon TDI drums. Labeled and closed. Awaiting shipment. Bldg 20, 1st Floor, 90-Day Area.

Waste, Pesticides and Toxics Division

Type of Document:
- ☐ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☑ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☐ State Notification of Enforcement Action

Facility Name : 3M

Facility Location: 900 Bush Avenue

City: St. Paul **State:** MN

U.S. EPA ID# MND 000 824 029

Assigned Staff M. Valentino **Phone:** 6-4532

Name	Signature	Date
Author	Michael Valentino	4-6-04
Regional Counsel	see Email enclosed	
Section Chief	Michael Valentino for LJ	4-6-04
Branch Chief		

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.
   Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

Waste, Pesticides and Toxics Division

Type of Document:
- [x] Notice of Violation and Inspection Report/Checklist
- [ ] No Violation Letter and Inspection Report/Checklist
- [ ] Letter of Acknowledgment
- [ ] Information Request
- [ ] Pre-Filing and Opportunity to Confer
- [ ] State Notification of Enforcement Action

Facility Name : 3M - St Paul Tape Plant / 3M

Facility Location: 751 Mendota Ave Bldg 24-2E-03

City: St. Paul **State:** MN

U.S. EPA ID# MND 000 824 029

Assigned Staff M. Valentino **Phone:** 6-4587

Name	Signature	Date
Author	Michael Valentino	9-30-04
Regional Counsel	— concurrence attached —	
Section Chief	Laura M. Jo	9/30/04
Branch Chief		

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
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   - One copy for the branch file; and
   - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.

   Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

Michael Valentino/R5/USEPA/US
09/29/2004 02:55 PM

To
Subject Fw: 3M & GE osmonics

----- Forwarded by Michael Valentino/R5/USEPA/US on 09/29/2004 02:54 PM -----

James Cha/R5/USEPA/US
09/29/2004 09:14 AM

To Michael Valentino/R5/USEPA/US@EPA
cc
Subject Re: 3M & GE osmonics

Hi, Mike. The NOVs and reports for both of these facilities are fine. Please keep this email as proof of my concurrence. Thanks.

Michael Valentino/R5/USEPA/US

Michael Valentino/R5/USEPA/US
09/29/2004 08:33 AM

To
Subject 3M & GE osmonics

Changes made to these docs should have them ready to go. James, if so, pls fire back electronic concurrence on both. Thanks

Mike

3M-NOV_Sept2004.wpd 3M-StPaul_InspReport_FY2004.wpd GE-Osmonics-NOV_Sept2004.wpd
GEOsmonics_InspRept_Sept04.wpd

Michael Mcclary
04/06/04 11:54 AM

To: Michael Valentino/R5/USEPA/US@EPA
cc:
Subject: Re: Fw: 3M 3007-- Ooops

Mike-- Good job on this. Just made a couple grammatical changes to your 8(f)(i). No need to send back-- I concur. Mike

3M-BushAvenue_3007-Revision#1_040604.wpd

Michael Valentino

Michael Valentino
04/06/2004 11:24 AM

To: Michael Mcclary/R5/USEPA/US@EPA
cc:
Subject: Re: Fw: 3M 3007-- Ooops

Mike:

Ok, changes made. I deleted the reference in 8.f.i. to the coating on the floor, and included in 16 reference to both 8 and 11, since there were 2 spills in the same room. I think you're right; it was redundant and ended up confusing. The new 16 should be clear --- the spills were in the same large room so the answers will address both spills.

Mike

3M-BushAvenue_3007-Revision#1_040504.wpd

3M Environmental Technology
and Safety Services

PO Box 33331
St. Paul, MN 55133-3331
651 778 6442

3M

January 31, 2003

CERTIFIED MAIL

St. Paul – Ramsey County Department of Public Health
Environmental Health Section
1670 Beam Avenue, Suite A
Maplewood, MN 55109-1176

Subject: 2002 Hazardous Waste Annual Report
License Renewal Application
3M STPM
EPA ID No. MND000824029

To Whom It May Concern:

As required, 3M s submitting the subject application for the following 3M facility:

EPA ID No.:	MND000824029
Facility Name:	3M STPM
Facility Address:	900 Bush Avenue St. Paul, MN 55106

Transporters – Three transporters may be used to transport waste to the 3M Cottage Grove Incinerator:

3M Private	MND006173082
Larsen Transfer	MND041773714
Safety Kleen Systems	MND981953045

T/S/D – All wastes, unless otherwise indicated, are shipped to the 3M Cottage Grove Incinerator MND006172969.

Management Methods – All wastes show incineration as the method used, however, the 3M Cottage Grove facility may consolidate certain wastes for transport to other facilities for recycling, treatment, or disposal.

DEC 14 2000

DE-9J

Roger P. Smith, Registered Agent
Minnesota Mining & Manufacturing Company
3M Center
Saint Paul, Minnesota 55144-1000

Re: Consent Agreement and
Final Order
3M Saint Paul Main Plant
EPA ID No.: MND 000 824 029

Dear Mr. Smith:

The United States Environmental Protection Agency (U.S. EPA), Region 5, Enforcement and Compliance Assurance Branch received your submittal dated October 3, 2000 in compliance with the September 22, 2000 Consent Agreement and Final Order (CAFO), Docket Number: RCRA-5-2000-002. With this letter, U.S. EPA considers the relevant portions of the CAFO satisfied and terminated.

Thank you for your cooperation in this matter. If you have any questions, please contact Patrick Kuefler, of my staff, at (312) 353-6268.

Sincerely,

Lorna M. Jereza, P.E., Chief
Compliance Section 1
Enforcement and Compliance Assurance Branch

cc: Ann Foss, MPCA
Ray Bissonette, MPCA

bcc: Pat Kuefler (DE-9J)
A. Coyle ORC
Section Copy
Branch Copy

DE-9J/PK:be/12/12/00/filename:3Mmain/CAFO/maincafocloseout.ltr.wpd

ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

SECRETARY	SECRETARY	SECRETARY	SECRETARY
12/12/00			
AUTHOR/ TYPIST	COMPLIANCE SECTION 1 SECTION CHIEF	COMPLIANCE SECTION 2 SECTION CHIEF	CA SECTION SECTION CHIEF
	for CS 12-14-00		

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 22 2000

RECEIVED
REGIONAL HEARING CLERK
'00 SEP 22 P4:34

REPLY TO THE ATTENTION OF

DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Roger P. Smith, Registered Agent
Minnesota Mining & Manufacturing Company
3M Center
Saint Paul, Minnesota 55144-1000

Re: Consent Agreement and Final Order
3M St. Paul Main Plant
EPA ID No.: MND 000 824 029

Dear Ms. Smith:

Enclosed please find one of two original signed copies of a fully executed Consent Agreement and Final Order (CAFO) in resolution of the above case. We filed the originals with the Regional Hearing Clerk on SEP 22 2000.

Please pay the civil penalty of $38,596.00 within 30 days of the date we filed the CAFO with the Regional Hearing Clerk and reference your check with the number BD 054200010 and docket number **5-RCRA-2000-002**.

Thank you for your cooperation in resolving this matter.

Sincerely,

Margaret McCue for

Robert Springer, Director
Waste, Pesticides and Toxics Division

Enclosure

cc: Michael Nash, 3M (w/enclosure)
Ray Bissonnette, MPCA (w/enclosure)
Ann Foss, MPCA (w/enclosure)

RECEIVED
'00 SEP 22 PM 3:34

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:	)	
	)	**DOCKET NO. RCRA-5-2000-002**
Minnesota Mining & Manufacturing Company	)	
850-935 Bush Avenue	)	
St. Paul, Minnesota 55133	)	
	)	
U.S. EPA I.D. #: MND 000 824 029	)	
	)	
Respondent.	)	
	)	

CONSENT AGREEMENT AND FINAL ORDER

I. PREAMBLE

On March 24, 2000, the United States Environmental Protection Agency (U.S. EPA) filed a Complaint in this matter pursuant to Section 3008(a) of the Resource Conservation and Recovery Act, as amended (RCRA), 42 U.S.C. § 6928(a). The Complainant is the Chief, Enforcement and Compliance Assurance Branch, Waste, Pesticides and Toxics Division, Region 5, U.S. EPA. The Respondent is Minnesota Mining and Manufacturing Company, St. Paul, Minnesota.

II. STIPULATIONS

The Parties, desiring to settle this action, enter into the following stipulations:

1. Respondent owns and operates a facility located at 850-935 Bush Avenue, St. Paul, Minnesota.

2. Respondent admits the jurisdictional allegations of the Complaint. Respondent agrees not to contest jurisdiction in any proceeding to enforce the terms of this Consent Agreement and Final Order (CAFO).

3. Respondent neither admits nor denies the specific factual allegations or the conclusions of law in the Complaint, other than admissions and denials in Respondent's Answer filed on May 1, 2000. Furthermore, this CAFO does not constitute a determination of violation of any federal or state law or regulation.

4. Respondent withdraws its request for a hearing and waives any rights to a hearing on the allegations in the Complaint or to challenge the terms of this CAFO.

5. If the Respondent violates any provision in this CAFO, Respondent waives any rights to challenge the authority of the U.S. EPA to bring a civil action in the appropriate United States District Court to compel compliance with the CAFO, or to seek an additional penalty for the violation, or both.

6. Respondent consents to the issuance of this Consent Order and to the payment of a civil penalty. Pursuant to Sections 3008(a) and 3008(g) of RCRA, 42 U.S.C. §§ 6928(a) and 6928(g), the nature of the violations, and other relevant factors, U.S. EPA agrees to mitigate the proposed penalty of $44,635 to $38,596.

7. Respondent must give notice and a copy of this CAFO to any successor in interest prior to transferring ownership or operational control of the facility. This CAFO binds Respondent and any successors in interest.

8. Nothing in this CAFO relieves Respondent from its obligations to comply with all applicable federal, state and local statutes and regulations, including the RCRA Subtitle C requirements at 40 C.F.R. Parts 260 through 270.

9. Respondent certifies to the best of its knowledge that it is complying fully with the requirements of Sections 3002, 3004 and 3005 of RCRA, 42 U.S.C. §§ 6922, 6924 and 6925, 40 C.F.R. Parts 262, 265 and 270, as applicable.

III. PAYMENT OF PENALTY

10. Within 30 days of the effective date of this CAFO, Respondent must pay a civil penalty in the amount of $38,596 by cashier's or certified check, to the "Treasurer, United States of America." Respondent must send the check to:

U.S. EPA, Region 5
Regional Finance Office
P.O. Box 70753
Chicago, Illinois 60673

Respondent must state its name, the billing document number and the case docket number on face of the check. Respondent must send copies of the transmittal letter and check to:

Regional Hearing Clerk
U.S. EPA Region 5
77 West Jackson Boulevard (M-19J)
Chicago, Illinois 60604

Ms. Ann L. Coyle
Assistant Regional Counsel
Office of Regional Counsel
U.S. EPA Region 5
77 West Jackson Boulevard (C-14J)
Chicago, Illinois 60604

Mr. Patrick F. Kuefler
RCRA Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division
U.S. EPA Region 5
77 West Jackson Boulevard (DE-9J)
Chicago, Illinois 60604

11. Pursuant to 31 U.S.C. § 3717, Respondent must pay the following amounts on any amount overdue under this CAFO:

(a) **Interest**. Any unpaid portion of a civil penalty will bear interest at the rate established by the Secretary of the Treasury pursuant to 31 U.S.C. § 3717(a)(1). Interest will be assessed at the rate of the United States Treasury tax and loan rate according to 4 C.F.R. § 102.13(c). Interest will accrue on any amount overdue from the date the payment was due.

(b) **Monthly Handling Charge**. Respondent must pay a $15 handling charge each month that any portion of the penalty is more than 30 days past due.

(c) **Non-Payment Penalty**. On any portion of a civil penalty more than 90 days past due, Respondent must pay a non-payment penalty of six percent per year, which will accrue from the date the penalty payment became due and is not paid. This penalty is in addition to charges under subparagraphs (a) and (b).

12. This civil penalty is not deductible for federal tax purposes.

IV. MISCELLANEOUS PROVISIONS

13. Nothing in this agreement shall be construed as prohibiting, altering, or limiting the authority of U.S. EPA to seek any remedy or sanction for Respondent's violation of this CAFO, or any applicable provision of law.

14. This CAFO settles U.S. EPA's claims for civil penalties for the violations alleged in the complaint.

15. Each party must bear its own costs and attorneys' fees in the action resolved by this CAFO.

16. Notwithstanding any other provision of this CAFO, U.S. EPA reserves any rights to bring an enforcement action pursuant to Section 7003 of RCRA, 42 U.S.C. § 6973, or other statutory authority should U.S. EPA find that the handling, storage, treatment, transportation, or disposal of solid waste or hazardous waste at the facility may present an imminent and substantial endangerment to health or the environment. U.S. EPA also reserves the right: (a) for any matters other than violations alleged in the Complaint, to take any action authorized under Section 3008 of RCRA; (b) to enforce compliance with the applicable provisions of Minn. R. 7045.0001 *et seq.*; (c) to take any action under 40 C.F.R. Parts 124 and 270; and (d) to enforce compliance with this CAFO.

V. SIGNATORIES

17. Each person signing this Consent Agreement certifies that he or she has the authority to sign this Consent Agreement for the party whom he or she represent and to bind that party to its terms.

Date: Aug 29, 2000 By: BA Cholarka
Minnesota Mining and Manufacturing Company
Respondent

Date: September 22, 2000 By: Joseph M. Boyle
Joseph M. Boyle, Chief
Waste, Pesticides and Toxics Division
Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency, Region 5,
Complainant

CONSENT AGREEMENT AND FINAL ORDER
In the Matter of: Minnesota Mining and Manufacturing Company
Docket No.: RCRA-5-2000-002

FINAL ORDER

It is ordered as agreed to by the parties and as stated in the Consent Agreement, effective immediately upon filing of this CAFO with the Regional Hearing Clerk.

Date: 4/28/03 By: _____

Robert L. Springer, Director
Waste, Pesticides and Toxics Division
U.S. Environmental Protection Agency, Region 5

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 22 2000

REPLY TO THE ATTENTION OF

DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Roger P. Smith, Registered Agent
Minnesota Mining & Manufacturing Company
3M Center
Saint Paul, Minnesota 55144-1000

Re: Consent Agreement and Final Order
3M St. Paul Main Plant
EPA ID No.: MND 000 824 029

Dear Ms. Smith:

Enclosed please find one of two original signed copies of a fully executed Consent Agreement and Final Order (CAFO) in resolution of the above case. We filed the originals with the Regional Hearing Clerk on SEP 22 2000 .

Please pay the civil penalty of $38,596.00 within 30 days of the date we filed the CAFO with the Regional Hearing Clerk and reference your check with the number BD 054200010 and docket number **5-RCRA-2000-002.**

Thank you for your cooperation in resolving this matter.

Sincerely,

Margaret McCue - for

Robert Springer, Director
Waste, Pesticides and Toxics Division

Enclosure

cc: Michael Nash, 3M (w/enclosure)
Ray Bissonnette, MPCA (w/enclosure)
Ann Foss, MPCA (w/enclosure)

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 50% Recycled Paper (20% Postconsumer)

3. Respondent neither admits nor denies the specific factual allegations or the conclusions of law in the Complaint, other than admissions and denials in Respondent's Answer filed on May 1, 2000. Furthermore, this CAFO does not constitute a determination of violation of any federal or state law or regulation.

4. Respondent withdraws its request for a hearing and waives any rights to a hearing on the allegations in the Complaint or to challenge the terms of this CAFO.

5. If the Respondent violates any provision in this CAFO, Respondent waives any rights to challenge the authority of the U.S. EPA to bring a civil action in the appropriate United States District Court to compel compliance with the CAFO, or to seek an additional penalty for the violation, or both.

6. Respondent consents to the issuance of this Consent Order and to the payment of a civil penalty. Pursuant to Sections 3008(a) and 3008(g) of RCRA, 42 U.S.C. §§ 6928(a) and 6928(g), the nature of the violations, and other relevant factors, U.S. EPA agrees to mitigate the proposed penalty of $44,635 to $38,596.

7. Respondent must give notice and a copy of this CAFO to any successor in interest prior to transferring ownership or operational control of the facility. This CAFO binds Respondent and any successors in interest.

8. Nothing in this CAFO relieves Respondent from its obligations to comply with all applicable federal, state and local statutes and regulations, including the RCRA Subtitle C requirements at 40 C.F.R. Parts 260 through 270.

11. Pursuant to 31 U.S.C. § 3717, Respondent must pay the following amounts on any amount overdue under this CAFO:

(a) **Interest**. Any unpaid portion of a civil penalty will bear interest at the rate established by the Secretary of the Treasury pursuant to 31 U.S.C. § 3717(a)(1). Interest will be assessed at the rate of the United States Treasury tax and loan rate according to 4 C.F.R. § 102.13(c). Interest will accrue on any amount overdue from the date the payment was due.

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12. This civil penalty is not deductible for federal tax purposes.

IV. MISCELLANEOUS PROVISIONS

13. Nothing in this agreement shall be construed as prohibiting, altering, or limiting the authority of U.S. EPA to seek any remedy or sanction for Respondent's violation of this CAFO, or any applicable provision of law.

14. This CAFO settles U.S. EPA's claims for civil penalties for the violations alleged in the complaint.

15. Each party must bear its own costs and attorneys' fees in the action resolved by this CAFO.

CONSENT AGREEMENT AND FINAL ORDER
In the Matter of: Minnesota Mining and Manufacturing Company
Docket No.: RCRA-5-2000-002

FINAL ORDER

It is ordered as agreed to by the parties and as stated in the Consent Agreement, effective immediately upon filing of this CAFO with the Regional Hearing Clerk.

Date: 9/22/00

By: Margaret McCue for
Robert L. Springer, Director
Waste, Pesticides and Toxics Division
U.S. Environmental Protection Agency, Region 5

SEP 22 2000

DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Roger P. Smith, Registered Agent
Minnesota Mining & Manufacturing Company
3M Center
Saint Paul, Minnesota 55144-1000

Re: Consent Agreement and
Final Order
3M St. Paul Main Plant
EPA ID No.: MND 000 824 029

Dear Ms. Smith:

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Please pay the civil penalty of $38,596.00 within 30 days of the date we filed the CAFO with the Regional Hearing Clerk and reference your check with the number BD 054200016 and docket number **5-RCRA-2000-002.**

Thank you for your cooperation in resolving this matter.

Sincerely,

Robert Springer, Director
Waste, Pesticides and Toxics Division

Enclosure

cc: Michael Nash, 3M (w/enclosure)
Ray Bissonnette, MPCA (w/enclosure)
Ann Foss, MPCA (w/enclosure)

bcc: Ann Coyle, ORC (w/enclosure)
Regional Hearing Clerk, R-19J (w/enclosure)
Section Copy
Branch Copy

DE-9J:/PK:be/3/14/00/filename:cover.cafo.mainfin.wpd

ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY
AUTHOR/ TYPIST	COMPLIANCE SECTION 1 SECTION CHIEF	COMPLIANCE SECTION 2 SECTION CHIEF	CA SECTION SECTION CHIEF	ECAB BRANCH CHIEF	WPTD DIVISION DIRECTOR
PK 9/21/00	MJ 9/21/00	ACC 9/21/00		JMB 9/22/00	MM for 9/22/00

RCRA CONSENT AGREEMENT AND FINAL ORDER SIGN-OFF

PART I **BACKGROUND**

Facility Name 3M Main Plant St Paul

Facility EPA ID Number MND 000 824 029

Docket Nmber RCRA-5-2000-002-~~[illegible]~~

ECAB Assignee/Phone Kuefler 3-6268 ORC Assignee/Phone Coyle 6-2248

Summary of Agreement Pay $38,596

PART II **CONCURRENCES ON PROPOSED CAFO (PROPOSAL NO. _____)**

		Initials	Date	Agree	Disagree
1.	ECAB Assignee	PK	8/24/00	X	
2.	Chief, ECAB Section	WN	8/24/00	X	
3.	Asst. Regional Counsel	ACC	8/25/00	X	
4.	Chief, ECAB	JMB	8/24/00	X	

PART III **RETURN TO ORC ASSIGNEE FOR TRANSMITAL OF TWO ORIGINAL COPIES OF DRAFT TO RESPONDENT.**

PART IV **FINAL CAFO APPROVAL, AFTER RESPONDENT HAS SIGNED BOTH COPIES OF PROPOSED CAFO**

		Initials	Date	Agree	Disagree
1.	ECAB Assignee	PK	9/21/00	X	
2.	Chief, ECAB Section	WN	9/21/00	X	
3.	Asst. Regional Counsel	ACC	9/21/00	X	
4.	ORC Section Chief	CF	9/21/00	X	
5.	Chief, ECAB	JMB	9/22/00	✓	
6.	Director, WPTD		/ /		
~~7.~~	~~Regional Administrator~~		/ /		

PART V **RETURN TO A. ~~PERRY, DRE~~ 8J, FOR MAILING**
Engram DE 9J

☑ **HAVE YOU COMPLETED THE CASE CONCLUSION DATA SHEET? DO NOT FORWARD IF IT IS NOT INCLUDED IN SIGN-OFF PACKAGE.**

☑ RCRIS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 22 2000

REPLY TO THE ATTENTION OF

DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Roger P. Smith, Registered Agent
Minnesota Mining & Manufacturing Company
3M Center
Saint Paul, Minnesota 55144-1000

Re: Consent Agreement and Final Order
3M St. Paul Main Plant
EPA ID No.: MND 000 824 029

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Sincerely,

Margaret McCue - for

Robert Springer, Director
Waste, Pesticides and Toxics Division

Enclosure

cc: Michael Nash, 3M (w/enclosure)
Ray Bissonnette, MPCA (w/enclosure)
Ann Foss, MPCA (w/enclosure)

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

'00 SEP 22 P4:3

IN THE MATTER OF:	)	
	)	**DOCKET NO. RCRA-5-2000-002**
Minnesota Mining & Manufacturing Company	)	
850-935 Bush Avenue	)	
St. Paul, Minnesota 55133	)	
	)	
U.S. EPA I.D. #: MND 000 824 029	)	
	)	
Respondent.	)	
	)	

CONSENT AGREEMENT AND FINAL ORDER

I. PREAMBLE

On March 24, 2000, the United States Environmental Protection Agency (U.S. EPA) filed a Complaint in this matter pursuant to Section 3008(a) of the Resource Conservation and Recovery Act, as amended (RCRA), 42 U.S.C. § 6928(a). The Complainant is the Chief, Enforcement and Compliance Assurance Branch, Waste, Pesticides and Toxics Division, Region 5, U.S. EPA. The Respondent is Minnesota Mining and Manufacturing Company, St. Paul, Minnesota.

II. STIPULATIONS

The Parties, desiring to settle this action, enter into the following stipulations:

1. Respondent owns and operates a facility located at 850-935 Bush Avenue, St. Paul, Minnesota.

2. Respondent admits the jurisdictional allegations of the Complaint. Respondent agrees not to contest jurisdiction in any proceeding to enforce the terms of this Consent Agreement and Final Order (CAFO).

3. Respondent neither admits nor denies the specific factual allegations or the conclusions of law in the Complaint, other than admissions and denials in Respondent's Answer filed on May 1, 2000. Furthermore, this CAFO does not constitute a determination of violation of any federal or state law or regulation.

4. Respondent withdraws its request for a hearing and waives any rights to a hearing on the allegations in the Complaint or to challenge the terms of this CAFO.

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6. Respondent consents to the issuance of this Consent Order and to the payment of a civil penalty. Pursuant to Sections 3008(a) and 3008(g) of RCRA, 42 U.S.C. §§ 6928(a) and 6928(g), the nature of the violations, and other relevant factors, U.S. EPA agrees to mitigate the proposed penalty of $44,635 to $38,596.

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U.S. EPA, Region 5
Regional Finance Office
P.O. Box 70753
Chicago, Illinois 60673

Respondent must state its name, the billing document number and the case docket number on face of the check. Respondent must send copies of the transmittal letter and check to:

Regional Hearing Clerk
U.S. EPA Region 5
77 West Jackson Boulevard (M-19J)
Chicago, Illinois 60604

Ms. Ann L. Coyle
Assistant Regional Counsel
Office of Regional Counsel
U.S. EPA Region 5
77 West Jackson Boulevard (C-14J)
Chicago, Illinois 60604

Mr. Patrick F. Kuefler
RCRA Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division
U.S. EPA Region 5
77 West Jackson Boulevard (DE-9J)
Chicago, Illinois 60604

11. Pursuant to 31 U.S.C. § 3717, Respondent must pay the following amounts on any amount overdue under this CAFO:

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14. This CAFO settles U.S. EPA's claims for civil penalties for the violations alleged in the complaint.

15. Each party must bear its own costs and attorneys' fees in the action resolved by this CAFO.

16. Notwithstanding any other provision of this CAFO, U.S. EPA reserves any rights to bring an enforcement action pursuant to Section 7003 of RCRA, 42 U.S.C. § 6973, or other statutory authority should U.S. EPA find that the handling, storage, treatment, transportation, or disposal of solid waste or hazardous waste at the facility may present an imminent and substantial endangerment to health or the environment. U.S. EPA also reserves the right: (a) for any matters other than violations alleged in the Complaint, to take any action authorized under Section 3008 of RCRA; (b) to enforce compliance with the applicable provisions of Minn. R. 7045.0001 *et seq.*; (c) to take any action under 40 C.F.R. Parts 124 and 270; and (d) to enforce compliance with this CAFO.

V. SIGNATORIES

17. Each person signing this Consent Agreement certifies that he or she has the authority to sign this Consent Agreement for the party whom he or she represent and to bind that party to its terms.

Date: Aug 29, 2000 By: BA Chalarka
Minnesota Mining and Manufacturing Company
Respondent

Date: September 22, 2000 By: Joseph M. Boyle
Joseph M. Boyle, Chief
Waste, Pesticides and Toxics Division
Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency, Region 5,
Complainant

3/26/2000

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:	)	DOCKET NO. RCRA-5-2000-004
	)	
Minnesota Mining & Manufacturing Company	)	ANSWER,
10746 Innovation Road	)	GROUNDS FOR DEFENSE,
Cottage Grove, Minnesota 55133	)	REQUEST FOR INFORMAL
	)	CONFERENCE AND
U.S. EPA I.D. No. MND 000 824 029	)	REQUEST FOR HEARING
	)	
Respondent.	)	

ANSWER, GROUNDS FOR DEFENSE AND REQUEST FOR INFORMAL CONFERENCE AND REQUEST FOR HEARING

Respondent, for its Answer to the Complaint in the above-captioned matter, states as follows:

I. COMPLAINT

A. Preliminary Statement and Jurisdiction

Allegations: 1. This is a civil administrative action instituted under Section 3008(a) of the Solid Waste Disposal Act, as amended, also known as the Resource Conservation and Recovery Act of 1976 (RCRA), as amended, 42 U.S.C. § 6928(a). RCRA was amended in 1984 by the Hazardous and Solid Waste Amendments of 1984 (HSWA).

2. The Complainant is, by lawful delegation, the Chief, Enforcement & Compliance Assurance Branch, Waste, Pesticides & Toxics Division, United States Environmental Protection Agency (U.S. EPA), Region 5, Chicago, Illinois.

3. The Respondent is Minnesota Mining & Manufacturing Company (3M), a corporation doing business in Minnesota.

ANSWER: 1. Minnesota Mining and Manufacturing Company ("Respondent") admits that the United States Environmental Protection Agency, Region V ("Complainant") purports to bring this action pursuant to RCRA for the assessment of a civil administrative penalty against it for alleged violations.

Michael A. Nash
Senior Counsel

Office of General Counsel

April 26, 2000

VIA CERTIFIED MAIL
Return Receipt Requested

3M

Regional Hearing Clerk, (R-19J)
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: Minnesota Mining and Manufacturing Company
Cottage Grove, Minnesota
Docket No. 5-RCRA-2000-004

Dear Sir or Madam:

Enclosed herewith and served upon you by U.S. Certified Mail, please find the following documents in the above-referenced matter:

1. Respondent's Answer to the Complaint, and

2. Affidavit of Service.

Very truly yours,

Michael A. Nash
Senior Counsel
MAN:lah
Enclosures
cc w/enclosures: Ann L. Coyle
Assistant Regional Counsel
Office of Regional Counsel (C-14J)
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Minnesota Mining and Manufacturing Company

PO Box 33428
St. Paul, MN 55133-3428
651 733 0134
651 736 9469 Facsimile
manash@mmm.com

2. Respondent admits the allegations of Paragraph 2.

3. Minnesota Mining and Manufacturing Company ("3M") is the correct legal name. Respondent admits the rest of the allegations of paragraph A.3.

B. Statutory and Regulatory Background

Allegations: 4. Jurisdiction for this action is conferred on U.S. EPA by Sections 2002(a)(1), 3006(b), and 3008 of RCRA; 42 U.S.C. §§6912(a)(1), 6926(b), and 6928.

5. U.S. EPA has promulgated regulations, codified at 40 C.F.R. Parts 260 through 279, governing generators and transporters of hazardous waste and facilities that treat, store, and dispose of hazardous waste.

6. Pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926, the Administrator of U.S. EPA (the Administrator) may authorize a state to administer the RCRA hazardous waste program in lieu of the federal program when the Administrator finds that the state program meets certain conditions. Any violation of regulations promulgated pursuant to Subtitle C (Sections 3001-3023 of RCRA, 42 U.S.C. §§ 6921-6939(e) or of any state provision authorized pursuant to RCRA Section 3006, constitutes a violation of RCRA, subject to the assessment of civil penalties and issuance of compliance orders as provided in Section 3008 of RCRA, 42 U.S.C. § 6928.

7. Pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), the Administrator granted the State of Minnesota final authorization to administer a state hazardous waste program in lieu of the federal government's base RCRA program effective on February 11, 1985. 50 FED. Reg. 3756 (January 28, 1985). The Administrator granted final authorization to administer additional RCRA and certain HSWA requirements effective September 18, 1987, 52 Fed. Reg. 27199 (July 20, 1987); June 23, 1989, 54 Fed. Reg. 16361 (April 24, 1989) (corrected effective June 23, 1989, 54 Fed. Reg. 27169 (June 28, 1989)); August 14, 1990, 55 Fed. Reg. 24232 (June 15, 1990); August 23, 1991, 56 Fed. Reg. 28709 (June 24, 1991); May 18, 1992, 57 Fed. Reg. 9501 (March 19, 1992); May 17, 1993, 58 Fed. Reg. 14321 (March 17, 1993); and March 21, 1994, 59 Fed. Reg. 2998 (January 20, 1994). U.S. EPA-authorized Minnesota regulations are codified at Minnesota Rule (Minn. R.) 7045.0001 *et seq. See also* 40 C.F.R. § 272.1200 *et seq.*

8. The Administrator may assess a civil penalty of up to $25,000 per day of violation for RCRA violations that occurred prior to January 31, 1997 under Section 3008 of RCRA, 42 U.S.C. § 6928. The Debt Collections Improvements Act of 1996 increased the statutory maximum penalty to $27,500 per day of violation for RCRA violations that occurred on or after January 31, 1997. 31 U.S.C. § 3701 and 40 C.F.R. Part 19.

9. U.S. EPA has provided notice of commencement of this action to the State of Minnesota pursuant to Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2).

ANSWER: B.4-9. Paragraphs 4-8 state conclusions of law rather than factual allegations, and Respondent therefore makes no answer thereto. Based on the cover letter accompanying the Complaint in this matter, Respondent admits the allegation of Paragraph 9.

C. General Allegations

Allegation: 10. The Respondent is 3M, which is and was at all times relevant to this Complaint a corporation incorporated under the laws of Minnesota, and the owner and operator of a facility as defined by Minn. R. 7045.0020, subpart 24, and 40 C.F.R. § 260.10, located at 10746 Innovation Road, Cottage Grove, Minnesota 55133 (the facility).

ANSWER: Respondent is a corporation incorporated under the laws of Delaware; Respondent admits the rest of the allegations in Paragraph 10.

Allegation: 11. Respondent is a "person" as defined by Minn. R. 7045.0020, subpart 66, and Section 1004(15) of RCRA, 42 U.S.C. § 6903(15).

ANSWER: Respondent admits the allegations of Paragraph 11.

Allegation: 12. On September 29, 1995, Respondent received a Hazardous Waste Storage and Treatment Permit pursuant to Minnesota Statute Chapters 115 and 116 and Minn. R. 7001.0010 to 7001.0730, Minn. R. Chapter 7007, and Minn. R. 7045.0020 to 7045.1380 (1994).

On January 19, 1996, Respondent received the federal portion of its RCRA hazardous waste permit.

ANSWER: Respondent admits the allegations of Paragraph 12.

Allegation: 13. On October 27 through 29, 1998, U.S. EPA, the Minnesota Pollution Control Agency, and Washington County representatives conducted a RCRA compliance evaluation inspection and records review (the inspection) at the facility.

ANSWER: Respondent admits the allegations of Paragraph 13.

Allegation: 14. The facility is permitted to operate 12 storage tanks: three blend tanks (Blend Tanks #1, #2, and #3), each with 3,400 gallon capacity; one decant tank, with 10,000 gallon capacity; one overflow tank (Overflow Tank #3), with 12,900 gallon capacity; three waste solvent tanks (Tanks #4, #5, and #6), each with 12,900 gallon capacity; one aqueous tank (Aqueous Tank #7), with 12,900 gallon capacity; one fuel oil tank (#2 Fuel Oil Tank #8), with 17,000 gallon capacity; and two burner supply tanks (Tanks #9 and #10), each with 12,900 gallon capacity.

ANSWER: Respondent admits the allegations of Paragraph 14.

Allegation: 15. Blend Tanks #1, #2, and #3 and the Decant Tank are located outside of Buildings 47 and 60. Overflow Tank #3, Tanks #4, #5, and #6, Aqueous Tank #7, #2 Fuel Oil Tank #8, and Tanks #9 and #10, are located at the waste solvent tank farm.

ANSWER: Respondent admits the allegations of Paragraph 15.

Allegation: 16. These tanks are used to blend liquid hazardous wastes prior to incineration or shipment to an off-site facility.

ANSWER: Respondent admits the allegations of Paragraph 16.

Allegation: 17. These hazardous waste tanks typically contain ethyl acetate, methanol, methyl ethyl ketone, toluene, and xylene. The most volatile substance commonly placed in the tanks is acetone, the vapor pressure of which is 7.3 psi at 100 degrees Fahrenheit.

ANSWER: Respondent admits the allegations of Paragraph 17.

Allegation: 18. Pursuant to Section 3004(n) of RCRA, 42 U.S.C. § 6924(n), U.S. EPA promulgated regulations to control and monitor air emissions at hazardous waste treatment, storage, and disposal facilities as necessary to protect human health and the environment. On December 6, 1994, U.S. EPA issued a set of these regulations at 40 C.F.R. Parts 264 and 265, Subpart CC, applicable to tanks, surface impoundments, and containers used to manage hazardous waste. 59 Fed. Reg. 62896.

ANSWER: Paragraph 18 states conclusions of law rather than factual allegations, and Respondent therefore makes no answer thereto.

Allegation: 19. Pursuant to Section 3006(g) of RCRA, 42 U.S.C. § 6926, U.S. EPA has jurisdiction to carry out directly those portions of the HSWA requirements for which a State is not authorized. The State of Minnesota has not received authorization for the regulations to control the air emission standards for tanks, surface impoundments, and containers, found at 40 C.F.R. Part 264 Subpart CC (40 C.F.R. §§ 264.1080 to 264.1091), for owners and operators of hazardous waste treatment, storage, and disposal facilities. Thus, U.S. EPA has jurisdiction to carry out those requirements directly in Minnesota.

ANSWER: Paragraph 19 states conclusions of law rather than factual allegations, and Respondent therefore makes no answer thereto.

Allegation: 20. Pursuant to Section 3006(g) of RCRA, 42 U.S.C. § 6926(g), requirements imposed pursuant to HSWA take effect immediately in all States.

ANSWER: Paragraph 20 states conclusions of law rather than factual allegations, and Respondent therefore makes no answer thereto.

Allegation: 21. The effective date of the Subpart CC requirements for owners and operators of hazardous waste treatment, storage, and disposal facilities is June 5, 1995. 59 Fed. Reg. 62896 (December 6, 1994).

ANSWER: Paragraph 21 states conclusions of law rather than factual allegations, and Respondent therefore makes no answer thereto. However, Respondent believes the actual effective date to be December 6, 1996 (as indicated in 61 FR 59931, November 25, 1996, and as further indicated in the Complainant's Penalty Summary Sheet.

Allegation: 22. The Subpart CC requirements are effective in Minnesota as of June 5, 1995, for owners and operators of hazardous waste treatment, storage, and disposal facilities.

ANSWER: Paragraph 22 states conclusions of law rather than factual allegations, and Respondent therefore makes no answer thereto. However, Respondent believes the actual effective date to be December 6, 1996 (as indicated in 61 FR 59931, November 25, 1996, and as further indicated in the Complainant's Penalty Summary Sheet.

COUNT 1: FAILURE TO MEET THE AIR EMISSION STANDARDS FOR TANKS

Allegation: 23. Complainant incorporates paragraphs 1 through 22 of this Complaint as though set forth fully in this paragraph.

ANSWER: Respondent, answering Paragraph 23, repeats and realleges its answers to paragraphs 1 through 22.

Allegation: 24. Pursuant to 40 C.F.R. § 264.1082(b), the owner or operator of a facility engaged in the management of hazardous waste in tanks shall control air emissions from

each waste management unit in accordance with the standards specified in 40 C.F.R. § 264.1084, except as provided for in 40 C.F.R. § 264.1082(c). 40 C.F.R. § 264.1082(c)(1) provides an exemption for tanks from the standards specified in 40 C.F.R. §264.1084 provided that all hazardous waste entering the unit has an average volatile organic (VO) concentration at the point of waste origination of less than 500 parts per million by weight (ppmw).

ANSWER: Paragraph 24 states conclusions of law rather than factual allegations, and Respondent therefore makes no answer thereto. However, the Cottage Grove Incinerator had a TSD permit prior to the effective date of Subpart CC. Thus, part 265 requirements apply until the permit is renewed. This same answer is incorporated by reference in any answer below addressing an allegation that the part 264 Subpart CC requirements apply.

Allegation: 25. Respondent's waste tanks, Blend Tanks #1, #2, and #3 the Decant Tank, Overflow Tank #3, Tanks #4, #5, and #6, Aqueous Tank #7, #2 Fuel Oil Tank #8, and Tanks #9 and #10, store hazardous waste that has VO concentration greater than 500 ppmw.

ANSWER: Respondents admits the allegations of Paragraph 25.

Allegation: 26. Pursuant to 40 C.F.R. § 264.1084(b), the owner or operator of a facility that treats, stores, or disposes of hazardous waste in tanks shall control air emissions from each tank in accordance with the standards specified in 40 C.F.R. § 264.1084, as applicable.

ANSWER: Paragraph 26 states conclusions of law rather than factual allegations, and Respondent therefore makes no answer thereto.

Allegation: 27. Pursuant to 40 C.F.R. § 264.1084(b), an owner or operator of a facility that treats, stores, or disposes of hazardous waste in tanks shall control air pollutant emissions from each tank in accordance with the Tank Level 1 or 2 controls found at 40 C.F.R. §264.1084(c) or (d), respectively.

ANSWER: Paragraph 27 states conclusions of law rather than factual allegations, and Respondent therefore makes no answer thereto.

Allegation: 28. The conditions an owner or operator must meet to control air pollutant emissions from tanks using Tank Level 1 or Tank Level 2 controls are found in 40 C.F.R. §§ 264.1084(b)(1)(I) through (b)(1)(iii).

ANSWER: Paragraph 28 states conclusions of law rather than factual allegations, and Respondent therefore makes no answer thereto.

Allegation: 29. Respondent must comply, at a minimum, with the Tank Level 1 controls found at 40 C.F.R. §264.1084(c).

ANSWER: Paragraph 29 states conclusions of law rather than factual allegations, and Respondent therefore makes no answer thereto.

Allegation: 30. Pursuant to 40 C.F.R. §264.1084(c)(1), an owner or operator shall determine the maximum organic vapor pressure for hazardous waste to be managed in a tank using Tank Level 1 controls before the first time hazardous waste is placed in the tank.

ANSWER: Paragraph 30 states conclusions of law rather than factual allegations, and Respondent therefore makes no answer thereto.

Allegation: 31. Respondent determined the maximum organic vapor pressure for hazardous waste to be managed in tanks Blend Tanks #1, #2, and #3 the Decent Tank, Overflow Tank #3, Tanks #4, #5, and #6, Aqueous Tank #7, #2 Fuel Oil Tank #8, and Tanks #9 and #10, using Tank Level 1 controls in 1998; therefore, Respondent did not determine the maximum organic vapor pressure for the hazardous waste to be managed in these tanks before the first time hazardous waste was placed in those tanks.

ANSWER: Respondent had placed waste in the tank long before the effective date of Subpart CC and finds this allegation confusing and vague. Further, Respondent denies the allegations of Paragraph 50. Respondent had a working understanding of the materials contained in the tank and had personal and engineering knowledge of the vapor pressure of constituents of the waste. In September 1998, an analysis of maximum organic vapor pressure was formally documented. Prior to September 1998, this same type of analysis was done to ensure that the vapor pressure in the storage tanks stayed below the level for Level 1 controls, but was not formally recorded.

Allegation: 32. Respondent's failure to determine the maximum organic vapor pressure for hazardous waste to be managed in Blend Tanks #1, #2, and #3 the Decant Tank, Overflow Tank #3, Tanks #4, #5, and #6, Aqueous Tank #7, #2 Fuel Oil Tank #8, and Tanks #9 and #10, using Tank Level 1 controls before the first time hazardous waste was placed in those tanks violated 40 C.F.R. § 264.1084(c)(1).

ANSWER: Paragraph 32 states conclusions of law rather than factual allegations, and Respondent therefore makes no answer thereto.

Allegation: 33. Pursuant to 40 C.F.R. § 265.1085(c)(4)(ii), an owner or operator shall perform an initial inspection of the fixed roof and its closure devices on or before the date that the tank becomes subject to this section. Thereafter, the owner or operator shall perform the inspections at least once every year.

ANSWER: Paragraph 33 states conclusions of law rather than factual allegations, and Respondent therefore makes no answer thereto.

Allegation: 34. Respondent did not perform an initial inspection of the fixed roof and its closure devices for Blend Tanks #1, #2, and #3 the Decant Tank, Overflow Tank #3, Tanks #4, #5, and #6, Aqueous Tank #7, #2 Fuel Oil Tank #8, and Tanks #9 and #10, on or before June 5, 1995.

ANSWER: Respondent denies the allegations of Paragraph 34. Respondent believes the actual effective date to be December 6, 1996 as indicated in 61 FR 59931, November 25, 1996, and as further indicated in the Complainant's Penalty Summary Sheet. Further, since 1995 a facility process operator has completed a daily visual inspection of the storage tanks. This inspection includes checking for leaks and structural integrity of the tanks and associated piping. In addition to the daily visual inspections, other inspections for preventative maintenance were conducted.

Allegation: 35. Respondent did not perform inspections of the fixed roof and its closure devices for Blend Tanks #1, #2, and #3 the Decant Tank, Overflow Tank #3, Tanks #4, #5, and #6, Aqueous Tank #7, #2 Fuel Oil Tank #8, and Tanks #9 and #10, in 1996 or 1997.

ANSWER: Respondent denies the allegations of Paragraph 35. Respondent denies the allegations of Paragraph 34. Respondent believes the actual effective date to be December 6, 1996 as indicated in 61 FR 59931, November 25, 1996, and as further indicated in the Complainant's Penalty Summary Sheet. Thus, no annual inspection was required in 1996. Further, since 1995 a facility process operator has completed a daily visual inspection of the storage tanks. This inspection includes checking for leaks and structural integrity of the tanks and associated piping. In addition to the daily visual inspections, other inspections for preventative maintenance were conducted during this time period. In addition, the area where the tanks are located was frequented often by workers who would have noticed any leaks from the tanks.

Allegation: 36. Respondent's failure to perform an initial inspection of the fixed roof and its closure devices for Blend Tanks #1, #2, and #3 the Decant Tank, Overflow Tank #3, Tanks #4, #5, and #6, Aqueous Tank #7, #2 Fuel Oil Tank #8, and Tanks #9 and #10, on or before June 5, 1995, or in 1996 and 1997 violated 40 C.F.R. § 264.1084(c)(4)(ii).

ANSWER: Paragraph 36 states conclusions of law rather than factual allegations, and Respondent therefore makes no answer thereto.

Allegation: 37. The recordkeeping requirements with which an owner or operator of a tank subject to Subpart CC must comply are at 40 C.F.R. §264.1090(b).

ANSWER: Paragraph 37 states conclusions of law rather than factual allegations, and Respondent therefore makes no answer thereto. Further, Respondent does not believe that 40 C.F.R. 264.1090(b) contains recordkeeping requirements.

Allegation: 38. At the time of the inspection, Respondent did not have a recordkeeping system for Blend Tanks #1, #2, and #3 the Decant Tank, Overflow Tank #3, Tanks #4, #5, and #6, Aqueous Tank #7, #2 Fuel Oil Tank #8, and Tanks #9 and #10, for the years 1996 and 1997.

ANSWER: Respondent denies the allegations of Paragraph 38. Respondent is not certain as to which recordkeeping requirements Complainant is referencing. Further, any Subpart CC recordkeeping requirements would not have been applicable to all of 1996 because of the effective date of the regulation.

Allegation: 39. Respondent's failure to have a recordkeeping system for Blend Tanks #1, #2, and #3 the Decant Tank, Overflow Tank #3, Tanks #4, #5, and #6, Aqueous Tank #7, #2 Fuel Oil Tank #8, and Tanks #9 and #10, for the years 1996 and 1997 violated 40 C.F.R. § 264.1090(b).

ANSWER: Paragraph 39 states conclusions of law rather than factual allegations, and Respondent therefore makes no answer thereto.

II. RULES GOVERNING THIS PROCEEDING

Allegation: The "Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders, and the Revocation, Termination or Suspension of Permits" (Consolidated rules) at 64 Fed. Reg. 40138 (1999) (to be codified at 40 C.F.R. Part 22) govern this proceeding to assess a civil penalty. A copy of the Consolidated Rules is enclosed with the Complaint served on Respondent.

ANSWER: Section II. states conclusions of law rather than factual allegations and Respondent therefore makes no answer thereto. Respondent admits that it received a copy of the Consolidated Rules with the Complaint.

III. PROPOSED CIVIL PENALTY

Allegation: Section 3008(a)(3) of RCRA requires the Administrator to consider "the seriousness of the violation and any good faith efforts to comply with applicable requirements" in assessing an administrative penalty. 42 U.S.C. § 6928(a)(3). Based on an evaluation of the facts alleged in this Complaint and the requirements of Section 3008 of RCRA, Complainant proposes that the Administrator asses a civil penalty against Respondent of $7,780, as further explained in Attachment 1 "Penalty Summary Sheet."

Complainant evaluated the facts and circumstances of this case with specific reference to U.S. EPA's 1990 RCRA Civil Penalty Policy. A copy of the penalty policy is available upon request.

Complainant developed the proposed penalty based on the best information available to Complainant at this time. Complainant may adjust the proposed penalty if the Respondent establishes bona fide issues of ability to pay or other defenses relevant to the penalty's appropriateness.

ANSWER: Respondent interprets the above language in Section III. and Attachment 1 as EPA's explanation as to the appropriateness of the penalty in this matter. As such, Respondent neither admits nor denies the content of the language.

IV. COMPLIANCE ORDER

Allegation: Based on the foregoing, Respondent is hereby ordered-pursuant to authority in 3008(a) of RCRA, 42 U.S.C. § 6928(a), and § 22.37(b) of the Consolidated Rules to comply with the following requirements immediately upon the effective date of this Order:

1. Respondent must achieve and maintain compliance with all requirements and prohibitions governing the storage of hazardous waste applicable to generators, and treatment and storage facilities codified at or incorporated by Minn. R. 7045 and 40 C.F.R. Part 262 and 265.

2. Respondent must notify U.S. EPA in writing upon achieving compliance with this Order within 15 calendar days after the date it achieves compliance. If Respondent has not taken or completed any requirement of this Order, Respondent must notify U.S. EPA of the failure, its reasons for the failure, and the proposed date for compliance within 10 calendar days after the due date set forth in this Order.

3. Respondent must submit all reports, submissions, and notifications required by this Order to:

Patrick Kuefler
Waste, Pesticides 7 Toxics Division (DE-9J)
Enforcement and Compliance Assurance Branch
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590.

ANSWER: Section IV. states no factual allegations, and Respondent therefore makes no answer thereto.

V. FILING AND SERVICE OF DOCUMENTS

Allegation: Respondent must file with the Regional Hearing Clerk the original and one copy of each document Respondent intends as part of the record in this proceeding. The Regional Hearing Clerk's address is:

Regional Hearing Clerk (R-19J)
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Respondent must serve a copy of each document filed in this proceeding on each party pursuant to Section 22.5 of the Consolidated Rules. Complainant has authorized Ann Coyle to receive any answer and subsequent legal documents that Respondent serves in this proceeding. Respondent may telephone Ms. Coyle at (312) 886-2248. Ms. Coyle's address is:

Ann L. Coyle
Assistant Regional Counsel
Office of Regional Counsel (C-14J)
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

ANSWER: Section V. states no factual allegations, and Respondent therefore makes no answer thereto.

VI. PENALTY PAYMENT

Allegation: 44. Respondent may resolve this proceeding at any time by paying the proposed penalty by certified or cashier's check, payable to "Treasurer, the United States of America," and by delivering the check to:

U.S. Environmental Protection Agency, Region 5
P.O. Box 70753
Chicago, Illinois 60673

Respondent must include the case name and docket number on the check and in the letter transmitting the check. Respondent simultaneously must send copies of the check and transmittal letter to Mr. Kuefler and Ms. Coyle at the addresses stated above in Parts IV and V, respectively.

ANSWER: Respondent admits that the Complainant has proposed a penalty but denies that Complainant is entitled to the imposition of the proposed civil penalties and declines to pay the proposed penalty. Further, Respondent requires an Informal Conference and a Hearing.

VII. OPPORTUNITY TO REQUEST A HEARING

Allegation: The Administrator must provide an opportunity to request a hearing to any person against whom the Administrator proposes to assess a penalty under Section 3008(b) of RCRA, 42 U.S.C. § 6928(b). Respondent has the right to request a hearing on any material fact alleged in the complaint, or on the appropriateness of the proposed penalty, or both. To request a hearing, Respondent must specifically make the request in its answer, as discussed in Part VIII below.

ANSWER: Respondent requests a hearing to contest the Complaint.

VIII. ANSWER

Allegation: Respondent must file a written answer to this complaint if Respondent contests any material fact of the complaint; contends that the proposed penalty is inappropriate; or contends that it is entitled to judgment as a matter of law. To file an answer, Respondent must file the original written answer and one copy with the Regional Hearing Clerk at the address specified in Part V above and must serve copies of the written answer on the other parties.

If Respondent chooses to file a written answer to the complaint, it must do so within 30 calendar days after receiving the complaint. In counting the 30-day time period, the date of receipt is not counted, but Saturdays, Sundays, and federal legal holidays are counted. If the 30-day time period expires on a Saturday, Sunday, or federal legal holiday, the time period extends to the next business day.

Respondent's written answer must clearly and directly admit, deny, or explain each of the factual allegations in the complaint; or must state clearly that Respondent has no knowledge of a particular factual allegation. Where Respondent states that it has no knowledge of a particular factual allegation, the allegation is deemed denied.

Respondent's failure to admit, deny, or explain any material factual allegation in the complaint constitutes an admission of the allegation.

Respondent's answer must also state:

a. the circumstances or arguments which Respondent alleges constitute grounds of defense;
b. the facts that Respondent disputes;
c. the basis for opposing the proposed penalty; and

d. whether Respondent requests a hearing as discussed in Part VII above.

If Respondent does not file a written answer within 30 calendar days after receiving this complaint the Presiding Officer may issue a default order, after motion, under Section 22.17 of the Consolidated Rules. Default by Respondent constitutes an admission of all factual allegations in the complaint and a waiver of the right to contest the factual allegations. Respondent must pay any penalty assessed in a default order without further proceedings 30 days after the order becomes the final order of the Administrator of U.S. EPA under Section 22.27(c) of the Consolidated Rules.

ANSWER: Section VIII. states no factual allegations, and Respondent therefore makes no answer thereto.

IX. SETTLEMENT CONFERENCE

Allegation: Whether or not Respondent requests a hearing, Respondent may request an informal conference to discuss the facts of this case and to arrive at a settlement. To request a settlement conference, Respondent may contact Ann Coyle at the address or phone number specified in Part V above.

Respondent's request for an informal settlement conference does not extend the 30 calendar day period for filing a written answer to this Complaint. Respondent may pursue the informal conference procedure simultaneously with the adjudicatory hearing procedure. U.S. EPA encourages all parties for whom a civil penalty is proposed to pursue the possibilities of settlement through an informal conference. U.S. EPA, however, will not reduce the penalty simply because the parties hold a conference.

The parties will embody any settlement that they may reach as a result of the conference in a written Consent Agreement and Final Order (CAFO) issued by the Director, Waste, Pesticides and Toxics Division, U.S. EPA, Region 5. The issuance of a CAFO shall constitute a waiver of Respondent's right to request a hearing on any stipulated matter in the CAFO.

ANSWER: Respondent recognizes the opportunity for an informal settlement conference as stated in Section IX. of the Complaint. Respondent hereby requests an informal settlement conference.

X. CONTINUING OBLIGATION TO COMPLY

Allegation: Neither the assessment nor payment of a civil penalty will affect Respondent's continuing obligation to comply with RCRA and any other applicable federal, state, or local law.

ANSWER: Section X. states no factual allegations and Respondent therefore makes no answer thereto.

Grounds for Defense:

Respondent makes the following points:

1. The Penalty Summary Sheet attached to the Administrative Complaint does not provide an explanation as to why the particular gravity-based penalty amounts were chosen from the RCRA Civil Penalty Policy, why the classifications of alleged violations were chosen, why a multi-day penalty amount was added to the penalty calculation, how the multi-day penalty amount was calculated, what the increase of 10% for History of Noncompliance is based upon, and how the economic benefit calculation was made. As such, Respondent contends that the proposed penalty is inappropriate. Complainant is attempting to levy multi-day and gravity-based penalties where no such penalties are warranted. Complainant is attempting to use adjustment factors to increase the penalty where no increase is warranted. Complainant's characterization of the allegations pursuant to the EPA RCRA Penalty Policy as "minor/major" are not supported by the facts.

2. Complainant fails to apply appropriate Adjustment Factors from the RCRA Civil Penalty Policy.

3. No actual or potential harm to human health or the environment occurred as a result of the factual allegations described in the Complaint.

4. Respondent received no economic benefit whatsoever from the factual allegations described in the Complaint.

5. Complainant is attempting to penalize in several instances where U.S. EPA's regulations are uncertain, vague and confused.

6. Respondent has operated in substantial compliance with all aspects of the waste handling regulations.

7. Allegations that Respondent violated the Subpart CC rules incorporated in Part 264 are inappropriate in that Respondent, as a permitted facility prior to the effective date of the Subpart CC rules, was not required to comply with the Part 264 rules until such were incorporated into its next TSD permit.

Respectfully submitted,

By: _____

Michael A. Nash
Senior Counsel
3M Center Bldg. 220-12E-02
P.O. Box 33428
St. Paul, Minnesota 55133-3428

Dated: April 26, 2000

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN RE:	)	DOCKET NO. 5-RCRA-2000-004
	)	
Minnesota Mining & Manufacturing Company	)	**AFFIDAVIT OF SERVICE**
10746 Innovation Road	)	**OF MICHAEL A. NASH**
Cottage Grove, Minnesota 55133	)	
	)	
U.S. EPA ID No. MND 000 824 029	)	
	)	
Respondent	)	

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

Michael A. Nash, being first duly sworn, says:

1. I am the attorney for the Respondent in the above-entitled action;

2. I certify that Respondent's Answer to the complaint was served via U.S. Certified Mail on April 26, 2000 upon

Regional Hearing Clerk, (R-19J)
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

and

3. I certify that one copy of Respondent's Answer was mailed via U.S. Certified Mail on April 26, 2000 to

Ann L. Coyle
Assistant Regional Counsel
Office of Regional Counsel (C-14J)
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

FURTHER AFFIANT SAITH NOT.

Dated: April 26, 2000

(Affiant's name)

SUBSCRIBED AND SWORN TO before me
this April 26, ~~1998~~ 2000

Maureen C. Fariey
Notary Public

MAUREEN C. FARICY
NOTARY PUBLIC MINNESOTA
My Comm. Expires Jan. 31 2005

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

MAR 27 2000

DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Roger P. Smith, Registered Agent
Minnesota Mining & Manufacturing Company
3M Center
Saint Paul, Minnesota 55144-1000

Re: Administrative Complaint and Compliance Order,
3M Saint Paul Main Plant
EPA ID No.: MND 000 824 029

RCRA-5-2000-002

Dear Mr. Smith:

Enclosed please find an Administrative Complaint and Compliance Order (Complaint), which specifies the United States Environmental Protection Agency's (U.S. EPA) determination of violations of the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. § 6901 *et seq.*, by Minnesota Mining & Manufacturing Company (3M). U.S. EPA based its determination on a June 23 & 24, 1999, inspection of the facility located at 850-935 Bush Avenue, Saint Paul, Minnesota 55133, and information in U.S. EPA files. The general allegations in the Complaint state the reasons for U.S. EPA's determination. Specifically, 3M failed to meet the hazardous waste storage requirements of RCRA.

Accompanying this Complaint is a Notice of Opportunity for Hearing. Should you desire to contest the Complaint, you must file a written request for a hearing with the Regional Hearing Clerk within thirty (30) days of the date of this Complaint. You must file the request for hearing with the Regional Hearing Clerk (E-19J), United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604. You must also send a copy of your request to Ann Coyle, Office of Regional Counsel (C-14J), at the above address.

Regardless of whether you choose to request a hearing within the prescribed time limit following the filing of this Complaint, U.S. EPA extends to you the opportunity to request an informal

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settlement conference. The settlement conference discussions may include the mitigation of the proposed penalty in accordance with U.S. EPA guidance on pollution prevention and supplemental environmental projects. A request for an informal settlement conference with U.S. EPA will not affect or extend the thirty (30) day deadline to file an Answer in order to avoid a Finding of Default on the Complaint.

If you have any questions or want to request an informal settlement conference for the purpose of settlement with Waste, Pesticides and Toxics Division staff, please contact Patrick F. Kuefler, United States Environmental Protection Agency, RCRA Enforcement and Compliance Assurance Branch (DE-9J), 77 West Jackson Boulevard, Chicago, Illinois 60604. He may also be reached at (312) 353-6268.

Sincerely yours,

Joseph M. Boyle

Joseph M Boyle, Chief
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosure

cc: Ann Foss, MPCA (w/enclosure)
Abe' Batatunde, 3M

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Sincerely yours,

Joseph M Boyle, Chief
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosure

cc: Ann Foss, MPCA (w/enclosure)
Abe' Batatunde, 3M

bcc: Public Affairs, D-19J
Ann Coyle, C-14J
Christina Moraga, DE-8J
Branch copy
Section copy

DE-9J:/PK:be/3/13/00/filename:3Mmain tranasmit let.wpd

ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY	
BE 3/13/00					
AUTHOR/ TYPIST	SECTION I CHIEF	ORC STAFF ATTORNEY	ORC SECTION CHIEF	ECAB BRANCH CHIEF	

3/23/00
CF 3-23-00

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:	)	
	)	**DOCKET NO.** RCRA-5-2000-002
Minnesota Mining & Manufacturing Company	)	
850-935 Bush Avenue	)	
St. Paul, Minnesota 55133	)	
	)	
U.S. EPA I.D. #: MND 000 824 029	)	
	)	
Respondent.	)	
	)	

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ADMINISTRATIVE COMPLAINT AND COMPLIANCE ORDER

I. COMPLAINT

A. Preliminary Statement and Jurisdiction

1. This is a civil administrative action instituted under Section 3008(a) of the Solid Waste Disposal Act, as amended, also known as the Resource Conservation and Recovery Act of 1976 (RCRA), as amended, 42 U.S.C. § 6928(a). RCRA was amended in 1984 by the Hazardous and Solid Waste Amendments of 1984 (HSWA).

2. The Complainant is, by lawful delegation, the Chief, Enforcement & Compliance Assurance Branch, Waste, Pesticides & Toxics Division, United States Environmental Protection Agency (U.S. EPA), Region 5, Chicago, Illinois.

3. The Respondent is Minnesota Mining & Manufacturing Company (3M), a corporation doing business in Minnesota.

B. Statutory and Regulatory Background

4. Jurisdiction for this action is conferred on U.S. EPA by Sections 2002(a)(1), 3006(b), and 3008 of RCRA; 42 U.S.C. §§ 6912(a)(1), 6926(b), and 6928.

5. U.S. EPA has promulgated regulations, codified at 40 C.F.R. Parts 260 through 279, governing generators and transporters of hazardous waste and facilities that treat, store, and dispose of hazardous waste.

6. Pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926, the Administrator of U.S. EPA (the Administrator) may authorize a state to administer the RCRA hazardous waste program in lieu of the federal program when the Administrator finds that the state program meets certain conditions. Any violation of regulations promulgated pursuant to Subtitle C (Sections 3001-3023 of RCRA, 42 U.S.C. §§ 6921-6939e) or of any state provision authorized pursuant to RCRA Section 3006, constitutes a violation of RCRA, subject to the assessment of civil penalties and issuance of compliance orders as provided in Section 3008 of RCRA, 42 U.S.C. § 6928.

7. Pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), the Administrator granted the State of Minnesota final authorization to administer a state hazardous waste program in lieu of the federal government's base RCRA program effective on February 11, 1985. 50 Fed. Reg. 3756 (January 28, 1985). The Administrator granted final authorization to administer additional RCRA and certain HSWA requirements effective September 18, 1987, 52 Fed. Reg. 27199 (July 20, 1987); June 23, 1989, 54 Fed. Reg. 16361 (April 24, 1989) (corrected effective June 23, 1989, 54 Fed. Reg. 27169 (June 28, 1989)); August 14, 1990, 55 Fed. Reg. 24232 (June 15, 1990); August 23, 1991, 56 Fed. Reg. 28709 (June 24, 1991); May 18, 1992, 57 Fed. Reg. 9501 (March 19, 1992); May 17, 1993, 58 Fed. Reg. 14321 (March 17, 1993); and March 21, 1994, 59 Fed. Reg. 2998 (January 20, 1994). U.S. EPA-authorized Minnesota regulations are codified at Minnesota Rule (Minn. R.) 7045.0001 *et seq*. *See also* 40 C.F.R. § 272.1200 *et seq*.

8. The Administrator may assess a civil penalty of up to $25,000 per day of violation

for RCRA violations that occurred prior to January 31, 1997, under Section 3008 of RCRA, 42 U.S.C. § 6928. The Debt Collections Improvements Act of 1996 increased the statutory maximum penalty to $27,500 per day of violation for RCRA violations that occurred on or after January 31, 1997. 31 U.S.C. § 3701 and 40 C.F.R. Part 19.

9. U.S. EPA has provided notice of commencement of this action to the State of Minnesota pursuant to Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2).

C. General Allegations

10. The Respondent is 3M, which is and was at all times relevant to this Complaint a corporation incorporated under the laws of Minnesota, and the owner and operator of a facility as defined by Minn. R. 7045.0020, subpart 24, and 40 C.F.R. § 260.10, located at 835-950 Bush Avenue, St. Paul, Minnesota 55133 (the facility).

11. Respondent is a "person" as defined by Minn. R. 7045.0020, subpart 66, and Section 1004(15) of RCRA, 42 U.S.C. § 6903(15).

12. Respondent submitted to U.S. EPA a Hazardous Waste Notification pursuant to Section 3010 of RCRA, 42 U.S.C. § 6930, dated August 18, 1980, identifying itself as a person owning and operating a facility that generates hazardous waste.

13. On June 23 and 24, 1999, U.S. EPA and the Minnesota Pollution Control Agency conducted a RCRA compliance evaluation inspection and records review (the inspection) at the facility.

14. The facility generates a hazardous waste containing heptane, xylene and toluene mixture (EPA waste codes F001, F003, and F005) that it stores in a tank with approximate capacity of 3,800 gallons (Tank PET051-01).

15. During the June 23-24, 1999 inspection, U.S. EPA found that Tank PET051-01 held approximately 265 gallons of hazardous waste having EPA waste codes D001, D035, F003, and F005.

16. The hazardous waste mixture in Tank PET051-01 has an organic concentration of at least 10 percent by weight.

17. Pursuant to Section 3005(a) of RCRA, 42 U.S.C. § 6925(a), and the regulations at 40 C.F.R. Part 270 and Minn. R. 7001.0520, the treatment, storage, or disposal of hazardous waste by any person who has not applied for or received a permit is prohibited.

18. Minn. R. 7045.0205 through 7045.0350 and 40 C.F.R. Part 262 set forth the standards applicable to generators of hazardous waste.

19. Pursuant to Minn. R. 7045.0292 and 40 C.F.R. § 262.34(a), generators of hazardous waste may accumulate hazardous waste on-site for 90 days or less without a permit or having interim status, provided that the generator complies with the provisions of Minn. R. 7045.0292 and 40 C.F.R. § 262.34(a).

20. Prior to January 21, 1999, and pursuant to 40 C.F.R. § 262.34(a)(1)(ii) (1998), a generator could accumulate hazardous waste on-site for 90 days or less without a permit and without having interim status provided that, among other things, the waste was placed in tanks and the generator complied with 40 C.F.R. Part 265, Subpart J (§§ 265.190-265.202).

21. Pursuant to 40 C.F.R. § 265.202, the owner or operator shall manage all hazardous waste placed in a tank in accordance with, among other things, the applicable requirements of 40 C.F.R. Part 265, Subpart BB (§§ 265.1050 - 265.1064) and Subpart CC (§§ 265.1080 - 265.1091) .

22. On January 21, 1999, U.S. EPA amended 40 C.F.R. § 262.34(a)(1)(ii) to state that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that the waste is placed in tanks and the generator complies with, among other things, the applicable requirements of 40 C.F.R. Part 265, Subparts BB and CC.

23. U.S. EPA has not authorized the state of Minnesota to administer the exemptions of 40 C.F.R. § 262.34(a)(1)(ii) under RCRA Section 3006(g).

24. Pursuant to Section 3006(g) of RCRA, 42 U.S.C. § 6926, U.S. EPA has jurisdiction to carry out directly those portions of the HSWA requirements for which a State is not authorized. Thus, U.S. EPA has jurisdiction to administer the exemptions of 40 C.F.R. § 262.34(a)(1)(ii) and the requirements of 40 C.F.R. Part 265, Subparts BB and CC, directly in Minnesota.

25. Pursuant to Section 3006(g) of RCRA, 42 U.S.C. § 6926(g), requirements imposed pursuant to HSWA take effect immediately in all States.

26. Any facility storing hazardous waste without a permit or interim status that fails to fully comply with the provisions of Minn. R. 7045.0292 and 40 C.F.R. § 262.34(a), as applicable, is storing hazardous waste in violation of Section 3005(a) of RCRA, 42 U.S.C. § 6925(a), and corresponding state and federal regulations.

COUNT 1: STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS BY FAILING TO IMPLEMENT A LEAK DETECTION MONITORING PROGRAM

27. Complainant incorporates paragraphs 1 through 26 of this Complaint as though set forth fully in this paragraph.

28. Pursuant to 40 C.F.R. §§ 262.34(a)(1)(ii) and 265.202, a generator of hazardous waste may accumulate hazardous waste on-site for 90 days or less without a permit and without having interim status provided that, among other things, the generator manages all hazardous waste placed in a tank in accordance with the applicable requirements of 40 C.F.R. Part 265, Subpart BB (§§ 265.1050 - 265.1064).

29. Pursuant to 40 C.F.R. § 265.1050(c), an owner or operator shall mark each piece of equipment to which Subpart BB applies in such a manner that it can be distinguished readily from other pieces of equipment.

30. At the time of the inspection, Respondent had not marked the pieces of equipment associated with Tank PET051-01 in a manner that readily distinguished them from other pieces of equipment.

31. Respondent's failure to mark the pieces of equipment associated with Tank PET051-01 in a manner that readily distinguished them from other pieces of equipment violated 40 C.F.R. § 265.1050(c).

32. Pursuant to Subpart BB,"in light liquid service" means that a piece of equipment contains or contacts a waste stream where the vapor pressure of one or more of the components in the stream is greater than 0.3 kilopascals (kPa) at 20 degrees Celsius, the total concentration of the pure components having a vapor pressure greater than 0.3 kPa at 20 degrees Celsius is equal to or greater than 20 percent by weight, and the fluid is a liquid at operating conditions.

33. Tank PET051-01 contains 20 percent xylene and heptane waste with a vapor pressure in excess of 0.3 kPa.

34. The xylene and heptane waste in Tank PET051-01 is a liquid at operating

conditions.

35. Tank PET051-01 is in "light liquid service," as defined at 40 C.F.R. § 265.1051.

36. Pursuant to 40 C.F.R. § 265.1052(a), an owner or operator shall monitor monthly each pump in light liquid service to detect leaks.

37. At the time of the inspection, Respondent did not perform monthly leak detection monitoring of the pumps associated with Tank PET051-01.

38. Respondent's failure to perform monthly leak detection monitoring of the pumps associated with Tank PET051-01 violated 40 C.F.R. § 265.1052(a).

39. Pursuant to 40 C.F.R. § 265.1057, an owner or operator shall monitor monthly each valve in gas/vapor or light liquid service to detect leaks.

40. At the time of the inspection, Respondent did not perform monthly monitoring of the valves associated with Tank PET051-01.

41. Respondent's failure to perform monthly monitoring of the valves associated with Tank PET051-01 violated 40 C.F.R. § 265.1057.

42. Respondent did not meet all of the requirements of 40 C.F.R. Part 265, Subpart BB; therefore, Respondent did not satisfy the conditions in 40 C.F.R. § 262.34(a) necessary to exempt it from the requirement to obtain interim status or a permit for the storage (accumulation) of hazardous waste. Respondent stored hazardous waste without a permit or interim status in violation of Section 3005(a) of RCRA, 42 U.S.C. § 6925(a), and the regulations at 40 C.F.R. § 270.1(c).

COUNT 2: STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS BY FAILING TO IMPLEMENT A HAZARDOUS WASTE AIR EMISSION CONTROL PROGRAM

43. Complainant incorporates paragraphs 1 through 42 of this Complaint as though set forth fully in this paragraph.

44. Pursuant to 40 C.F.R. §§ 262.34(a)(1)(ii) and 265.202, a generator of hazardous waste may accumulate hazardous waste on-site for 90 days or less without a permit and without having interim status provided that, among other things, the generator manages all hazardous waste placed in a tank in accordance with the applicable requirements of 40 C.F.R. Part 265, Subpart CC (§§ 265.1080 - 265.1091).

45. Pursuant to 40 C.F.R. § 265.1083(b), the owner or operator of a facility engaged in the management of hazardous waste in tanks shall control air emissions from each waste management unit in accordance with the standards specified in 40 C.F.R. § 265.1085, except as provided for in 40 C.F.R. § 265.1083(c). 40 C.F.R. § 265.1083(c)(1) exempts tanks from the standards specified in 40 C.F.R. § 265.1085 provided that all hazardous waste entering the unit has an average volatile organic (VO) concentration at the point of waste origination of less than 500 parts per million by weight (ppmw).

46. Respondent's Tank PET051-01 store hazardous waste that has VO concentration greater than 500 ppmw.

47. Pursuant to 40 C.F.R. § 265.1085(b), an owner or operator of a facility engaged in the management of hazardous waste in tanks shall control air pollutant emissions from each tank in accordance with the Tank Level 1 or 2 controls at 40 C.F.R. §§ 265.1085(c) or (d), respectively.

48. Respondent must comply, at a minimum, with the Tank Level 1 controls found at 40 C.F.R. § 265.1085(c).

49. Pursuant to 40 C.F.R. § 265.1085(c)(1), an owner or operator shall determine the maximum organic vapor pressure for hazardous waste to be managed in a tank using Tank Level 1 controls before the first time hazardous waste is placed in the tank.

50. Respondent did not determine the maximum organic vapor pressure of the hazardous waste to be managed in Tank PET051-01 before the first time it placed hazardous waste in that tank.

51. Respondent's failure to determine the maximum organic vapor pressure of the hazardous waste to be managed in Tank PET051-01 before the first time it placed hazardous waste in that tank violated 40 C.F.R. § 265.1085(c)(1).

52. Pursuant to 40 C.F.R. § 265.1085(c)(4)(ii), an owner or operator shall perform an initial inspection of the fixed roof and its closure devices on or before the date that the tank becomes subject to this section. Thereafter, the owner or operator shall perform the inspections at least once every year.

53. At the time of the inspection, Respondent had not performed the initial inspection of Tank PET051-01, nor had it performed annual inspections for years 1996, 1997, and 1998.

54. Respondent's failure to perform the initial inspection of Tank PET051-01, and the annual inspections for years 1996, 1997, and 1998 violated 40 C.F.R. § 265.1085(c)(4)(ii).

55. The recordkeeping requirements with which an owner or operator of a tank subject to Subpart CC must comply are at 40 C.F.R. § 265.1090(b).

56. At the time of the inspection, Respondent did not have a recordkeeping system for

Tank PET051-01.

57. Respondent's failure to have a recordkeeping system for Tank PET051-01 violated 40 C.F.R. § 265.1090(b).

58. Respondent did not meet the requirements of 40 C.F.R. Part 265, Subpart CC; therefore, Respondent did not satisfy the conditions of 40 C.F.R. § 262.34(a) necessary to exempt it from the requirement to obtain interim status or a permit for the storage (accumulation) of hazardous waste. Respondent stored hazardous waste without a permit or interim status in violation of Section 3005(a) of RCRA, 42 U.S.C. § 6925(a), and the regulations found at 40 C.F.R. § 270.1(c).

II. RULES GOVERNING THIS PROCEEDING

The "Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders, and the Revocation, Termination or Suspension of Permits" (Consolidated Rules) at 64 Fed. Reg. 40138 (1999) (to be codified at 40 C.F.R. Part 22) govern this proceeding to assess a civil penalty. A copy of the Consolidated Rules is enclosed with the Complaint served on Respondent.

III. PROPOSED CIVIL PENALTY

Section 3008(a)(3) of RCRA requires the Administrator to consider "the seriousness of the violation and any good faith efforts to comply with applicable requirements" in assessing an administrative penalty. 42 U.S.C. § 6928(a)(3). Based on an evaluation of the facts alleged in this Complaint and the requirements of Section 3008 of RCRA, Complainant proposes that the Administrator assess a civil penalty against Respondent of $44,635 as further explained in Attachment 1, "Penalty Summary Sheet."

Complaint evaluated the facts and circumstances of this case with specific reference to U.S. EPA's 1990 RCRA Civil Penalty Policy. A copy of the penalty policy is available upon request.

Complainant developed the proposed penalty based on the best information available to Complainant at this time. Complainant may adjust the proposed penalty if the Respondent establishes bona fide issues of ability to pay or other defenses relevant to the penalty's appropriateness.

IV. COMPLIANCE ORDER

Based on the foregoing, Respondent is hereby ordered–pursuant to authority in 3008(a) of RCRA, 42 U.S.C. § 6928(a), and § 22.37(b) of the Consolidated Rules–to comply with the following requirements immediately upon the effective date of this Order:

1. Respondent may not treat, store, or dispose of hazardous waste without a RCRA permit, except as provided for in paragraph 2 of this Order.

2. Respondent must achieve and maintain compliance with all requirements and prohibitions governing the storage of hazardous waste applicable to generators, codified at or incorporated by Minn. R. 7045 and 40 C.F.R. Part 262.

3. Respondent must notify U.S. EPA in writing upon achieving compliance with this Order within 15 calendar days after the date it achieves compliance. If Respondent has not taken or completed any requirement of this Order, Respondent must notify U.S. EPA of the failure, its reasons for the failure, and the proposed date for compliance within 10 calendar days after the due date set forth in this Order.

4. Respondent must submit all reports, submissions, and notifications required by this

Order to:

Patrick Kuefler
Waste, Pesticides & Toxics Division (DE-9J)
Enforcement and Compliance Assurance Branch
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590.

V. FILING AND SERVICE OF DOCUMENTS

Respondent must file with the Regional Hearing Clerk the original and one copy of each document Respondent intends as part of the record in this proceeding. The Regional Hearing Clerk's address is:

Regional Hearing Clerk (R-19J)
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Respondent must serve a copy of each document filed in this proceeding on each party pursuant to Section 22.5 of the Consolidated Rules. Complainant has authorized Ann Coyle to receive any answer and subsequent legal documents that Respondent serves in this proceeding. Respondent may telephone Ms. Coyle at (312) 886-2248. Ms. Coyle's address is:

Ann Coyle
Assistant Regional Counsel
Office of Regional Counsel (C-14J)
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

VI. PENALTY PAYMENT

Respondent may resolve this proceeding at any time by paying the proposed penalty by certified or cashier's check, payable to "Treasurer, the United States of America," and by

delivering the check to:

U.S. Environmental Protection Agency, Region 5
P.O. Box 70753
Chicago, Illinois 60673

Respondent must include the case name and docket number on the check and in the letter transmitting the check. Respondent simultaneously must send copies of the check and transmittal letter to Mr. Kuefler and Ms. Coyle at the addresses stated above in Parts IV and V, respectively.

VII. OPPORTUNITY TO REQUEST A HEARING

The Administrator must provide an opportunity to request a hearing to any person against whom the Administrator proposes to assess a penalty under Section 3008(b) of RCRA, 42 U.S.C. § 6928(b). Respondent has the right to request a hearing on any material fact alleged in the complaint, or on the appropriateness of the proposed penalty, or both. To request a hearing, Respondent must specifically make the request in its answer, as discussed in Part VIII below.

VIII. ANSWER

Respondent must file a written answer to this complaint if Respondent contests any material fact of the complaint; contends that the proposed penalty is inappropriate; or contends that it is entitled to judgment as a matter of law. To file an answer, Respondent must file the original written answer and one copy with the Regional Hearing Clerk at the address specified in Part V above and must serve copies of the written answer on the other parties.

If Respondent chooses to file a written answer to the complaint, it must do so within 30 calendar days after receiving the complaint. In counting the 30-day time period, the date of receipt is not counted, but Saturdays, Sundays, and federal legal holidays are counted. If the 30-

day time period expires on a Saturday, Sunday, or federal legal holiday, the time period extends to the next business day.

Respondent's written answer must clearly and directly admit, deny, or explain each of the factual allegations in the complaint; or must state clearly that Respondent has no knowledge of a particular factual allegation. Where Respondent states that it has no knowledge of a particular factual allegation, the allegation is deemed denied.

Respondent's failure to admit, deny, or explain any material factual allegation in the complaint constitutes an admission of the allegation.

Respondent's answer must also state:

a. the circumstances or arguments which Respondent alleges constitute grounds of defense;
b. the facts that Respondent disputes;
c. the basis for opposing the proposed penalty; and
d. whether Respondent requests a hearing as discussed in Part VII above.

If Respondent does not file a written answer within 30 calendar days after receiving this complaint the Presiding Officer may issue a default order, after motion, under Section 22.17 of the Consolidated Rules. Default by Respondent constitutes an admission of all factual allegations in the complaint and a waiver of the right to contest the factual allegations. Respondent must pay any penalty assessed in a default order without further proceedings 30 days after the order becomes the final order of the Administrator of U.S. EPA under Section 22.27(c) of the Consolidated Rules.

IX. SETTLEMENT CONFERENCE

Whether or not Respondent requests a hearing, Respondent may request an informal conference to discuss the facts of this case and to arrive at a settlement. To request a settlement

conference, Respondent may contact Ann Coyle at the address or phone number specified in Part V above.

Respondent's request for an informal settlement conference does not extend the 30 calendar day period for filing a written answer to this Complaint. Respondent may pursue the informal conference procedure simultaneously with the adjudicatory hearing procedure. U.S. EPA encourages all parties for whom a civil penalty is proposed to pursue the possibilities of settlement through an informal conference. U.S. EPA, however, will not reduce the penalty simply because the parties hold a conference.

The parties will embody any settlement that they may reach as a result of the conference in a written Consent Agreement and Final Order (CAFO) issued by the Director, Waste, Pesticides and Toxics Division, U.S. EPA, Region 5. The issuance of a CAFO shall constitute a waiver of Respondent's right to request a hearing on any stipulated matter in the CAFO.

X. CONTINUING OBLIGATION TO COMPLY

Neither the assessment nor payment of a civil penalty will affect Respondent's continuing obligation to comply with RCRA and any other applicable federal, state, or local law.

Dated this 24th day of March, 2000.

Joseph M. Boyle

Joseph M. Boyle, Chief
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division
U.S. Environmental Protection Agency
Region 5

Complaint Docket No. RCRA-5-2000-002

In the Matter of: Minnesota Mining and Manufacturing Company
Docket No: RCRA - 5 - 2000 - 002

CERTIFICATE OF SERVICE

I certify that I mailed, by first-class, certified-return receipt requested, postage prepaid, U.S. Mail a copy of the Complaint to:

Roger P. Smith
Registered Agent For
Minnesota Mining & Manufacturing
3M Center
Saint Paul, Minnesota 55144-1000

I mailed a copy of the Complaint and attachments, by certified mail to:

Abe' Babatunde
Advanced Environmental Engineer
3M Tape Manufacturing
Building 42-2F-27
P.O. Box 33331
Saint Paul, Minnesota 55133-3331

I hand delivered the original of the Complaint and this Certificate of Service to the Office of the Regional Hearing Clerk located in the Planning and Management Division, U.S. EPA, Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604, on the date below.

Dated: 3/27/, 2000.

Secretary, Compliance Section I, Enforcement and
Compliance Assurance Branch, U.S. EPA, Region 5

Appendix for letter to
Mr. Valentino
U.S. EPA, Region 5

ATTACHMENTS:

Appendix Numbers	Appendix Names
Appendix A	Certification
Appendix B	Waste Stream Profiles
Appendix C	Statement of Waste Characterization/Testing
Appendix D	Applicable Hazardous Waste Manifest
Appendix E	Hazardous Waste Procedures for 20-5
Appendix F	Phthalic Anhydride Diester MSDS
Appendix G	General Spill Cleanup Procedure (including TDI spills)
Appendix H	MSDS for Materials used in the Drum Emptying Procedure
Appendix I	TDI MSDS
Appendix J	Emergency Response Arrangements
Appendix K	Addresses of Emergency Response Agencies/Companies
Appendix L	List of Personnel Consulted
Appendix M	Facility Changes
Appendix N	Process Flow Diagrams for 4F and 5F

Appendix A

Certification Statement

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature

MATTHEW D. MCKENZIE, PLANT MANAGER
Printed Name and Title

4/28/2004
Date

Appendix for letter to
Mr. Valentino
U.S. EPA, Region 5

Appendix B

Waste Stream Profiles

The following 3 Waste Stream Profiles are confidential and enclosed in an envelope stamped "3M Confidential":

WSP: 13-0022-9356-4
WSP: 13-0059-8342-7
WSP: 13-0075-7810-0

Appendix for letter to
Mr. Valentino
U.S. EPA, Region 5

Appendix C

Statement of Waste Characterization/Testing

The following statement has been provided from Daryl C. Huggett, Senior Specialist Environmental Engineering, Contract Disposal Services and Resource Recovery relating to the waste characterization methods used for the waste streams included in this request:

"For these specific waste streams 3M has used knowledge of the waste through the known materials and processes involved to classify these wastes for US EPA, State MPCA and Ramsey County hazardous waste requirements."

Appendix for letter to
Mr. Valentino
U.S. EPA, Region 5

Appendix D

Applicable Hazardous Waste Manifest

We have made a number of shipments of hazardous waste of profiles 13-0055-9542-9 and 13-0059-8342-7 since the inspection on 10/22/03. There are as follows:

1. Manifest # 7055949, shipped 11/06/03 included 29 drums of WSP 13-0055-9542-9
2. Manifest # 7056096, shipped on 1/15/04 included 26 drums of WSP 13-0055-9542-9
3. Manifest # 7056255, shipped on 2/19/04 included 4 drums of WSP 13-0055-9542-9 and 1 drums of WSP 13-0059-8342-7.

Copies of the above listed manifests are included in this appendix.

MINNESOTA POLLUTION CONTROL AGENCY
METRO DISTRICT / MAJOR FACILITIES
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

73-D
7-P

For MPCA use only

OMB No. 2050-0039

PLEASE **TYPE** (Form designed for use on elite (12-pitch) typewriter) or print. Instructions on cover page.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MND000824029
Manifest Document No.: 55949
2. Page 1 of 3

Information in shaded area not required by Federal law. Minnesota rules require Items H. and I.

3. Generator's Name and Mailing Address: 3M St. Paul - Main Plant
3M 900 Bush Avenue Building 24
St. Paul, MN 55144 STPM
4. Generator's Phone (651/778-4350 Jeramy Grezek

A. State Manifest Document Number: MN 7055949
B. State Generator's ID:
C. State Transporter's ID: 4PW0255684OH
D. Transporter's Phone: 716/827-7200
E. State Transporter's ID:
F. Transporter's Phone:
G. State Facility's ID:
H. Facility's Phone: 651/458-2147

5. Transporter 1 Company Name: Hazmat Environmental Group, Inc.
6. US EPA ID Number: NYD980769947
7. Transporter 2 Company Name:
8. US EPA ID Number:
9. Designated Facility Name and Site Address: 3M Cottage Grove Center
10746 Innovation Road-Bldg 47
Cottage Grove, MN 55016
10. US EPA ID Number: MND006172969

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, I.D. Number and Packing Group)	HM	12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	Hazardous Waste, Liquid, N.O.S.,9, NA3082,III, (F002, F003, F005, D003, D028) RQ 3M Profile No. 13-0016-7734-6	X	2	DM	185	P	F002 F003 F005 D003 D028 D035
b.	Hazardous Waste, Solid, N.O.S.,(LEAD, SILVER), 9, NA3077,III, (D008, D011) RQ 3M Profile No. 13-0016-9480-4	X	1	DM	15	P	D008 D011
c.	Waste Flammable Liquid, Toxic, N.O.S.,(1, 2-DICHLOROETHANE, ETHYL ALCOHOL, N-BUTYL ALCOHOL), 3, 6.1, UN1992,II, (F002, F003, F005, D001, D003, D019, D028) RQ 3M Profile No.	X	1	DM	180	P	F002 F003 F005 D001 D003 D019 D028 D035
d.	3M Profile No. 13-0022-9356-4						MN01

J. Additional Descriptions for Materials Listed Above
a.
b. 5 GAL PAIL
c.
d.

K. Handling Codes for Wastes Listed Above
a.
b.
c.
d.

15. Special Handling Instructions and Additional Information Trailer No: B109
Placards Required: FLAMMABLE, TOXIC
☒ L.D.R. Notification(s) Attached
Carrier has Emergency Response Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and all applicable state laws and regulations.
If I am a large quantity generator I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment, or, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Ronald L. Anderson
Signature: Ronald L. Anderson
Date: Month 1 Day 06 Year 03

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Tom Rowan
Signature: Tom Rowan
Date: Month 1 Day 06 Year 03

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: David L. Kokkeler
Signature: David L. Kokkeler
Date: Month 4 Day 6 Year 03

GENERATOR / TRANSPORTER / FACILITY

FOR ACCIDENT AND SPILL EMERGENCIES CALL CHEMTREC FOR ASSISTANCE 1-800-424-9300

In case of spill or emergency, immediately call the Minnesota Duty Officer (the Minnesota Pollution Control Agency) at 800/422-0798 or 612/649-5451 and the National Response Center at 800/424-8802. Outside Minnesota, call the National Response Center and appropriate state agency.

Minnesota Form PQ-00371-04 (3/99)

(Previous editions obsolete)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST *(Continuation Sheet)*

21. Generator's US EPA ID No.	Manifest Document No.	22. Page	Information in the shaded areas is not required by Federal law.
MND000824029	55949	2	

23. Generator's Name
3M St. Paul - Main Plant
900 Bush Avenue Building 24
St. Paul, MN 55144

L. State Manifest Document Number: MN7055949
M. State Generator's ID

24. Transporter _____ Company Name
25. US EPA ID Number
N. State Transporter's ID
O. Transporter's Phone

26. Transporter _____ Company Name
27. US EPA ID Number
P. State Transporter's ID
Q. Transporter's Phone

	28. US DOT Description *(Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)*	HM		29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a.		X	Waste Flammable Liquid, N.O.S.,(HYDROTREATED LIGHT PETROLEUM DISTILLATES, FUEL OIL #2), 3, UN1993,III, (D001) RQ Profile No. 13-0023-5149-5	1	DM	400	P	D001
b.			Waste Non-Regulated Antifreeze Profile No. 13-0023-6119-7	6	DM	1690	P	NONE
c.		X	Waste Flammable Liquid, N.O.S.,(TOLUENE, XYLENE), 3, UN1993,II, (F003, F005, D001, D039) RQ Profile No. 13-0023-6216-1	1	DM	300	P	F003 F005 D001 D039
d.		X	Waste Consumer Commodity, ORM-D,, (D001) RQ Profile No. 13-0024-9417-0	1	DM	300	P	D001
e.			Waste Non-Regulated Chemicals With Absorbent Profile No. 13-0051-0598-9	2	DM	700	P	NONE
f.			Waste Polyvinyl Chloride Resin Profile No. 13-0055-8087-6	2	DM	650	P	NONE
g.		X	Waste Flammable Liquid, N.O.S.,(METHYL ETHYL KETONE), 3, UN1993,II, (F005, D001) RQ Profile No. 13-0055-8378-9	1	DM	350	P	F005 D001 D035
h.		X	Hazardous Waste, Solid, N.O.S.,(LEAD, SILVER), 9, NA3077,III, (D008, D011) RQ Profile No. 13-0055-9498-4	1	DM	375	P	D008 D011
i.		X	Waste Toxic Liquid, Organic, N.O.S.,(TOLUENE-2, 4-DIISOCYANATE), 6.1, UN2810,II Profile No. 13-0055-9542-9	29	DM	8750	P	NONE MN01

S. Additional Descriptions for Materials Listed Above

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

GENERATOR

TRANSPORTER

33. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name	Signature	Date (Month Day Year)

34. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name	Signature	Date (Month Day Year)

FACILITY

35. Discrepancy Indication Space

Copy 3: Facility mails to Generator

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST
(Continuation Sheet)

21. Generator's US EPA ID No.: MND000824029

Manifest Document No.: 55949

22. Page: 3

Information in the shaded areas is not required by Federal law.

23. Generator's Name
3M St. Paul - Main Plant
900 Bush Avenue Building 24
St. Paul, MN 55144

L. State Manifest Document Number: MN7055949

M. State Generator's ID

24. Transporter _____ Company Name

25. US EPA ID Number

N. State Transporter's ID

O. Transporter's Phone

26. Transporter _____ Company Name

27. US EPA ID Number

P. State Transporter's ID

Q. Transporter's Phone

	28. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)	HM		29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a.			Waste Non-Pumpable Rubber - Mills Profile No. 13-0055-9736-7	1	DF	200	P	NONE
b.			Waste MN Regulated (Used Oil) Profile No. 13-0060-9417-4	6	DM	275	P	NONE MN04
c.			Waste MN Regulated (Used Oil) Profile No. 13-0060-9417-4	4	DM	1050	P	NONE MN04
d.	X		Hazardous Waste, Solid, N.O.S.,(LEAD OXIDE PHOSPHONATE), 9, NA3077,III, (D008) RQ Profile No. 13-0062-8411-4	11	DM	2600	P	D008
e.	X		Hazardous Waste, Liquid, N.O.S.,(BENZENE), 9, NA3082,III, (D018) RQ Profile No. 13-0076-0595-2	1	DM	300	P	D018
f.	X		Hazardous Waste, Liquid, N.O.S.,(LEAD PHOSPHITE, DIBASIC), 9, NA3082,III, (D008) RQ Profile No. 13-0089-9356-3	1	DM	100	P	D008
g.			Waste MN Regulated (Used Oil and Solids) Profile No. 13-0091-9477-3	4	DM	925	P	NONE MN04
h.	X		Waste Flammable Liquid, N.O.S.,(HEPTANE, TOLUENE, XYLENE), 3, UN1993,II, (F003, F005, D001) RQ Profile No. 13-0093-8471-9	1	DM	350	P	F003 F005 D001 D035
i.	X		Hazardous Waste, Solid, N.O.S.,(LEAD), 9, NA3077,III, (D008) RQ Profile No. 13-0099-8417-3	3	DM	1075	P	D008

S. Additional Descriptions for Materials Listed Above
b. 5 GAL PAIL

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

GENERATOR

TRANSPORTER

33. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name | Signature | Date (Month Day Year)

34. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name | Signature | Date (Month Day Year)

FACILITY

35. Discrepancy Indication Space

Copy 3: Facility mails to Generator

HazMat

ENVIRONMENTAL GROUP, INC
60 Commerce Drive, Buffalo, NY 14218
www.hazmatinc.com

FAX (716) 827-7217
(716) 827-7200

HAZMAT

NYDEC #9A-278
EPA ID# NYD980769947

DATE 11/6/03

245640

PICK UP

SHIPPER

NAME: 3M Bldg #24
STREET:
CITY: St. Paul STATE: MN ZIP CODE:
CONTACT NAME: PHONE:
SCHEDULED TIME:

DELIVERY

CONSIGNEE

NAME: 3M
STREET:
CITY: Cottage Grove STATE: MN ZIP CODE:
CONTACT NAME: PHONE:

ADDITIONAL INFORMATION / EQUIPMENT DAMAGE
If damaged at pickup site, did you send in Equipment Damage Report (EDR) via Qualcomm? Y N Explain damage below.

Pursuant to 6NYCRR 372.2 (b) (2) (ii) HazMat certifies that it is authorized to deliver this shipment of manifested waste to the TSDF listed on this Bill of Lading

ADDITIONAL INFORMATION / EQUIPMENT DAMAGE
If damaged at delivery site, did you send in Equipment Damage Report (EDR) via Qualcomm? Y N Explain damage below.

PURCHASE ORDER NO.	WORK ORDER NUMBER	MANIFEST NUMBER	H.M. NUMBER
		MN 7055919	26090

LOAD NUMBER	TRACTOR	TRAILER	ROLL OFF BOX	DRIVER NUMBER	DRIVER'S NAME
	261	6109		1781	T Rowen

EQUIPMENT	MATERIAL DESCRIPTION / MANIFEST NUMBER	QUANTITY
EQUIPMENT TYPE UNIT# DROPPED UNIT# PICKED UP CONDITION REPORT	Waste Flammable Liquid 3 1993 Waste Toxic Liquid 6.1 2810	80 pcs as per manifest WT 31,720 P

PICK UP

PICK UP DATE 11-6-03

ARRIVAL TIME 08:00 AM/PM RELEASE TIME 08:45 AM/PM

DAY #2 DATE

ARRIVAL TIME AM/PM RELEASE TIME AM/PM

TRAILER EMPTY UPON ARRIVAL ☐ YES
(if not, explain below—)

DIP MEASUREMENT (Tankers Only) INCHES

COMMENTS: (EXPLAIN ALL DELAYS)

HAZMAT MATERIALS USED (ex. overpacks, etc.): ☐ YES ☐ NO

IF YES EXPLAIN:

I, THE UNDERSIGNED, CERTIFY THAT THE ABOVE INFORMATION IS TRUE AND COMPLETE.

SHIPPER'S SIGNATURE Date 11/6/03

DELIVERY

DRIVER 1781 DAY #1 DATE 11-6-03

ARRIVAL TIME AM/PM RELEASE TIME AM/PM

DAY #2 DATE ARRIVAL TIME AM/PM RELEASE TIME AM/PM

DAY #3 DATE ARRIVAL TIME AM/PM RELEASE TIME AM/PM

TRAILER CLEAN AND EMPTY UPON DEPARTURE ☐ YES ☐ NO
(if not, explain below—)

COMMENTS: (Explain all delays or discrepancies))

IF YES EXPLAIN:

I, THE UNDERSIGNED, CERTIFY THAT THE ABOVE INFORMATION IS TRUE AND COMPLETE.

CONSIGNEE'S SIGNATURE Date

GENERATOR COPY

TRANSPORTERS

Item 17. Transporter 1 Acknowledgement of Receipt of Materials. Enter the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. Transporter 2 Acknowledgement of Receipt of Materials. If applicable, see item 17.

Note: International shipments – transporter responsibilities. Exports – transporters must sign and enter the date the waste left the United States in item 15. Imports-shipments of hazardous waste regulated by RCRA and transported into the United States from another country must upon entry be accompanied by the EPA Uniform Hazardous Waste Manifest. (40 CFR 263.10 (c) (1).

Distribution of Manifest Copies. After signing for receipt of the waste, the transporter receives copies 1 through 5 of the manifest. Upon delivery of the shipment to the designated facility the transporter provides copies 1 through 5 of the manifest to the designated facility representative. The designated facility representative signs and dates the manifest upon acceptance of the waste. Copy 5 of the manifest is returned to the transporter.

OWNERS AND OPERATORS OF TREATMENT, STORAGE, OR DISPOSAL FACILITIES:

Item 19. Discrepancy Indication Space. The authorized representative of the designated (or alternate) facility's owner or operator must note in this space any discrepancy between the waste described on the manifest and the waste actually received at the facility. Owners and operators of facilities located in Minnesota who cannot resolve significant discrepancies within 10 days of receiving the waste must submit to the MPCA a copy of the manifest at issue describing the discrepancy and attempts to reconcile it.

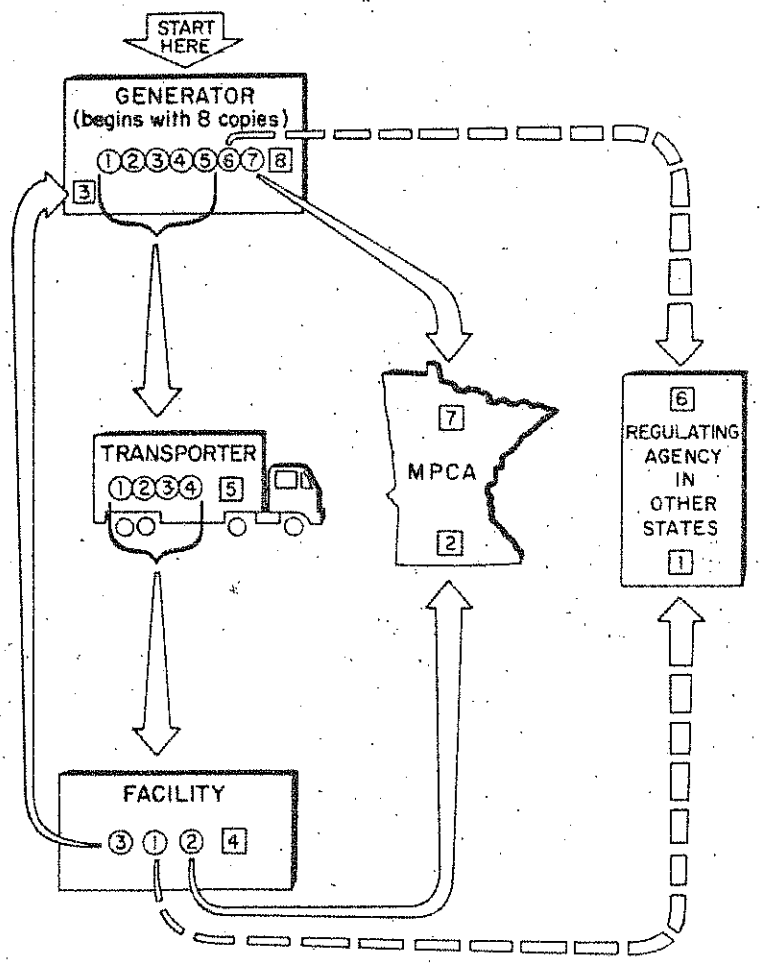
Item 20. Facility Owner or Operator: Certification of Receipt of Hazardous Materials Covered by this Manifest Except as Noted in Item 19. Print or type the name of the person accepting the waste on behalf of the owner or operator of the facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Distribution of Manifest Copies. Copy 5 of the manifest is returned to the transporter. Copy 1 is sent to the destination state within 10 days. Copy 2 is sent to the generator state within 10 days. Copy 3 is sent to the generator within 10 days. Copy 4 is retained by the designated facility. **Note:** Some states other than Minnesota do not require submittal of copies 1 and 2.

MAILING ADDRESS; MAIL MINNESOTA POLLUTION CONTROL AGENCY COPIES TO; Minnesota Pollution Control Agency, Metro District/Major Facilities, 520 Lafayette Road, St. Paul, MN 55155, Attn: HWIMS. Telephone (651) 296-6300.

For Questions on transportation regulations call Minnesota Department of Transportation, Office of Motor Carrier Services at 888-472-3389 or 651-405-6000.

Distribution of Minnesota's Uniform Hazardous Waste Manifest by Minnesota Generators



Distribution

Copy 1: Facility mails to Destination State
Copy 2: Facility mails to Generator State
Copy 3: Facility mails to Generator
Copy 4: Facility retains
Copy 5: Transporter retains
Copy 6: Generator mails to Destination State
Copy 7: Generator mails to Generator State
Copy 8: Generator retains

KEY
○ Copy is sent to next point
□ Copy stays at this point
Used if facility is located in another state

MINNESOTA POLLUTION CONTROL AGENCY
METRO DISTRICT/MAJOR FACILITIES
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

Generator Name:	EPA ID:	Manifest Number
3M St. Paul - Main Plant	MND000824029	MN7055949

==========

I hereby certify that all information submitted above and below and in all associated documents is complete and accurate to the best of my knowledge and information.

Information was provided by: [X] using knowledge of the waste
[] waste analysis data (attached)

Signature Ronald L. Anderson Date 11/06/03

Title Production Supv.

==========

TSD Facility Name: 3M Cottage Grove Center

Pursuant to 40 CFR 268.7(a) I hereby notify the above named facility that this waste shipment contains a waste(s) that is (are) restricted under the land disposal restriction contained in either 40 CFR 268 or RCRA Section 3004(d). This shipment contains one or more of the following wastes which are subject to the listed treatment requirements and require treament prior to land disposal according to applicable treament standards set forth in 40 CFR 268.subpart D.

13-0016-7734-6 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D003 (Reactive Sulfides Subcategory), D028 (Toxic Characteristic for 1,2-Dichlorethane), D035 (Toxic Characteristic for Methyl Ethyl Ketone), F002, F003, F005

F001-F005 Spent Solvent Waste containing the following solvents: 1,1,1-Trichloroethane, 1,1,1-Trichloroethane, Methylene Chloride, Acetone, Ethyl Acetate, Ethylbenzene, Methanol, Methyl Isobutyl Ketone, Xylene, Carbon Disulfide, Methyl Ethyl Ketone, Toluene

UTS Constituents: 1,1,1-Trichloroethane, 1,1-Dichloroethane, 1,2-Dichloroethane, Acetone, Acetonitrile, Carbon Disulfide, Ethyl Acetate, Ethylbenzene, Methanol, Methyl Ethyl Ketone, Methyl Isobutyl Ketone, Methylene Chloride, Toluene, Xylene

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13-0016-9480-4 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D008 (Toxic Characteristic for Lead), D011 (Toxic Characteristic for Silver)

UTS Constituents: Lead, Silver

13-0022-9356-4 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D001 (High TOC Ignitable Characteristic Liquids

Generator Name:	EPA ID:	Manifest Number
3M St. Paul - Main Plant	MND000824029	MN7055949

Subcategory (>= 10% TOC)), D003 (Reactive Sulfides Subcategory), D019 (Toxic Characteristic for Carbon Tetrachloride), D028 (Toxic Characteristic for 1,2-Dichlorethane), D035 (Toxic Characteristic for Methyl Ethyl Ketone), F002, F003, F005

F001-F005 Spent Solvent Waste containing the following solvents: 1,1,1-Trichloroethane, Carbon Tetrachloride, 1,1,1-Trichloroethane, Methylene Chloride, Acetone, Cyclohexanone, Ethyl Acetate, Ethylbenzene, Methanol, Methyl Isobutyl Ketone, Xylene, n-Butyl Alcohol, Carbon Disulfide, Methyl Ethyl Ketone, Toluene

UTS Constituents: 1,1,1-Trichloroethane, 1,1-Dichloroethane, 1,2-Dichloroethane, 1,4-Dioxane, Acetone, Acetonitrile, Carbon Disulfide, Carbon Tetrachloride, Cyclohexanone, Diethyl Phthalate, Ethyl Acetate, Ethylbenzene, Methanol, Methyl Ethyl Ketone, Methyl Isobutyl Ketone, Methylene Chloride, Toluene, Triethylamine, Xylene, n-Butyl Alcohol

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13-0023-5149-5 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D001 (High TOC Ignitable Characteristic Liquids Subcategory (>= 10% TOC))

13-0023-6216-1 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D001 (High TOC Ignitable Characteristic Liquids Subcategory (>= 10% TOC)), D039 (Toxic Characteristic for Tetrachloroethylene), F003, F005

F001-F005 Spent Solvent Waste containing the following solvents: 1,1,1-Trichloroethane, Tetrachloroethylene, 1,1,1-Trichloroethane, Tetrachloroethylene, Ethylbenzene, Xylene, Toluene

UTS Constituents: 1,1,1-Trichloroethane, Ethylbenzene, Tetrachloroethylene, Toluene, Xylene

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13-0024-9417-0 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D001 (High TOC Ignitable Characteristic Liquids Subcategory (>= 10% TOC))

13-0055-8378-9 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D001 (High TOC Ignitable Characteristic Liquids Subcategory (>= 10% TOC)), D035 (Toxic Characteristic for Methyl Ethyl Ketone), F005

F001-F005 Spent Solvent Waste containing the following solvents: Methyl Ethyl Ketone

UTS Constituents: Methyl Ethyl Ketone

Generator Name:	EPA ID:	Manifest Numbe
3M St. Paul - Main Plant	MND000824029	MN7055949

13-0055-9498-4 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D008 (Toxic Characteristic for Lead), D011 (Toxic Characteristic for Silver)

UTS Constituents: Lead, Silver

13-0062-8411-4 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D008 (Toxic Characteristic for Lead)

UTS Constituents: Antimony Trioxide, Lead Oxide Phosphonate

13-0076-0595-2 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D018 (Toxic Characteristic for Benzene)

UTS Constituents: Benzene

13-0089-9356-3 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D008 (Toxic Characteristic for Lead)

UTS Constituents: Lead Phosphite, Dibasic

13-0093-8471-3 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D001 (High TOC Ignitable Characteristic Liquids Subcategory (>= 10% TOC)), D035 (Toxic Characteristic for Methyl Ethyl Ketone), F003, F005

F001-F005 Spent Solvent Waste containing the following solvents: Xylene, Methyl Ethyl Ketone, Toluene

UTS Constituents: Methyl Ethyl Ketone, Toluene, Xylene

13-0099-8417-3 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D008 (Toxic Characteristic for Lead)

UTS Constituents: Lead

********** End of Report **********

INCINERATOR MANIFEST/LDR PRINTING REQUEST FORM

NAME Ron Anderson
PHONE 651-778-4350
LOCATION 24-1W-16
EPA ID NO. MND 000824029

MAILING ADDRESS (INTER-OFFICE OR FED EXPRESS)
3M Co 850 Bush Bldg 24-1W-16
St. Paul, MN. 55106 Please send
Via Roadrunner (dept. 1531) for
timely delivery

NOTE - FOR LOGISTICS LOCATIONS, PLEASE CALL FOR ALTERNATE FORM

COMMENTS Manifest # 55949

TENTATIVE SHIP DATE 11/6/03 8 A.M.
TRANSPORTER(S) Haz Mat

	WSP NO.	CONTAINERS			AMOUNT	LBS (P) OR GAL (G)
		NUMBER	TYPE (1)	SIZE (2)		
1	13-0016-7734-6	2	DM		185	P
2	13-0016-9480-4	1	DM	5 gal	15	P
3	13-0022-9356-4	1	DM		180	P
4	13-0023-5149-5	1	DM		400	P
5	13-0023-6119-7	6	DM		1590	P
6	13-0023-6216-1	1	DM		300	P
7	13-0024-9417-0	1	DM		300	P
8	13-0051-0598-9	2	DM		700	P
9	13-0055-8087-6	2	DM		650	P
10	13-0055-8378-9	1	DM		350	P
11	13-0055-9498-4	1	DM		375	P
12	13-0055-9542-9	29	DM		8750	P
13	13-0055-9736-7	1	DF	40 Gal	200	P
Size 14	13-0060-9417-4	6	DM	5 Gal	275	P
15	13-0060-9417-4	4	DM		1050	P
16	13-0062-8411-4	11	DM		2600	P
17	13-0076-0595-2	1	DM		300	P
18	13-0089-9356-3	1	DM		100	P
19	13-0091-9477-3	4	DM		925	P
20	13-0093-8471-3	1	DM		350	P
21	13-0099-8417-3	3	DM		1075	P

FAX TO WAYNE NEUMANN @
8-458-2017 OR
(612) 458-2017
QUESTIONS?
CALL (612) 458-1377

(1) TYPES OF CONTAINERS
DM - METAL DRUMS, PAILS
DF - FIBERBOARD OR PLASTIC DR.
CF - FIBER/PLASTIC BOXES, CRTNS
BA - PAPER OR PLASTIC BAGS

(2) CONTAINER SIZE
IF CONTAINER TYPE IS "DM" OR "DF" AND NOT 55 GAL., INDICATE SIZE ALSO, E.G. "5 GAL" OR "30 GAL" OR SALVAGE DRUM

Phil

13-0055-8378-9

MEK

13-0024-9417-0

Aerosol Cans

OK

~~13-0076-0595-2~~

OK

~~13-0060-9417-4~~

~~13-0057-0598-9~~

OK

55949

	MANIFEST # 55949		TRAILER #				
13-0012-1878-6		13-0040-1989-2		13-0062-8456-9	*		
0012-4311-5		13-0046-0456-0		13-0064-3898-3			
13-0014-3703-0		13-0046-6616-3					
13-0015-4492-6		13-0046-6616-3		13-0075-3445-9			
13-0016-7637-1		13-0046-6713-8		13-0075-3736-1			
13-0016-7734-6	//	13-0048-6359-6		13-0075-7810-0			
13-0016-9480-4	/			13-0075-7810-0			
13-0016-9771-6		13-0050-1220-1		13-0077-7414-7	*		
13-0019-2411-0		13-0050-4492-3		13-0078-7477-2			
		13-0050-5294-2		13-0079-6317-9			
13-0022-9356-4	/	13-0052-1495-5					
13-0023-5149-5		13-0052-8453-7	*	13-0084-1812-4			
13-0023-6216-1	/	13-0055-8087-6	//	13-0084-6435-9			
13-0028-3164-5		13-0055-9542-9		13-0088-0193-1		~~////~~ ~~////~~ ~~////~~ ~~////~~	~~////~~
		13-0055-9639-3		13-0088-0290-5			////
13-0031-6495-4		13-0057-5492-7		13-0088-1438-9			
13-0031-8498-6	*	13-0057-5804-3					
13-0035-9456-5	*	13-0058-6086-4		13-0091-5404-1			
13-0031-8495-2	*	13-0059-4453-6		13-0093-3252-2			
13-0038-4456-3		13-0059-8342-1		13-0094-6735-1			
13-0038-4456-3				13-0023-5149-5	/		
13-0039-5335-6		13-0052-1598-6					
		13-0062-8411-4		~~////~~ ~~////~~ /			
		13-0032-1598-8					
		13-0075-8004-9					
		13-0023-6119-7		~~////~~ /			
		13-0070-9471-0					
		13-0089-8417-3		///			
		13-0055-8378-9		/			
		13-0089-9356-3		/			
		13-0055-9236-7		/			

*** = This waste is shipped directly to Mercury Waste Solutions.**
Separate from waste going to CG Incinerator.

13-0052-8453-7 Goes directly to Engen Power

13-0076-0595-2 /
13-0051-0598-9 //
13-0024-9417-0 /

PATH: pcshare/Env.SafetyHealth/Environmental/Waste Stream Profiles
Scrap Form Bldg 51

50

1/7/03

Waste Stream Profiles for DEMOLITION WORK ONLY

1-0013-8471-1	*	13-0099-8417-3
13-0012-8435-8	*	
13-0021-9477-0		
13-0023-9438-8	*	
13-0024-9438-6		
13-0039-8456-7	*	
13-0043-8495-7	*	
13-0054-8432-7		
13-0054-9498-7		
13-0055-9498-4	/	
13-0058-7471-7		
13-0060-9417-4	~~////~~ ~~////~~	
13-0061-9417-2		
13-0061-9495-8		
13-0068-8456-6		
13-0076-8435-3		
0080-8474-4	*	
13-0081-8411-4	*	
13-0085-8492-5		
13-0085-9459-3	*	
13-0091-9477-3	////	
13-0092-9456-5		
13-0092-9477-1		
13-0093-8471-3	/	

*** = This waste is shipped directly to Mercury Waste Solutions. Separate from waste going to CG Incinerator.**

Likely most or all of these profiles can be inactivated in Jan. 04
Paper copies are in brown file folder next to blue binder containing active tape

Abrasives Demo.	**Dept. 1034**
13-0092-9477-1	Circuit boards - Reclaimed
13-0099-8417-3	Lead Paint Chips
13-0058-7471-7	MN Regulated (Used oil & solids)
13-0068-8456-6	MN Regulated (Used oil)
13-0021-9477-0	Materials containing mercury (thermometers)
13-0061-9417-2	Non-regulated rubber / resin solids
13-0043-8495-7	Universal waste used batteries direct to MWSI
13-0080-8474-4	Used lamps direct to MWSI
13-0012-8435-8	Used lighting ballasts direct to MWSI

General Demo ($18,000)	**Dept. 1044**
13-0092-9456-5	Rags & solids contaminated with Solvent Line Br
13-0061-9495-8	Solvents from line breaking in Abrasives
13-0054-8432-7	Thick liquid (Multiphase) flammable
13-0085-8492-5	Line break solvents & solids
13-0018-9438-8	Adhesive piping
13-0086-9477-3	Rubber hoses w product
13-0093-8471-3	Thin solvent from line breaking in Tape
13-0024-8471-8	RM42247

Tape Demo	**Dept. 1539**
13-0023-9438-8	Universal waste - Used batteries direct to MWSI
13-0024-9438-6	Non-regulated rubber/resin solids
13-0039-8456-7	Universal waste - Used lamps direct to MWSI
13-0054-9498-7	Materials containing Mercury
13-0055-9498-4	Circuit boards - Reclaimed
13-0060-9417-4	MN Regulated (Used oil)
13-0076-8435-3	Lead Paint Chips

13-0085-9459-3	Used lighting ballasts direct to MWSI
13-0091-9477-3	MN regulated (Used oils & solids)
13-0013-8471-1	Incidental broken lamps for recycle
13-0025-8432-7	Alcohol & Water
13-0062-8411-4	ZCal ductwork (lead)
13-0070-0559-1	Material drained from REECO
13-0033-8411-5	RM32204
13-0010-0598-5	RM185772
13-0041-0559-2	Styrene/Butadiene latex
13-0026-9417-4	Non Reg Polyester plasticizer
13-0073-8411-1	NonReg Polyethylene Glycol
13-0081-0059-8	NonReg Sodium Acetate
13-0083-8411-0	Ethyl Alcohol
13-0091-0559-7	Butyl alcohol
13-0046-8432-3	NonReg Polyamide resin
13-0073-8411-1	NonReg polyethylene Glycol
13-0015-8471-6	NonReg Polyisoprene
13-0081-0559-8	NonReg Sodium Acetate
13-0060-0598-0	NonReg Styrene, 1,3 Butadiene polymer
13-0077-8492-2	Orange Dye

(8) 13-0057-0598-9
2 @ 200
(42)

~~1st Row~~

(16) 13-0076-0595-2
1 @ 300
(38)

(12) 13-0055-9542-9
1 @ 200 4 @ 1178
4 @ 1592 3 @ 900
3 @ 1000
4 @ 656
4 @ 1372
4 @ 1452
2 @ 400

(5) 13-0023-6119-7
1 @ 300 1 @ 200
3 @ 874 1 @ 200

(11) 13-0055-9498-4
1 @ 375
~~300~~
(27)

(10) 13-0055-8378-9
1 @ 350

(15) 13-0062-8411-4
4 @ 908 1 @ 200
4 @ 1106 2 @ 374

(9) 13-0055-8087-6
1 @ 324
1 @ 320

(1) 13-0091-9477-3
1 @ 115 3 @ 800

(20) 13-0099-8417-3
1 @ 336 1 @ 392
1 @ 336

(14) 13-0060-9417-4
6 @ 274 1 @ 200 1 @ 150
5 Gal 1 @ 300 1 @ 200
~~1 @ 200~~

(19) 13-0093-8471-3
1 @ 350

(2) 13-0016-9480-4
1 @ 15 5 gal

(13) 13-0055 9736-7 40 Gal
1 @ 200

(3) 13-0022-9356-4
1 @ 180

(1) 13-0016-7734-6
2 @ 185

(17) 13-0089-9356-3
1 @ 100

(4) 13-0023-5149-5
1 @ 400

(7) 13-0024-9417-0
1 @ 300

(6) 13-0023-6216-1 1 @ 300

MINNESOTA POLLUTION CONTROL AGENCY
METRO DISTRICT / MAJOR FACILITIES
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

72-D
12-P
1-TP

For MPCA use only

OMB No. 2050-0039

PLEASE **TYPE** (Form designed for use on elite (12-pitch) typewriter) or print. Instructions on cover page.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MND000824029
Manifest Document No.: 56096
2. Page 1 of 5

Information in shaded area not required by Federal law. Minnesota rules require Items H. and I.

3. Generator's Name and Mailing Address: 3M St. Paul - Main Plant
3M 900 Bush Avenue Building 24
St. Paul, MN 55144 STPM

4. Generator's Phone (651/778-4350 Jeramy Grezek

A. State Manifest Document Number: MN 7056096
B. State Generator's ID

5. Transporter 1 Company Name: Hazmat Environmental Group, Inc.
6. US EPA ID Number: NYD980769947
C. State Transporter's ID: UPW025584-OH
D. Transporter's Phone: 716/827-7200

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address: 3M Cottage Grove Center
10746 Innovation Road-Bldg 47
Cottage Grove, MN 55016
10. US EPA ID Number: MND006172969
G. State Facility's ID
H. Facility's Phone: 651/458-2147

11. US DOT Description (Including Proper Shipping Name, Hazard Class, I.D. Number and Packing Group)

	HM	11. US DOT Description	12. Containers No	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	Hazardous Waste, Liquid, N.O.S., 9, NA3082, III, (F002, F003, F005, D003, D028) RQ 3M Profile No. 13-0016-7734-6	3	DM	400	P	F002 F003 F005 D003 D028 D036
b.		Waste Nonregulated Nalco 8330 3M Profile No. 13-0021-1535-3	1	DM	150	P	NONE
c.	X	Waste Flammable Liquid, Toxic, N.O.S., (1, 2-DICHLOROETHANE, ETHYL ALCOHOL, N-BUTYL ALCOHOL), 3, 6.1, UN1992, II, (F002, F003, F005, D001, D003, D019, D028) RQ 3M Profile No. 13-0022-9356-4	1	DM	180	P	F002 F003 F005 D001 D003 D019 D028 D036 MN01
d.							

J. Additional Descriptions for Materials Listed Above
a.
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a.
b.
c.
d.

15. Special Handling Instructions and Additional Information Trailer No: B-123
Placards Required: CORROSIVE (3266), TOXIC, CORROSIVE, FLAMMABLE
☐ L.D.R. Notification(s) Attached
Carrier has Emergency Response Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and all applicable state laws and regulations.
If I am a large quantity generator I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment, or, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: RONALD L. ANDERSON
Signature: Ronald L. Anderson
Date: Month 01 Day 15 Year 04

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: BRAD UNDERWOOD
Signature: [illegible]
Date: Month 01 Day 15 Year 04

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space: Gen. Agrees with Changes To mani. Pg. 3 Lines A+B + Pg. 4 Line B.

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: David T. Kokkeler
Signature: David T. Kokkeler
Date: Month 1 Day 15 Year 04

GENERATOR
TRANSPORTER
FACILITY

FOR ACCIDENT AND SPILL EMERGENCIES CALL CHEMTREC FOR ASSISTANCE 1-800-424-9300

In case of spill or emergency, immediately call the Minnesota Duty Officer (the Minnesota Pollution Control Agency) at 800/422-0798 or 612/649-5451 and the National Response Center at 800/424-8802. Outside Minnesota, call the National Response Center and appropriate state agency.

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST
(Continuation Sheet)

21. Generator's US EPA ID No.: MND000324029

Manifest Document No.: 56096

22. Page: 2

Information in the shaded areas is not required by Federal law.

23. Generator's Name
3M St. Paul - Main Plant
900 Bush Avenue Building 24
St. Paul, MN 55144

L. State Manifest Document Number: MN7056096

M. State Generator's ID

24. Transporter _____ Company Name

25. US EPA ID Number

N. State Transporter's ID

O. Transporter's Phone

26. Transporter _____ Company Name

27. US EPA ID Number

P. State Transporter's ID

Q. Transporter's Phone

	28. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)	HM	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a.	Waste Corrosive Liquid, Basic, Inorganic, N.O.S.,(SODIUM HYDROXIDE, SODIUM PHOSPHATE, TRIBASIC), 8, UN3266,I Profile No.(2) RQ	X	2	DM	100	P	D002
b.	Profile No. 13-0023-1656-5						
c.	Waste Nonregulated Propylene Glycol and Water Profile No. 13-0024-0532-6		6	DM	1150	P	NONE
d.	Waste Consumer Commodity, ORM-D,, (D001) RQ Profile No. 13-0024-9417-0	X	1	DM	200	P	D001
e.	Waste Toxic Liquid, Organic, N.O.S.,(METHYLENE CHLORIDE), 6.1, UN2810,III Profile No. 13-0033-1556-4	X	2	DM	30	P	U080 MN01 MN02
f.	Waste Corrosive Liquid, Acidic, Organic, N.O.S.,(CITRIC ACID, GLUTARALDEHYDE), 8, UN3265,II, (D002) RQ Profile No. 13-0037-0553-3	X	1	DM	200	P	D002
g.	Waste Corrosive Liquid, Basic, Inorganic, N.O.S.,8, UN3266,II ,(SODIUM HYDROXIDE) RQ Profile No. 13-0048-1598-4	X	1	TP	1475	P	D002
h.	Waste Corrosive Liquid, Acidic, Inorganic, N.O.S.,(HYDROCHLORIC ACID), 8, UN3264,II, (D002) RQ Profile No. 13-0049-0574-4	X	3	DF	1000	P	D002
i.	Waste Nonregulated Ferro Blowing Agent Profile No. 13-0054-1517-2		1	DF	125	P	NONE

S. Additional Descriptions for Materials Listed Above
c. 30 GAL DRUM e. 5 GAL PAIL i. 40 GAL DRUM

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

GENERATOR

TRANSPORTER

33. Transporter _____ Acknowledgement of Receipt of Materials
Printed /Typed Name | Signature | Date: Month Day Year

34. Transporter _____ Acknowledgement of Receipt of Materials
Printed /Typed Name | Signature | Date: Month Day Year

FACILITY

35. Discrepancy Indication Space

Copy 3: Facility mails to Generator

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST
(Continuation Sheet)

21. Generator's US EPA ID No. MND000824029 N 0

Manifest Document No. 50098

22. Page 3

Information in the shaded areas is not required by Federal law.

23. Generator's Name
3M St. Paul - Main Plant
900 Bush Avenue Building 24
St. Paul, MN 55144

L. State Manifest Document Number MN7056096

M. State Generator's ID

24. Transporter _____ Company Name

25. US EPA ID Number

N. State Transporter's ID

O. Transporter's Phone

26. Transporter _____ Company Name

27. US EPA ID Number

P. State Transporter's ID

Q. Transporter's Phone

	HM	28. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a.		Waste Nonregulated Propylene Glycol Profile No. 13-0055-0592-3	~~2~~ 1	DM	50	P	NONE
b.		Waste Nonregulated Propylene Glycol Profile No. 13-0055-0592-3	1	~~DM~~ DF	300	P	NONE
c.		Waste Nonregulated Propylene Glycol Profile No. 13-0055-0592-3	1	DM	300	P	NONE
d.		Waste Polyvinyl Chloride Resin Profile No. 13-0055-8087-6	2	DM	530	P	NONE
e.	X	Waste Toxic Liquid, Organic, N.O.S., (TOLUENE-2, 4-DIISOCYANATE), 6.1, UN2810, II Profile No. 13-0055-9542-9	26	DM	8850	P	NONE MN01
f.	X	Waste Corrosive Liquid, Basic, Inorganic, N.O.S., (SODIUM SILICATE), 8, UN3266, III, (D002) RQ Profile No. 13-0059-1559-3	1	DM	350	P	D002
g.	X	Waste Corrosive Liquid, Flammable, N.O.S., (DIBUTYLAMINE), 8, 3, UN2920, II Profile No. 13-0064-1517-1	1	DM	35	P	D001 D002 MN02
h.	X	Waste Corrosive Liquid, Acidic, Inorganic, N.O.S., (HYDROCHLORIC ACID), 8, UN3264, II, (D002) RQ Profile No. 13-0068-0514-0	2	DF	500	P	D002
i.	X	Waste Flammable Liquid, N.O.S., (ISOPROPYL ALCOHOL, PYRIDINE), 3, UN1993, II Profile No. 13-0070-1535-0	2	DM	300	P	D001 U196 MN02

S. Additional Descriptions for Materials Listed Above
a. 5 GAL PAIL g. 5 GAL PAIL h. 30 GAL DRUM

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

GENERATOR

TRANSPORTER

33. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name | Signature | Date: Month Day Year

34. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name | Signature | Date: Month Day Year

FACILITY

35. Discrepancy Indication Space

Copy 3: Facility mails to Generator

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator's US EPA ID No.: MND000824029

Manifest Document No.: 56096

22. Page: 4

Information in the shaded areas is not required by Federal law.

23. Generator's Name
3M St. Paul - Main Plant
900 Bush Avenue Building 24
St. Paul, MN 55144

L. State Manifest Document Number: MN7056096

M. State Generator's ID

24. Transporter _____ Company Name

25. US EPA ID Number

N. State Transporter's ID

O. Transporter's Phone

26. Transporter _____ Company Name

27. US EPA ID Number

P. State Transporter's ID

Q. Transporter's Phone

	28. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)	HM	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a.	Waste Nonregulated Nalco 7465, 2536 Plus & KMP Anti-foam Profile No. 13-0074-0632-0		7	DM	250	P	NONE
b.	Waste Nonregulated Soda Ash Profile No. 13-0079-1569-1		~~1~~ 2	DM	~~350~~ 700	P	NONE
c.	Hazardous Waste, Solid, N.O.S.,(METHYL ETHYL KETONE, 1, 2-DICHLOROETHANE), 9, NA3077,III, (D028) RQ Profile No. 13-0079-6317-9	X	1	DM	100	P	D028 D035
d.	Waste Nonregulated Novoperm Yellow Solid Pigment Profile No. 13-0086-1577-0		1	DF	50	P	NONE
e.	Waste Corrosive Solid, Acidic, Inorganic, N.O.S.,(PHOSPHORUS PENTOXIDE), 8, UN3260,II Profile No. 13-0086-0553-0	X	1	DM	150	P	D002 D003
f.	Waste Corrosive Solid, Basic, Inorganic, N.O.S.,(SODIUM HYDROXIDE, SODIUM PHOSPHATE, TRIBASIC), 8, UN3262,II Profile (D002) RQ	X	3	DM	470	P	D002
g.	Profile No. 13-0091-1596-0						
h.	Waste Nonregulated Liquid Soap Profile No. 13-0092-0671-0		1	DM	150	P	NONE
i.	Waste Flammable Liquid, N.O.S.,(HEPTANE, TOLUENE, XYLENE), 3, UN1993,II, (F003, F005, D001) RQ Profile No. 13-0093-8471-3	X	1	DM	375	P	F003 F005 D001 D035

S. Additional Descriptions for Materials Listed Above
a. 5 GAL PAIL d. 15 GAL DRUM

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

GENERATOR

TRANSPORTER

33. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name | Signature | Date (Month Day Year)

34. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name | Signature | Date (Month Day Year)

FACILITY

35. Discrepancy Indication Space

Copy 3: Facility mails to Generator

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator's US EPA ID No.	Manifest Document No.	22. Page	Information in the shaded areas is not required by Federal law.
MND000824029	56096	5	

23. Generator's Name
3M St. Paul - Main Plant
900 Bush Avenue Building 24
St. Paul, MN 55144

L. State Manifest Document Number: MN7056096

M. State Generator's ID

24. Transporter _____ Company Name

25. US EPA ID Number

N. State Transporter's ID

O. Transporter's Phone

26. Transporter _____ Company Name

27. US EPA ID Number

P. State Transporter's ID

Q. Transporter's Phone

	28. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)	HM	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a.	Waste Nonregulated TEXCOOL E100 Profile No. 13-0096-1538-9		1	DM	150	P	NONE
b.	Waste Nonregulated Virginia KMP Pipe Saver Profile No. 13-0099-0574-9		7	DF	2250	P	NONE
c.	Waste Flammable Liquid, N.O.S., (TOLUENE, XYLENE), 3, UN1993, II, (F003, F005, D001, D039) RQ Profile No. 13-0023-6216-1	X	1	DM	200	P	F003 F005 D001 D039
d.	Profile No.						
e.	Profile No.						
f.	Profile No.						
g.	Profile No.						
h.	Profile No.						
i.	Profile No.						

GENERATOR

S. Additional Descriptions for Materials Listed Above
1. 40 GAL DRUM

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

TRANSPORTER

33. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name | Signature | Date (Month Day Year)

34. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name | Signature | Date (Month Day Year)

FACILITY

35. Discrepancy Indication Space

Copy 3: Facility mails to Generator

PLEASE ENSURE THAT ALL COPIES ARE LEGIBLE.

INSTRUCTIONS: PLEASE FOLD BACK, DO NOT DETACH

MINNESOTA UNIFORM HAZARDOUS WASTE MANIFEST INSTRUCTIONS

READ ALL INSTRUCTIONS BEFORE COMPLETING THIS FORM

Minnesota rules require generators, transporters and owners and operators of hazardous waste treatment, storage, and disposal facilities to use this form (PQ-00371-04-E) for intrastate transportation, and interstate transportation to destination states not requiring the use of their manifest. If the destination state requires the use of their manifest, use that manifest. Federal regulations and Minnesota rules require completion of the information in items 1 through 20. Minnesota rules also require generators of hazardous waste to complete items H. and I.

GENERATORS:

Item 1. Generator's U.S. Environmental Protection Agency (EPA) Identification (ID) Number – Manifest Number. Enter the generator's EPA twelve digit ID number and the unique five digit number assigned to this manifest (e.g., 00001) by the generator.

Item 2. Page 1 of . Enter "1" unless additional manifests or continuation sheets (EPA Form 8700-22A) are used for listing additional transporters or for listing additional wastes in item 11. The State Manifest Document number from item A. of the original manifest must appear in item L. of all continuation sheets. Attach continuation sheets to the manifest. Minnesota does not provide continuation sheets.

Item 3 and 4. Generator's Name, Mailing Address and Telephone Number. Enter the name and mailing address of the generator. These must correspond to the generator's EPA ID number. The address should be the location that will manage the returned manifest forms. Enter a telephone number where an authorized agent of the generator may be reached in an emergency. If the location of the site of waste generation is different than the mailing address, also provide the address of the site of waste generation. If the waste is imported, enter both the name and address of the importer and the foreign generator. Also, enter the name of the county in which the waste is generated.

Items 5, 6, 7 and 8. Transporter Company Names and EPA ID Numbers. Enter the company names and the EPA 12-digit ID numbers of the transporters who will transport the waste. If more than one transporter is used, the generator must supply additional copies of this manifest (Copy #5) for each transporter.

Note: If more than two transporters are used, use additional manifests or continuation sheets (EPA Form 8700-22A, items 24-27) and list the transporters and their EPA ID numbers in the order they will be transporting the waste.

Items 9 and 10. Designated Facility Name, Site Address and EPA ID Number. Enter the company name, site address and the EPA twelve digit ID number of the facility designated to receive the waste listed on this manifest. The address must be the site address, which may differ from the company mailing address.

Item 11. United States Department of Transportation (DOT) Description. (Include Proper Shipping Name, Hazard Class or Division Number, UN/NA Number, and Packing Group when appropriate.) Enter the U.S. DOT proper shipping name, hazard class or division number, UN/NA and packing group when appropriate for each waste as identified in 49 CFR 171 through 177. Enter an X in the box preceding the waste description for each federally regulated hazardous waste. Use additional manifests or continuation sheets as needed to accommodate the number of wastes included in a particular shipment.

Item 12. Containers (Number and Type). Enter the number of containers for each waste and the appropriate abbreviation from Table I for the type of container.

Table I – Types of Containers

DM - Metal drums, barrels, kegs	TP - Tanks, portable	CF - Fiber or plastic boxes, cartons, cases	TC - Tank cars
DW - Wooden drums, barrels, kegs	CM - Metal boxes, cartons, cases (including roll-offs)	BA - Burlap, cloth, paper or plastic bags	DT - Dump truck
DF - Fiberboard or plastic drums, kegs	CW - Wooden boxes, cartons, cases	TT - Cargo tanks (tank trucks)	CY - Cylinders

Item 13. Total Quantity. Enter the total quantity of waste described in each line.

Item 14. Unit (Weight/Volume). Enter the appropriate abbreviation from Table II (below) for the unit of measure.

Table II – Units of Measure

G - Gallons (liquids only)	T - Tons (2,000 lbs.)	L - Liters (liquids only)	M - Metric tons (1,000 kg)
P - Pounds	Y - Cubic yards	K - Kilograms	N - Cubic meters

Item 15. Special Handling Instructions and Additional Information. Use this space to indicate special transportation, treatment, storage, or disposal information such as alternate facility information (name, address, and EPA ID number) or Bill of Lading information. For international shipments enter the point of departure (city and state).

Item 16. Generator's Certification. The generator must read, sign (by hand), and date the certification statement. If a mode other than highway is used, the word "highway" should be lined out and the appropriate mode (rail, water, or air) inserted in the space below. If another mode in addition to the highway mode is used, enter the appropriate additional mode (e.g., and rail) in the space below. Primary exporters shipping hazardous wastes to a facility located outside of the United States must add to the end of the first sentence of the certification the following words: "And conforms to the terms of the EPA acknowledgement of consent to the shipment."

In signing the waste minimization certification statement, those generators who have not been exempted by statute or regulation from the duty to make a waste minimization certification under section 3002(b) of RCRA are also certifying that they have complied with the waste minimization requirements. Generators may preprint the words "On behalf of" in the signature block or may handwrite this statement in the signature block prior to signing the generator certifications.

Note: All of the above information except the handwritten signature required in item 16 may be preprinted.

Item A. State Manifest Document Number. Minnesota has preprinted the State manifest document numbers to assure a unique number for each manifest to be used for recordkeeping purposes.

Items B.-G. Not Required Under State Law, However, Hazardous Waste Transporters are required to be registered with the Minnesota Department of Transportation. Lines C and E enter the Transporter Identification Number issued by the Minnesota Department of Transportation under the Uniform Hazardous Materials Transporters Registration Program.

Item H. Facility's Telephone Number. Enter a telephone number where an authorized agent of the receiving facility may be reached.

Item I. Waste Number. For hazardous wastes, enter the hazardous waste number from Minnesota Rules Parts 7045.0131-7045.0137.

Items J. and K. Not Required Under State Law.

Distribution of Manifest Copies. After both the generator and the transporter sign and date the manifest, copies 1 through 5 must be given to the first transporter. If more than one transporter, the generator must provide an additional copy #5 of the manifest for each additional transporter. Copy 6 is sent to the destination state within five working days. Copy 7 is sent to the generator state within five working days. **Note:** Some states other than Minnesota do not require submittal of these copies. Copy 8 must be retained by the generator.

MAILING ADDRESS; MAIL MINNESOTA POLLUTION CONTROL AGENCY COPIES TO; Minnesota Pollution Control Agency, Metro District/Major Facilities, 520 Lafayette Road, St. Paul, MN 55155, Attn: HWIMS. Telephone (651) 296-6300.

For Questions on transportation regulations call Minnesota Department of Transportation, Office of Motor Carrier Services at 888-472-3389 or 651-405-6000.

Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street SW., Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office Management and Budget, Washington, DC 20503.

Generator Name:	EPA ID:	Manifest Number
3M St. Paul - Main Plant	MND000824029	MN7056096

I hereby certify that all information submitted above and below and in all associated documents is complete and accurate to the best of my knowledge and information.

Information was provided by: [X] using knowledge of the waste
[] waste analysis data (attached)

Signature Ronald L Anderson Date 1/15/04

Title Production Supv.

TSD Facility Name: 3M Cottage Grove Center

Pursuant to 40 CFR 268.7(a) I hereby notify the above named facility that this waste shipment contains a waste(s) that is (are) restricted under the land disposal restriction contained in either 40 CFR 268 or RCRA Section 3004(d). This shipment contains one or more of the following wastes which are subject to the listed treatment requirements and require treament prior to land disposal according to applicable treament standards set forth in 40 CFR 268.subpart D.

13-0016-7734-6 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D003 (Reactive Sulfides Subcategory), D028 (Toxic Characteristic for 1,2-Dichlorethane), D035 (Toxic Characteristic for Methyl Ethyl Ketone), F002, F003, F005

F001-F005 Spent Solvent Waste containing the following solvents: 1,1,1-Trichloroethane, 1,1,1-Trichloroethane, Methylene Chloride, Acetone, Ethyl Acetate, Ethylbenzene, Methanol, Methyl Isobutyl Ketone, Xylene, Carbon Disulfide, Methyl Ethyl Ketone, Toluene

UTS Constituents: 1,1,1-Trichloroethane, 1,1-Dichloroethane, 1,2-Dichloroethane, Acetone, Acetonitrile, Carbon Disulfide, Ethyl Acetate, Ethylbenzene, Methanol, Methyl Ethyl Ketone, Methyl Isobutyl Ketone, Methylene Chloride, Toluene, Xylene

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13-0022-9356-4 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D001 (High TOC Ignitable Characteristic Liquids Subcategory (>= 10% TOC)), D003 (Reactive Sulfides Subcategory), D019 (Toxic Characteristic for Carbon Tetrachloride), D028 (Toxic Characteristic for 1,2-Dichlorethane), D035 (Toxic Characteristic for Methyl Ethyl Ketone), F002, F003, F005

F001-F005 Spent Solvent Waste containing the following solvents: 1,1,1-Trichloroethane, Carbon Tetrachloride, 1,1,1-Trichloroethane,

Generator Name:	EPA ID:	Manifest Number
3M St. Paul - Main Plant	MND000824029	MN7056096

Methylene Chloride, Acetone, Cyclohexanone, Ethyl Acetate, Ethylbenzene, Methanol, Methyl Isobutyl Ketone, Xylene, n-Butyl Alcohol, Carbon Disulfide, Methyl Ethyl Ketone, Toluene

UTS Constituents: 1,1,1-Trichloroethane, 1,1-Dichloroethane, 1,2-Dichloroethane, 1,4-Dioxane, Acetone, Acetonitrile, Carbon Disulfide, Carbon Tetrachloride, Cyclohexanone, Diethyl Phthalate, Ethyl Acetate, Ethylbenzene, Methanol, Methyl Ethyl Ketone, Methyl Isobutyl Ketone, Methylene Chloride, Toluene, Triethylamine, Xylene, n-Butyl Alcohol

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13-0023-1556-5 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D002 (Corrosive Characteristic Waste)

13-0024-9417-0 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D001 (High TOC Ignitable Characteristic Liquids Subcategory (>= 10% TOC))

13-0033-1556-4 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: U080

13-0037-0553-3 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D002 (Corrosive Characteristic Waste)

13-0048-1598-4 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D002 (Corrosive Characteristic Waste)

13-0049-0574-4 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D002 (Corrosive Characteristic Waste)

13-0059-1559-3 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D002 (Corrosive Characteristic Waste)

13-0064-1517-1 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D001 (High TOC Ignitable Characteristic Liquids Subcategory (>= 10% TOC)), D002 (Corrosive Characteristic Waste)

13-0068-0514-0 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D002 (Corrosive Characteristic Waste)

13-0070-1535-0 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D001 (High TOC Ignitable Characteristic Liquids

Generator Name:	EPA ID:	Manifest Number
3M St. Paul - Main Plant	MND000824029	MN7056096

Subcategory (>= 10% TOC)), U196

13-0079-6317-9 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D028 (Toxic Characteristic for 1,2-Dichlorethane), D035 (Toxic Characteristic for Methyl Ethyl Ketone)

UTS Constituents: 1, 2-Dichloroethane, Acetone, Acetonitrile, Methanol, Methyl Ethyl Ketone, Methylene Chloride

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13-0086-0553-0 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D002 (Corrosive Characteristic Waste), D003 (Water Reactive Subcategory)

13-0091-1595-0 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D002 (Corrosive Characteristic Waste)

13-0093-8471-3 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D001 (High TOC Ignitable Characteristic Liquids Subcategory (>= 10% TOC)), D035 (Toxic Characteristic for Methyl Ethyl Ketone), F003, F005

F001-F005 Spent Solvent Waste containing the following solvents: Xylene, Methyl Ethyl Ketone, Toluene

UTS Constituents: Methyl Ethyl Ketone, Toluene, Xylene

13-0023-6216-1 [] Wastewater [X] Nonwastewater
EPA Waste Numbers: D001 (High TOC Ignitable Characteristic Liquids Subcategory (>= 10% TOC)), D039 (Toxic Characteristic for Tetrachloroethylene), F003, F005

F001-F005 Spent Solvent Waste containing the following solvents: 1,1,1-Trichloroethane, Tetrachloroethylene, 1,1,1-Trichloroethane, Tetrachloroethylene, Ethylbenzene, Xylene, Toluene

UTS Constituents: 1,1,1-Trichloroethane, Ethylbenzene, Tetrachloroethylene, Toluene, Xylene

********** End of Report **********

HAZMAT

ENVIRONMENTAL GROUP, INC
60 Commerce Drive, Buffalo, NY 14218
www.hazmatinc.com

FAX (716) 827-7217
(716) 827-7200

HAZMAT

NYDEC #9A-278
EPA ID# NYD980769947

DATE 1 / 15 / 04

248649

PICK UP		DELIVERY	
SHIPPER NAME	3M - 10	CONSIGNEE NAME	3M
STREET	BUILDING 24	STREET	
CITY / STATE / ZIP CODE	ST PAUL MN	CITY / STATE / ZIP CODE	COTTAGE GROVE MN
CONTACT NAME / PHONE		CONTACT NAME / PHONE	
SCHEDULED TIME			

ADDITIONAL INFORMATION / EQUIPMENT DAMAGE
If damaged at pickup site, did you send in Equipment Damage Report (EDR) via Qualcomm? Y N Explain damage below.

Pursuant to 6NYCRR 372.2 (b) (2) (ii) HazMat certifies that it is authorized to deliver this shipment of manifested waste to the TSDF listed on this Bill of Lading

ADDITIONAL INFORMATION / EQUIPMENT DAMAGE
If damaged at delivery site, did you send in Equipment Damage Report (EDR) via Qualcomm? Y N Explain damage below.

PURCHASE ORDER NO.	WORK ORDER NUMBER	MANIFEST NUMBER	H.M. NUMBER
		56096	9692

LOAD NUMBER	TRACTOR	TRAILER	ROLL OFF BOX	DRIVER NUMBER	DRIVER'S NAME
	68	B-183		1080	DLE WOOD

EQUIPMENT	MATERIAL DESCRIPTION / MANIFEST NUMBER	QUANTITY
EQUIPMENT TYPE B-183 UNIT# DROPPED UNIT# PICKED UP CONDITION REPORT	CORROSIVE. 3266 - TOXIC, CORROSIVE, FLAMMABLE	85

PICK UP

PICK UP DATE 1-15-04

ARRIVAL TIME 0745 AM PM RELEASE TIME 0830 AM PM

DAY #2 DATE

ARRIVAL TIME AM PM RELEASE TIME AM PM

TRAILER EMPTY UPON ARRIVAL ☐ YES
(if not, explain below—)

DIP MEASUREMENT (Tankers Only) INCHES

COMMENTS: (EXPLAIN ALL DELAYS)

HAZMAT MATERIALS USED (ex. overpacks, etc.): ☐ YES ☐ NO

IF YES EXPLAIN:

I, THE UNDERSIGNED, CERTIFY THAT THE ABOVE INFORMATION IS TRUE AND COMPLETE.

SHIPPER'S SIGNATURE Date

DELIVERY

DRIVER DAY #1 DATE

ARRIVAL TIME AM PM RELEASE TIME AM PM

DAY #2 DATE ARRIVAL TIME AM PM RELEASE TIME AM PM

DAY #3 DATE ARRIVAL TIME AM PM RELEASE TIME AM PM

TRAILER CLEAN AND EMPTY UPON DEPARTURE ☐ YES ☐ NO
(if not, explain below—)

COMMENTS: (Explain all delays or discrepancies))

IF YES EXPLAIN:

I, THE UNDERSIGNED, CERTIFY THAT THE ABOVE INFORMATION IS TRUE AND COMPLETE.

CONSIGNEE'S SIGNATURE Date

GENERATOR COPY

(66) 3 13-0022-9356-4 ✓
1 @ 180

5 13-0023-6216-1 ✓
1 @ 200

4 13-0055-9542-9 ✓
3 @ 1000
4 @ 1475
4 @ 1625 4 @ 1375
3 @ 940
26 4 @ 1125
4 @ 1275

2 13-0021-1535-3 ✓ 1 @ 150
4 13-0023-1556-5 ✓
2-6 gal plastic
@ 100

532-5 ✓
Metal
Metal

14 13-0055-8087-6
1 @ 230
1 @ 300

13 13-0055-059
1-5 gal plasti
@ 50
1 @ 300
1-55 gal plasti

74-4 ✓
astic
stic @ 300
53-3 ✓

7 13-0024-9417-
1 @ 200

4-0 ✓
stic @ 500
-0 ✓

HESD

Title

Duration | Quantity | Responsibility #

Description

Waste Manifest
56096
85 containers
20,720 Lbs.
56096

Resources | Quantity | Resources | Quantity

Form 32134 - C ©1992
Commercialization Services
3M Hardgoods & Electronic Support Division
(612) 733-0108
3M

1 13-0016-7734-6 ✓
3 @ 400

2 @ 300

13-0033-1556-4 ✓
2-5 gal metal @ 30

21 13-0079-1559-1 ✓
1 @ 250 1 @ 350

76 59 22 13-0079-6317-9 ✓ 1 @ 100

28 13-0093-8471-3 ✓
1 @ 375

30 13-0099-0574-9 ✓
4-40 gal plastic
@ 1230
3-40 gal plastic
@ 1000

26 13-0091-1595-0 ✓
3 @ 470

29 13-0096-1538-9 ✓
1 @ 150

25 13-0086-0553-0 ✓
1 @ 150

~~13-0094-0574-9~~
~~4-40 gal plastic~~
~~@ 1225~~

18 13-0064-1517-1 ✓
1-5gal metal @ 35

16 13-0059-1559-3 ✓
1 @ 350

20 13-0074-0532-0 ✓
7-5gal plastic @ 250

10 13-0048-1598-4 ✓
1-plastic tote
@ 1475

23 13-0083-1456-2 ✓
1-5gal metal @ 35

12 13-0054-1517-2 ✓
1-40 gal plastic @ 125

24 13-0085-1577-0 ✓
1-15 gal. plastic
@ 50

27 13-0092-~~0577~~ 0571-0 ✓
1 @ 150 Liq Soap

~~13-0086-0553-0~~
~~1 @ 125~~

28 27

25

INCINERATOR MANIFEST/LDR PRINTING REQUEST FORM

NAME Ron Anderson
PHONE 651-778-4350
LOCATION 24-1W-16
EPA ID NO. MND000824029

MAILING ADDRESS (INTER-OFFICE OR FED EXPRESS)
24-1W-16
Please send via RoadRunner for delivery by 8AM 1/15/04 Dept 1531

NOTE - FOR LOGISTICS LOCATIONS, PLEASE CALL FOR ALTERNATE FORM

COMMENTS Manifest # 56096

TENTATIVE SHIP DATE 1/15/04
TRANSPORTER(S) Haz Mat

	WSP NO.	CONTAINERS			AMOUNT	LBS (P) OR GAL (G)
		NUMBER	TYPE (1)	SIZE (2)		
1	13-0016-7734-6	3	DM		400	P
2	13-0021-1535-3	1	DM		150	P
3	13-0022-9356-4	1	DM		180	P
4	13-0023-1556-5	2	DF	6 gal.	100	P
* 5	13-0023-6216-1	1	DM		200	P
6	13-0024-0532-5	6	DM	30 gal	1150	P
7	13-0024-9417-0	1	DM		200	P
8	13-0033-1556-4	2	DM	5 gal.	30	P
9	13-0037-0553-3	1	DM		200	P
10	13-0048-1598-4	1	DF	Plastic Tote	1475	P
11	13-0049-0574-4	3	DF		1000	P
12	13-0054-1517-2	1	DF	40 gal	125	P
13	13-0055-0592-3	2	DF	5 gal	50	P
14	13-00 " " "	1	DM		300	P
15	13-00 " " "	1	DF		300	P
16	13-0055-8087-6	2	DM		530	P
17	13-0055-9542-9	26	DM		8850	P
18	13-0059-1559-3	1	DM		350	P
19	13-0064-1517-1	1	DM	5 gal	35	P
20	13-0068-0514-0	2	DF	30 gal	500	P
21	13-0070-1535-0	2	DM		300	P

FAX TO WAYNE NEUMANN @
612-458-2017 OR
(612) 458-2017
QUESTIONS?
CALL (612) 458-1377

(1) TYPES OF CONTAINERS
DM - METAL DRUMS, PAILS
DF - FIBERBOARD OR PLASTIC DR.
CF - FIBER/PLASTIC BOXES, CRTNS
BA - PAPER OR PLASTIC BAGS

(2) CONTAINER SIZE
IF CONTAINER TYPE IS "DM" OR "DF" AND NOT 55 GAL., INDICATE SIZE ALSO, E.G. "5 GAL" OR "30 GAL" OR SALVAGE DRUM

INCINERATOR MANIFEST/LDR PRINTING REQUEST FORM

page 2 of 2

NAME
PHONE
LOCATION
EPA ID NO.

MAILING ADDRESS (INTER-OFFICE OR FED EXPRESS)

NOTE - FOR LOGISTICS LOCATIONS, PLEASE CALL FOR ALTERNATE FORM

COMMENTS

TENTATIVE SHIP DATE
TRANSPORTER(S)

	WSP NO.	CONTAINERS			AMOUNT	LBS (P) OR GAL (G)
		NUMBER	TYPE (1)	SIZE (2)		
1	13-0074-0532-0	7	DF	5gal	250	P
2	13-0079-1559-1	1	DM		350	P
3	13-0079-6317-9	1	DM		100	P
* off 4	13-0083-1456-2	1	DM	5gal.	35	P
5	13-0085-1577-0	1	DF	15gal	50	P
6	13-0086-0553-0	1	DM		150	P
7	13-0091-1595-0	3	DM		470	P
8	13-0092-0571-0	1	DM		150	P
9	13-0093-8471-3	1	DM		375	P
10	13-0096-1538-9	1	DM		150	P
11	13-0099-0574-9	7	DF	40 gal.	2250	P
12	13-00					
13	13-00					
14	13-00					
15	13-00					
16	13-00					
17	13-00					
18	13-00					
19	13-00					
20	13-00					
21	13-00					

Post-it® Fax Note 7671

To Edie Gray	Date 1/14/04 # of pages ▶ 2
Co./Dept. 3M	From Rox Anderson
Phone #	Co. 3M
Fax #	Phone # 778-4350
	Fax #

X TO WAYNE NEUMANN @
8-458-2017 OR
(612) 458-2017

QUESTIONS?
CALL (612) 458-1377

(1) TYPES OF CONTAINERS
DM - METAL DRUMS, PAILS
DF - FIBERBOARD OR PLASTIC DR.
CF - FIBER/PLASTIC BOXES, CRTNS
BA - PAPER OR PLASTIC BAGS

(2) CONTAINER SIZE
IF CONTAINER TYPE IS "DM" OR "DF" AND NOT 55 GAL., INDICATE SIZE ALSO, E.G. "5 GAL" OR "30 GAL" OR SALVAGE DRUM

MINNESOTA POLLUTION CONTROL AGENCY
METRO DISTRICT / MAJOR FACILITIES
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

77-D
3-8

For MPCA use only

OMB No. 2050-0039

PLEASE **TYPE** (Form designed for use on elite (12-pitch) typewriter) or print. **Instructions on cover page.**

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MND000824029
Manifest Document No.: 56255
2. Page 1 of 4

Information in shaded area not required by Federal law. Minnesota rules require Items H. and I.

3. Generator's Name and Mailing Address
3M St. Paul - Main Plant
3M, 850 Bush Avenue, Building 24
St. Paul, MN 55106 STPM

4. Generator's Phone (651)/778-4350 Jeramy Grezek

A. State Manifest Document Number: MN 7056255
B. State Generator's ID:

5. Transporter 1 Company Name: Hazmat Environmental Group, Inc.
6. US EPA ID Number: NYD980769947
C. State Transporter's ID: HAW 0255684 OH
D. Transporter's Phone: 716/827-7200

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address
3M Cottage Grove Center
10746 Innovation Road-Bldg 47,
Cottage Grove, MN 55016
10. US EPA ID Number: MND006172969
G. State Facility's ID:
H. Facility's Phone: 651/458-2147

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, I.D. Number and Packing Group)	HM	12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	Waste Corrosive Liquid, Acidic, Inorganic, N.O.S., (HYDROCHLORIC ACID), 8, UN3264, II — 3M Profile No. 13-0011-1574-3	X	1	DF	10	P	D002
b.	Hazardous Waste, Liquid, N.O.S., 9, NA3082, III, (F002, F003, F005, D003, D028) RQ — 3M Profile No. 13-0016-7734-6	X	7	DM	1400	P	F002 F003 F005 D003 D028 D035
c.	Waste Nonregulated Compublend Base C — 3M Profile No. 13-0017-1538-5		1	DM	300	P	NONE
d.	Waste Corrosive Solid, Basic, Inorganic, N.O.S., (SODIUM HYDROXIDE), 8, UN3262, II — 3M Profile No. 13-0018-0514-5	X	1	DM	200	P	D002

J. Additional Descriptions for Materials Listed Above
a. 5 GAL PAIL
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a.
b.
c.
d.

15. Special Handling Instructions and Additional Information
Placards Required: DANGEROUS, TOXIC
Trailer No: B132
☒ L.D.R. Notification(s) Attached
Carrier has Emergency Response Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and all applicable state laws and regulations.
If I am a large quantity generator I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment, or, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: RONALD L. ANDERSON
Signature: Ronald L. Anderson
Date: Month 02 Day 19 Year 04

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Tom Rowan
Signature: Tom Rowan
Date: Month 02 Day 19 Year 04

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: David T. Kokkeler
Signature: David T. Kokkeler
Date: Month 2 Day 19 Year 04

GENERATOR

TRANSPORTER

FACILITY

FOR ACCIDENT AND SPILL EMERGENCIES CALL CHEMTREC FOR ASSISTANCE 1-800-424-9300

In case of spill or emergency, immediately call the Minnesota Duty Officer (the Minnesota Pollution Control Agency) at 800/422-0798 or 612/649-5451 and the National Response Center at 800/424-8802. Outside Minnesota, call the National Response Center and appropriate state agency.

Minnesota Form PQ-00371-04 (3/99)

(Previous editions obsolete)

dd

Copy 3: Facility mails to Generator

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST
(Continuation Sheet)

21. Generator's US EPA ID No.: MND000824029

Manifest Document No.: 56255

22. Page 2 of 4

Information in the shaded areas is not required by Federal law.

23. Generator's Name
3M St. Paul - Main Plant
850 Bush Avenue, Building 24
St. Paul, MN 55106

L. State Manifest Document Number: MN7056255

M. State Generator's ID

24. Transporter _____ Company Name

25. US EPA ID Number

N. State Transporter's ID

O. Transporter's Phone

26. Transporter _____ Company Name

27. US EPA ID Number

P. State Transporter's ID

Q. Transporter's Phone

	28. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)	HM	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a.	Waste Flammable Liquid, Toxic, N.O.S., (1, 2-DICHLOROETHANE, ETHYL ALCOHOL, N-BUTYL ALCOHOL), 3, 6.1, UN1992, (F002, F003, F005, D001, D003, D019, D028) RQ Profile No. 13-0022-9356-4	X	1	DM	250	P	F002 F003 F005 D001 D003 D019
b.							
c.	Waste Corrosive Liquid, Basic, Inorganic, N.O.S., (SODIUM HYDROXIDE, SODIUM HYPOCHLORITE), 8, UN3266, II, (D002) RQ Profile No. 13-0027-0592-2	X	1	DF	300	P	D002
d.	Waste Non-Regulated Chemicals Profile No. 13-0031-0577-5		1	DM	1200	P	NONE
e.	Waste Corrosive Liquid, Acidic, Inorganic, N.O.S., (HYDROCHLORIC ACID), 8, UN3264, II, (D002) RQ Profile No. 13-0042-1535-9	X	1	DM	100	P	D002 MN02
f.	Waste Non-Regulated Chemicals Profile No. 13-0045-9417-5		1	DM	550	P	NONE
g.	Waste Flammable Liquid, N.O.S., (PETROLEUM NAPHTHA, MEDIUM ALIPHATIC SOLVENT NAPHTHA), 3, UN1993, III, (D001) RQ Profile No. 13-0052-0538-3	X	3	DM	688	P	D001 MN02
h.	RQ Waste Mercury, 8, UN2809, III Profile No. 13-0054-9498-7	X	1	DM	350	P	D002 D009
i.	Profile No.						

S. Additional Descriptions for Materials Listed Above
a. (D028 D035 MN01)

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

GENERATOR

TRANSPORTER

33. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name | Signature | Date (Month Day Year)

34. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name | Signature | Date (Month Day Year)

FACILITY

35. Discrepancy Indication Space

Copy 3: Facility mails to Generator

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST *(Continuation Sheet)*

21. Generator's US EPA ID No.: MND000824029

Manifest Document No.: 56255

22. Page 3 of 4

Information in the shaded areas is not required by Federal law.

23. Generator's Name
3M St. Paul - Main Plant
850 Bush Avenue, Building 24
St. Paul, MN 55106

L. State Manifest Document Number: MN7056255

M. State Generator's ID

24. Transporter _____ Company Name

25. US EPA ID Number

N. State Transporter's ID

O. Transporter's Phone

26. Transporter _____ Company Name

27. US EPA ID Number

P. State Transporter's ID

Q. Transporter's Phone

	28. US DOT Description *(Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)*	HM		29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a.	Waste Flammable Liquid, N.O.S., (NAPHTHA/MINERAL SPIRITS, METHYL ISOBUTYL KETONE, TOLUENE), 3, UN1993, II, (F003, F005, D001) RQ	X	Profile No. 13-0055-9477-8	3	DM	550	P	F003 F005 D001
b.			Profile No.					
c.	Waste Toxic Liquid, Organic, N.O.S., (TOLUENE-2, 4-DIISOCYANATE), 6.1, UN2810, II	X	Profile No. 13-0055-9542-9	40	DM	14864	P	NONE MN01
d.	Waste Corrosive Liquid, Basic, Inorganic, N.O.S., (SODIUM HYDROXIDE), 8, UN3266, II	X	Profile No. 13-0058-0553-9	1	DF	60	P	D002
e.	Waste Flammable Liquid, N.O.S., (HEPTANE, TOLUENE, METHYL ETHYL KETONE), 3, UN1993, II, (D001) RQ	X	Profile No. 13-0059-2328-2	1	DM	100	P	D001 D035
f.	Waste Corrosive Liquid, Basic, Organic, N.O.S., (N,N-DIETHYLETHANOLAMINE), 8, UN3267, II, (D002) RQ	X	Profile No. 13-0059-8342-7	1	DM	350	P	D002
g.	Waste Nonregulated Soap Stone		Profile No. 13-0061-0511-1	1	DM	150	P	NONE
h.	Hazardous Waste, Solid, N.O.S., (LEAD OXIDE PHOSPHONATE), 9, NA3077, III, (D008) RQ	X	Profile No. 13-0062-8411-4	1	DM	150	P	D008
i.			Profile No.					

S. Additional Descriptions for Materials Listed Above

d. 5 GAL PAIL

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

GENERATOR

TRANSPORTER

33. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name | Signature | Date: Month Day Year

34. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name | Signature | Date: Month Day Year

FACILITY

35. Discrepancy Indication Space

Copy 3: Facility mails to Generator

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST
(Continuation Sheet)

21. Generator's US EPA ID No. MND000824029 (MND000824029)

Manifest Document No. 56255

22. Page 4 of 4

Information in the shaded areas is not required by Federal law.

23. Generator's Name
3M St. Paul - Main Plant
850 Bush Avenue, Building 24
St. Paul, MN 55106

L. State Manifest Document Number: MN7056255

M. State Generator's ID

24. Transporter _____ Company Name

25. US EPA ID Number

N. State Transporter's ID

O. Transporter's Phone

26. Transporter _____ Company Name

27. US EPA ID Number

P. State Transporter's ID

Q. Transporter's Phone

	28. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)	HM	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a.	Waste Corrosive Liquid, Basic, Inorganic, N.O.S., (SODIUM HYPOCHLORITE, CALCIUM HYPOCHLORITE), 8, UN3266, PG II, (D002) RQ Profile No. 13-0089-0514-6	X	2	DM	300	P	D002 MN02
b.	Profile No.						
c.	Waste MN Regulated (Used Oil and Solids) Profile No. 13-0091-9477-3		3	DM	1050	P	NONE MN04
d.	Waste Corrosive Liquid, Acidic, Inorganic, N.O.S., (SULFURIC ACID), 8, UN3264, II, (D002) RQ Profile No. 13-0098-1538-5	X	1	DM	50	P	D002 MN02
e.	Waste Consumer Commodity, ORM-D, (D001) RQ Profile No. 13-0050-4492-3	X	1	DM	100	P	D001
f.	Profile No.						
g.	Profile No.						
h.	Profile No.						
i.	Profile No.						

S. Additional Descriptions for Materials Listed Above
d. 5 GAL PAIL

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

GENERATOR

33. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name | Signature | Date (Month Day Year)

34. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name | Signature | Date (Month Day Year)

TRANSPORTER

35. Discrepancy Indication Space

FACILITY

Copy 3: Facility mails to Generator

HAZMAT

ENVIRONMENTAL GROUP, INC
60 Commerce Drive, Buffalo, NY 14218
www.hazmatinc.com
FAX (716) 827-7217
(716) 827-7200

HAZMAT

NYDEC #9A-278
EPA ID# NYD980769947

DATE 251763

2/19/04

PICK UP

SHIPPER

NAME 3M Bldg #24

STREET

CITY St. Paul STATE Mn ZIP CODE

CONTACT NAME PHONE

SCHEDULED TIME

DELIVERY

CONSIGNEE

NAME 3M

STREET

CITY Cottage Grove STATE Mn ZIP CODE

CONTACT NAME PHONE

ADDITIONAL INFORMATION / EQUIPMENT DAMAGE
If damaged at pickup site, did you send in Equipment Damage Report (EDR) via Qualcomm? Y N Explain damage below.

Pursuant to 6NYCRR 372.2 (b) (2) (iii) HazMat certifies that it is Authorized to deliver this shipment of manifested waste to the TSDF listed on this Bill of Lading. Shipment valuation limits apply from HazMat Rules Publication 101, Item 848.

ADDITIONAL INFORMATION / EQUIPMENT DAMAGE
If damaged at delivery site, did you send in Equipment Damage Report (EDR) via Qualcomm? Y N Explain damage below.

PURCHASE ORDER NO.	WORK ORDER NUMBER	MANIFEST NUMBER	H.M. NUMBER
—	—	Mn 7056255	31831

LOAD NUMBER	TRACTOR	TRAILER	ROLL OFF BOX	DRIVER NUMBER	DRIVER'S NAME
—	261	B132	—	1781	T Rowan

EQUIPMENT	MATERIAL DESCRIPTION / MANIFEST NUMBER	QUANTITY
EQUIPMENT TYPE ____	Waste Flammable Liquid 3 1993	80 pcs as per manifest
UNIT# DROPPED ____	Waste Corrosive Liquid 8 3264	
UNIT# PICKED UP ____	Waste Toxic Liquid 6.1 2810	
CONDITION REPORT ____	20 skids	Wt 23,072 P

PICK UP

PICK UP DATE 2-19-04

ARRIVAL TIME 07:30 AM/PM RELEASE TIME 08:30 AM/PM

DAY #2 DATE ____

ARRIVAL TIME ____ AM/PM RELEASE TIME ____ AM/PM

TRAILER EMPTY UPON ARRIVAL ☐ YES
(if not, explain below—)

DIP MEASUREMENT (Tankers Only) ____ INCHES

COMMENTS: (EXPLAIN ALL DELAYS) ____

HAZMAT MATERIALS USED (ex. overpacks, etc.): ☐ YES ☐ NO

IF YES EXPLAIN:

I, THE UNDERSIGNED, CERTIFY THAT THE ABOVE INFORMATION IS TRUE AND COMPLETE.

SHIPPER'S SIGNATURE Date

DELIVERY

DRIVER 1781 DAY #1 DATE 2-19-04

ARRIVAL TIME ____ AM/PM RELEASE TIME ____ AM/PM

DAY #2 DATE ____ ARRIVAL TIME ____ AM/PM RELEASE TIME ____ AM/PM

DAY #3 DATE ____ ARRIVAL TIME ____ AM/PM RELEASE TIME ____ AM/PM

TRAILER CLEAN AND EMPTY UPON DEPARTURE ☐ YES ☐ NO
(if not, explain below—)

COMMENTS: (Explain all delays or discrepancies)) ____

IF YES EXPLAIN:

I, THE UNDERSIGNED, CERTIFY THAT THE ABOVE INFORMATION IS TRUE AND COMPLETE.

CONSIGNEE'S SIGNATURE Date

HAZMAT BILL OF LADING GENERATOR COPY

Generator Name:	EPA ID:	Manifest Number:
3M St. Paul - Main Plant	MND000824029	MN7056255

I hereby certify that all information submitted above and below and in all associated documents is complete and accurate to the best of my knowledge and information.

Information was provided by: [X] Using knowledge of the waste

[ ] Waste analysis data (attached)

Signature Ronald L. Anderson Date 2/18/04

Title Production Supv

TSD Facility Name: 3M Cottage Grove Center

Pursuant to 40 CFR 268.7(a) I hereby notify the above named facility that this waste shipment contains a waste(s) that is (are) restricted under the land disposal restriction contained in either 40 CFR 268 or RCRA Section 3004(d). This shipment contains one or more of the following wastes.which are subject to the listed treatment requirements and require treament prior to land disposal according to applicable treament standards set forth in 40 CFR 268.subpart D.

13-0011-1574-3 [ ] Wastewater [X] Nonwastewater

EPA Waste Numbers: D002(Corrosive Characteristic Waste)

13-0016-7734-6 [ ] Wastewater [X] Nonwastewater

EPA Waste Numbers: D003(Reactive Sulfides Subcategory), D028(Toxic Characteristic for 1,2-Dichlorethane), D035(Toxic Characteristic for Methyl Ethyl Ketone), F002, F003, F005

F001-F005 Spent Solvent Waste containing the following solvents: 1,1,1-Trichloroethane, Acetone, Carbon Disulfide, Ethyl Acetate, Ethylbenzene, Methanol, Methyl Ethyl Ketone, Methyl Isobutyl Ketone, Methylene Chloride, Toluene, Xylene

UTS Constituents: 1, 2-Dichloroethane, 1,1,1-Trichloroethane, 1,1-Dichloroethane, Acetone, Acetonitrile, Carbon Disulfide, Ethyl Acetate, Ethylbenzene, Methanol, Methyl Ethyl Ketone, Methyl Isobutyl Ketone, Methylene Chloride, Toluene, Xylene

13-0018-0514-5 [ ] Wastewater [X] Nonwastewater

EPA Waste Numbers: D002(Corrosive Characteristic Waste)

13-0022-9356-4 [ ] Wastewater [X] Nonwastewater

EPA Waste Numbers: D001(High TOC Ignitable Characteristic Liquids Subcategory (>= 10% TOC)), D003(Reactive Sulfides Subcategory), D019(Toxic Characteristic for Carbon Tetrachloride), D028(Toxic Characteristic for 1,2-Dichlorethane), D035(Toxic Characteristic for Methyl Ethyl Ketone), F002, F003, F005

Generator Name:	EPA ID:	Manifest Number:
3M St. Paul - Main Plant	MND000824029	MN7056255

F001-F005 Spent Solvent Waste containing the following solvents: 1,1,1-Trichloroethane, Acetone, Carbon Disulfide, Carbon Tetrachloride, Cyclohexanone, Ethyl Acetate, Ethylbenzene, Methanol, Methyl Ethyl Ketone, Methyl Isobutyl Ketone, Methylene Chloride, n-Butyl Alcohol, Toluene, Xylene

UTS Constituents: 1, 2-Dichloroethane, 1,1,1-Trichloroethane, 1,1-Dichloroethane, 1,4-Dioxane, Acetone, Acetonitrile, Carbon Disulfide, Carbon Tetrachloride, Cyclohexanone, Diethyl Phthalate, Ethyl Acetate, Ethylbenzene, Methanol, Methyl Ethyl Ketone, Methyl Isobutyl Ketone, Methylene Chloride, n-Butyl Alcohol, Toluene, Triethylamine, Xylene

---

13-0027-0592-2 [ ] Wastewater [X] Nonwastewater

EPA Waste Numbers: D002(Corrosive Characteristic Waste)

13-0042-1535-9 [ ] Wastewater [X] Nonwastewater

EPA Waste Numbers: D002(Corrosive Characteristic Waste)

13-0052-0538-3 [ ] Wastewater [X] Nonwastewater

EPA Waste Numbers: D001(High TOC Ignitable Characteristic Liquids Subcategory (>= 10% TOC))

13-0054-9498-7 [ ] Wastewater [X] Nonwastewater

EPA Waste Numbers: D002(Corrosive Characteristic Waste), D009(Toxic Characteristic for Mercury - High Mercury Inorganic Subcategory (=or> 260 Mg/Kg Mercury).)

UTS Constituents: Mercury

13-0055-9477-8 [ ] Wastewater [X] Nonwastewater

EPA Waste Numbers: D001(High TOC Ignitable Characteristic Liquids Subcategory (>= 10% TOC)), F003, F005

F001-F005 Spent Solvent Waste containing the following solvents: Acetone, Ethyl Acetate, Methyl Isobutyl Ketone, Toluene

---

13-0058-0553-9 [ ] Wastewater [X] Nonwastewater

EPA Waste Numbers: D002(Corrosive Characteristic Waste)

13-0059-2328-2 [ ] Wastewater [X] Nonwastewater

EPA Waste Numbers: D001(High TOC Ignitable Characteristic Liquids Subcategory (>= 10%

Generator Name:	EPA ID:	Manifest Number:
3M St. Paul - Main Plant	MND000824029	MN7056255

TOC)), D035(Toxic Characteristic for Methyl Ethyl Ketone)

UTS Constituents: Methyl Ethyl Ketone, Toluene

.....

13-0059-8342-7 [ ] Wastewater [X] Nonwastewater

EPA Waste Numbers: D002(Corrosive Characteristic Waste)

.....

13-0062-8411-4 [ ] Wastewater [X] Nonwastewater

EPA Waste Numbers: D008(Toxic Characteristic for Lead)

UTS Constituents: Antimony Trioxide, Lead Oxide Phosphonate

.....

13-0089-0514-6 [ ] Wastewater [X] Nonwastewater

EPA Waste Numbers: D002(Corrosive Characteristic Waste)

.....

13-0098-1538-5 [ ] Wastewater [X] Nonwastewater

EPA Waste Numbers: D002(Corrosive Characteristic Waste)

.....

13-0050-4492-3 [ ] Wastewater [X] Nonwastewater

EPA Waste Numbers: D001(High TOC Ignitable Characteristic Liquids Subcategory (>= 10% TOC))

.....

********** End of Report **********

INCINERATOR MANIFEST/LDR PRINTING REQUEST FORM

Page 1 of 2

NAME Ron Anderson
PHONE 651-778-4350
LOCATION 24-1W-16
EPA ID NO. MND 000824029

MAILING ADDRESS (INTER-OFFICE OR FED EXPRESS)
24-1W-16
Please send via RoadRunner for delivery by 8 A.M. 2/19
Dept. 1531

NOTE - FOR LOGISTICS LOCATIONS, PLEASE CALL FOR ALTERNATE FORM

COMMENTS Manifest # 56255

TENTATIVE SHIP DATE 2/19/04
TRANSPORTER(S) HazMAT

	WSP NO.	CONTAINERS			AMOUNT	LBS (P) OR GAL (G)
		NUMBER	TYPE (1)	SIZE (2)		
1	13-0011-1574-3	1	DF	5gal.	10	P
2	13-0016-7734-6	7	DM		1400	P
3	13-0017-1538-5	1	DM		300	P
4	13-0018-0514-5	1	DM		200	P
5	13-0022-9356-4	1	DM		250	P
6	13-0027-0592-2	1	DF		300	P
7	13-0031-0577-5	7	DM		1200	P
8	13-0042-1535-9	1	DM		100	P
9	13-0045-9417-5	1	DM		550	P
10	13-0050-4492-3	1	DM		100	P
11	13-0052-0538-3	3	DM		688	P
12	13-0054-9498-7	1	DM		350	P
13	13-0055-9477-8	3	DM		550	P
14	13-0055-9542-9	40	DM		14,864	P
15	13-0058-0553-9	1	DF	5gal	60	P
16	13-0059-2328-2	1	DM		100	P
17	13-0059-8342-7	1	DM		350	P
18	13-0061-0511-1	1	DM		150	P
19	13-0062-8411-4	1	DM		150	P
~~20~~	~~13-0088-0193-1~~	~~4~~	~~DM~~	~~5gal~~	~~135~~	~~P~~
21	13-0089-0514-6	2	DM		300	P

FAX TO WAYNE NEUMANN @
8-458-2017 OR
(612) 458-2017
QUESTIONS?
CALL (612) 458-1377

(1) TYPES OF CONTAINERS
DM - METAL DRUMS, PAILS
DF - FIBERBOARD OR PLASTIC DR.
CF - FIBER/PLASTIC BOXES, CRTNS
BA - PAPER OR PLASTIC BAGS

(2) CONTAINER SIZE
IF CONTAINER TYPE IS "DM" OR "DF" AND NOT 55 GAL., INDICATE SIZE ALSO, E.G. "5 GAL" OR "30 GAL" OR SALVAGE DRUM

INCINERATOR MANIFEST/LDR PRINTING REQUEST FORM

NAME Ron Anderson
PHONE 651-778-4350
LOCATION 24-W-16
EPA ID NO. MND000824029

MAILING ADDRESS (INTER-OFFICE OR FED EXPRESS)
24-W-16
Road runner Dept 1531

NOTE - FOR LOGISTICS LOCATIONS, PLEASE CALL FOR ALTERNATE FORM

COMMENTS Manifest # 56255

TENTATIVE SHIP DATE 2/19/04
TRANSPORTER(S) Haz Mat

	WSP NO.	CONTAINERS NUMBER	TYPE (1)	SIZE (2)	AMOUNT	LBS (P) OR GAL (G)
22	13-0091-8477-3	3	DM		1050	P
~~23~~	~~13-0095-0632-5~~	~~1~~	~~DF~~	~~5 gal~~	~~50~~	~~P~~
24	13-0098-1538-5	1	DM	5 gal	50	P
4	13-00					
5	13-00					
12	13-00					
13	13-00					
14	13-00					
15	13-00				23,872	lbs.
16	13-00					
17	13-00					
18	13-00					
19	13-00					
20	13-00					
21	13-00					

Totals 80 containers

Post-it® Fax Note 7671

Date 2/18	# of pages ▶ 2
To Edie Group	From Ron Anderson
Co./Dept. 3M C.G.J	Co. 3M SPTP
Phone # 458-2445	Phone # 778-4350
Fax # 458-2017	Fax # 778-6709

FAX TO WAYNE NEUMANN @
1-458-2017 OR
(612) 458-2017
QUESTIONS?
CALL (612) 458-1377

(1) TYPES OF CONTAINERS
DM - METAL DRUMS, PAILS
DF - FIBERBOARD OR PLASTIC DR.
CF - FIBER/PLASTIC BOXES, CRTNS
BA - PAPER OR PLASTIC BAGS

(2) CONTAINER SIZE
IF CONTAINER TYPE IS "DM" OR "DF" AND NOT 55 GAL., INDICATE SIZE ALSO, E.G. "5 GAL" OR "30 GAL" OR SALVAGE DRUM

Haz Waste shipment 2/19/04 (40)

(1) 13-0011-1574-3 ✓
1-5gal plastic @ 10

(3) 13-0017-1538-5 ✓
1 @ 300

(4) 13-0018-0514-5 ✓
1 @ 200

(2) 13-0016-7734-6 ✓
4 @ 800, 3 @ 600

(6) 13-0027-0592-2 ✓
1-55gal plastic @ 300

(5) 13-0022-9356-4 ✓
1 @ 250

(8) 13-0042-1535-9 ✓
1 @ 100

(12) 13-0054-9498-7 ✓
1 @ 350

(17) 13-0059-8342-7 ✓
1 @ 350

(18) 13-0061-0544-1 ✓
1 @ 150

(7) 13-0031-0577-5 ✓
1 @ 150, 3 @ 600
1 @ 150, 2 @ 300

(13) 13-0055-9477-8 ✓
1 @ 200, 1 @ 200
1 @ 150

(10) 13-0050-4492-3 ✓
1 @ 100

(15) 13-0058-0553-9 ✓
1-5gal. plastic @ 60

(11) 13-0052-0538-3 ✓
2 @ 538, 1 @ 150

(22) 13-0091-9477-3 ✓
1 @ 350, 2 @ 700

(20) 13-0088-0193-1 ✓
2-5gal Metal @ 75
2-5gal Metal @ 60

(23) 13-0095-0632-5 ✓
1-5gal plastic @ 50

(24) 13-0098-1538-5 ✓
1-5gal Metal @ 50

(48)

(15) 13-0055-9542-9 ✓
4 @ 1554
4 @ 1500
4 @ 1462
4 @ 1606
4 @ 1638
4 @ 1228
4 @ 1504
4 @ 1448
4 @ 1454
4 @ 1470

(20) 13-0089-0514-6 ✓
2 @ 300

(19) 13-0062-8411-4 ✓
1 @ 150

(8) 13-0045-9417-5 ✓
1 @ 550

(16) 13-0059-2328-2 ✓
1 @ 100

8 total

Appendix for letter to
Mr. Valentino
U.S. EPA, Region 5

Appendix E

Hazardous Waste Procedures for 20-5
(The procedure is enclosed in a sealed envelope stamped "3M Confidential")

Appendix for letter to
Mr. Valentino
U.S. EPA, Region 5

Appendix F

Phthalic Anhydride Diester MSDS
(The MSDS is enclosed in a sealed envelope stamped "3M Confidential")

Appendix for letter to
Mr. Valentino
U.S. EPA, Region 5

Appendix G

General Spill Cleanup Procedure (including TDI Spills)

GENERAL HAZARDOUS WASTE AND EMERGENCY RESPONSE:

- The Emergency Tone Alert - Fast Whoop - evacuate
- Emergency Call Number - 234
- Evacuation Route - Varies by department, take nearest door
- Assembly area - Varies by department
- How to report someone missing - tell supervisor, guard, or someone in white hat
- The chemicals they handle - flammable
- The hazards these chemicals create - fire, explosions
- The consequences of being mishandled - fatal

REPORTING AND RECORD KEEPING FOR ALL SPILLS INCLUDING TDI

Criteria for non-reportable Spills:

- **Spill is classified as non-emergency or health risk by properly trained employees, trained supervisor/coaches, trained process experts or Hazardous Material Technicians. (General Guidelines)**
- Spill does not exceed 5 gallons or is non-hazardous material, with the exception of TDI, which is reportable in any quantity.
- No discharge to the environment, including air, ground, sewer, or storm sewer.
- No injuries as a result of the spill.
- No involvement by outside agencies including the fire dept., media, neighbors.
- No cleanup contractor or hazmat team needed.
- No violation of environmental permits.

Reportable Spills

- **All other spills that do not meet the above criteria are reportable**

Note: The plant Environmental Specialist, with information from the Hazardous Materials Coordinator and in consultation with the Corporate Emergency Response Coordinator within EHS Operations will determine if outside agencies need to be informed. Separate procedures are available. (Potential risk of spill/leak will be determined by factors such as: location, near sewer system, containment areas, type and quantity of material spilled, etc.)

Specific Spill Procedures: Toluene Diisocyanate (TDI)

Procedures for TDI spill cleanup are located in a Standard Operating Procedures (SOP).

Electronic Link to Standard Operating Procedures; 20-5 Factory; 5F Compounder; Safety Procedures; 5F TDI Spill cleanup Procedure [A hard copy of the TDI spill procedures is provided in this same Appendix]

Spill Cleanup (General) – When Using Bay West:

The decision may be made based on availability of people, size, and nature of spill, or time of spill, to utilize Bay West for cleanup. All reasonable and safe steps to secure the area should be taken prior to contacting Bay West for cleanup.

Bay West can be contacted as follows:

- Call 651-291-0456 (always answered).
- State that a spill has occurred, the call is urgent or an emergency and an immediate response is needed. Please have a Bay West response person call you immediately.
- Give your company name and address

Appendix for letter to
Mr. Valentino
U.S. EPA, Region 5

Appendix H

MSDS for Materials used in the Drum Emptying Procedure
(The MSDS' are enclosed in a sealed envelope stamped "3M Confidential")

Appendix for letter to
Mr. Valentino
U.S. EPA, Region 5

Appendix I

TDI MSDS

(The MSDS is enclosed in a sealed envelope stamped "3M Confidential")

Appendix for letter to
Mr. Valentino
U.S. EPA, Region 5

Appendix J

Emergency Response Arrangements

For your convenience an Emergency Response Flow Map has been included which documents the order in which internal and external entities are contacted in the event of an emergency, including a spill.

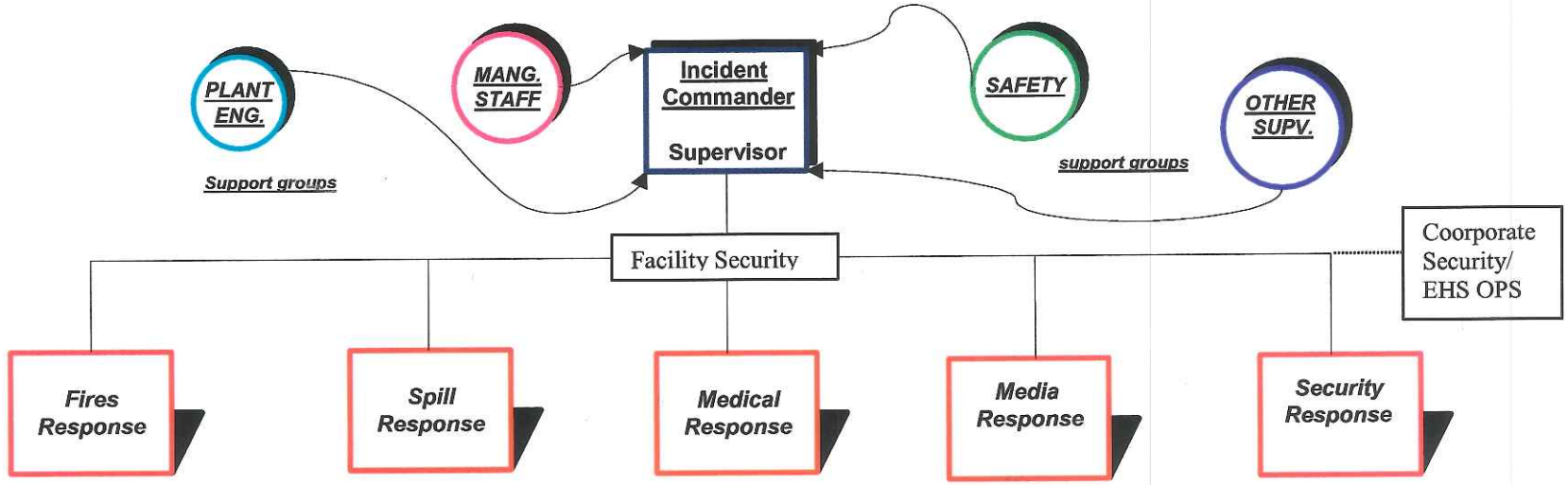
The St. Paul Fire Department, St. Paul Police Department, and Regions Hospital are contacted based on the severity of the emergency. Each agency has received a copy of the facility's RCRA Emergency/Contingency Plan and a copy of the certified mail receipts is included in this appendix.

The St. Paul Fire Department has visited the 3M St. Paul Main site on a number of occasions and was sent a copy of the facility's RCRA Emergency/Contingency Plan.

The St. Paul Police Department may also be contacted in events of emergency at the facility that meet the criteria established per the St. Paul Main Site Emergency Alert System.

Regions Hospital has received a copy of the facility's RCRA Emergency/Contingency Plan.

3M Corporate has a contract with Bay West for spill clean-up as documented in the General Spill Procedures in Appendix G and they are contacted in incidents that can not be handled by the facility.



	Fires Response	Spill Response	Medical Response	Media Response	Security Response
First Level of Response	Dept. Fire Extinguisher training	Supervisors using Operations level Hazwoper Training	Supervisors using First Aid CPR.	Product Manager	Supervisor
Second Level of Response	Sprinklers, CO2 Systems	SPFD-Hazmat	Medical/ Security First Responders	Plant Manager & Human Resources	Uniform Security Services
Third Level of Response	St. Paul Fire Dept	Clean-up Contractors (Baywest)	SPFD Paramedics or Ambulance crew Regions Hospital	Corporate Public Relations	St. Paul Police Dept.

St. Paul Tape Plant
Response to Emergencies

4/29/04 ts

RCRA Plans Sent to the Agencies listed below in August of 2003.

Bldg-24-160-22
900 Bush Ave.
St. Paul, MN 55104

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
St. Paul Police Dept
Attn: Chief of Police
Eastern Dist
699 E. 7th St
St. Paul, MN. 55106

COMPLETE THIS SECTION ON DELIVERY

A. Signature X ☐ Agent ☐ Addressee

B. Received by (Printed Name) | C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

3. Service Type
☐ Certified Mail ☐ Express Mail
☒ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

7002 3150 0001 9155 9648

102595-01-M-2509

PS Form 3811, August 2001 Domestic Return Receipt

Is your RETURN ADDRESS completed on the reverse side?

SENDER:
- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Regions Hospital
attn: T. Finzen
640 Jackson St.
St. Paul, MN 55101

4a. Article Number
7002 3150 0001 9155 5176

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

5. Signature (Addressee)
Jennifer Klein 8-7-03

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

Thank you for using Return Receipt Service.

PS Form 3811, December 1991 ☆U.S. GPO: 1993—352-714 **DOMESTIC RETURN RECEIPT**

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
3rd Dist. Fire Station #7
Attn: Frank Langer
1038 Ross Ave.
St. Paul, MN
55106

COMPLETE THIS SECTION ON DELIVER

A. Signature X Frank Langer

B. Received by (Printed Name) | C. 8

D. Is delivery address different from item 1? If YES, enter delivery address below:

DAYTON'S BLUFF STA
AUG - 8 2003
USPS 55106

3. Service Type
☒ Certified Mail ☐ Express Mail
☒ Registered ☐ Return Receipt f
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

7002 3150 0001 9155 5190

PS Form 3811, August 2001 Domestic Return Receipt

Appendix for letter to
Mr. Valentino
U.S. EPA, Region 5

Appendix K

Addresses of Emergency Response Agencies/Companies

Medical
Regions Hospital
640 Jackson Street
St. Paul, MN 55101
Contact: T Funzen
(651) 221-3285
Fire Department
3rd Street Fire Station
1938 Ross Avenue
St. Paul, MN 55106
Contact: Frank Langer
(651) 224-7411
Police
St. Paul Police Department
Eastern District
699 East 7th Street
St. Paul, MN 55106
Contact: Police Chief
(651) 291-1111
Spill Clean-up Contractor
Bay West
5 Empire Street
St. Paul, MN 55103
(651) 291-0456

Appendix for letter to
Mr. Valentino
U.S. EPA, Region 5

Appendix L

List of Personnel Consulted

Employee Name	Title	Phone Number	Years
David P. Carlson	Lead Environmental Administrator	651-778-4094	31
Belinda M. Wirth	Supervisor Environmental Operations	651-778-6014	12
Wendy M. Reno	Advanced Environmental Engineer	651-778-7674	6
Christopher W. Cox	Senior Engineer	651-778-7558	14
Terry J. Saunders	Manufacturing Engineer	651-778-5521	7
Mark S. Larison	Manufacturing Manager	651-778-5413	9
Matthew D. McKenzie	Plant Manager	651-778-4771	13
Randy A. Norton	Supply Chain Manager	651-778-5806	25
Robert E. Cook	Technologist	651-768-1261	20
Mary J. Westerberg	EHS Engineer	651-733-8114	5
Steve M. Porter	EHS Engineer	651-733-2859	31
Daryl C. Huggett	Senior Specialist Environmental Engineering	651-458-2502	25
Michael A. Nash	General Council	651-733-0134	

Appendix for letter to
Mr. Valentino
U.S. EPA, Region 5

Appendix M

Facility Changes

In 2002 it was announced that the St. Paul Tape Plant would be downsized. At present, the facility's operations have been reduced overall by approximately 75%. For your reference, below is a listing of the changes that have occurred at the St. Paul Tape Plant in the last two years.

Employees (as of 01/31/02):
68 salaried
229 hourly

Buildings:
20, 22, 23, 24, 26, 51

Equipment at the Site in 2001:
Solvent Coaters (12)
Compounding
19X Maker
11X Maker
1J Extruder
4J Extruder
5J Extruder
4F Maker
8F Maker
5F Compounding
Mixers/Moguls (8)
Churns (72)
Slitters (6)
Calendar
IMF
Red Label Room
Storage Tanks
Silos

Employees (as of 01/01/04):
15 salaried
48 hourly

Buildings Remaining:
20 and 24

Equipment Remaining:
IMF
4F Maker
5F Compounding
Slitters (3)

Appendix for letter to
Mr. Valentino
U.S. EPA, Region 5

Appendix N

Process Flow Diagrams for 4F and 5F

(The Process Flow Diagrams are enclosed in a sealed envelope stamped "3M Confidential")

OSMONICS

5951 Clearwater Drive
Minnetonka, MN 55343-8995 USA

Phone (952) 933-2277
Fax (952) 933-0141

February 26, 2002

Mr. Raymond T. Bissonnette
MINNESOTA POLLUTION CONTROL AGENCY
Water and Waste Prevention Unit
Policy and Planning Division
520 Lafayette Road North
St. Paul, MN 55155

Re: 2001 Biennial Hazardous Waste Report

Enclosed is the Hazardous Waste Report for the calendar year 2001 as required due to Osmonics' status as a large quantity generator of hazardous waste.

Please notify me if you have any questions regarding this submission.

Sincerely,

OSMONICS, INC.

Julie Whitted
Regulatory Affairs Specialist

Encl: Site Identification Form
Diskette with Electronic Submission

Rec'd 10-20-03

MAIL THE COMPLETED FORM TO: The appropriate EPA Regional or State Office.	United States Environmental Protection Agency **RCRA SUBTITLE C SITE IDENTIFICATION FORM**
1. Reason for Submittal (see instructions on page 10) CHECK CORRECT BOXES	**A. Reason for Submittal:** ☐ To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste or used oil activities). ☐ To provide subsequent notification (to update site identification information). ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application. ☐ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment #) ☒ As a component of Hazardous Waste Report.
2. Site EPA ID Number (see instructions on page 11)	**EPA ID Number:** MND985700582
3. SiteName (see instructions on page 11)	**Site Name:** Osmonics, Inc.
4. Site Location Information (see instructions on page 11)	**Street Address:** 5951 Clearwater Drive **City, Town or Village:** Minnetonka **State:** MN **County Name:** HENNEPIN **Zip Code:** 553438995
5. Site Land Type (see instructions on page 11)	**Site Land Type:** ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other
6. North American Industry Classification System (NAICS) Code(s) for the Site (see instructions on page 11)	**A.** 339999 **B.** **C.** **D.**
7. Site Mailing Address (see instructions on page 12)	**Street or P.O. Box:** SAME **City, Town or Village:** **State:** **Country:** UNITED STATES **Zip Code:**
8. Site Contact Person (see instructions on page 12)	**First Name:** Julie **MI:** C **Last Name:** Whitted **Phone Number:** 9529332277 **Phone Number Extension:** 6691
9. Legal Owner and Operator of the Site (see instructions on page 12 and 13)	**Name of Site's Legal Owner:** Osmonics, Inc. **Date Became Owner (mm/dd/yyyy):** 01/01/1978 **Owner Type:** ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other **Name of Site's Operator:** Osmonics, Inc. **Date Became Operator (mm/dd/yyyy):** 01/01/1978 **Operator Type:** ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

EPA ID No. MND985700582

10. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. See instructions on pages 13, 14, 15 and 16)

A. Hazardous Waste Activities

1. Generator of Hazardous Waste
(choose one of the following three categories)

- [X] a. LQG: Greater than 1000 kg/mo (2,200 lbs.) of non-acute hazardous waste; or
- [ ] b. SQG: 100 to 1000 kg/mo (220 - 2,200 lbs.) of non-acute hazardous waste; or
- [ ] c. CESQG: Less than 100 kg/mo of non-acute hazardous waste

In addition, indicate other generator activities (check all that apply)

- [ ] d. United States Importer of Hazardous Waste
- [ ] e. Mixed Waste (hazardous and radioactive) Generator

For items 2 through 6, check all that apply:

- [ ] **2. Transporter of Hazardous Waste**
- [ ] **3. Treater, Storer or Disposer of Hazardous Waste (at your site)** Note: A hazardous waste permit is required for this activity.
- [ ] **4. Recycler of Hazardous Waste (at your site)** Note: A hazardous waste permit may be required for this activity.
- **5. Exempt Boiler and/or Industrial Furnace**
  - [ ] a. Small Quantity On-Site Burner Exemption
  - [ ] b. Smelting, Melting, Refining Furnace Exemption
- [ ] **6. Underground Injection Control**

B. Universal Waste Activities

1. Large Quantity Handler of Universal Waste (refer to your State regulations to determine what is regulated). Indicate types of universal waste generated and/or accumulated at your site. (check all boxes that apply):

	Generated	Accumulated
a. Batteries	[X]	[X]
b. Pesticides	[ ]	[ ]
c. Thermostats	[X]	[X]
d. Lamps	[X]	[X]
e. Other (specify)	[ ]	[ ]
f. Other (specify)	[ ]	[ ]
g. Other (specify)	[ ]	[ ]

- [ ] **2. Destination Facility for Universal Waste**
  Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

1. Used Oil Transporter - Indicate type(s) of activity(ies)
- [ ] a. Transporter
- [ ] b. Transfer Facility

2. Used Oil Processor and/or Re-refiner - Indicate Type(s) of Activity(ies)
- [ ] a. Processor
- [ ] b. Re-refiner

- [ ] **3. Off-Specification Used Oil Burner**

4. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)
- [ ] a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- [ ] b. Marketer Who First Claims the Used Oil Meets the Specifications

11. Description of Hazardous Wastes (see instructions on page 16)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D002	D003	D007	D008	D009	D011
D022	D039	D040	F002	F003	F005	P048
P064	P098	U019	U051	U080	U117	U133
U151	U196	U213	U220	U228	U239	

EPA ID No.	MND985700582

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if needed for more waste codes.

12. Comments (see instructions on page 17)

13. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons direcly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. **(see instructions on page 17)**

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
David J Paulson	David J Paulson, Director, CTS	02/26/2002

20 Feb 02

OMB#: 2050-0024 Expires 11/30/2002

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

Final Review

TE NAME: Osmonics, Inc.

EPA ID NO: MND985700582

FORM GM

U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1

A. Waste Description (page 22)
Ignitable spent solvent from filter manufacturing; contains Isopropyl Alcohol

B. EPA Hazardous Waste Codes (page 22)
D001 NA
NA NA NA

C. State Hazardous Waste Codes (page 22)

D. Source Code (page 23) G07
Product & product processing
Management Method Code for Source Code G25

E. Form Code (page 23)
Non halo Solvent
W203

F. RCRA Radioactive Mixed (page 23)
☐ Yes

G. Quantity Generated in 2001 (page 22)
110.000000

H. UOM (page 23) 5 gal
Density 0.78
☐ lbs/gal ☒ sg

Sec. 2

Was any of this waste managed on-site? (page 24)
☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3

A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)
☒ Yes (CONTINUE TO BOX B) ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 1	IND000646943 Vopak/PCI	H061 fuel blend	55.000000
Site 2	ILD980502744 SR	H061	55.000000
Site 3			

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Osmonics, Inc.

EPA ID NO: MND985700582

FORM GM

U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1

A. Waste Description (page 22)
Ignitable spent solvent from membrane manufacturing; contains dimethylformamide.

B. EPA Hazardous Waste Codes (page 22): D001 NA NA NA NA

C. State Hazardous Waste Codes (page 22)

D. Source Code (page 23)	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
G09 amn production n.o.s Management Method Code for Source Code G25	non-halo solvent W203	☐ Yes	1,450.000000	1 lbs Density ☐ lbs/gal ☐ sg

Sec. 2

Was any of this waste managed on-site? (page 24)
☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3

A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)
☒ Yes (CONTINUE TO BOX B) ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 1	IND000646943 Vopak/PCI	H061	1,450.000000
Site 2			
Site 3			

Comments: G09 - Waste or off specification raw product generated in membrane manufacturing

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

TE NAME: Osmonics, Inc.

EPA ID NO: MND985700582

U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1

A. Waste Description (page 22)
Waste paint material from painting operation; contains tolulene, xylene, paint.

B. EPA Hazardous Waste Codes (page 22)
~~D007~~ D008 submitted
F003 F005 NA

C. State Hazardous Waste Codes (page 22)

D. Source Code (page 23)	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
G06 painting & coating Management Method Code for Source Code G25	organic solids W409 n.o.s	☐ Yes	3,700.00 3,350.000000	1 lbs Density ☐ lbs/gal ☐ sg

Sec. 2

Was any of this waste managed on-site? (page 24)
☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3

A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)
☒ Yes (CONTINUE TO BOX B) ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 1	IND000646943 Vopak/PCI	H061	2,700.000000
Site 2	MND980615736 Vopak	H141	650.000000
Site 3			~~350~~ 1000.00

Comments: W409 - waste paint filters and floor scrapings which may contain residual ignitable solvents.

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Osmonics, Inc.

EPA ID NO: MND985700582

FORM GM

U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1

A. Waste Description (page 22)
Ignitable spent solvent; contains acetone, 1,4-dioxane, and methanol.

B. EPA Hazardous Waste Codes (page 22)
D001 NA
NA NA NA

C. State Hazardous Waste Codes (page 22)

D. Source Code (page 23) G09
prod n.o.s
Management Method Code for Source Code G25

E. Form Code (page 23)
conc non-halo
W203

F. RCRA Radioactive Mixed (page 23)
☐ Yes

G. Quantity Generated in 2001 (page 22)
1,725.000000

H. UOM (page 23) 1 lbs
Density
☐ lbs/gal ☐ sg

Sec. 2

Was any of this waste managed on-site? (page 24)
☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3

A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)
☒ Yes (CONTINUE TO BOX B) ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 1	IND000646943 Vopak/PCI	H061	1,325.000000
Site 2	MND980615736 Vopak	H141	400.000000
Site 3			

Comments: G09 - Waste or off specification raw product generated in membrane manufacturing

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

.TE NAME: Osmonics, Inc.

EPA ID NO: MND985700582

FORM GM

U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1

A. Waste Description (page 22)
Ignitable spent solvent; contains naphtha, hexane, and Isopar G.

B. EPA Hazardous Waste Codes (page 22)
D001 NA
NA NA NA

C. State Hazardous Waste Codes (page 22)

D. Source Code (page 23)	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
G09 Management Method Code for Source Code G25	W203	☐ Yes	1,475.000000	1 Density ☐ lbs/gal ☐ sg

Sec. 2

Was any of this waste managed on-site? (page 24)
☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3

A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)
☒ Yes (CONTINUE TO BOX B) ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 1	IND000646943	H061	1,475.000000
Site 2			
Site 3			

Comments: G09 - Waste generated from Research and Development membrane manufacturing

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Osmonics, Inc.

EPA ID NO: MND985700582

FORM GM

U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1

A. Waste Description (page 22)
Ignitable spent solvent; contains n-methyl,2-pyrrolidone and acetone.

B. EPA Hazardous Waste Codes (page 22): D001 NA NA NA NA

C. State Hazardous Waste Codes (page 22)

D. Source Code (page 23)	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
G09 Management Method Code for Source Code G25	W203	☐ Yes	2,400.000000	1 Density ☐ lbs/gal ☐ sg

Sec. 2

Was any of this waste managed on-site? (page 24)
☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3

A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)
☒ Yes (CONTINUE TO BOX B) ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 1	IND000646943	H061	1,400.000000
Site 2	MND980615736	H141	1,000.000000
Site 3			

Comments: G09 - Waste or off specification raw product generated in membrane manufacturing

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

ITE NAME: Osmonics, Inc.

EPA ID NO: MND985700582

FORM GM

U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1

A. Waste Description (page 22)
Spent ignitable solvent; contains methyl ethyl ketone, xylene, and paint.

B. EPA Hazardous Waste Codes (page 22)
D001 F003 F005 NA NA

C. State Hazardous Waste Codes (page 22)

D. Source Code (page 23)	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
G06 Paint & Coating Management Method Code for Source Code G25	paint thinner W211	☐ Yes	1,500.000000	1 Density ☐ lbs/gal ☐ sg

Sec. 2

Was any of this waste managed on-site? (page 24)
☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3

A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)
☒ Yes (CONTINUE TO BOX B) ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 1	MND980615736 Voplate	H141	1,000.000000
Site 2	ILD980502744 PCI	H061	500.000000
Site 3			

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Osmonics, Inc.

EPA ID NO: MND985700582

FORM GM

U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1

A. Waste Description (page 22)
Ignitable spent adhesive cleaning solution.

B. EPA Hazardous Waste Codes (page 22): D001 NA NA NA NA

C. State Hazardous Waste Codes (page 22)

D. Source Code (page 23)	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
G19 other intermittent prod. n.o.s. Management Method Code for Source Code G25	W203	☐ Yes	450.000000	1 Density ☐ lbs/gal ☐ sg

Sec. 2

Was any of this waste managed on-site? (page 24)
☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3

A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)
☒ Yes (CONTINUE TO BOX B) ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 1	IND000646943 PCI	H061	450.000000
Site 2			
Site 3			

Comments: G19 - Periodic equipment and tool cleaning.

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Osmonics, Inc.

EPA ID NO: MND985700582

FORM GM

U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1

A. Waste Description (page 22)
Ignitable spent solvent; contains ethanol, glycerin and water.

B. EPA Hazardous Waste Codes (page 22)
D001 NA
NA NA NA

C. State Hazardous Waste Codes (page 22)

D. Source Code (page 23)	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
G01 Dip production Management Method Code for Source Code G25	are non halo W203	☐ Yes	41,515.000000	1 Density ☐ lbs/gal ☐ sg

Sec. 2

Was any of this waste managed on-site? (page 24)
☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3

A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)
☒ Yes (CONTINUE TO BOX B) ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 1	IND000646943 PCI	H061	27,900.000000
Site 2	MND980615736 VOPAK	H141	11,850.000000
Site 3	ILD980502744 SR	H061	1,765.000000

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Osmonics, Inc.

EPA ID NO: MND985700582

FORM GM

U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1

A. Waste Description (page 22)
Ignitabe spent solvent; contains n-methyl formamide and gamma butyrolactone.

B. EPA Hazardous Waste Codes (page 22): D001 NA NA NA NA

C. State Hazardous Waste Codes (page 22)

D. Source Code (page 23): G09

Management Method Code for Source Code G25: W203

E. Form Code (page 23)

F. RCRA Radioactive Mixed (page 23): ☐ Yes

G. Quantity Generated in 2001 (page 22): 400.000000

H. UOM (page 23): 1 Density ☐ lbs/gal ☐ sg

Sec. 2

Was any of this waste managed on-site? (page 24)
☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3

A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)
☒ Yes (CONTINUE TO BOX B) ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 1	IND000646943 Update (PC)	H061	400.000000
Site 2			
Site 3			

Comments: G09 - Waste or off specification raw product generated in membrane manufacturing

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Osmonics, Inc.

EPA ID NO: MND985700582

FORM GM

U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1

A. Waste Description (page 22)
Ignitable spent solvent; contains 2-pyrrolidone, gamma butyrolactone, and

B. EPA Hazardous Waste Codes (page 22): D001 NA NA NA NA

C. State Hazardous Waste Codes (page 22):

D. Source Code (page 23)	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
G09	W203	☐ Yes	500.000000	1 Density ☐ lbs/gal ☐ sg

Management Method Code for Source Code G25

Sec. 2

Was any of this waste managed on-site? (page 24)

☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)

☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3

A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)

☒ Yes (CONTINUE TO BOX B) ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 1	IND000646943	H061	500.000000
Site 2			
Site 3			

Comments: G09 - Waste or off specification raw product generated in membrane manufacturing

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Osmonics, Inc.

EPA ID NO: MND985700582

FORM GM

U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1

A. Waste Description (page 22)
Ignitable spent solvent; contains hexane and soybean oil.

B. EPA Hazardous Waste Codes (page 22): D001 NA NA NA NA

C. State Hazardous Waste Codes (page 22)

D. Source Code (page 23): G09

Management Method Code for Source Code G25: W203

E. Form Code (page 23)

F. RCRA Radioactive Mixed (page 23): ☐ Yes

G. Quantity Generated in 2001 (page 22): 900.000000

H. UOM (page 23): 1 Density ☐ lbs/gal ☐ sg

Sec. 2

Was any of this waste managed on-site? (page 24)
☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3

A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)
☒ Yes (CONTINUE TO BOX B) ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 1	KSD980633259 separate system	H061	500.000000
Site 2	MND980615736 separate	H141	400.000000
Site 3			

Comments: G09 - Research and Development processing chemicals.

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Osmonics, Inc.

EPA ID NO: MND985700582

FORM GM

U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1

A. Waste Description (page 22)
Ignitable spent solventst; contains various non-halogenated and halogenated

B. EPA Hazardous Waste Codes (page 22): D001 D022 F002 F003 NA

C. State Hazardous Waste Codes (page 22):

D. Source Code (page 23): G22 Lab waste

Management Method Code for Source Code G25:

E. Form Code (page 23): non & halo solvents W204

F. RCRA Radioactive Mixed (page 23): ☐ Yes

G. Quantity Generated in 2001 (page 22): 1,400.000000

H. UOM (page 23): 1 Density ☐ lbs/gal ☐ sg

Sec. 2

Was any of this waste managed on-site? (page 24)

☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)

☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3

A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)

☒ Yes (CONTINUE TO BOX B) ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 1	IND000646943 Vopak	H061	1,400.000000
Site 2			
Site 3			

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Osmonics, Inc.

EPA ID NO: MND985700582

U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1

A. Waste Description (page 22)
Spent aqueous parts washing solution.

B. EPA Hazardous Waste Codes (page 22): D039 NA NA NA NA

C. State Hazardous Waste Codes (page 22)

D. Source Code (page 23)	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
G01 Management Method Code for Source Code G25: Dip, flush, wipe cleaning	W113	☐ Yes	45.000000	5 Density 8.30 ☒ lbs/gal ☐ sg

Sec. 2

Was any of this waste managed on-site? (page 24)
☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3

A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)
☒ Yes (CONTINUE TO BOX B) ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 1	ILD980613913	H141	45.000000
Site 2			
Site 3			

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Osmonics, Inc.

EPA ID NO: MND985700582

U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1

A. Waste Description (page 22)
Waste mercury from facility thermometer collection.

B. EPA Hazardous Waste Codes (page 22): U151 NA NA NA NA

C. State Hazardous Waste Codes (page 22):

D. Source Code (page 23)	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
G11 Discarding stuff. Management Method Code for Source Code G25	Lab pack W001	☐ Yes	8.000000	1 Density ☐ lbs/gal ☐ sg

Sec. 2

Was any of this waste managed on-site? (page 24)

☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)

☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3

A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)

☒ Yes (CONTINUE TO BOX B) ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 1	ILD980502744	H040	8.000000
Site 2			
Site 3			

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Osmonics, Inc.

EPA ID NO: MND985700582

FORM GM

U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1

A. Waste Description (page 22): Waste filters with residual solvents; contains acetone, dioxane, methanol,

B. EPA Hazardous Waste Codes (page 22): D001 F003 NA NA NA

C. State Hazardous Waste Codes (page 22):

D. Source Code (page 23)	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
G09 N.O.S Management Method Code for Source Code G25	Solid org. N.O.S W409	☐ Yes	250.000000	1 Density ☐ lbs/gal ☐ sg

Sec. 2

Was any of this waste managed on-site? (page 24)

☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)

☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3

A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)

☒ Yes (CONTINUE TO BOX B) ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 1	MND980615736 Voyne	~~H141~~ H040	250.000000
Site 2		Invalid	
Site 3			

Comments: G09 - Waste generated from filtering solutions in membrane manufacturing
W409 - filters containing residual organic solvents

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Osmonics, Inc.

EPA ID NO: MND985700582

U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1

A. Waste Description (page 22)
Mixed lab pack chemicals; contains old, obsolete, and unused adhesives, paints,

B. EPA Hazardous Waste Codes (page 22): D001 D002 D003 D007 D009

C. State Hazardous Waste Codes (page 22):

D. Source Code (page 23): G11
Discard
Management Method Code for Source Code G25

E. Form Code (page 23): Lab pack waste W004

F. RCRA Radioactive Mixed (page 23): ☐ Yes

G. Quantity Generated in 2001 (page 22): 1673 ~~1,205.000000~~

H. UOM (page 23): 1 Density ☐ lbs/gal ☐ sg

Sec. 2

Was any of this waste managed on-site? (page 24)
☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3

A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)
☒ Yes (CONTINUE TO BOX B) ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 1	ILD980502744	H040	1673 ~~1,205.000000~~
Site 2			
Site 3			

Comments: Section 1, Box B, D011, D022, D040, F003, F005, P048, P064, P098, U019, U051, U080, U117, U133, U151, U196, U213, U228, U239.

3M Confidential

Environmental Policy & Procedures
East Side Site RCRA Emergency/Contingency Plan
St. Paul Tape Plant

Paper Document Locations:

CODE: Contents

Status: Active

EFFECTIVE: 04/30/2003
SUPERSEDES: 04/18/2001

TITLE: Table of Contents

REASON FOR ISSUE: Create Main Plant version

AUTHOR: Mary Jo J. Westerberg/US-Corporate/3M/US
Reference:

Section A - General

1. Name and address of facility
2. Map showing area of facility and diagram showing hazardous waste storage areas

Section B - Generating Facility

1. General hazardous waste handling information

Section C - Spill Containment and Clean-up

1. Spill handling and Containment
2. Spill clean-up materials and equipment
3. Post emergency procedures

Section D - Emergency Notification

Section E - Evacuation Procedure

Section F - Training and Job Descriptions

Section G - Procedures for Handling Hazardous Waste

1. Satellite and 90 Day Accumulation Areas
2. Packaging, Labeling, Types of Waste

Section H - Distribution

Section I - History Page

Recd. 10-22-03

End of Document

3M Confidential

Environmental Policy & Procedures
East Side Site RCRA Emergency/Contingency Plan
St. Paul Tape Plant

Paper Document Locations:

CODE: Section A

Status: Active

EFFECTIVE: 07/24/2003
SUPERSEDES: 04/22/2003

TITLE: ☑ General

REASON FOR ISSUE: ☑ Update for post-demolition

AUTHOR: Mary Jo J. Westerberg/US-Corporate/3M/US
Reference:

The 3M St. Paul Main Plant is part of 3M, which is headquartered in St. Paul, Minnesota. The address of the parent company is:

3M Company

3M Center

St. Paul, MN 55144-1000

Telphone: 651-733-1110

The address of the St. Paul Main Plant is:

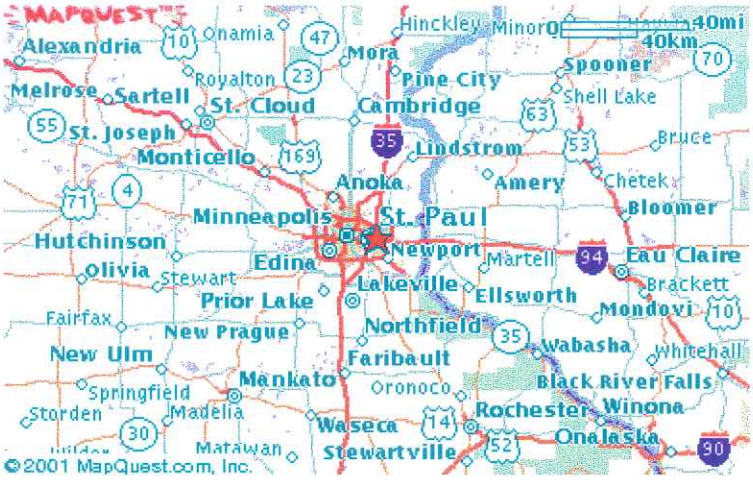
3M Company

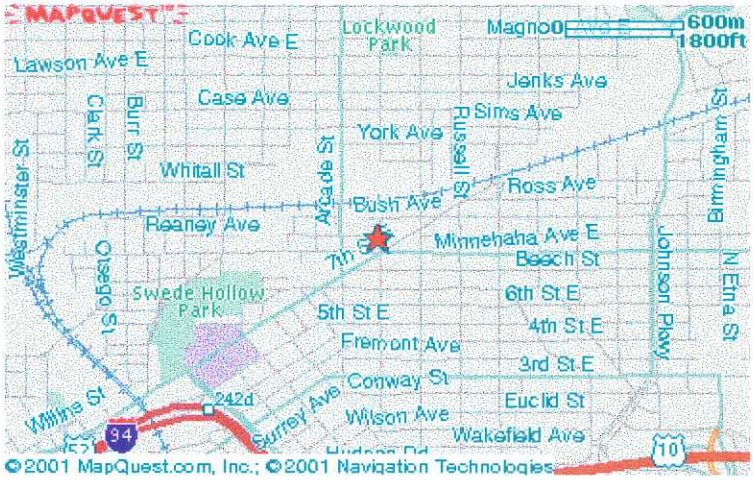
751 Mendota Street

St. Paul, MN 55144-1000

Telphone: 651-778-4863

The red star on the maps below show the plants' location relative to the area and within the city of St. Paul.

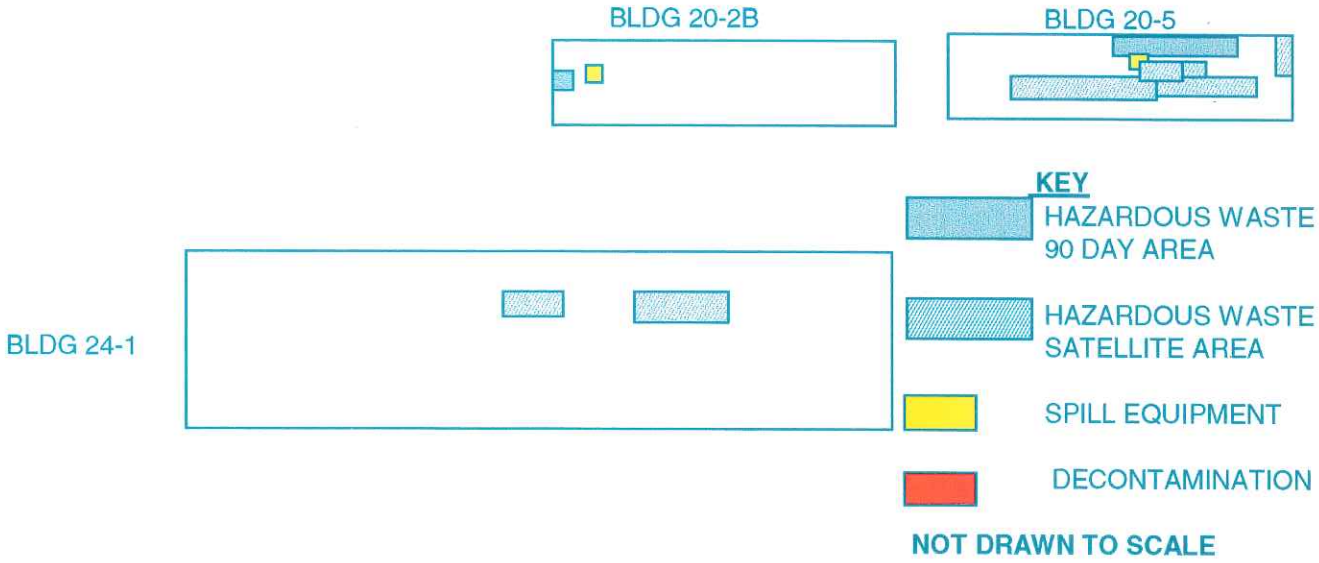




The hazardous waste areas in the plant are shown below and on the attached document.

Plant Eng & Lab 90-Day Areas.d

HAZARDOUS WASTE AREAS



NOT DRAWN TO SCALE

End of Document

3M Confidential

Environmental Policy & Procedures
East Side Site RCRA Emergency/Contingency Plan
St. Paul Tape Plant

Paper Document Locations:

CODE: Section B

Status: Active

EFFECTIVE: 07/24/2003
SUPERSEDES: 04/30/2003

TITLE: Generating Facility

REASON FOR ISSUE: Remove reference to Bldg. 51 Tank - demolished, Add 20-2B storage area

AUTHOR: Mary Jo J. Westerberg/US-Corporate/3M/US
Reference:

The St. Paul Main Plant is presently classified as a hazardous waste/generating facility in accordance with the 1976 Resource Conservation and Recovery Act. This hazardous waste contingency plan has been prepared to describe the special precautions and procedures for minimizing hazards to human health or the environment should there be a release of hazardous waste or hazardous waste constituents to the air, soil, or surface water. Such releases would include leaks, spills, fires, or explosions.

A. Hazardous waste is generally segregated into two categories, pumpable/pourable and non-pumpable in each generating area. The waste is generally accumulated in 55-gallon drums and labeled with the proper waste and hazard identification for each specific waste stream.

1. Many of the waste drums are used in areas having containment, should a leak or spill occur.

2. Any drum that leaks or is spilled is handled according to the spill procedure outlined in the plant Emergency
Response Plan which can be accessed through the following link, through:

- Safety & Health Policy & Procedures
- Emergency Response Plan
- Document title: Response Procedure - Leaks / Spills

3. The plant has both satellite and 90-day storage areas as illustrated in Section A.

4. Containers of waste are accumulated in the hazardous waste storage area of Building 20-2B for shipment primarily to 3M Cottage Grove Incinerator and other licensed vendors as needed.
   a. All containers are inspected for proper closure and labeling prior to shipment.
   b. A Hazardous Waste Manifest is prepared prior to shipment.
   c. The building 24 dock distributes manifest copies according to instructions on the manifest and retains the required manifest copies.

End of Document

3M Confidential

Environmental Policy & Procedures
East Side Site RCRA Emergency/Contingency Plan
St. Paul Tape Plant

Paper Document Locations:

CODE: Section C

Status: Active

EFFECTIVE: 07/24/2003
SUPERSEDES: 04/30/2003

TITLE: Spill Clean-Up

REASON FOR ISSUE: Remove demolished buildings, clarify location references

AUTHOR: Mary Jo J. Westerberg/US-Corporate/3M/US
Reference:

The emergency procedures used for any hazardous waste spill or leak is located throught the following link under:

- Safety & Health Policy & Procedure
- Emergency Response Plan
- Document Title: Response Procedure - Leaks / Spills

Emergency equipment for spill/leak containment and cleanup are chosen in each production area based on the materials and hazards present, and along with the emergency procedures, are capable of handling all spills or leaks. The materials stocked and used are listed below.

Building 20-5

- Rubber gloves, rubber boots, aprons, floor dry, non-sparking shovel, and gas/vapor respirators
- For TDI spills there is also drummed "kill" solution

Building 24-1 - Material Handling/Dock

- Floor dry, non-sparking shovels, rubber gloves, rubber boots, sorbent tubes and pads, and squeegees.

Building 1-2 - 90-day Hazardous Waste Storage area

- Flammable liquid sorbent, Mercury vapor absorber, caustic neutralizer, caustic spill kit, acid spill kit, Gloves, goggles, respirator, non-sparking shovel

Building 1-2 - Northeast Lab Area

- Caustic spill kit, acid spill kit, solvent spill kit

Building 2-2 - Northwest Lab Area

- Caustic spill kit, acid spill kit, solvent spill kit, Hydrofluoric acid (HF) spill kit

Building 2-3 - Center Lab Area

- Broom, charcoal, acid spill kit, solvent spill kit, boots, gloves, acid neutralizer, coveralls

Building 2-3 - East Lab Area

- Caustic spill kit, Charcoal, acid neutralizer

Building 1-3B - Boiler Room

- Sorbent pads

Building 14-1 - Plant Engineering Shop Satellite Accumulation Area

- Broom, non-sparking shovel, floor dri, squeegee, boots, respirator

Building 20-2B - 90-day Hazardous Waste Storage area

- Floor dry, sorbent tubes and pads, non-sparking shovels, squeegee, rubber boots, and rubber gloves.

- The production supervisors are responsible for maintaining the containment/spill equipment for the Tape Plant.
- The EHS Coordinator is responsible for maintaining the spill equipment for St. Paul Plant Engineering.
- The Safety Officer is responsible for maintaining the spill equipment for the Environmental Lab.

Post- emergency response procedures

a. Notification of Security (by calling 234) is necessary to ensure proper recordkeeping, followup, and agency reporting takes place.

b. All tools and equipment used needs to be decontaminated and returned to storage.

c. The area supervisor should assess if any additional or replacement equipment is necessary and see that replacement or additional equipment is procured.

d. The supervisor is to see that waste has been packaged and labeled correctly for disposal.

End of Document

3M Confidential

Environmental Policy & Procedures
East Side Site RCRA Emergency/Contingency Plan
St. Paul Tape Plant

Paper Document Locations:

CODE: Section D

Status: Active

EFFECTIVE: 07/24/2003
SUPERSEDES: 06/06/2003

TITLE: Emergency Notification

REASON FOR ISSUE: Update chemical list for Tape to remove solvents

AUTHOR: Mary Jo J. Westerberg/US-Corporate/3M/US
Reference:

The emergency notification procedures used for a hazardous waste incident are outlined in the Emergency Response Plan. Additionally, the Emergency Response Plan documents the procedures to be used for emergency situation and is available at the following link through:

- Safety & Health Policy & Procedures
- Emergency Response Plan

Tape

The general types of materials that could be involved in an emergency at the Tape Plant are in process materials and hazardous waste. Both in process materials and hazardous waste could involve either TDI or small amounts of MEK.

By electronic signature approval of this section of the RCRA Emergency/Contingency Plan by the Tape Plant Manager, Matt McKenzie, the authority is granted to the emergency coordinator to contact outside agencies that may be needed to handle an emergency situation.

Signature Matt McKenzie Date 03/06/03

Plant Engineering

The general types of materials that could be involved in an emergency for Plant Engineering are batteries containing mercury, batteries containing lithium, fluorescent lamps containing mercury and lead, circuit boards containing lead and silver, PCB ballasts, aerosol cans and oily rags.

By electronic signature approval of this section of the RCRA Emergency/Contingency Plan by the Plant Engineering Manager, Bill Boyd, the authority is granted to the emergency coordinator to contact outside agencies that may be needed to handle an emergency situation.

Signature Bill Boyd Date 04/24/03

Environmental Lab

The general types of materials that could be involved in an emergency for the Environmental Lab are laboratory quantities (one gallon or less) of flammable liquids, corrosive liquids, both acids and caustics, hydrofluoric acid, toluene diisocyanate (TDI), mercury, solvents, and samples containing heavy metals.

By electronic signature approval of this section of the RCRA Emergency/Contingency Plan by the Environmental Lab Manager, Dale Bacon, the authority is granted to the emergency coordinator to contact outside agencies that may be needed to handle an emergency situation.

Signature Dale Bacon Date 04/24/03

The plant Environmental Engineer will consult with Environmental, Technology, and Safety Services Department personnel as necessary concerning agency notification requirements.

End of Document

3M Confidential

Environmental Policy & Procedures
East Side Site RCRA Emergency/Contingency Plan
St. Paul Tape Plant

Paper Document Locations:

CODE: Section E

Status: Active

EFFECTIVE: 04/30/2003
SUPERSEDES: 04/22/2003

TITLE: Evacuation Procedure

REASON FOR ISSUE: Include links to PE Evacuation Procedures and Emergency Response link

AUTHOR: Mary Jo J. Westerberg/US-Corporate/3M/US
Reference:

A spill, leak, or release of hazardous waste may warrant an evacuation of the area or plant. The following link outlines Evacuation Procedures and Routes for St. Paul Tape Plant under:

- Safety & Health Policy & Procedure
- Emergency Response Plan
- Document title: Evacuation Routes & Procedures

Link to Plant Engineering Emergency Preparedness and Response Manual

Evacuation Routes for remainder of Main Plant:

evacuation routes.doc

Following are the evacuation maps for the remainder of the Main Plant:

B1&2 floorplans.pdf B14 floorplans.pdf B20 floorplans.pdf B3 floorplans.pdf enviro lab bldg.pdf

Bldg 1 2B floor plan.doc

End of Document

3M Confidential

Environmental Policy & Procedures
East Side Site RCRA Emergency/Contingency Plan
St. Paul Tape Plant

Paper Document Locations:

CODE: Section F

Status: Active

EFFECTIVE: 04/30/2003
SUPERSEDES: 04/22/2003

TITLE: Training and Job Descriptions

REASON FOR ISSUE: Job title changes: Add Waste Management Coordinator Backup

AUTHOR: Mary Jo J. Westerberg/US-Corporate/3M/US
Reference:

The plant hazardous waste training systems is made up of three elements.

- The plant conducts annual hazardous waste training as outlined below.
- Employee job descriptions include hazardous waste references as outlined below.
- Training Records
  - *The tape plant training records are kept in CRS by the plant training coordinators.
  - *The Plant Engineering training records are kept in the St. Paul Plant Engineering EHS files.
  - *The Environmental Lab training records are kept in the Environmental Lab Hazardous Waste Site Records binder in Sample Check-In

RCRA / Hazardous Waste Training Outline

Importance of Training
- Employee Safety
- Laws - General Awareness
- Liabilities - General Awareness

Waste Stream Profiles

Packaging - Proper containers and closure

Palletizing Waste

Labeling - Satellite and Non-Satelite Storage

New or Different Wastes

How to get additional information

Evacuation Routes

Notification

Spill Equipment

Handling and Clean-up of Spills

Job Descriptions
Job titles and job descriptions of employees involved in the safe handling of hazardous waste:

I. Job Title: **Production Supervisor, Production Coach**

Description:

Responsibilities include assuring that her/his crew-members are handling hazardous waste materials consistent with established procedures. This includes packaging, labeling, and staging. Additionally, she/he must alert appropriate personnel in the event of any problems related to hazardous waste.

II. Job Titles: **Production Operators (a) Custodian, (b) Flexo-FFTM, (c) Machine Operator, (d) Senior Operator**

Description:

Responsibilities include proper handling of hazardous waste as provided in the annual training. Operators will collect hazardous waste during production or clean up between product runs. Handling includes packaging, labeling, container inspection, and sealing. Responsible for clean-up of minor leaks and spills.

III. Job Title: **Process Engineers**

Description:

Familiar with hazardous waste materials as they relate to safety concerns. The process engineer is the first contact by laboratory personnel when changes in materials are proposed to improve/introduce products. Inform Material Control Personnel and Hazardous Waste Management Coordinator of proposed changes affecting hazardous waste generation.

IV. Job Title: **Plant Engineering (a) Utility I (b) Oiler (c) Systems Control Tech**

Description:

Responsibilities include properly handling Hazardous Waste as provided in annual training. Handling includes packaging, labeling, container inspection, and sealing.

V. Job Title: **Plant Engineering (a) Electrician (b) Material Handling Equipment Mechanic (c) Millwright Mechanic (d) Painter (e) Groundskeeper II (f) Steamfitter (g) Refrigeration & Air Conditioning Mechanic**

Description:

Responsibilities include properly handling Hazardous Waste consistent with established procedures. This includes packaging, labeling, and staging. Additionally must alert appropriate personnel in the event of any problems related to Hazardous Waste.

VI. Job Title: **Plant Engineering (a) Lead Material Handling Equipment Mechanic (b) Lead Multicraft (c) Lead Steamfitter (d) Lead Systems Control Tech**

Description:

Responsibilities include assuring that crew members are properly handling Hazardous Waste consistent with established procedures. This includes packaging, labeling, and staging. Additionally must alert appropriate personnel in the event of any problems related to Hazardous Waste.

VII. Job Title: Environmental Lab personnel

Description:

Responsibilities include properly handling Hazardous Waste as provided in annual training. Handling includes packaging, disposing of waste into satellite accumulation or 90-day storage drums. Responsible for cleanup of minor leaks and spills.

VIII. Job Title: Waste Management Coordinator and/or Waste Management Coordinator Backup

Description:

Responsibilities include but not limited to ensuring proper handling of hazardous waste to meet EPA, DOT, OSHA and 3M requirements. Ensure that proper records and documentation are maintained at the facility. Responsible for conducting a complete program of instructions for facility personnel that ensures proper handling of hazardous waste.

IX. Job Title: Dock Analyst/Dock Supervisor

Description:

Responsibilities include preparing shipping papers (manifests, bill of lading, and land ban notification) for transporting wastes for disposal. Familiar with hazardous waste materials as they relates to safety concerns.

X. Job Title: Security Officer

Description:

Responsibilities include spill or leak recognition and then making proper notifications of the situation.

XI. Job Title: (a) Dock Operator, (b) Material Handler

Description:

Assist in non-emergency hazardous spill clean-up as directed by Supervisor. Responsibilities include proper handlng of hazardous waste, as provided in the annual training. Handling includes labeling, inspection, and transporting waste to a staging area as well as loading onto transport trailers.

End of Document

3M Confidential

Environmental Policy & Procedures
East Side Site RCRA Emergency/Contingency Plan
St. Paul Tape Plant

Paper Document Locations:

CODE: Section G

Status: Active

EFFECTIVE: 07/24/2003
SUPERSEDES: 04/30/2003

TITLE: Procedures for Handling Hazardous Waste

REASON FOR ISSUE: Remove demolished buildings

AUTHOR: Mary Jo J. Westerberg/US-Corporate/3M/US
Reference:

Hazardous waste is generated throughout the plant. Individual waste types or groups of wastes are defined into specific waste streams. Each waste stream has a Waste Stream Profile that describes how to properly package and label waste for disposal. More specific information below covers hazardous waste storage areas, packaging, labeling, waste types, and office hazardous waste.

Satellite and 90-day Accumulation Areas for Hazardous Waste

A map illustrating these areas is in Section A.

Building 20-5

- 5F area located on north end of building 20 - 5th floor is a 90 Day Accumulation Area. Spill equipment is located in the aisle outside 5F area to the west and phones are in the 5F area and aisle outside the 5F area.

- All other locations as shown on the 5th Floor of Building 20 map are Satellite Accumulation areas.

Building 1-2 3M Environmental Lab Main Cage

- This is a 90-Day Accumulation Area located in the caged area in the center of the second floor of building 1. Spill equipment is located within the cage, adjacent to this area. A phone is located within the cage.

Building 20-2B Main Plant 90-Day Hazardous Waste Storage Area

- This is a 90-Day Hazardous Waste storage room located in the room to the west of the building 20 dock. Spill equipment is located directly outside the room. A phone is located inside the room.

Building 24 QC Labs

- There is one active lab in Bldg. 24, on 24-1. This area is a Satellite Accumulation Area.

Building 24 IMF

- There is a satellite accumulation area next to the Sterlco serving 24-1 IMF.

Building 1-2 Environmental Lab

- There are two labs on the second floor of building 1 both are Satellite Accumulation Areas.

Building 2 - Environmental Lab
- There are two labs on the second floor and third floor of building 2 both are Satellite Accumulation Areas.

Building 1-2B - Boiler Room
- This is a Satellite Accumulation Area located in the northeast corner of building 1 floor 2B.

Building 14-1 - Plant Engineering
- This is a Satellite Accumulation Area located in the northeast corner of building 14 1st floor.

Packaging

- Hazardous waste is generally placed in 55-gallon UN 1A2/Y1.2 spec drums. There are other containers occasionally specified by the waste stream profile.

- When 55-gallon drums are received they are checked for condition, damaged drums are not accepted. Production departments using drums also check for condition of drum, defective drums are not used.

- Used 55-gallon drums are acceptable for hazardous waste, however, all previous labels must either be removed or blanked out and drums examined for proper condition before use.

- In the case of non-pumpable hazardous waste the packaging instructions on the waste stream profile or the following method can be used: Place an anti-stat poly liner into the drum, place a fiber drum into the bag, and then place a second anti-stat poly liner into the fiber drum. A lid on the fiber drum may be used in lieu of the second anti-stat poly liner.

- Completed waste drums must be closed properly. Proper closure includes securing anti-stat poly liner(s) with a wire tie, placing lid if used on a fiber drum, correct drum cover gasket fit, bungs tightened, and locking ring correctly seated and tightened.

- Completed drums should be palletized with the drum bolt and label facing outward on the pallet (when the fork truck operator carries the load the labels would either be on the operator end of the load or the opposite end of the load). In general, like waste types should be palletized together, e.g. pumpable liquids with pumpable liquids. All palletized loads must have at least two wraps of filament tape approximately eight inches down from the top of the drums.

Labeling

- Waste Stream Profile details labeling.

- A waste drum is labeled before it has waste placed into it.

- Use black Sharpie type pen.

- The Start Accumulation Date is filled in for non-satellite waste drums before placing waste into the drum. A waste drum must be off the tape site before 90 days from the date on the drum. Satellite drums are dated when they are finished and being prepared for shipment and must be moved to a 90-day storage area within 3 days of being dated.

- Record the eleven-digit waste stream profile number.

- Label includes major chemical component(s) and reportable quantity (if required).

- Mark waste type - pumpable/pourable or non-pumpable.

- When the drum is completed and capped up, the employee completing the drum must put their name or initials on the label.

- Fill in department number and telephone number

- If not preprinted, fill in the Company Name, EPA number, and plant address.

Waste Types

The viscosity of waste determines if it is Pumpable/Pourable or Non-Pumpable waste. Each of these types have individual differences in how we handle them.

Pumpable/Pourable waste drums have a "stovepipe" style lid before being closed for shipment. Drum lids must be closed at all times unless waste is being added or removed from a container. In general, solvents and low viscosity solutions are placed in pumpable drums, thicker solutions are placed in pourable drums. Consult the Waste Stream Profile for specific contents for specific waste streams and your department practices for individual differences, if any.

Non-Pumpable waste has a fire drum cover on them while they are in use. Drum covers must be closed at all times unless waste is being added or removed from a container. In general, drums should have an anti-stat poly liner placed into the drum and then a fiber drum placed into the anti-stat poly liner, and then either a second anti-stat poly liner or a fiber drum lid. Pails, gloves, bags, etc. that have pourable waste on them should first be drained into a pourable waste drum before going into the non-pumpalbe waste drum. Consult Waste Stream Profile for specific contents for specific waste streams and your department practices for individual differences, if any.

Non-Regulated scrap is either placed into 55-gallon metal drums or into a fiber drum, consult profile for correct packaging and labeling.

Office Hazardous Waste

There are three types of hazardous waste generated in the office; aerosol cans, hazardous batteries, and calculators. Generally, all batteries except Alkaline are hazardous waste. Alkaline batteries can go in the non-recyclable office waste containers. All employees are advised to either dispose of these wastes in the correct production waste drums or deliver them to the Environmental Engineer who will dispose of them properly. The recyclable waste containers, either green or individually labeled are for recyclables only. Green recyclables containers include paper, post-its and newspapers. There are also waste containers for recycling computer paper and aluminum cans, they are individually marked. Glossy paper, plastic, kleenex, food waste and similar items do not go into the recyclables containers. The office custodian can address specific questions. 3M hires a service to sort our recyclables into sellable groupings.

End of Document

3M Confidential

Environmental Policy & Procedures
East Side Site RCRA Emergency/Contingency Plan
St. Paul Tape Plant

Paper Document Locations:

CODE: Section H

Status: Active

EFFECTIVE: 04/22/2003
SUPERSEDES: 03/22/2002

TITLE: Distribution

REASON FOR ISSUE: Create Main Plant version

AUTHOR: Mary Jo J. Westerberg/US-Corporate/3M/US
Reference:

St. Paul Tape Plant employees can access this plan on MDI. The employees or organizations below do not have access to MDI and have paper copies. A master copy is also retained by the Tape Plant Environmental Engineer along with the record of mailing copies to the Fire Department, Medical Center, and Police Department.

1. Plant EO Contact - ET&SS - 42-2E-27
2. Security Station - Building 24 Lobby
3. 3rd District Fire Chief Station No. 7
4. Regions Hospital
5. St. Paul Police Department East Side Station
6. Main Plant Engineering
7. 3M Environmental Lab
8. Security Station Building 20 Lobby

End of Document

3M Confidential

Environmental Policy & Procedures
East Side Site RCRA Emergency/Contingency Plan
St. Paul Tape Plant

Paper Document Locations:

CODE: Section I

Status: Active

EFFECTIVE: 04/22/2003
SUPERSEDES: 04/19/2001

TITLE: Historical Records

REASON FOR ISSUE: Create Main Plant version

AUTHOR: Mary Jo J. Westerberg/US-Corporate/3M/US
Reference:

Historical copies are retained and viewable in the Tape Plant MDI system.

End of Document

#2

RCRA 3008(a) ADMINISTRATIVE COMPLAINT SIGNOFF

PART I BACKGROUND

INSTALLATION NAME 3M - Main - ST Paul **EPA ID#** MND 000 824 029
RESPONDENT'S NAME 3M
INSTALLATION LOCATION ST. Paul MN
ASSIGNEES **ECAB** Kuefler **ORC** Coyle
PHONE 3-6268 **PHONE** 6-2248

TYPE (S) AND DATE(S) OF EVALUATION(S) DETECTING VIOLATION(S)
6/23-24/99

REFERRED BY STATE? (X) NO **DATE** __/__/__ ( ) YES
LOCATED IN ENVIRONMENTAL JUSTICE AREA?[1] (X) NO ( ) YES
SMALL BUSINESS PER SBREFA?[2] (X) NO ( ) YES
DATE OF SBREFA LETTER __/__/__
HISTORY OF NONCOMPLIANCE[3] (X) YES ( ) NO
SIGNIFICANT NONCOMPLIER[4] (X) YES ( ) NO

RECIPIENT OF NOTICE TO STATE MN
DATE 3/13/00

PART II APPROVAL	**INITIALS**	**DATE**	**CONCUR**	**CONCUR AS NOTED**	**NON CONCUR**
1. ECAB ASSIGNEE	PK	3/24/00	(✓)	( )	( )
2. ECAB SECTION CHIEF	WJJ	3/24/00	(✓)	( )	( )
3. ASST. REG. COUNSEL	AUC	3/23/00	(✓)	( )	( )
4. CHIEF, ORC SECTION	CFX	3/23/00	(✓)	( )	( )
5. ECAB BRANCH CHIEF	JMB	3/24/00	(✓)	( )	( )

PART III FILED	**INITIALS**	**DATE**	**DOCKET NO.**
1. ECAB SECRETARY	_____	__/__/__	
2. OTHER_____	_____		

[1]See 10/30/97 Draft "Region 5 Interim Guidelines for Identifying and Addressing Potential Environmental Justice Case".

[2]Small Business Regulatory Enforcement Fairness Act

[3]Per RCRA Civil Penalty Policy

[4]Per Hazardous Waste Civil Enforcement Response Policy

3M Environmental Technology
and Services

PO Box 33331
St. Paul, MN 55133-3331
651 778 6442

3M

December 6, 1999

Certified Mail

Mr. Darryl J. Weakley
Major Facilities Section
Metro District
Minnesota Pollution Control Agency
520 Lafayette Road, N.
St. Paul, MN 55155-4194

RE: CORRECTED Response to State Hazardous Waste Inspection Letter – November 17, 1999
EPA ID No. MN000824029
3M St. Paul Main Plant
900 Bush Avenue
St. Paul, MN 55106

Dear Mr. Weakley:

On December 3, 1999, 3M sent a letter in response to your letter of November 17, 1999. This letter described the actions taken to address the issues resulting from MPCA hazardous waste inspection at the subject facility on June 23-24, 1999.

After sending this letter, we realized that Attachment G for the 3M Abrasives Manufacturing Plant contained some mistakes since it was not the most recent version. Both the listing and map of satellite accumulation areas and 90-day hazardous waste storage areas have been corrected and they are attached for your reference.

If you have any additional questions or concerns, please contact me at (651) 778-6014. Thank you for your assistance.

Sincerely,

Belinda Wirth
Senior Environmental Engineer
Building 42-2E-27

Enclosure

cc: Ms. Tamara Ohl, EPA, Region V
Greg LaMere, Ramsey County, Dept. of Public Health

3M -St. Paul Abrasives Manufacturing Plant
Hazardous Waste Satellite and 90 day Accumulation Areas

Building 1 Basement

There is a red label room or flammable liquid storage room (90-day hazardous waste storage area) in the northwest corner of the building. Satellite accumulation area is just outside this room against the south wall. The spill equipment is located outside the east entrance to the red label room.

Building 1 – First Floor

There is a satellite accumulation area located in the Abrasives quality laboratory. Spill equipment is located in the north side of the room.

Building 1 – Second Floor

There is a 90-day hazardous waste storage area used by the Bldg. 2 Environmental Lab which is located in the center of the building, and next to it is spill equipment. Also, there are satellite accumulation areas located on this floor in the labs.

Building 2 - Third Floor

There are numerous satellite accumulation areas located in the Bldg. 2 -Environmental Lab.

Building 47 – Floor B

There is a 90-day hazardous waste storage area in the south end of the building, and next to it is spill equipment. There is telephone inside the office on the south side of the building within a short distance from the 90-day hazardous waste storage area. Both a satellite accumulation area and spill equipment are located in the southeast end of the building outside the 8-Maker. There is more spill equipment located west on the south wall and near the east-end at the shipping dock. The maintenance truck shop on the northwest wall also has a satellite accumulation area.

Building 47 – First Floor

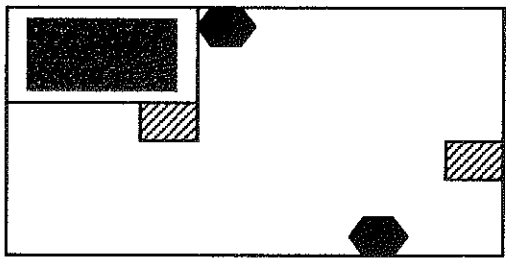
There is 90-day hazardous waste storage area near 6 maker which is located in the south east entry, and spill equipment is located in the middle of the floor.

Building 47 – Third Floor

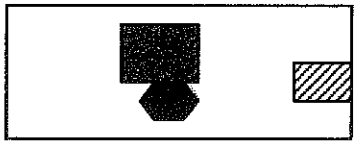
The red label room (90-day hazardous waste storage area) is on the west wall. There is a satellite accumulation area located in the northeast corner of this floor. Spill equipment is located in the middle of this floor.

3M – St. Paul Abrasives Manufacturing Plant
Hazardous Waste Storage Areas

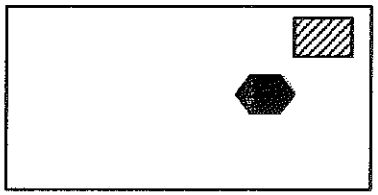
Bldg. 1 - Basement



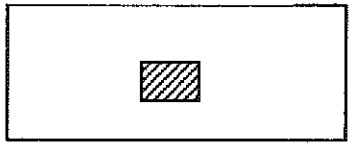
Bldg. 1 - 2nd Floor



Bldg. 1 - 1st Floor



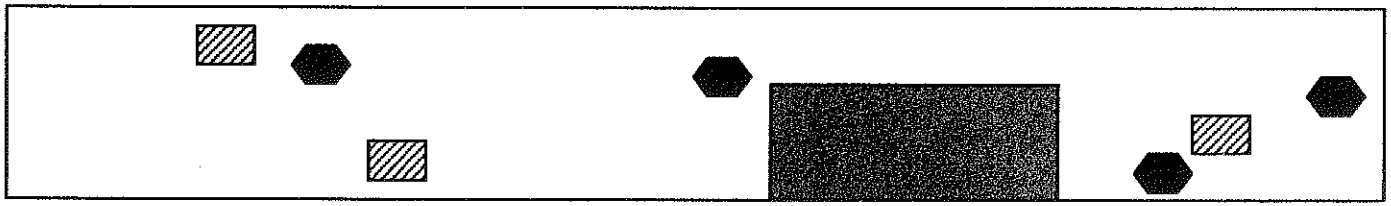
Bldg 2- 3rd Floor



KEY

- Hazardous waste 90-Day Area
- Spill / Decontamination Equipment
- Satellite Accumulation Area

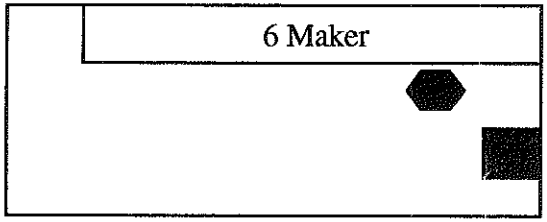
Bldg. 47 – Floor B



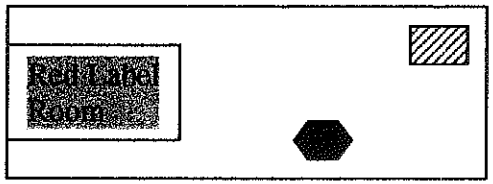
North

NOT DRAWN TO SCALE

Bldg. 47 – 1st Floor



Bldg. 47 – 3 rd Floor



Effective Date: 12/6/99

3M Environmental Technology
and Services

PO Box 33331
St. Paul, MN 55133-3331
651 778 6442

3M

December 3, 1999

Certified Mail

Mr. Darryl J. Weakley
Major Facilities Section
Metro District
Minnesota Pollution Control Agency
520 Lafayette Road, N.
St. Paul, MN 55155-4194

RE: Response to State Hazardous Waste Inspection Letter – November 17, 1999
EPA ID No. MN000824029
3M St. Paul Main Plant
900 Bush Avenue
St. Paul, MN 55106

Dear Mr. Weakley:

This is in response to your letter of November 17, 1999. The following actions have been taken to address the issues resulting from MPCA hazardous waste inspection at the subject facility on June 23-24, 1999. The response, for your convenience, will follow the item numbering of your November 17, 1999 letter.

Abrasives Manufacturing Plant

Item 1, page 1 Missing copies of initial generator copy of hazardous waste manifest.
Attached are copies of the hazardous waste manifests that were missing from the MPCA database from January 1997 through May 1999 from the Main Plant (see Attachment A). We believe that these manifests were sent to the MPCA. We have improved our record keeping procedures to ensure that records of generator copies sent to the MPCA are kept on file.

Items 2 and 3, pages 1&2 Accumulation of hazardous waste.
The oilers satellite accumulation area in Building 1B was eliminated after the MPCA inspection in June 1999. A new satellite accumulation area has been created in the same vicinity (labeled as "1B Satellite Accumulation Area") which includes hazardous waste instruction signs. The four hazardous waste drums (D008) noted during the inspection were shipped off-site as noted on Manifest number 45061, which is dated July 8, 1999. A copy of this manifest is enclosed (see Attachment B).

Item 4, page 2 Label Aerosol Drum.
The drum of aerosol cans has been labeled as "hazardous waste" and since been shipped off-site. As noted above, the oilers satellite accumulation area has been eliminated and replaced with a new satellite accumulation area.

Item 5, page 2 Personnel Training - Job descriptions.
The updated RCRA plan will contain the Hazardous Waste Personnel Training Program document which describes hazardous waste related jobs (see Attachment C). The names of the employees in each job title are included in the Human Resources databases. The training records are kept in a paper file, with plans to move to the CRS2 database.

Item 6, page 2 Preparedness & Prevention Requirements - Spill Cabinets.
A survey of all spill cabinet locations and their contents has been completed. There were spill cabinets (hazardous waste spill control and decontamination equipment) located near each 90-day hazardous waste storage area (see Attachment G). The RCRA Plan will be modified to identify all spill cabinet locations. In addition, all spill cabinets will be restocked with the following equipment at a minimum:

- Shovel (1)
- Broom (1)
- Absorbent materials (floor dry, absorbent booms, rags, etc.)
- Five gallon pail (1)
- Personnel protection equipment

In addition, salvage drums are located on-site for repacking of leaking 55-gallon drums.

Item 7, page 2 Required Aisle Space
The forklift was immediately removed from the glue room (Bldg. 47-3) aisle. The oilers satellite accumulation area in Building 1B has been eliminated and a new satellite accumulation area (one row against the wall) has been created in the same vicinity.

Item 8, page 3 Satellite Accumulation
The four hazardous waste drums (D008) in the oilers satellite accumulation area have been removed and shipped off-site as noted above in Item 2.

Tape Manufacturing Plant

Item 1, page 3 Use of Manifest, General requirements.
Attached are copies of the hazardous waste manifests that were missing from the MPCA database from January 1997 through May 1999 from the Main Plant. We believe that these manifests were sent to the MPCA (see Attachment A). We have improved our record keeping procedures to ensure that records of generator copies sent to the MPCA are kept on file.

Item 2, page 3 Hazardous waste tank inspections.
The tank has been routinely visually inspected in accordance with the 3M Above Ground Tank Inspection standard (see Attachment D and E). Visible and readily accessible portions of the tank system, including the tank, piping, pumps, secondary containment, etc., are examined daily for evidence of active leaks. These areas were also inspected during the months of January, February, and March 1998 by 3M Security. 3M Security inspected the hazardous waste storage tank area as part of their daily walkthrough for any evidence of leak or spill. Attached is the 3M Security record of these inspections that were missing from Attachment E (see Attachment F).

The tank has not been in use since April 21, 1999. The small amount of hazardous waste that was in the tank during the inspection has been removed and disposed.

Item 3, page 3 Accumulation of hazardous waste.
At the time of the inspection, the concrete pavement on the north side of Building 23 was being used as a hazardous waste staging area. That is, hazardous waste drums were moved to this concrete pavement from process areas inside Building 23 before being transferred to Building 51 for storage. The concrete pavement was used as staging area because some of the forklifts used for this operation are gas powered, which means that they can not be used inside buildings with flammable liquids. They are also too big to fit inside the elevators in the buildings. All the hazardous waste drums on the concrete pavement were already packaged for shipment and were removed daily. The facility is no longer using the concrete pavement as a staging area. We have revised our material handling procedure to ensure that no hazardous waste drum is left unattended.

Item 4, page 3 Personnel Training
The facility RCRA plan contains an outline of hazardous waste job training. The plan has been modified to contain Hazardous Waste Personnel Training Program document which describes hazardous waste related jobs (see Attachment C). The facility training records are on CRS2 database. This database contains the names of employees and employee training in relation to job-specific requirements. This database assures the required training is completed and documented appropriately.

Item 5, page 4 Preparedness and prevention
As mentioned previously in Item 3 above, under Tape Manufacturing, the concrete pavement on the north side of Building 23 was being used as a hazardous waste staging area, not a storage area. The facility is no longer using the concrete pavement as a staging area.

Requirements:

Abrasive Manufacturing

Items 1 a, b, c, d, e, f, g, and h
These items are addressed above.

Item 2
Attached is the location of all 90-day hazardous waste storage areas and satellite accumulation areas in the Abrasives and Plant Engineering areas (see Attachment G). The facility updated RCRA plan will include these listed areas. Please note that both Building 1-Flammable Liquid Storage Room and Building 47-1, near the 6 Maker are being used as 90-day hazardous waste storage areas.

Item 3
All required issues have been addressed.

Tape Manufacturing

Items 1 a, b, c, and e
These items are addressed above.

Item 1 d, page 6
We have revised our procedure to ensure that no hazardous waste drum is left unattended on the north side of Building 23 before being moved to Building 51 storage.

Item 1 f, page 6
Attached is a list of the locations of the spill/decontamination equipment at Tape Manufacturing plant (see Attachment G).

Item 2, page 6
Attached is the location of all 90-day hazardous storage areas and satellite accumulation areas in the Tape Manufacturing plant (see Attachment G). The facility updated RCRA plan will include these listed areas.

Item 3
All required issues have been addressed.

We trust that this provides additional information and assists in addressing the issues regarding the hazardous waste management at the facility. If you have any additional questions or concerns, please contact me at (651) 778-7674 or Belinda Wirth at (651) 778-6014. Thank you for your assistance.

Sincerely,

Adé Babatunde

Adé Babatunde
Advanced Environmental Engineer
Building 42-2E-27

Enclosure

cc: Ms. Tamara Ohl, EPA, Region V
Greg LaMere, Ramsey County, Dept. of Public Health

Attachment A

NOV 18 '99 13:41 FR SK BLAINE 510301 612 780 9251 TO 6517785474 P.02/03

MINNESOTA POLLUTION CONTROL AGENCY
HAZARDOUS WASTE DIVISION
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

5-103-01 Manifest Entered By Branch/AC/OC/RC

For MPCA use only

Please type. (Form designed for use on elite (12-pitch) typewriter.)

Instructions on back of form.

OMB No. 2050-0039 - Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MND 000824029
Manifest Document No.: 74829
2. Page 1 of 1

Information in shaded area not required by Federal law. Minnesota rules require Items H. and I.

3. Generator's Name and Mailing Address
3M ST PAUL MAIN PLANT
900 BUSH AVE
ST PAUL BLDG 2B20 ATTN: BOB WILL
MN 55106

4. Generator's Phone (612 778-4915)

A. State Manifest Document Number: MN 5575129
B. State Generator's ID:
C. State Transporter's ID:
D. Transporter's Phone: 612 780-1332
E. State Transporter's ID:
F. Transporter's Phone:
G. State Facility's ID:
H. Facility's Phone: 612 780-1332

5. Transporter 1 Company Name: SAFETY-KLEEN CORP.
6. US EPA ID Number: ILD 984908202
7. Transporter 2 Company Name:
8. US EPA ID Number:
9. Designated Facility Name and Site Address: SAFETY-KLEEN CORP. 510301
9261 ISANTI NE
BLAINE MN 55449
10. U.S. EPA ID Number: MND 981953045

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

	HM		12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII(D001) (D006, D008, D018, D027, D039D040) (ERG#128)	1	DF	4	G	D001 D039
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above: (A) D006, D008 (A) D018, D027, D040

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information 9650 92730465 074829 5-103-01 1290 12
EMERGENCY RESP#800-468-1760 24HR

A 10037 B C D

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: X Rao Tullafsau
Signature: X [signature]
Date: Month 01 Day 10 Year 99

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: TROY RUBINK
Signature: [signature]
Date: Month 01 Day 10 Year 99

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Jim Barrett
Signature: [signature]
Month 1 Day 10 Year 99

GENERATOR

TRANSPORTER

FACILITY

Minnesota Form PQ-00371-03 (6/88)

COPY 4: FACILITY RETAINS

Public reporting burden for this collection of information is estimated to average 37 minutes for generators, 15 minutes for transporters, and 19 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

In case of spill or emergency immediately call the Minnesota Pollution Control Agency at 612/296-8100; the Minnesota Division of Emergency Services at 612/778-0800; the National Response Center at 800/424-8802. Outside Minnesota, call the Local Response Center and appropriate state agency.

MINNESOTA POLLUTION CONTROL AGENCY
HAZARDOUS WASTE DIVISION
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

5-103-01

For MPCA use only

Please type. (Form designed for use on elite (12-pitch) typewriter.) Instructions on back of form. OMB No. 2050-0039 Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MND 000824029
Manifest Document No.: [redacted] 41700
2. Page 1 of 1
Information in shaded area not required by Federal law. Minnesota rules require Items H and I

3. Generator's Name and Mailing Address
3M ST PAUL MAIN PLANT
935 BUSH AVE
ST PAUL MN 55106
BLDG 47 DOCK. 47-B-38

4. Generator's Phone (612) 778-5230

A. State Manifest Document Number: MN 5575130
B. State Generator's ID:
C. State Transporter's ID:
D. Transporter's Phone: 612 780-1332
E. State Transporter's ID:
F. Transporter's Phone:
G. State Facility's ID:
H. Facility's Phone: 612 780-1332

5. Transporter 1 Company Name: SAFETY-KLEEN CORP.
6. US EPA ID Number: ILD 984908202
7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address
SAFETY-KLEEN CORP. 510301
9261 ISANTI NE
BLAINE MN 55449
10. U.S. EPA ID Number: MND 981953045

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

	HM		12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	RQ WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII(D001) (D003, [redacted], D039D040) (ERG#128)	1	DM	15	G	D001 D039
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
1(A) D006 [redacted] (A) [redacted] D040
Waste Petroleum Naphtha (Sludge) Safety Kleen Service Center Operations

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information 9650 92730468 [redacted] 5-103-01-130
EMERGENCY RESP#800-468-1760 24HR
P41700
A 10099 B C D

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.
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Printed/Typed Name: X BOB TOLLEFSON
Signature: X [signature]
Date: Month 05 Day 16 Year 99

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: TROY RUBINK
Signature: [signature]
Date: Month 05 Day 16 Year 99

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year

19. Discrepancy Indication Space
Line 11a D008, D018, + D027, are Deleted, TR

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: ANDY KALUPA
Signature: [signature]
Month Day Year

GENERATOR / TRANSPORTER / FACILITY

In case of spill or emergency, immediately call the Minnesota Pollution Control Agency at 612/296-810 Minnesota Division of Emergency Services at 612/778-0800, the National Response Center at 800/424-880 outside Minnesota, call the National Response Center and appropriate state agency.

Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for tra and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering a completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

Minnesota Form PQ-00371-03 (6/88)

COPY 1 FACILITY RETAINS

** TOTAL PAGE.03 **

MINNESOTA POLLUTION CONTROL AGENCY
HAZARDOUS WASTE DIVISION
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

5-103-01

For MPCA use only

Please type. (Form designed for use on elite (12-pitch) typewriter.) Instructions on back of form. OMB No. 2050-0039 - Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MND 000824029
Manifest Document No.: 52027
2. Page 1 of 1
Information in shaded area not required by Federal law. Minnesota rules require items H. and I.

3. Generator's Name and Mailing Address
3M ST PAUL MAIN PLANT
935 BUSCH AVE BLDG 47 DOCK. 47-B-38
ST PAUL MN 55106
4. Generator's Phone (612) 778-4955

A. State Manifest Document Number: MN 5593878
B. State Generator's ID

5. Transporter 1 Company Name: SAFETY-KLEEN CORP.
6. U.S. EPA ID Number: ILD 984908202
C. State Transporter's ID

7. Transporter 2 Company Name
8. U.S. EPA ID Number
D. Transporter's Phone: 612 780-1332
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
SAFETY-KLEEN CORP. 510301
9261 ISANTI NE
BLAINE MN 55449
10. U.S. EPA ID Number: MND 981953045
G. State Facility's ID
H. Facility's Phone: 612 780-1332

GENERATOR

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	RQ WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII (D001) (D008, D018, [redacted], D039, D040) (ERG#128) 6.7#/	X	1	DM	28	G	D001 D039
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
I (A) D008 D018 (A) [redacted] D040

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information 9731 93846397 152027 5-103-01-1269 12
EMERGENCY RESP#800-468-1760 24HR
P5912
A: 10045 B: C D

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.
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Printed/Typed Name: GREGORY B MUELLER
Signature: Gregory B Mueller
Date: Month 04 Day 06 Year 95

TRANSPORTER

17. Transporter 1 Acknowledgement and Receipt of Materials
Printed/Typed Name: TROY RUBINK
Signature:
Date: Month 04 Day 06 Year 95

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

FACILITY

19. Discrepancy Indication Space
LINE 11a DOES not contain D027.TR

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Date: Month Day Year

Minnesota Form PQ-00371-03 (6/88)

COPY 3: FACILITY MAILS TO GENERATOR

Minnesota Division of Emergency Services at 612/779-0800, the National Response Center at 800/424-8802 Outside Minnesota, call the National Response Center and appropriate state agency

and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460; and to the Office of Information Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

MINNESOTA POLLUTION CONTROL AGENCY
HAZARDOUS WASTE DIVISION
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

5-103-01

For MPCA use only

Please type. (Form designed for use on elite (12-pitch) typewriter.) Instructions on back of form. OMB No. 2050-0039 - Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MND 000824029
Manifest Document No.: 25095
2. Page 1 of 1

Information in shaded area not required by Federal law. Minnesota rules require Items H. and I.

3. Generator's Name and Mailing Address
3M ST. PAUL MAIN PLANT
900 BUSH AVENUE BLDG 47 GLUE ROOM
SAINT PAUL MN 55106

4. Generator's Phone (612) 778-5071

A. State Manifest Document Number: MN 5614472

B. State Generator's ID: 9270019999

5. Transporter 1 Company Name: SAFETY-KLEEN CORP.

6. U.S. EPA ID Number: ILD 984908202

C. State Transporter's ID:

7. Transporter 2 Company Name:

8. U.S. EPA ID Number:

D. Transporter's Phone: 612 780-1332

E. State Transporter's ID:

F. Transporter's Phone:

9. Designated Facility Name and Site Address
SAFETY-KLEEN CORP. 510301
9261 ISANTI NE
BLAINE MN 55449

10. U.S. EPA ID Number: MND 981953045

G. State Facility's ID:

H. Facility's Phone: 612 780-1332

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

	HM		12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	WASTE COMPOUNDS, CLEANING LIQUID (MONOETHANOLAMINE)S NA1760 PGIII(D006) (D008, D018, D027D039D040)(ERG#154)7.9#/GL	1	DM	6	G	D006 D008
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
I(A) D018 D027 (A) D039,D040

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information 9750 94528253 125095 5-103-01-1624 12
EMERGENCY RESP#800-468-1760 24HR

A: 950 B: C: D:

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.
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Printed/Typed Name: Nathan Newman
Signature: [signature]
Date: Month 12 Day 11 Year 97

17. Transporter 1 Acknowledgement and Receipt of Materials
Printed/Typed Name: TROY RUBINK
Signature: [signature]
Month 12 Day 11 Year 97

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: [illegible]
Signature: [signature]
Month 12 Day 12 Year 97

GENERATOR

TRANSPORTER

FACILITY

Minnesota Form PQ-00371-03 (6/88)

COPY 3 FACILITY MAILS TO GENERATOR

Minnesota Division of Emergency Services at 612/778-6000, the National Response Center at 800/424-8802 and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.
Outside Minnesota, call the National Response Center and appropriate state agency.

MINNESOTA POLLUTION CONTROL AGENCY
HAZARDOUS WASTE DIVISION
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

5-103-1

For MPCA use only

Please type. (Form designed for use on elite (12-pitch) typewriter.) Instructions on back of form. OMB No. 2050-0039 - Expires 9-30-

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MND 000824029
Manifest Document No.: 45530
2. Page 1 of 1

Information in shaded area not required by Federal law. Minnesota rules require Items H. and I.

3. Generator's Name and Mailing Address
3M ST. PAUL MAIN PLANT
900 BUSH AVENUE BLDG 47 GLUE ROOM
SAINT PAUL MN. 55106
4. Generator's Phone (612)778-5071

A. State Manifest Document Number: MN 5621749
B. State Generator's ID: 9270019999

5. Transporter 1 Company Name: SAFETY-KLEEN CORP.
6. U.S. EPA ID Number: ILD 984908202
C. State Transporter's ID:
7. Transporter 2 Company Name:
8. U.S. EPA ID Number:
D. Transporter's Phone: 612 780-133
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address
SAFETY-KLEEN CORP. 510301
9261 ISANTI NE
BLAINE MN 55449
10. U.S. EPA ID Number: MND 981953045
G. State Facility's ID:
H. Facility's Phone: 612 780-1332

GENERATOR

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	RQ WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII(D001) (D008, D018, D039, D040)6.7#GAL(ERG#:28)	2	DM	42	G	D001 D039
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
I(A) D005 D018 (A) D040

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information 9821 95338413 045530 5-103-01-1624 12
EMERGENCY RESP#300-468-1760 24HR
A: 10044 B: C: D:

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and a classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and nation government regulations, and all applicable state laws and regulations.
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Printed/Typed Name: X Wayne Lynum
Signature: X Wayne Lynum
Date: Month Day Ye 05 29

TRANSPORTER

17. Transporter 1 Acknowledgement and Receipt of Materials
Printed/Typed Name: TROY RUBINK
Signature:
Date: Month Day Ye 05 29

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Ye

FACILITY

19. Discrepancy Indication-Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name:
Signature:
Date: Month Day

Minnesota Form PQ-00371-03 (6/88)

COPY 3: FACILITY MAILS TO GENERATOR

Public reporting burden for this collection of information is estimated to average 37 minutes for generators, 15 minutes for transporters and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden to Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

In case of spill or emergency immediately call the Minnesota Pollution Control Agency at 612/296-6300. In Minnesota Department of Emergency Services at 612/779-8800. The National Response Center at 800/424-8802 Outside Minnesota the National Response Center and appropriate state agency

MINNESOTA POLLUTION CONTROL AGENCY
HAZARDOUS WASTE DIVISION
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

5-103-01

For MPCA use only

Please type. (Form designed for use on elite (12-pitch) typewriter.) Instructions on back of form. OMB No. 2050-0039 · Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MND 000824029 | Manifest Document No. 48916

2. Page 1 of 1

Information in shaded area not required by Federal law. Minnesota rules require Items H. and I.

3. Generator's Name and Mailing Address
3M ST. PAUL MAIN PLANT
900 BUSH AVENUE BLDG 47 GLUE ROOM
SAINT PAUL MN 55106

4. Generator's Phone (612)778-5071

A. State Manifest Document Number MN 5622735

B. State Generator's ID 9270019999

5. Transporter 1 Company Name: SAFETY-KLEEN CORP.

6. U.S. EPA ID Number: ILD 984908202

C. State Transporter's ID

7. Transporter 2 Company Name

8. U.S. EPA ID Number

D. Transporter's Phone 612 780-1332

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
SAFETY-KLEEN CORP 510301
9261 ISANTI NE
BLAINE MN 55449

10. U.S. EPA ID Number: MND 981953045

G. State Facility's ID

H. Facility's Phone 612 780-1332

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM		12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	WASTE COMPOUNDS, CLEANING LIQUID (MONOETHANOLAMINE)8 NA1760 PGIII(D006) (D008, D018, D027D039D040)(ERG#154)7.9#/GL	1	DM	6	G	D006 D008
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
I(A) D018 D027 (A) D039, D040

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information 9805 94808696 248916 5-103-01-1624 12
EMERGENCY RESP#800-468-1760 24HR

A. 950 B: C: D:

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.
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GENERATOR

Printed/Typed Name | Signature | Date Month Day Year 02 06 98

17. Transporter 1 Acknowledgement and Receipt of Materials
Printed/Typed Name: TROY RUBANK | Signature | Month Day Year 02 06 98

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Month Day Year

TRANSPORTER

19. Discrepancy Indication Space

FACILITY

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name | Signature | Month Day Year 02 [illegible]

Minnesota Form PQ-00371-03 (6.88)

COPY 3: FACILITY MAILS TO GENERATOR

Outside Minnesota, call the National Response Center and appropriate state agency

...A POLLUTION CONTROL AGENCY
...RDOUS WASTE DIVISION
...LAFAYETTE ROAD
...ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

5-103-01

For MPCA use only

...e type. (Form designed for use on elite (12-pitch) typewriter.) Instructions on back of form. OMB No. 2050-0039 - Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MND 000824029
Manifest Document No.: 33949
2. Page 1 of 1

Information in shaded area not required by Federal law. Minnesota rules require Items H. and I.

3. Generator's Name and Mailing Address
3M ST PAUL MAIN PLANT
BLDG 2 DOCK 2 24-1W-25 935 BUSH AVE
ST PAUL MN 55106

4. Generator's Phone (612) 778-7539

A. State Manifest Document Number: MN 5626762
B. State Generator's ID:
C. State Transporter's ID:
D. Transporter's Phone: 612 780-133
E. State Transporter's ID:
F. Transporter's Phone:
G. State Facility's ID:
H. Facility's Phone: 612 780-1332

5. Transporter 1 Company Name: SAFETY-KLEEN CORP.
6. U.S. EPA ID Number: ILD 984908202

7. Transporter 2 Company Name:
8. U.S. EPA ID Number:

9. Designated Facility Name and Site Address
SAFETY-KLEEN CORP. 510301
9261 ISANTI NE
BLAINE MN 55449

10. U.S. EPA ID Number: MND 981953045

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

	HM		12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	RQ WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII(D001) (D008, D018, D039, D040)6.7#GAL(ERG#128)	1	DM	24	G	D001 D039
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
I(A) D008 D018 (A) D040

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information 9817 95204201 733949 5-103-01-1281 12
EMERGENCY RESP#800-468-1760 24HR

A: 10044 B: C: D.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: X Brent Duerr
Signature: X [signature]
Date: Month 05 Day 01 Year 95

17. Transporter 1 Acknowledgement and Receipt of Materials
Printed/Typed Name: Troy Rubink
Signature: [signature]
Month 05 Day 01 Year 95

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name:
Signature:
Month Day Year

GENERATOR

TRANSPORTER

FACILITY

Minnesota Division of Emergency Services at 612/778-0800; the National Response Center at 800/424-8802. Outside Minnesota, call the National Response Center and appropriate state agency.

Minnesota Form PQ-00371-03 (6/88)

COPY 6: GENERATOR MAILS TO DESTINATION STATE

MINNESOTA POLLUTION CONTROL AGENCY
HAZARDOUS WASTE DIVISION
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

5-103-01

For MPCA use only

Please type. (Form designed for use on elite (12-pitch) typewriter.) Instructions on back of form. OMB No. 2050-0039 - Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MND 000824029
Manifest Document No.: 25275
2. Page 1 of 1

Information in shaded area not required by Federal law. Minnesota rules require items H. and I.

3. Generator's Name and Mailing Address
3M ST PAUL MAIN PLANT
935 BUSH AVE BLDG 47 DOCK, 47-B-38
ST PAUL MN 55106

4. Generator's Phone (612) 778-5071

A. State Manifest Document Number: MN 5647387
B. State Generator's ID:

5. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC
6. U.S. EPA ID Number: ILD 984908202
C. State Transporter's ID:

7. Transporter 2 Company Name:
8. U.S. EPA ID Number:
D. Transporter's Phone: 612 780-1332
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address
SAFETY-KLEEN SYSTEMS, INC
9261 ISANTI NE
BLAINE MN 55449
10. U.S. EPA ID Number: 510301 MND 981953045
G. State Facility's ID:
H. Facility's Phone: 612 780-1332

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII (D039, D008, D018, D040)(ERG#128)6.7#/GAL	2	DM	46	G	D039 D008
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
I(A) D018 D040

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information 9845 96182465 625275 5-103-01-1277 12
EMERGENCY RESP#800-468-1760 24HR

A: 975 B: C: D:

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: X JAMES [illegible] Signature: [illegible] Date: Month 11 Day 13 Year 98

17. Transporter 1 Acknowledgement and Receipt of Materials
Printed/Typed Name: TROY RUBINK Signature: [illegible] Date: Month 11 Day 13 Year 98

TRANSPORTER

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: Signature: Date: Month Day Year

19. Discrepancy Indication Space

FACILITY

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Koeckritz Signature: [illegible] Date: Month 11 Day 16 Year -X

Minnesota Form PQ-00371-03 (6/88)

COPY 3: FACILITY MAILS TO GENERATOR

Minnesota Division of Emergency Services at 612-779-8900, the National Response Center at 800-424-8802 (Outside Minnesota, call the National Response Center and appropriate state agency and to indicate for healthcare, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

MINNESOTA POLLUTION CONTROL AGENCY
HAZARDOUS WASTE DIVISION
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

3-103-01

For MPCA use only

Please type. (Form designed for use on elite (12-pitch) typewriter.) Instructions on back of form. OMB No. 2050-0039 - Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MND 0824029 | Manifest Document No. 91025 | 2. Page 1 of 1

Information in shaded area not required by Federal law. Minnesota rules require items H. and I.

3. Generator's Name and Mailing Address
3M ST PAUL MAIN PLANT
935 BUSH AVE BLDG 47 DOCK, 47-B-38
ST PAUL MN 55106

4. Generator's Phone (651) 778-5071

A. State Manifest Document Number MN 5654348

B. State Generator's ID

5. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC | 6. U.S. EPA ID Number: ILD 984908202

C. State Transporter's ID

7. Transporter 2 Company Name | 8. U.S. EPA ID Number

D. Transporter's Phone 612 780-1332

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
SAFETY-KLEEN SYSTEMS, INC
9201 ISANTI NE
BLAINE MN 55449 | 10. U.S. EPA ID Number: MND 981953043 | S10301

G. State Facility's ID

H. Facility's Phone 612 780-1332

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

	HM		12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA)NA1993 PGIII (D018, D039, D040)(ERG#128)6.7LBS/GAL	1	DM	2	G	D018 D039
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
I(A) D040

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information 9909 96743291 0000591025 S10301 1277 12
EMERGENCY RESP#800-468-1760 24HR

A: 820 B: C: D:

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name | Signature | Date Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement and Receipt of Materials
Printed/Typed Name | Signature | Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Month Day Year

19. Discrepancy Indication Space

FACILITY

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name | Signature | Month Day Year

Minnesota Form PQ-00371-03 (6/88)

COPY 7: GENERATOR MAILS TO GENERATOR STATE

and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

Outside Minnesota, call the National Response Center and appropriate state agency.

MINNESOTA POLLUTION CONTROL AGENCY
HAZARDOUS WASTE DIVISION
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

5-103-[illegible]

For MPCA use only

Please type. (Form designed for use on elite (12-pitch) typewriter.) Instructions on back of form. OMB No. 2050-0039 - Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MND 000824029
Manifest Document No.: 91015
2. Page 1 of 1

Information in shaded area not required by Federal law. Minnesota rules require Items H. and I.

3. Generator's Name and Mailing Address
DM ST PAUL MAIN PLANT
935 BUSH AVE BLDG 47 DOCK, 47-8-38
ST PAUL MN 55106

4. Generator's Phone (651) 778-5071

A. State Manifest Document Number: MN 5654348

B. State Generator's ID

5. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC
6. U.S. EPA ID Number: ILD 984908202

C. State Transporter's ID

7. Transporter 2 Company Name
8. U.S. EPA ID Number

D. Transporter's Phone: 612 780-133[illegible]
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
SAFETY-KLEEN SYSTEMS, INC
9261 ISANTI NE
BLAINE MN 55449

10. U.S. EPA ID Number: 510301
MND 981953045

G. State Facility's ID

H. Facility's Phone: 612 780-1332

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

	HM		12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA)NA1993 PGIII (D018 D039, D040)(ERG#128)6.7LBS/GAL	1	DM	[illegible]	G	D018 D039
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
I(A) D040

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information 9909 96743291 0000591025 5103011277 12
EMERGENCY RESP#800-468-1760 24HR

A: 820 B: C: D:

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: [illegible] Signature: [illegible] Date: Month Day Year

17. Transporter 1 Acknowledgement and Receipt of Materials
Printed/Typed Name: [illegible] Signature Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name Signature Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name Signature Month Day Year

GENERATOR

TRANSPORTER

FACILITY

Minnesota Form PQ-00371-03 (6/88)

COPY 8: GENERATOR RETAINS

Minnesota Division of Emergency Services at 612/778-0800, the National Response Center at 800/424-8802, and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden to: Chief Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.
Outside Minnesota, call the National Response Center and appropriate state agency.

...A POLLUTION CONTROL AGENCY
...RDOUS WASTE DIVISION
...LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

5-103-01

For MPCA use only

...type. (Form designed for use on elite (12-pitch) typewriter.)

Instructions on back of form.

OMB No. 2050-0039 - Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MND 000824029
Manifest Document No. 02226
2. Page 1 of 1

Information in shaded area not required by Federal law. Minnesota rules require items H. and I.

3. Generator's Name and Mailing Address
GM ST. PAUL MAIN PLANT
900 BUSH AVENUE
SAINT PAUL BLDG 47 GLUE ROOM
MN 55106

4. Generator's Phone (651) 778-5071

5. Transporter 1 Company Name
SAFETY-KLEEN SYSTEMS, INC

6. U.S. EPA ID Number
ILD 984908202

7. Transporter 2 Company Name

8. U.S. EPA ID Number

9. Designated Facility Name and Site Address
SAFETY-KLEEN SYSTEMS, INC
9261 ISANTI NE
BLAINE MN 55449

10. U.S. EPA ID Number
510301
MND 981953045

A. State Manifest Document Number
MN 5660...
B. State Generator's ID
9270019999
C. State Transporter's ID
D. Transporter's Phone 612 780-1332
E. State Transporter's ID
F. Transporter's Phone
G. State Facility's ID
H. Facility's Phone 612 780-1332

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

	HM		12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a.	X	RQ WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII (D001, D018, D039, D040) (ERG128) (6.7#/GL)	1	DM	30	G	D001 D039
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
I(A) D018 D040

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
EMERGENCY RESP#800-468-1760 24HR 9913 96879945 0000302226 5103011624 12

A: 801 B: C: D:

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.
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Printed/Typed Name: Nate N-[illegible]
Signature: [illegible]
Date: Month 04 Day 01 Year 99

17. Transporter 1 Acknowledgement and Receipt of Materials
Printed/Typed Name: Joseph E Glaser
Signature: [illegible]
Month 04 Day 01 Year 99

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

19. Discrepancy Indication Space

Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: J Koeckeritz
Signature: [illegible]
Month 04 Day 05 Year 99

GENERATOR

TRANSPORTER

FACILITY

DOC. EXP.

SCHEDULED SERVICE WEEK

SCHEDULED TERRITORY

REFERENCE NUMBER

Minnesota Form PQ-00371-03 (6/88)

COPY 4: FACILITY RETAINS

NOV 18 '99 13:27 FR SK BLAINE 510301 612 780 9251 TO 6517785474 P.02/04

MINNESOTA POLLUTION CONTROL AGENCY
HAZARDOUS WASTE DIVISION
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

5-103-01

For MPCA use only

Please type. (Form designed for use on elite (12-pitch) typewriter.) Instructions on back of form. OMB No. 2050-0039 · Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MND 000824029
Manifest Document No.: 18187
2. Page 1 of 1

Information in shaded area not required by Federal law. Minnesota rules require items H. and I.

3. Generator's Name and Mailing Address
3M ST. PAUL MAIN PLANT
900 BUSH AVENUE BLDG 47 GLUE ROOM
SAINT PAUL MN 55106

4. Generator's Phone (612) 778 5071

A. State Manifest Document Number: MN 5629213
B. State Generator's ID: 9270019999
C. State Transporter's ID:
D. Transporter's Phone: 612 780-1832
E. State Transporter's ID:
F. Transporter's Phone:
G. State Facility's ID:
H. Facility's Phone: 612 780-1832

5. Transporter 1 Company Name: SAFETY-KLEEN CORP.
6. U.S. EPA ID Number: ILD 984908202

7. Transporter 2 Company Name:
8. U.S. EPA ID Number:

9. Designated Facility Name and Site Address
SAFETY-KLEEN CORP. 510301
9261 ISANTI NE
BLAINE MN 55449

10. U.S. EPA ID Number: MND 981953045

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	WASTE COMPOUNDS, CLEANING LIQUID (MONOETHANOLAMINE) 8 NA1760 PGIII (D006) (D008, D018, D027 D039 D040) (ERG#154) 7.9#/GL	1	DM	6	G	D006 D008
b.	X	RQ waste combustible liquid, N.O.S. (Petroleum Naptha) NA 1993 PGIII (D001) (D008, D018, D039, D040) (ERG#128)	2	DM	34	G	D001 D039
c.							
d.							

J. Additional Descriptions for Materials Listed Above
I(A) D018 D027 (A) D039, D040
I(B) D008 D018 D040

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information 981 95073420 918187 5-103-01-1624 12
EMERGENCY RESP#800-468-1760 24HR

A: 950 B: 10044 C: D:

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.
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Printed/Typed Name: X Thomas Harris
Signature: X Thomas Harris
Date: Month 04 Day 03 Year 98

17. Transporter 1 Acknowledgement and Receipt of Materials
Printed/Typed Name: TREY RUBINK
Signature: [signature]
Month 04 Day 03 Year 98

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: J Koeckeritz
Signature: [signature]
Month 04 Day 06 Year 98

Minnesota Form PQ-00371-03 (6/88)

COPY 4: FACILITY RETAINS

GENERATOR

TRANSPORTER

FACILITY

Minnesota Division of Emergency Services at 612/778-0800; the National Response Center at 800/424-8802. Outside Minnesota, call the National Response Center and appropriate state agency.

NOV 18 '99 13:28 FR SK BLAINE 510301 612 780 9251 TO 6517785474 P.03/04

MINNESOTA POLLUTION CONTROL AGENCY
HAZARDOUS WASTE DIVISION
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

5-103-01

For MPCA use only

Type. (Form designed for use on elite (12-pitch) typewriter.) Instructions on back of form. OMB No. 2050-0039 - Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MND 000824029
Manifest Document No.: 07085
2. Page 1 of 1

Information in shaded area not required by Federal law. Minnesota rules require Items H. and I.

3. Generator's Name and Mailing Address
3M ST. PAUL MAIN PLANT
900 BUSH AVENUE BLDG 47 GLUE ROOM
SAINT PAUL MN 55106

4. Generator's Phone (612) 778-5071

5. Transporter 1 Company Name: SAFETY-KLEEN [redacted] Systems, INC
6. U.S. EPA ID Number: ILD 984908202

7. Transporter 2 Company Name:
8. U.S. EPA ID Number:

9. Designated Facility Name and Site Address
SAFETY-KLEEN [redacted] Systems, INC 510301
9261 ISANTI NE
BLAINE MN 55449
10. U.S. EPA ID Number: MND 981953045

A. State Manifest Document Number: MN [redacted]
B. State Generator's ID: [redacted]
C. State Transporter's ID:
D. Transporter's Phone: 612 780-1232
E. State Transporter's ID:
F. Transporter's Phone:
G. State Facility ID:
H. Facility Phone: 612 [redacted]

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

	HM		12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	RQ WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII(D001) (D008, D018, D039, D040)6.7#GAL(ERG#128)	2	DM	45	G	D001 D039
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
I(A) D008 D018 (A) D040

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
EMERGENCY RESP#800-468-1760 24HR 9829 95641692 507085 5-103-01-1624 12

A: 10044 B: C: D:

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.
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Printed/Typed Name: Nathan Newman
Signature: Nath. Newman
Date: Month 12 Day 16 Year 98

17. Transporter 1 Acknowledgement and Receipt of Materials
Printed/Typed Name: TROY RUBINK
Signature: [signature]
Month 12 Day 16 Year 98

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: J Koeckeritz
Signature: [signature]
Month 12 Day 17 Year 98

GENERATOR

TRANSPORTER

FACILITY

Minnesota Form PQ-00371-03 (6/88)

COPY 4: FACILITY RETAINS

In case of spill or emergency, immediately call the Minnesota Pollution Control Agency at 612/296-8100, the Minnesota Division of Emergency Services at 612/778-0800; the National Response Center at 800/424-8802. Outside Minnesota, call the National Response Center and appropriate state agency.

Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 18 and [illegible] rules for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering and [illegible] the form. Send comments regarding the burden estimate, including suggestions for reducing this [illegible] Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

NOV 19 '99 08:03 FR SK BLAINE 510301 612 780 9251 TO 6517785474 P.02/03

...ZARDOUS WASTE DIVISION
...20 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

5-103-01

For MPCA use only

55531

Type (Form designed for use on elite (12-pitch) typewriter.) Instructions on back of form. OMB No. 2050-0039 - Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MND 000824029
Manifest Document No.: 84130
2. Page 1 of 1

Information in shaded area not required by Federal law. Minnesota rules require Items H. and I.

3. Generator's Name and Mailing Address
3M ST. PAUL MAIN PLANT
900 BUSH AVENUE BLDG 47 GLUE ROOM
SAINT PAUL MN 55106

4. Generator's Phone (612) 778-5071

5. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC
6. U.S. EPA ID Number: ILD 984908202

7. Transporter 2 Company Name:
8. U.S. EPA ID Number:

9. Designated Facility Name and Site Address
SAFETY-KLEEN SYSTEMS, INC
9261 ISANTI NE
BLAINE MN 55449

10. U.S. EPA ID Number: 510301
MND 981953045

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

	HM		12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol
a.	X	RQ WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII (D001, D018, D039, D040)(ERG128)(6.7#/GL)	1	DM	28	G
b.						
c.						
d.						

I. Additional Descriptions for Materials Listed Above
I(A) D018 D040

15. Special Handling Instructions and Additional Information
EMERGENCY RESP#800-468-1760 24HR 9905 96602597 984130 5-103-01-1624 12

A: 801 B: C: D:

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: X GREG BOLAND
Signature: X [signature]
Date: Month 02 Day 05 Year 99

17. Transporter 1 Acknowledgement and Receipt of Materials
Printed/Typed Name: TROY RUBINK
Signature: [signature]
Month 02 Day 05 Year 99

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: J Koeckeritz
Signature: [signature]
Month 02 Day 08 Year 99

GENERATOR

TRANSPORTER

FACILITY

Minnesota Form PQ-00371-03 (6/88)

COPY 4: FACILITY RETAINS

In case of spill or emergency, immediately call the Minnesota Pollution Control Agency at 612/296-8100, the Minnesota Division of Emergency Services at 612/778-0800, the National Response Center at 800/424-8802. Outside Minnesota, call the National Response Center and appropriate state agency.

Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

MINNESOTA POLLUTION CONTROL AGENCY
HAZARDOUS WASTE DIVISION
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

For MPCA use only

PLEASE TYPE (Form designed for use on elite (12-pitch) typewriter) or print. Instructions on cover page.

OMB No. 2050-0039
Expires 9/30/99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MND000824029
Manifest Document No.: 41002
2. Page 1 of 2

Information in shaded area not required by Federal law. Minnesota rules require Items H. and I.

3. Generator's Name and Mailing Address: 3M St. Paul - Main Plant
3M 850 Bush Avenue Buildings 24
St. Paul, MN 55106

A. State Manifest Document Number: MN 7041002

4. Generator's Phone: (612) 778-5477 Charlie Cadotte STPM

B. State Generator's ID

5. Transporter 1 Company Name: Larson Transfer
6. US EPA ID Number: MND041773714

C. State Transporter's ID

D. Transporter's Phone: 612/884-9112

7. Transporter 2 Company Name
8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address: 3M Cottage Grove Center
10746 Chemolite Road
Cottage Grove, MN 55016
10. US EPA ID Number: MND006172969

G. State Facility's ID

H. Facility's Phone: 612/458-2147

11. US DOT Description (Including Proper Shipping Name, Hazard Class, I.D. Number and Packing Group)

	HM	11. US DOT Description	12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	Waste Flammable Liquid, N.O.S.,(HEPTANE, XYLENE, TOLUENE), 3, UN1993,II, (F003, F005, D001) RQ 3M Profile No. 13-0046-6519-9	40	DM	14000	P	F003 F005 D001 D035
b.	X	Waste Flammable Liquid, N.O.S.,(HEPTANE, XYLENE, TOLUENE), 3, UN1993,II, (F003, F005, D001) RQ 3M Profile No. 13-0046-6616-3	12	DM	4200	P	F003 F005 D001 D035
c.	X	Waste Toxic Liquid, Organic, N.O.S., (TRICHLOROETHYLENE), 6.1, UN2810,III, (F002, D040) RQ 3M Profile No. 13-0055-9251-2	5	DM	1750	P	F002 D040 MN01
d.	X	Waste Toxic Liquid, Organic, N.O.S.,(TOLUENE-2, 4-DIISOCYANATE), 6.1, UN2810,II 3M Profile No. 13-0055-9639-3	2	DM	700	P	NONE MN01

J. Additional Descriptions for Materials Listed Above
a.
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a.
b.
c.
d.

15. Special Handling Instructions and Additional Information
Placards Required: FLAMMABLE, POISON
Trailer No: 70823
☒ L.D.R. Notification(s) Attached
Carrier has Emergency Response Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and all applicable state laws and regulations.
If I am a large quantity generator I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment, or, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: CHARLES CADOTTE
Signature: Charles Cadotte
Date: Month 03 Day 25 Year 98

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Ron Johnson
Signature: Ron Johnson
Date: Month 03 Day 25 Year 98

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: James Flynn
Signature
Date: Month 03 Day 25 Year 98

GENERATOR
TRANSPORTER
FACILITY

FOR ACCIDENT AND SPILL EMERGENCIES CALL CHEMTREC FOR ASSISTANCE 1-800-424-9300

Control Agency) at 800-422-0798 or 612/649-5451 and the National Response Center at 800-424-8802. Outside Minnesota, call the National Response Center and appropriate state agency.

Minnesota Form PQ-00371-04-B (9/94)

(Previous editions obsolete)

CC

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST
(Continuation Sheet)

21. Generator's US EPA ID No.	Manifest Document No.	22. Page	Information in the shaded areas is not required by Federal law.
MND000824029	41002	2	

23. Generator's Name

3M St. Paul - Main Plant
850 Bush Avenue Buildings 24
St. Paul, MN 55106

L. State Generator's Document Number
M. State Generator's ID

24. Transporter _____ Company Name — 25. US EPA ID Number

N. State Transporter's ID

26. Transporter _____ Company Name — 27. US EPA ID Number

O. Transporter's Phone
P. State Transporter's ID
Q. Transporter's Phone

	HM	28. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a.	X	Waste Flammable Liquid, N.O.S.,(ETHYL ACETATE, METHYL ETHYL KETONE), 3, UN1993,II, (D001) RQ Profile No. 13-0040-6636-4	1	DM	350	P	D001 D035
b.	X	Waste Flammable Liquid, N.O.S.,(HEPTANE, ETHYL ALCOHOL), 3, UN1993,II, (D001, D018) RQ Profile No. 13-0053-7780-2	11	DM	3850	P	D001 D018
c.		Waste Polyvinyl Chloride Resin Profile No. 13-0055-8087-6	3	DM	1050	P	NONE
d.		Waste Non-Pumpable Aromatic Dihydrazide Profile No. 13-0055-9348-1	13	DM	4550	P	NONE
e.		Waste Non-Pumpable Rubber - Mills Profile No. 13-0055-9736-7	1	DF	350	P	NONE
f.		Profile No.					
g.		Profile No.					
h.		Profile No.					
i.		Profile No.					

GENERATOR

S. Additional Descriptions for Materials Listed Above

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

TRANSPORTER

33. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name	Signature	Date Month	Day	Year

34. Transporter _____ Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year

FACILITY

35. Discrepancy Indication Space

Copy 3: Facility mails to Generator

MINNESOTA POLLUTION CONTROL AGENCY
HAZARDOUS WASTE DIVISION
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

For MPCA use only

PLEASE **TYPE** (Form designed for use on elite (12-pitch) typewriter) or print. Instructions on cover page.

OMB No. 2050-0039
Expires 9/30/99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MND000824029
Manifest Document No. 41099
2. Page 1 of 3
Information in shaded area not required by Federal law. Minnesota rules require items H. and I.

3. Generator's Name and Mailing Address
3M St. Paul - Main Plant
3M 850 Bush Avenue Buildings 24
St. Paul, MN 55106
STPM
4. Generator's Phone (651)/778-5477 Charlie Cadotte KA

A. State Manifest Document Number
MN 7041099
B. State Generator's ID

5. Transporter 1 Company Name
Larson Transfer
6. US EPA ID Number MND041773714
C. State Transporter's ID
D. Transporter's Phone 612/884-9112

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
3M Cottage Grove Center
10746 Innovation Road
Cottage Grove, MN 55016
10. US EPA ID Number MND006172969
G. State Facility's ID
H. Facility's Phone 651/458-2147

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, I.D. Number and Packing Group)	HM	12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	Waste Flammable Liquid, N.O.S.,(HEPTANE, XYLENE, TOLUENE), 3, UN1993,II, (F003, F005, D001) RQ 3M Profile No. 13-0046-6519-9	X	24	DM	8400	P	F003 F005 D001 D035
b.	Waste Flammable Liquid, N.O.S.,(HEPTANE, XYLENE, TOLUENE), 3, UN1993,II, (F003, F005, D001) RQ 3M Profile No. 13-0046-6616-3	X	20	DM	7000	P	F003 F005 D001 D035
c.	Waste Flammable Liquid, N.O.S.,(ACETONE, NAPHTHA/MINERAL SPIRITS), 3, UN1993,II, (F003, D001) RQ 3M Profile No. 13-0055-7699-9	X	1	DM	350	P	F003 D001
d.	Waste Toxic Liquid, Organic, N.O.S., (TRICHLOROETHYLENE), 6.1, UN2810,III, (F002, D040) RQ 3M Profile No. 13-0055-9251-7	X	2	DM	700	P	F002 D040 M001

J. Additional Descriptions for Materials Listed Above
a.
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a.
b.
c.
d.

15. Special Handling Instructions and Additional Information
Placards Required: FLAMMABLE, TOXIC
Trailer No: 70824
[X] L.D.R. Notification(s) Attached
Carrier has Emergency Response Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and all applicable state laws and regulations.
If I am a large quantity generator I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment, or, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: CHARLES CADOTTE
Signature: Charles Cadotte
Date: Month 03 Day 16 Year 99

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Wayatt H. Wilson
Signature: Wayatt H. Wilson
Date: Month 03 Day 16 Year 99

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: [illegible]
Signature: [illegible]
Date: Month 3 Day 17 Year 99

FOR ACCIDENT AND SPILL EMERGENCIES CALL CHEMTREC FOR ASSISTANCE 1-800-424-9300

In case of spill or emergency, immediately call the Minnesota Duty Officer (the Minnesota Pollution Control Agency) at 800/422-0798 or 612/649-5451 and the National Response Center at 800/424-8802. Outside Minnesota, call the National Response Center and appropriate state agency.

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator's US EPA ID No. MND000824029	Manifest Document No. 41099	22. Page 2	Information in the shaded areas is not required by Federal law.

23. Generator's Name
3M St. Paul - Main Plant
850 Bush Avenue Buildings 24
St. Paul, MN 55106

24. Transporter _____ Company Name — 25. US EPA ID Number

26. Transporter _____ Company Name — 27. US EPA ID Number

	HM	28. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	[redacted]
a.	X	Waste Flammable Liquid, N.O.S.,(HEPTANE, ETHYL ALCOHOL), 3, UN1993,II, (D001, D006, D008, D018) RQ Profile No. 13-0017-2311-6	18	DM	6300	P	[redacted]
b.	X	Waste Flammable Liquid, N.O.S.,(HEPTANE, ACETONE), 3, UN1993,II, (D001, D018) RQ Profile No. 13-0038-0417-9	1	DM	350	P	[redacted]
c.	X	Waste Flammable Liquid, N.O.S.,(TOLUENE), 3, UN1993,II, (D001) RQ Profile No. 13-0047-0277-8	1	DM	350	P	[redacted]
d.	X	Waste Flammable Liquid, N.O.S.,(TOLUENE, HEPTANE, METHYL ETHYL KETONE), 3, UN1993,II, (D001) RQ Profile No. 13-0059-2231-8	1	DM	350	P	[redacted]
e.	X	Waste Flammable Liquid, N.O.S.,(HEPTANE, TOLUENE, METHYL ETHYL KETONE), 3, UN1993,II, (D001) RQ Profile No. 13-0059-2328-2	1	DM	350	P	[redacted]
f.	X	Waste Flammable Liquid, N.O.S.,(ETHYL ACETATE, HEPTANE), 3, UN1993,II, (D001) RQ Profile No. 13-0064-8314-6	1	DM	350	P	[redacted]
g.	X	Waste Flammable Liquid, N.O.S.,(ETHYL ACETATE, TOLUENE), 3, UN1993,II, (D001) RQ Profile No. 13-0075-0495-7	1	DM	350	P	[redacted]
h.	X	Waste Flammable Liquid, N.O.S.,(HEPTANE, ETHYL ALCOHOL), 3, UN1993,II, (D001) RQ Profile No. 13-0092-0435-8	9	DM	3150	P	[redacted]
i.	X	Waste Flammable Liquid, N.O.S.,(TOLUENE, ETHYL ACETATE), 3, UN1993,II, (D001) RQ Profile No. 13-0098-9314-3	2	DM	700	P	[redacted]

[redacted]

32. Special Handling Instructions and Additional Information

GENERATOR

TRANSPORTER

33. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name	Signature	Date Month	Day	Year

34. Transporter _____ Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year

FACILITY

35. Discrepancy Indication Space

Copy 3: Facility mails to Generator

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator's US EPA ID No.	Manifest Document No.	22. Page	Information in the shaded areas is not required by Federal law.
MND000824029	41099	3	

23. Generator's Name
3M St. Paul - Main Plant
850 Bush Avenue Buildings 24
St. Paul, MN 55106

24. Transporter _____ Company Name — 25. US EPA ID Number

26. Transporter _____ Company Name — 27. US EPA ID Number

	28. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)	HM	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	[redacted]
a.	Waste Toxic Liquid, Organic, N.O.S.,(TOLUENE-2, 4-DIISOCYANATE), 6.1, UN2810,II Profile No. 13-0055-9542-9	X	4	DM	1400	P	[redacted]
b.	Waste Non-Pumpable Aromatic Dihydrazide Profile No. 13-0055-9348-1		2	DM	700	P	[redacted]
c.	Profile No.						
d.	Profile No.						
e.	Profile No.						
f.	Profile No.						
g.	Profile No.						
h.	Profile No.						
i.	Profile No.						

[redacted]

32. Special Handling Instructions and Additional Information

TRANSPORTER

33. Transporter _____ Acknowledgement of Receipt of Materials
Printed /Typed Name — Signature — Date (Month Day Year)

34. Transporter _____ Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Date (Month Day Year)

FACILITY

35. Discrepancy Indication Space

Copy 3: Facility mails to Generator

MINNESOTA POLLUTION CONTROL AGENCY
HAZARDOUS WASTE DIVISION
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

For MPCA use only

OMB No. 2050-0039
Expires 9/30/99

PLEASE TYPE (Form designed for use on elite (12-pitch) typewriter) or print. Instructions on cover page.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MND008240029
Manifest Document No.: 41101
2. Page 1 of 2

Information in shaded area not required by Federal law. Minnesota rules require items H. and I.

3. Generator's Name and Mailing Address: 3M St. Paul - Main Plant
3M 850 Bush Avenue Buildings 24
St. Paul, MN 55106
STPM
4. Generator's Phone (651)/778-5477 Charlie Cadotte KA

A. State Manifest Document Number: MN 7041101
B. State Generator's ID

5. Transporter 1 Company Name: Larson Transfer
6. US EPA ID Number: MND041773714
C. State Transporter's ID
D. Transporter's Phone: 612/884-9112

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address: 3M Cottage Grove Center
10746 Innovation Road
Cottage Grove, MN 55016
10. US EPA ID Number: MND006172969
G. State Facility's ID
H. Facility's Phone: 651/458-2147

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, I.D. Number and Packing Group)	HM	12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	Waste Flammable Liquid, N.O.S.,(HEPTANE, XYLENE, TOLUENE), 3, UN1993,II, (F003, F005, D001) RQ 3M Profile No. 13-0046-6519-9	X	48 46	DM	16800 16100	P	F003 F005 D001 D035
b.	Waste Flammable Liquid, N.O.S.,(HEPTANE, XYLENE, TOLUENE), 3, UN1993,II, (F003, F005, D001) RQ 3M Profile No. 13-0046-6616-3	X	20	DM	7000	P	F003 F005 D001 D035
c.	Waste Toxic Liquid, Organic, N.O.S., (TRICHLOROETHYLENE), 6.1, UN2810,III, (F002, D040) RQ 3M Profile No. 13-0055-9251-7	X	1	DM	350	P	F002 D040 MN01
d.	Waste Non-Pumpable Aromatic Dihydrazide 3M Profile No. 13-0055-9348-1		6	DM	2100	P	NONE

J. Additional Descriptions for Materials Listed Above
a.
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a.
b.
c.
d.

15. Special Handling Instructions and Additional Information
Trailer No: 70823
Placards Required: FLAMMABLE, TOXIC
[X] L.D.R. Notification(s) Attached
Carrier has Emergency Response Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and all applicable state laws and regulations.
If I am a large quantity generator I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment, or, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR — Printed/Typed Name: CHARLES CADOTTE — Signature: [signature] — Date: Month 03 Day 23 Year 99

TRANSPORTER — 17. Transporter 1 Acknowledgement of Receipt of Materials — Printed/Typed Name: RICHARD NAGEL — Signature: [signature] — Date: Month 03 Day 23 Year 99

18. Transporter 2 Acknowledgement of Receipt of Materials — Printed/Typed Name — Signature — Date: Month Day Year

FACILITY — 19. Discrepancy Indication Space: Gen agrees with changes to manif. pg. 1 - Line A + Addition to pg. 2 Lines G + H

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name — Signature — Date: Month Day Year

FOR ACCIDENT AND OTHER EMERGENCIES CALL CHEMTREC FOR ASSISTANCE 1-800-424-9300

Control Agency) at 800/422-0798 or 612/649-5451 and the National Response Center at 800/424-8802. Outside Minnesota, call the National Response Center and appropriate state agency.

Minnesota Form PQ-00371-04-B (9/94) (Previous editions obsolete)

Copy 3: Facility mails to Generator

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator's US EPA ID No.	Manifest Document No.	22. Page	Information in the shaded areas is not required by Federal law.
MND000824029	41101	2	

23. Generator's Name

3M St. Paul - Main Plant
850 Bush Avenue Buildings 24
St. Paul, MN 55106

24. Transporter _____ Company Name — 25. US EPA ID Number

26. Transporter _____ Company Name — 27. US EPA ID Number

	28. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)	HM	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	[redacted]
a.	Waste Flammable Liquid, N.O.S.,(ETHYL ACETATE, METHYL ETHYL KETONE), 3, UN1993,II, (D001) RQ Profile No. 13-0040-6636-4	X	1	DM	350	P	[redacted]
b.	Waste Flammable Liquid, N.O.S.,(TOLUENE), 3, UN1993,II, (D001) RQ Profile No. 13-0047-0277-8	X	1	DM	350	P	[redacted]
c.	Waste Flammable Liquid, N.O.S.,(HEPTANE, TOLUENE, METHYL ETHYL KETONE), 3, UN1993,II, (D001) RQ Profile No. 13-0059-2328-2	X	1	DM	350	P	[redacted]
d.	Waste Toxic Liquid, Organic, N.O.S.,(TOLUENE-2, 4-DIISOCYANATE), 6.1, UN2810,II Profile No. 13-0055-9542-9	X	5	DM	1750	P	[redacted]
e.	Waste Toxic Liquid, Organic, N.O.S.,(TOLUENE-2, 4-DIISOCYANATE), 6.1, UN2810,II Profile No. 13-0055-9639-3	X	3	DM	1050	P	[redacted]
f.	Waste Vinyl Plastosol Profile No. 13-0058-6086-4		2	DM	700	P	[redacted]
g.	Waste Flammable Liquid, N.O.S., (Heptane), 3, UN1993, II, (D001) RQ Profile No. 13-0055-8281-5	X	1	DM	350	P	[redacted]
h.	Waste Flammable Liquid, N.O.S., (Methyl Ethyl Ketone), 3, UN1993, II, (F005, D001) RQ Profile No. 13-0055-8378-9	X	1	DM	350	P	[redacted]
i.	Profile No.						

[redacted]

32. Special Handling Instructions and Additional Information

GENERATOR

TRANSPORTER

33. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name — Signature — Date (Month Day Year)

34. Transporter _____ Acknowledgement of Receipt of Materials

Printed/Typed Name — Signature — Date (Month Day Year)

FACILITY

35. Discrepancy Indication Space

Copy 3: Facility mails to Generator

MINNESOTA POLLUTION CONTROL AGENCY
HAZARDOUS WASTE DIVISION
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

For MPCA use only

OMB No. 2050-0039
Expires 9/30/99

PLEASE **TYPE** (Form designed for use on elite (12-pitch) typewriter) or print. Instructions on cover page.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MND000824029
Manifest Document No.: 41103
2. Page 1 of 2

Information in shaded area not required by Federal law. Minnesota rules require Items H. and I.

3. Generator's Name and Mailing Address: 3M St. Paul - Main Plant
3M 850 Bush Avenue Buildings 24
St. Paul, MN 55106

4. Generator's Phone (651)/778-5477 Charlie Cadotte STPM KA

A. State Manifest Document Number: MN 7041103
B. State Generator's ID

5. Transporter 1 Company Name: Larson Transfer
6. US EPA ID Number: MND041773714
C. State Transporter's ID
D. Transporter's Phone: 612/884-9112

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address: 3M Cottage Grove Center
10746 Innovation Road
Cottage Grove, MN 55016
10. US EPA ID Number: MND006172969
G. State Facility's ID
H. Facility's Phone: 651/458-2147

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, I.D. Number and Packing Group)	HM	12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	Waste Flammable Liquid, N.O.S.,(HEPTANE, XYLENE, TOLUENE), 3, UN1993,II, (F003, F005, D001) RQ 3M Profile No. 13-0046-6519-9	X	36	DM	12600	P	F003 F005 D001 D035
b.	Waste Flammable Liquid, N.O.S.,(HEPTANE, XYLENE, TOLUENE), 3, UN1993,II, (F003, F005, D001) RQ 3M Profile No. 13-0046-6616-3	X	15	DM	5250	P	F003 F005 D001 D035
c.	Waste Toxic Liquid, Organic, N.O.S., (TRICHLOROETHYLENE), 6.1, UN2810,III, (F002, D040) RQ 3M Profile No. 13-0055-9251-7	X	2	DM	700	P	F002 D040 MN01
d.	Waste Non-Pumpable Aromatic Dihydrazide 3M Profile No. 13-0055-9348-1		6	DM	2100	P	NONE

J. Additional Descriptions for Materials Listed Above
a.
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a.
b.
c.
d.

15. Special Handling Instructions and Additional Information
Placards Required: FLAMMABLE, TOXIC
Trailer No: 70835
☒ L.D.R. Notification(s) Attached
Carrier has Emergency Response Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and all applicable state laws and regulations.

If I am a large quantity generator I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment, or, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: CHARLES CADOTTE
Signature: Charles Cadotte
Date: Month 03 Day 31 Year 99

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Rick Hoffman
Signature: Rick Hoffman
Date: Month 03 Day 31 Year 99

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Date: Month Day Year

GENERATOR
TRANSPORTER
FACILITY

FOR ACCIDENT AND SPILL EMERGENCIES CALL CHEMTREC FOR ASSISTANCE 1-800-424-9300

In case of spill or emergency, Minnesota Duty Officer (the Minnesota Pollution Control Agency) at 800/422-0798 or 612/649-5451 and the National Response Center at 800/424-8802. Outside Minnesota, call the National Response Center and appropriate state agency.

Minnesota Form PQ-00371-04-8 (9/94)
(Previous editions obsolete)
Copy 3: Facility mails to Generator

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST *(Continuation Sheet)*	21. Generator's US EPA ID No.	Manifest Document No.	22. Page	Information in the shaded areas is not required by Federal law.
	MND000824029	41103	2	

23. Generator's Name

3M St. Paul - Main Plant
850 Bush Avenue Buildings 24
St. Paul, MN 55106

24. Transporter _____ Company Name — 25. US EPA ID Number

26. Transporter _____ Company Name — 27. US EPA ID Number

	28. US DOT Description *(Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)*	HM		29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	
a.	Waste Flammable Liquid, N.O.S.,(HEPTANE, ETHYL ALCOHOL), 3, UN1993,II, (D001, D018) RQ	X	Profile No. 13-0053-7780-2	19	DM	6650	P	
b.	Waste Flammable Liquid, N.O.S.,(HEPTANE, TOLUENE, METHYL ETHYL KETONE), 3, UN1993,II, (D001) RQ	X	Profile No. 13-0059-2328-2	1	DM	350	P	
c.	Waste Toxic Liquid, Organic, N.O.S.,(TOLUENE-2, 4-DIISOCYANATE), 6.1, UN2810,II	X	Profile No. 13-0055-9542-9	2	DM	700	P	
d.	Waste Toxic Liquid, Organic, N.O.S.,(TOLUENE-2, 4-DIISOCYANATE), 6.1, UN2810,II	X	Profile No. 13-0055-9639-3	1	DM	350	P	
e.	Waste Polyvinyl Chloride Resin		Profile No. 13-0055-8087-6	1	DM	350	P	
f.	Waste Non-Pumpable Rubber - Mills		Profile No. 13-0055-9736-7	4	DF	1400	P	
g.	Waste Minnesota Regulated - Used Oil and Water		Profile No. 13-0046-7780-6	1	DM	350	P	
h.			Profile No.					
i.			Profile No.					

GENERATOR

32. Special Handling Instructions and Additional Information

TRANSPORTER

33. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name — Signature — Date (Month, Day, Year)

34. Transporter _____ Acknowledgement of Receipt of Materials

Printed/Typed Name — Signature — Date (Month, Day, Year)

FACILITY

35. Discrepancy Indication Space

Copy 3: Facility mails to Generator

MINNESOTA POLLUTION CONTROL AGENCY
HAZARDOUS WASTE DIVISION
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

For MPCA use only

PLEASE TYPE (Form designed for use on elite (12-pitch) typewriter) or print. Instructions on cover page.

OMB No. 2050-0039
Expires 9/30/99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MND000824029
Manifest Document No. 41107
2. Page 1 of 3

Information in shaded area not required by Federal law. Minnesota rules require Items H. and I.

3. Generator's Name and Mailing Address
3M St. Paul - Main Plant
3M 850 Bush Avenue Buildings 24
St. Paul, MN 55106
STPM

A. State Manifest Document Number
MN 7041107

B. State Generator's ID

4. Generator's Phone (651)/778-5477 Charlie Cadotte

5. Transporter 1 Company Name
Larson Transfer

6. US EPA ID Number
MND041773714

C. State Transporter's ID

D. Transporter's Phone 612/884-9112

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
3M Cottage Grove Center
10746 Innovation Road
Cottage Grove, MN 55016

10. US EPA ID Number
MND006172969

G. State Facility's ID

H. Facility's Phone
651/458-2147

11. US DOT Description (Including Proper Shipping Name, Hazard Class, I.D. Number and Packing Group)

	HM	11. US DOT Description	12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	Waste Flammable Liquid, N.O.S.,(HEPTANE, XYLENE, TOLUENE), 3, UN1993,II, (F003, F005, D001) RQ 3M Profile No. 13-0046-6519-9	34	DM	11900	P	F003 F005 D001 D035
b.	X	Waste Flammable Liquid, N.O.S.,(HEPTANE, XYLENE, TOLUENE), 3, UN1993,II, (F003, F005, D001) RQ 3M Profile No. 13-0046-6616-3	12	DM	4200	P	F003 F005 D001 D035
c.		Waste Non-Pumpable Aromatic Dihydriazide 3M Profile No 13-0055-9154-3	4	DF DM	1400	P	NONE
d.		Waste Non-Pumpable Aromatic Dihydrazide 3M Profile No. 13-0055-9348-1	11	DM	3850	P	NONE

J. Additional Descriptions for Materials Listed Above
a.
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a.
b.
c.
d.

15. Special Handling Instructions and Additional Information
Placards Required: FLAMMABLE, TOXIC
Trailer No: 70811
[X] L.D.R. Notification(s) Attached
Carrier has Emergency Response Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and all applicable state laws and regulations.
If I am a large quantity generator I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment, or, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: CHARLES CADOTTE
Signature: Charles Cadotte
Date: Month 04 Day 07 Year 99

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: RICHARD NAGEL
Signature: Richard Nagel
Date: Month 04 Day 07 Year 99

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name:
Signature:
Date: Month 4 Day 7 Year 99

GENERATOR
TRANSPORTER
FACILITY

CALL CHEMTREC FOR ASSISTANCE 1-800-424-9300

Outside Minnesota, call the National Response Center and appropriate state agency.

Minnesota Form PQ-00371-04-B (9/94)
(Previous editions obsolete)

Copy 3: Facility mail to Generator

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST *(Continuation Sheet)*	21. Generator's US EPA ID No. MND000824029	Manifest Document No. 41107	22. Page 2	Information in the shaded areas is not required by Federal law.

23. Generator's Name
3M St. Paul - Main Plant
850 Bush Avenue Buildings 24
St. Paul, MN 55106

24. Transporter _____ Company Name — 25. US EPA ID Number

26. Transporter _____ Company Name — 27. US EPA ID Number

	HM	28. US DOT Description *(Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)*	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a.	X	Waste Flammable Liquid, N.O.S.,(TOLUENE, BENZENE), 3, UN1993,II, (D001, D018) RQ Profile No. 13-0019-9332-1	3	DM	1050	P	D001 D018
b.	X	Waste Flammable Liquid, N.O.S.,(HEPTANE, TOLUENE), 3, UN1993,II, (D001, D018) RQ Profile No. 13-0022-1278-8	2	DM	700	P	D001 D018
c.	X	Waste Flammable Liquid, N.O.S.,(TOLUENE), 3, UN1993,II, (D001) RQ Profile No. 13-0047-0277-8	1	DM	350	P	D001
d.	X	Waste Flammable Liquid, N.O.S.,(TOLUENE, HEPTANE), 3, UN1993,II, (D001) RQ Profile No. 13-0049-5356-1	1	DM	350	P	D001 D035
e.	X	Waste Flammable Liquid, N.O.S.,(HEPTANE, TOLUENE, CYCLOHEXANE), 3, UN1993,II, (D001, D018) RQ Profile No. 13-0053-7877-6	1	DM	350	P	D001 D018
f.	X	Waste Flammable Liquid, N.O.S.,(HEPTANE, ETHYL ALCOHOL), 3, UN1993,II, (D001, D018) RQ Profile No. 13-0055-5338-6	3	DM	1050	P	D001 D018
g.	X	Hazardous Waste, Solid, N.O.S.,(LEAD OXIDE PHOSPHONATE), 9, NA3077,III, (D008) RQ Profile No. 13-0046-4166-1	1	~~DM~~ DF	350	P	D008
h.	X	Waste Toxic Liquid, Organic, N.O.S.,(TOLUENE-2, 4-DIISOCYANATE), 6.1, UN2810,II Profile No. 13-0055-9542-9	13	DM	4550	P	NONE 14001
i.	X	Waste Toxic Liquid, Organic, N.O.S.,(TOLUENE-2, 4-DIISOCYANATE), 6.1, UN2810,II Profile No. 13-0055-9639-3	1	DM	350	P	NONE 14001

[redacted]

Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

TRANSPORTER

33. Transporter _____ Acknowledgement of Receipt of Materials
Printed /Typed Name — Signature — Date (Month Day Year)

34. Transporter _____ Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Date (Month Day Year)

FACILITY

35. Discrepancy Indication Space

Copy 3: Facility mails to Generator

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST *(Continuation Sheet)*	21. Generator's US EPA ID No.	Manifest Document No.	22. Page	Information in the shaded areas is not required by Federal law.
	MND000824029	41107	3	

23. Generator's Name
3M St. Paul - Main Plant
850 Bush Avenue Buildings 24
St. Paul, MN 55106

24. Transporter _____ Company Name — 25. US EPA ID Number

26. Transporter _____ Company Name — 27. US EPA ID Number

28. US DOT Description *(Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)*

	HM	28. US DOT Description	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a.		Waste Non-Pumpable Rubber - Mills Profile No. 13-0055-9736-7	1	DF D14	350	P	NONE
b.		Profile No.					
c.		Profile No.					
d.		Profile No.					
e.		Profile No.					
f.		Profile No.					
g.		Profile No.					
h.		Profile No.					
i.		Profile No.					

GENERATOR

32. Special Handling Instructions and Additional Information

TRANSPORTER

33. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name — Signature — Date (Month Day Year)

34. Transporter _____ Acknowledgement of Receipt of Materials

Printed/Typed Name — Signature — Date (Month Day Year)

FACILITY

35. Discrepancy Indication Space

Copy 3: Facility mails to Generator

MINNESOTA POLLUTION CONTROL AGENCY
HAZARDOUS WASTE DIVISION
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

For MPCA use only

PLEASE **TYPE** (Form designed for use on elite (12-pitch) typewriter) or print. Instructions on cover page.

OMB No. 2050-0039
Expires 9/30/99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MND000824029
Manifest Document No.: 41109
2. Page 1 of 3

Information in shaded area not required by Federal law. Minnesota rules require Items H. and I.

3. Generator's Name and Mailing Address: 3M St. Paul - Main Plant
3M 850 Bush Avenue Buildings 24
St. Paul, MN 55106

A. State Manifest Document Number: MN 7041109

4. Generator's Phone (651)/778-5477 Charlie Cadotte STPM KA

B. State Generator's ID

5. Transporter 1 Company Name: Larson Transfer
6. US EPA ID Number: MND041773714

C. State Transporter's ID

D. Transporter's Phone: 612/884-9112

7. Transporter 2 Company Name
8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address: 3M Cottage Grove Center
10746 Innovation Road
Cottage Grove, MN 55016
10. US EPA ID Number: MND066172969

G. State Facility's ID

H. Facility's Phone: 651/458-2147

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, I.D. Number and Packing Group)	HM	12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	Waste Flammable Liquid, N.O.S.,(HEPTANE, XYLENE, TOLUENE), 3, UN1993,II, (F003, F005, D001) RQ 3M Profile No. 13-0046-6519-9	X	29	DM	10150	P	F003 F005 D001 D035
b.	Waste Flammable Liquid, N.O.S.,(HEPTANE, XYLENE, TOLUENE), 3, UN1993,II, (F003, F005, D001) RQ 3M Profile No. 13-0046-6616-3	X	18	DM	6300	P	F003 F005 D001 D035
c.	Waste Flammable Liquid, N.O.S.,(ACETONE, NAPHTHA/MINERAL SPIRITS), 3, UN1993,II, (F003, D001) RQ 3M Profile No. 13-0055-7699-9	X	2	DM	700	P	F003 D001
d.	Waste Flammable Liquid, N.O.S.,(METHYL ETHYL KETONE), 3, UN1993,II, (F005, D001) RQ 3M Profile No. 13-0055-8378-9	X	1	DM	350	P	F005 D001 D035

J. Additional Descriptions for Materials Listed Above
a.
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a.
b.
c.
d.

15. Special Handling Instructions and Additional Information
Placards Required: FLAMMABLE, DANGEROUS
Trailer No: 70816
☒ L.D.R. Notification(s) Attached
Carrier has Emergency Response Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and all applicable state laws and regulations.
If I am a large quantity generator I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment, or, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR — Printed/Typed Name: CHARLES CADOTTE — Signature: Charles Cadotte — Date: Month 04 Day 14 Year 99

TRANSPORTER — 17. Transporter 1 Acknowledgement of Receipt of Materials — Printed/Typed Name: WALLACE ESTEB — Signature: Wallace Esteb — Date: Month 04 Day 14 Year 99

18. Transporter 2 Acknowledgement of Receipt of Materials — Printed/Typed Name: — Signature: — Date: Month Day Year

FACILITY — 19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: [illegible] — Signature: [illegible] — Date: Month 4 Day 14 Year 99

FOR ACCIDENT AND SPILL EMERGENCIES CALL CHEMTREC FOR ASSISTANCE 1-800-424-9300

In case of spill or emergency, immediately call the Minnesota Duty Officer (the Minnesota Pollution Control Agency) at 800/422-0798 or 612/643-5451 and the National Response Center at 800/424-8802. Outside Minnesota, call the National Response Center and appropriate state agency.

Minnesota Form PQ-00371-04-B (9/94)
(Previous editions obsolete)

Copy 3: Facility mails to Generator

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator's US EPA ID No.	Manifest Document No.	22. Page	Information in the shaded areas is not required by Federal law.
	MND000824029	41109	2	

23. Generator's Name

3M St. Paul - Main Plant
850 Bush Avenue Buildings 24
St. Paul, MN 55106

24. Transporter _____ Company Name

25. US EPA ID Number

26. Transporter _____ Company Name

27. US EPA ID Number

	28. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)	HM		29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a.		X	Waste Flammable Liquid, N.O.S.,(TOLUENE, BENZENE), 3, UN1993,II, (D001, D018) RQ Profile No. 13-0019-9332-1	10	DM	3500	P	D001 D0[illegible]
b.		X	Waste Flammable Liquid, N.O.S.,(HEPTANE, TOLUENE), 3, UN1993,II, (D001, D018) RQ Profile No. 13-0022-1278-8	2	DM	700	P	[illegible]
c.		X	Waste Flammable Liquid, N.O.S.,(ETHYL ACETATE, METHYL ETHYL KETONE), 3, UN1993,II, (D001) RQ Profile No. 13-0040-6636-4	1	DM	350	P	[illegible]
d.		X	Waste Aerosols,2.1, UN1950 Limited Quantity Profile No. 13-0049-0250-1	1	DF DM	350	P	[illegible]
e.		X	Waste Flammable Liquid, N.O.S.,(HEPTANE, ETHYL ACETATE), 3, UN1993,II, (D001) RQ Profile No. 13-0054-5831-3	1	DM	350	P	[illegible]
f.		X	Waste Flammable Liquid, N.O.S.,(HEPTANE, TOLUENE, METHYL ETHYL KETONE), 3, UN1993,II, (D001) RQ Profile No. 13-0059-2328-2	1	DM	350	P	[illegible]
g.		X	Waste Corrosive Liquid, Basic, Organic, N.O.S., (N,N-DIETHYLETHANOLAMINE), 8, UN3267,II, (D002) RQ Profile No. 13-0059-8342-7	1	DM	350	P	[illegible]
h.		X	Hazardous Waste, Solid, N.O.S.,(CADMIUM, MERCURY), 9, NA3077,III, (D006, D009, D011) RQ Profile No. 13-0073-6371-9	2	DM	100	P	D0[illegible] D0[illegible]
i.		X	Waste Toxic Liquid, Organic, N.O.S.,(TOLUENE-2, 4-DIISOCYANATE), 6.1, UN2810,II Profile No. 13-0055-9542-9	4	DM	1400	P	[illegible]

GENERATOR

S. Additional Descriptions for Materials Listed Above

H. 5 gal. pail

Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

TRANSPORTER

33. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name	Signature	Date Month	Day	Year

34. Transporter _____ Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year

FACILITY

35. Discrepancy Indication Space

Copy 3: Facility mails to Generator

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator's US EPA ID No. MND000824029	Manifest Document No. 41109	22. Page 3	Information in the shaded areas is not required by Federal law.

23. Generator's Name
3M St. Paul - Main Plant
850 Bush Avenue Buildings 24
St. Paul, MN 55106

24. Transporter _____ Company Name — 25. US EPA ID Number

26. Transporter _____ Company Name — 27. US EPA ID Number

	HM	28. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	32. Waste No.
a.		Waste Polyvinyl Chloride Resin Profile No. 13-0055-8087-6	2	DM	700	P	NONE
b.		Waste Non-Pumpable Aromatic Dihydriazide Profile No. 13-0055-9154-3	4	DF DM	1400	P	NONE
c.		Waste Non-Pumpable Aromatic Dihydrazide Profile No. 13-0055-9348-1	4	DM	1400	P	NONE
d.		Waste Nonregulated Foam Pigments Profile No. 13-0091-5404-1	2	DM	700	P	NONE
e.		Waste Nonregulated Semi-finished Plastisol Premix Profile No. 13-0094-6735-1	3	DM	1050	P	NONE
f.		Profile No.					
g.		Profile No.					
h.		Profile No.					
i.		Profile No.					

33. Additional Descriptions for Materials Listed Above — 34. Special Handling Instructions and Additional Information

32. Special Handling Instructions and Additional Information

GENERATOR

TRANSPORTER

33. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name — Signature — Date (Month Day Year)

34. Transporter _____ Acknowledgement of Receipt of Materials

Printed/Typed Name — Signature — Date (Month Day Year)

FACILITY

35. Discrepancy Indication Space

Copy 3: Facility mails to Generator

MINNESOTA POLLUTION CONTROL AGENCY
HAZARDOUS WASTE DIVISION
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

For MPCA use only

OMB No. 2050-0039
Expires 9/30/99

PLEASE TYPE (Form designed for use on elite (12-pitch) typewriter) or print. Instructions on cover page.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MND000824029
Manifest Document No.: 41111
2. Page 1 of 2

Information in shaded area not required by Federal law. Minnesota rules require Items H. and I.

3. Generator's Name and Mailing Address: 3M St. Paul - Main Plant
3M 850 Bush Avenue Buildings 24
St. Paul, MN 55106
STPM
4. Generator's Phone (651)/778-5477 Charlie Cadotte KA

A. State Manifest Document Number: MN 7041111
B. State Generator's ID:
C. State Transporter's ID:
D. Transporter's Phone: 612/884-9112
E. State Transporter's ID:
F. Transporter's Phone:
G. State Facility's ID:
H. Facility's Phone: 651/458-2147

5. Transporter 1 Company Name: Larson Transfer
6. US EPA ID Number: MND041773714
7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address: 3M Cottage Grove Center
10746 Innovation Road
Cottage Grove, MN 55016
10. US EPA ID Number: MND006172969

11. US DOT Description (Including Proper Shipping Name, Hazard Class, I.D. Number and Packing Group)

	HM	11. US DOT Description	12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	Waste Flammable Liquid, N.O.S., (HEPTANE, XYLENE, TOLUENE), 3, UN1993, II, (F003, F005, D001) RQ 3M Profile No. 13-0046-6519-9	47	DM	16450	P	F003 F005 D001 D035
b.	X	Waste Flammable Liquid, N.O.S., (HEPTANE, XYLENE, TOLUENE), 3, UN1993, II, (F003, F005, D001) RQ 3M Profile No. 13-0046-6616-3	24	DM	8400	P	F003 F005 D001 D035
c.	X	Waste Toxic Liquid, Organic, N.O.S., (TRICHLOROETHYLENE), 6.1, UN2810, III, (F002, D040) RQ 3M Profile No. 13-0055-9251-7	1	DM	350	P	F002 D040 MN01
d.		Waste Non-Pumpable Aromatic Dihydrazide 3M Profile No. 13-0055-9348-1	7	DM	2450	P	NONE

J. Additional Descriptions for Materials Listed Above
a.
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a.
b.
c.
d.

15. Special Handling Instructions and Additional Information
Placards Required: FLAMMABLE, TOXIC
Trailer No: 70813
[X] L.D.R. Notification(s) Attached
Carrier has Emergency Response Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and all applicable state laws and regulations.
If I am a large quantity generator I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment, or, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: CHARLES CADOTTE
Signature: Charles Cadotte
Date: Month 04 Day 23 Year 99

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Jay M Albright
Signature: Jay M Albright
Date: Month 04 Day 23 Year 99

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Tom Lickink
Signature: Tom L
Date: Month 04 Day 23 Year 99

GENERATOR
TRANSPORTER
FACILITY

CALL CHEMTREC FOR ASSISTANCE 1-800-424-9300

Outside Minnesota, call the National Response Center and appropriate state agency.

Minnesota Form PQ-00371-04-B (9/94)
(Previous editions obsolete)

Copy 3: Facility mails to Generator

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator's US EPA ID No.	Manifest Document No.	22. Page	Information in the shaded areas is not required by Federal law.
	MND000824029	41111	2	

23. Generator's Name
3M St. Paul - Main Plant
850 Bush Avenue Buildings 24
St. Paul, MN 55106

24. Transporter _____ Company Name — 25. US EPA ID Number

26. Transporter _____ Company Name — 27. US EPA ID Number

	28. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)	HM	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol
a.	Waste Flammable Liquid, N.O.S.,(TOLUENE), 3, UN1993,II, (D001) RQ Profile No. 13-0047-0277-8	X	1	DM	350	P
b.	Waste Flammable Liquid, N.O.S.,(HEPTANE, TOLUENE, METHYL ETHYL KETONE), 3, UN1993,II, (D001) RQ Profile No. 13-0059-2328-2	X	2	DM	700	P
c.	Hazardous Waste, Solid, N.O.S.,(LEAD OXIDE PHOSPHONATE), 9, NA3077,III, (D008) RQ Profile No. 13-0046-4166-1	X	2	DM	700	P
d.	Waste Toxic Liquid, Organic, N.O.S.,(TOLUENE-2, 4-DIISOCYANATE), 6.1, UN2810,II Profile No. 13-0055-9639-3	X	2	DM	700	P
e.	Waste Polyvinyl Chloride Resin Profile No. 13-0055-8087-6		1	DM	350	P
f.	Profile No.					
g.	Profile No.					
h.	Profile No.					
i.	Profile No.					

GENERATOR

32. Special Handling Instructions and Additional Information

TRANSPORTER

33. Transporter _____ Acknowledgement of Receipt of Materials — Printed /Typed Name — Signature — Date (Month Day Year)

34. Transporter _____ Acknowledgement of Receipt of Materials — Printed/Typed Name — Signature — Date (Month Day Year)

FACILITY

35. Discrepancy Indication Space

Copy 3: Facility mails to Generator

POLLUTION CONTROL AGENCY
S WASTE DIVISION
ETTE ROAD
JL, MINNESOTA 55155
N: HWIMS

For MPCA use only

PLEASE TYPE (Form designed for use on elite (12-pitch) typewriter) or print. Instructions on cover page.

OMB No. 2050-0039
Expires 9/30/99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MND000824029
Manifest Document No. 41113
2. Page 1 of 2

Information in shaded area not required by Federal law. Minnesota rules require Items H. and I.

3. Generator's Name and Mailing Address 3M St. Paul - Main Plant
3M 850 Bush Avenue Buildings 24
St. Paul, MN 55106
STPM
4. Generator's Phone (651)/778-5477 Charlie Cadotte KA

A. State Manifest Document Number MN 7041113
B. State Generator's ID

5. Transporter 1 Company Name: Larson Transfer
6. US EPA ID Number: MND041773714
C. State Transporter's ID
D. Transporter's Phone 612/884-9112
7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
3M Cottage Grove Center
10746 Innovation Road
Cottage Grove, MN 55016
10. US EPA ID Number: MND006172969
G. State Facility's ID
H. Facility's Phone 651/458-2147

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, I.D. Number and Packing Group)	HM	12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	Waste Flammable Liquid, N.O.S.,(HEPTANE, XYLENE, TOLUENE), 3, UN1993,II, (F003, F005, D001) RQ 3M Profile No. 13-0046-6519-9	X	52	DM	18200	P	F003 F005 D001 D035
b.	Waste Flammable Liquid, N.O.S.,(HEPTANE, XYLENE, TOLUENE), 3, UN1993,II, (F003, F005, D001) RQ 3M Profile No. 13-0046-6616-3	X	19	DM	6650	P	F003 F005 D001 D035
c.	Waste Flammable Liquid, N.O.S.,(METHYL ETHYL KETONE), 3, UN1993,II, (F005, D001) RQ 3M Profile No. 13-0055-8378-9	X	1	DM	350	P	F005 D001 D035
d.	Waste Toxic Liquid, Organic, N.O.S., (TRICHLOROETHYLENE), 6.1, UN2810,III, (F002, D040) RQ 3M Profile No. 13-0055-9251-7	X	3	DM	1050	P	F002 D040 MN01

J. Additional Descriptions for Materials Listed Above
a.
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a.
b.
c.
d.

15. Special Handling Instructions and Additional Information Trailer No: 70809
Placards Required: FLAMMABLE, TOXIC
[X] L.D.R. Notification(s) Attached
Carrier has Emergency Response Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and all applicable state laws and regulations.
If I am a large quantity generator I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment, or, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR
Printed/Typed Name: CHARLES CADOTTE
Signature: Charles Cadotte
Date: Month 04 Day 28 Year 99

TRANSPORTER
17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Scott Anderson
Signature: Scott Anderson
Date: Month 04 Day 28 Year 99

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

FACILITY
19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Gary Rutter
Signature
Date: Month Day Year

CALL CHEMTREC FOR ASSISTANCE 1-800-424-9300

Outside Minnesota, call the National Response Center and appropriate state agency.

Minnesota Form PQ-00371-04-B (9/94)
(Previous editions obsolete)

Copy 3: Facility mails to Generator

pe. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039.

NIFORM HAZARDOUS WASTE MANIFEST
(Continuation Sheet)

21. Generator's US EPA ID No. MND000824029

Manifest Document No. 41113

22. Page 2

Information in the shaded areas is not required by Federal law.

23. Generator's Name

3M St. Paul - Main Plant
850 Bush Avenue Buildings 24
St. Paul, MN 55106

24. Transporter _____ Company Name

25. US EPA ID Number

26. Transporter _____ Company Name

27. US EPA ID Number

28. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)

	HM	28. US DOT Description	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	Waste No.
a.	X	Waste Flammable Liquid, N.O.S.,(HEPTANE, TOLUENE, METHYL ETHYL KETONE), 3, UN1993,II, (D001) RQ Profile No. 13-0059-2328-2	1	DM	350	P	D001, D035
b.	X	Waste Toxic Liquid, Organic, N.O.S.,(TOLUENE-2, 4-DIISOCYANATE), 6.1, UN2810,II Profile No. 13-0055-9542-9	3	DM	1050	P	NONE
c.		Waste Polyvinyl Chloride Resin Profile No. 13-0055-8087-6	4	DM	1400	P	NONE
d.		Waste Non-Pumpable Aromatic Dihydrazide Profile No. 13-0055-9348-1	4	DM	1400	P	NONE
e.		Waste Non-Pumpable Rubber - Mills Profile No. 13-0055-9736-7	1	DF	350	P	NONE
f.		Profile No.					
g.		Profile No.					
h.		Profile No.					
i.		Profile No.					

GENERATOR

[redacted]

31. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

TRANSPORTER

33. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name | Signature | Date: Month Day Year

34. Transporter _____ Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date: Month Day Year

FACILITY

35. Discrepancy Indication Space

Copy 3: Facility mails to Generator

Attachment B

MINNESOTA POLLUTION CONTROL AGENCY
HAZARDOUS WASTE DIVISION
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

(82)

For MPCA use only

OMB No. 2050-0039
Expires 9/30/99

PLEASE **TYPE** (Form designed for use on elite (12-pitch) typewriter) or print. Instructions on cover page.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MND000824029
Manifest Document No. 45061
2. Page 1 of 3

Information in shaded area not required by Federal law. Minnesota rules require Items H. and I.

3. Generator's Name and Mailing Address
3M St. Paul - Main Plant
3M 900 Bush Avenue Building 47
St. Paul, MN 55144
STPM KA
4. Generator's Phone (651) 778-4957 Donn Lorita

A. State Manifest Document Number MN 7045061
B. State Generator's ID

5. Transporter 1 Company Name
Larson Transfer
6. US EPA ID Number MND041773714

C. State Transporter's ID
D. Transporter's Phone 612/884-9112

7. Transporter 2 Company Name
8. US EPA ID Number

E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
3M Cottage Grove Center
10746 Innovation Road
Cottage Grove, MN 55016
10. US EPA ID Number MND006172969

G. State Facility's ID
H. Facility's Phone 651/458-2147

	HM	11. US DOT Description (Including Proper Shipping Name, Hazard Class, I.D. Number and Packing Group)	12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a.	X	Waste Flammable Liquid, N.O.S., (2-ETHOXYETHANOL), 3, UN1993, III, (F005, D001) RQ 3M Profile No. 13-0013-8395-2	12	DM	5420	P	F005 D001
b.		Waste Sweep Up Waste 3M Profile No. 13-0014-4188-3	3	DM	450	P	NONE
c.	X	Hazardous Waste, Liquid, N.O.S., (2-ETHOXYETHANOL), 9, NA3082, III, (F005) RQ 3M Profile No. 13-0014-4673-4	2	DM	885	P	F005
d.	X	Hazardous Waste, Solid, N.O.S., (LEAD), 9, NA3077, III, (D008) RQ 3M Profile No. 13-0016-8025-8	5	DM	2445	P	D008

J. Additional Descriptions for Materials Listed Above
a.
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a.
b.
c.
d.

15. Special Handling Instructions and Additional Information Trailer No: 70832
Placards Required: FLAMMABLE, DANGEROUS
[X] L.D.R. Notification(s) Attached
Carrier has Emergency Response Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and all applicable state laws and regulations.
If I am a large quantity generator I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment, or, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR — Printed/Typed Name: S.W. West — Signature: S.W. West — Date: Month 07 Day 08 Year 99

17. Transporter 1 Acknowledgement of Receipt of Materials
TRANSPORTER — Printed/Typed Name: Rocky Holbrook — Signature: Rocky Holbrook — Date: Month 7 Day 8 Year 99

18. Transporter 2 Acknowledgement of Receipt of Materials
TRANSPORTER — Printed/Typed Name: — Signature: — Date: Month Day Year

19. Discrepancy Indication Space
FACILITY

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
FACILITY — Printed/Typed Name: Laurie Woodley — Signature: Laurie Woodley — Date: Month 7 Day 8 Year 99

CALL CHEMTREC FOR ASSISTANCE 1-800-424-9300

Outside Minnesota, call the National Response Center and appropriate state agency.

Minnesota Form PQ-00371-04-B (9/94) (Previous editions obsolete)

Copy 3: Facility mails to Generator

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST
(Continuation Sheet)

21. Generator's US EPA ID No.: MND000824029

Manifest Document No.: 45061

22. Page: 2

Information in the shaded areas is not required by Federal law.

23. Generator's Name
3M St. Paul - Main Plant
900 Bush Avenue Building 47
St. Paul, MN 55144

M. State Manifest Document Number: MN 045061

N. State Generator's ID

24. Transporter _____ Company Name

25. US EPA ID Number

N. State Transporter's ID

26. Transporter _____ Company Name

27. US EPA ID Number

O. Transporter's Phone

P. State Transporter's ID

Q. Transporter's Phone

28. US DOT Description *(Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)*

	HM	28. US DOT Description	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	
a.		Waste Non-Regulated Mineral Residue Profile No. 13-0025-5332-2	2	DM	930	P	
b.		Waste Non-Regulated Aqueous Resin Solution Profile No. 13-0038-8338-9	6	DM	2715	P	
c.	X	Waste Toxic Liquid, Organic, N.O.S., (GLUTARALDEHYDE), 6.1, UN2810, III Profile No. 13-0041-7377-2	1	DM	170	P	
d.	X	Waste Corrosive Liquid, Acidic, Inorganic, N.O.S., (PHOSPHORUS PENTOXIDE), 8, UN3264, II, (D002) RQ Profile No. 13-0049-4712-6	1	DM	470	P	D002
e.		Waste Non-Pumpable Aromatic Dihydrazide Profile No. 13-0055-9348-1	3	DM	385	P	NONE
f.	X	Hazardous Waste, Solid, N.O.S., (MERCURY), 9, NA3077, III, (D009) RQ Profile No. 13-0064-3898-3	1	DM	100	P	D009
g.		Waste Non-Regulated Resin And Debris Profile No. 13-0075-8317-5	~~2~~ 2	DF	240	P	NONE
h.		Waste Non-Regulated Resin And Debris Profile No. 13-0075-8317-5	~~2~~ 2	DM	295	P	NONE
i.		Waste Empty oil containers Profile No. 13-0081-7143-4	1	DM	220	P	NONE

GENERATOR

R. Additional Descriptions for Materials Listed Above

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

TRANSPORTER

33. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name | Signature | Date: Month Day Year

34. Transporter _____ Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date: Month Day Year

FACILITY

Discrepancy Indication Space

Copy 3: Facility mails to Generator

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST
(Continuation Sheet)

21. Generator's US EPA ID No.: MND000824029

Manifest Document No.: 45061

22. Page: 3

Information in the shaded areas is not required by Federal law.

23. Generator's Name
3M St. Paul - Main Plant
900 Bush Avenue Building 47
St. Paul, MN 55144

L. State Manifest Document Number: MN7045061

M. State Generator's ID

N. State Transporter's ID

O. Transporter's Phone

P. State Transporter's ID

Q. Transporter's Phone

24. Transporter _____ Company Name

25. US EPA ID Number

26. Transporter _____ Company Name

27. US EPA ID Number

28. US DOT Description *(Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)*

	HM	28. US DOT Description	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	
a.	X	~~Waste Flammable Liquid, N.O.S.,(VM & P NAPHTHA, 2-ETHOXYETHYL ACETATE), 3, UN1993,III, (D001) RQ Profile No. 13-0081-8335-5~~	~~1~~	~~DM~~ ~~DP~~	~~480~~	~~P~~	~~D001~~
b.	X	Waste Flammable Liquid, N.O.S.,(VM & P NAPHTHA, 2-ETHOXYETHYL ACETATE), 3, UN1993,III, (D001) RQ Profile No. 13-0081-8335-5	7 8	DM	~~3785~~ 4235	P	D001
c.	X	Hazardous Waste, Liquid, N.O.S., (2-ETHOXYETHANOL), 9, NA3082,III, (F005) RQ Profile No. 13-0092-6656-3	22	DM	14055	P	
d.		Waste Nonregulated Resin Solution Profile No. 13-0093-6841-9	5	DM	2840	P	
e.	X	Hazardous Waste, Liquid, N.O.S.,9, NA3082,III, (F002, F003, F005, D003, D028) RQ Profile No. 13-0016-7734-6	4	DM	800	P	F002 F003 F005 D003 D028 D035
f.	X	Waste Flammable Liquid, Toxic, N.O.S.,(1, 2-DICHLOROETHANE, ETHYL ALCOHOL, N-BUTYL ALCOHOL), 3, 6.1, UN1992,II, (F002, F003, F005, D001, D003, D019, D028) RQ Profile No. 13-0022-9356-4	2	DM	625	P	F002 F003 F005 D001 D003 D019 D028 D035 MN01
h.		Profile No.					
i.		Profile No.					

S. Additional Descriptions for Materials Listed Above

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

GENERATOR

33. Transporter _____ Acknowledgement of Receipt of Materials

Printed /Typed Name | Signature | Date (Month Day Year)

34. Transporter _____ Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date (Month Day Year)

TRANSPORTER

35. Discrepancy Indication Space

FACILITY

Copy 3: Facility mails to Generator

Attachment C

HAZARDOUS WASTE PERSONNEL TRAINING PROGRAM

Introduction:
The U.S. EPA promulgated regulations for the training of personnel involved in handling hazardous waste materials in Chapter 40 Code of Federal Regulations, Section 265-16. The regulation requires that all individuals involved in the generation, storage, treatment, and disposal of hazardous waste complete either classroom training or on-the-job training. The primary purpose of the training is to insure the individual can recognize and respond to an emergency situation.

Job titles and job descriptions of employees involved in the safe handling of hazardous waste:

I. Job Title: Product Supervisor or Coach

Description:
Responsibilities include assuring that her/his crew-members are handling hazardous waste materials consistent with established procedures. This includes packaging, labeling, and staging. Additionally, she/he must alert appropriate personnel in the event of any problems related to hazardous waste.

II. Job Titles: (a) Operators, (b) Material Handlers, (c) Utility Person

Description:
Responsibilities include proper handling of hazardous waste as provided in the annual training. Operators will collect hazardous waste during production or clean up between product runs. Handling includes packaging, labeling, container inspection, and sealing. Responsible for clean-up of minor leaks and spills.

III. Job Title: Process Engineers

Description:
Familiar with hazardous waste materials as they relate to safety concerns. The process engineer is the first contact by laboratory personnel when changes in materials are proposed to improve/introduce products. Inform Material Control Personnel and Hazardous Waste Management Coordinator of proposed changes affecting hazardous waste generation.

IV. Job Titles: (a) Electrician, (b) Maintenance Person, (c) Boiler Person, (d) Machinist

Description:
Responsibilities include proper handling of hazardous waste as provided in the annual training. Handling includes packaging, labeling, container inspection, and sealing.

V. Job Titles: (a) Maintenance Supervisor, (b) Lead Person

Description:
Responsibilities include assuring that her/his crew-members are handling hazardous waste materials consistent with established procedures. This includes packaging, labeling, and staging. Additionally, she/he must alert appropriate personnel in the event of any problems related to hazardous waste.

Attachment C

VI. Job Title: (a) Warehouse Person, (b) Shipping and Receiving Clerk

Description:
Responsibilities include proper handling of hazardous waste as provided in the annual training. Handling includes labeling, inspection, and transporting waste to a staging area as well as loading onto transport trailers.

VII. Job Title: Waste Management Coordinator

Description:
Responsibilities include but not limited to ensuring proper handling of hazardous waste to meet EPA, DOT, OSHA and 3M requirements. This includes assuring that the container is in good condition and that it is compatible with the type of waste being handled. Ensure that proper records and documentation are maintained at the facility. Responsible for conducting a complete program of instructions for facility personnel that ensures proper handling of hazardous waste.

VIII. Job Title: Solvent Person

Description:
Responsibilities include proper handling of hazardous waste as provided in the annual training. Hazardous waste will be collected during drum filling or clean up. Inspect the packaging, labeling, container condition, and proper closure. Responsible for clean-up of minor leaks and spills. Perform daily hazardous waste tank inspection.

IX. Job Title: Dock Analyst

Description:
Responsibilities include preparing shipping papers (manifests, bill of lading, and land ban notification) for transporting wastes for disposal. Familiar with hazardous waste materials as they relates to safety concerns.

X. Job Title: Laboratory Personnel

Description:
Responsibilities include proper handling of hazardous waste as provided in the annual training. Familiar with hazardous waste materials as they relates to safety concerns. Additionally, he/she must alert appropriate personnel in the event of any problems related to hazardous waste.

3M Environmental Standard

Attachment D

ET&S Providing Global Leadership

Above Ground Tank Inspection

Applicability

This standard applies to all 3M U.S. and O.U.S. operations.

Introduction

The following preventive maintenance/inspection standard has been developed to minimize the potential for adverse environmental effects associated with the above ground storage of hazardous substances and petroleum products.

Standard

Above ground storage tanks containing hazardous substances or petroleum products shall be routinely inspected.

Inspection Routine

Inspect tanks daily and monthly or at other appropriate intervals. Include the date of inspection and the inspector's initials. Keep inspection logs on file for three years.

Suggested inspection procedures:

DAILY Examine the visible and readily accessible portions of each tank system, including the tank, piping, pumps, secondary containment, etc., for evidence of active leaks. Signs of leakage may include liquid flowing, unusual paint blistering, an unexplained wet area or odor inside the secondary containment. Note and investigate unusual conditions.

MONTHLY Check overfill and spill protection equipment (high level alarms, gauges, shutoffs) for proper operation. Examine visible portions of tank foundations and piping supports for deterioration. Check secondary containment structures for erosion, cracking, or other conditions which may compromise their integrity. Note and investigate unusual conditions.

Comments

Tanks containing materials such as water or inert gas are not part of this program, but some level of routine inspection may be appropriate.

For Further Information

Contact Environmental Technology and Services, St. Paul, MN, 612-778-4335

R. P. Bringer, Staff Vice President
Environmental Technology and Services

3M Environmental Technology and Services
Building 41-01-05
St. Paul, MN 55133
612 778 4335

Recycled paper
40% pre-consumer
10% post-consumer

Issued: 26 Sep 88 – U.S. Only
Reissued: 1 Nov 90 – to include O.U.S.

Attachment E

DAILY INSPECTION LOG - HAZARDOUS WASTE TANKS

Month: _____ Tank ID: _____ Building No: _____ Plant: **3M - St. Paul Tape Mfg. Plant**

Date	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
Tanks																															
General Condition																															
Seams																															
Manways																															
Connections																															
Gaskets																															
Foundation																															
Piping																															
All Aboveground Piping																															
Pumps																															
Overfill/Spill Control Equipment																															
Level Controls																															
Temperature Gauge Data																															
Pressure Gauge Data																															
Alarms																															
Secondary Containment																															
Inspector's Initial																															
Inspector's Signature																															

Date	Initial	Description of Problems/Corrective Actions Taken

Rev. 10/26/99

March 1997

DAILY INSPECTION LOG - HAZARDOUS WASTE TANKS

Plant _____
Month _____
Tank ID _____

Date	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
Tanks																															
General Condition		✓	✓	✓	✓	✓																									
Seams		✓	✓	✓	✓	✓																									
Manways, connections, gaskets		✓	✓	✓	✓	✓																									
Foundation		✓	✓	✓	✓	✓																									
Piping																															
All Aboveground Piping and Connections		✓	✓	✓	✓	✓																									
Pumps		✓	✓	✓	✓	✓																									
Overfill/Spill Control Equipment																															
Level Controls		✓	✓	✓	✓	✓																									
Temp. Gauge Data		✓	✓	✓	✓	✓																									
Pressure Gauge Data		✓	✓	✓	✓	✓																									
Alarms		✓	✓	✓	✓	✓																									
Secondary Containment		✓	✓	✓	✓	✓																									
Inspector's Initials		BS	BS	BS	BS	BS																									

Comments

Feb 1998

DAILY INSPECTION LOG - HAZARDOUS WASTE TANKS

Plant _____
Month _____
Tank ID _____

Date	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
Tanks																															
General Condition		✓	✓	✓	✓	✓			✓	✓	✓	✓	✓			✓	✓	✓													
Seams		✓	✓	✓	✓	✓			✓	✓	✓	✓	✓			✓	✓	✓													
Manways, connections, gaskets		✓	✓	✓	✓	✓			✓	✓	✓	✓	✓			✓	✓	✓													
Foundation		✓	✓	✓	✓	✓			✓	✓	✓	✓	✓			✓	✓	✓													
2298 Auto Dry on Floor under pump																															
Piping																															
All Aboveground Piping and Connections		✓	✓	✓	✓	✓			✓	✓	✓	✓	✓			✓	✓	✓													
Pumps		✓	✓	✓	✓	✓			✓	✓	✓	✓	✓			✓	✓	✓													
Overfill/Spill Control Equipment																															
Level Controls		✓	✓	✓	✓	✓			✓	✓	✓	✓	✓			✓	✓	✓													
Temp. Gauge Data		✓	✓	✓	✓	✓			✓	✓	✓	✓	✓			✓	✓	✓													
Pressure Gauge Data		✓	✓	✓	✓	✓			✓	✓	✓	✓	✓			✓	✓	✓													
Alarms		✓	✓	✓	✓	✓			✓	✓	✓	✓	✓			✓	✓	✓													
Secondary Containment			✓	✓	✓	✓			✓	✓	✓	✓	✓			✓	✓	✓													
Inspector's Initials		MT	B	B	B	B			B	B	B	B	B			B	B	B													
Comments																															

DAILY INSPECTION LOG - HAZARDOUS WASTE TANKS

Plant _____
Month _____
Tank ID _____

Date	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
Tanks																															
General Condition																															
Seams																															
Manways, connections, gaskets																															
Foundation																															
Piping																															
All Aboveground Piping and Connections																															
Pumps																															
Overfill/Spill Control Equipment																															
Level Controls																															
Temp. Gauge Data																															
Pressure Gauge Data																															
Alarms																															
Secondary Containment																															
Inspector's Initials																															
Comments																															

Attachment F

04/01/98
05:01:57

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : HIRTE, MARTIN S

Start Shift : 03/31/98 23:19
End Shift : 04/01/98 00:28
Total Time : 01:09

Keypoint	Key Time	Elapsed Time	Incident	Inciden Time
****** START SHIFT ******	23:19			
1-22-3 SOUTH @ COLUMN 6?	23:21	00:02		
KEYPOINT 192695 NOT FOUND	23:21	00:00		
3-22-1 "A" SECTION NRTHWT	23:22	00:01		
16-24-1 SOUTHWEST STORAGE	23:23	00:01		
14-24-2 SOUTHEAST	23:25	00:02		
11-24-1 COL.S.PAINT SHOP	23:30	00:05		
5-23-3 SOUTH @ COLUMN 68	23:31	00:01		
6-23-2 CNTR @ COLUMN 37	23:32	00:01		
7-23-1 "D" SECTION CTR	23:33	00:01		
9-24 MEZZANINE SOUTHEAST	23:34	00:01		
10-24 MEZZ POST C4 CENTER	23:35	00:01		
15-24-1 Z&L CALENDER	23:36	00:01		
13-24-2 WEST END	23:37	00:01		
12-24-1 NORTH WEST	23:38	00:01		
26-51-1 NW SECT WST WALL	23:39	00:01		
34-51 SO EAST BY TANKS	23:40	00:01	← Hazardous Waste Storage Tank Bldg. 51	
25-26-1 SO EAST TERMINAL	23:41	00:01		
8-24 PIPE TNNL SO OF STRN	23:48	00:07		
4-23-3B TNNL WST OF BLD20	23:53	00:05		
24-21 SB EST WALL EQ.RM	23:55	00:02		
23-21 BW COMPUTER ROOM	23:58	00:03		
35-21-1NW	00:01	00:03		
20-42-7W COMPUTER ROOM	00:06	00:05		
18-42-BW KITCHEN AREA	00:08	00:02		
22-42-1 WST ENT VESTIBULE	00:10	00:02		
42-5C COMPUTER ROOM	00:16	00:06		
19-42-B 1/2 PENTHS CENTER	00:19	00:03		
******* END SHIFT *******	00:28			

03/30/98
09:25:35

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : PETERSON, DON

Start Shift : 03/30/98 02:13
End Shift : 03/30/98 03:32
Total Time : 01:19

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	02:13			
3-22-1 "A" SECTION NRTHWT	02:15	00:02		
1-22-3 SOUTH @ COLUMN 6?	02:17	00:02		
KEYPOINT 192695 NOT FOUND	02:18	00:01		
16-24-1 SOUTHWEST STORAGE	02:20	00:02		
14-24-2 SOUTHEAST	02:25	00:05		
13-24-2 WEST END	02:29	00:04		
12-24-1 NORTH WEST	02:30	00:01		
15-24-1 Z&L CALENDER	02:31	00:01		
10-24 MEZZ POST C4 CENTER	02:33	00:02		
9-24 MEZZANINE SOUTHEAST	02:34	00:01		
11-24-1 COL.S.PAINT SHOP	02:37	00:03		
8-24 PIPE TNNL SO OF STRN	02:38	00:01		
5-23-3 SOUTH @ COLUMN 68	02:41	00:03		
6-23-2 CNTR @ COLUMN 37	02:42	00:01		
7-[illegible]-1 "D" SECTION CTR	02:43	00:01		
34-51 SO EAST BY TANKS	02:44	00:01		
26-51-1 NW SECT WST WALL	02:45	00:01		
25-26-1 SO EAST TERMINAL	02:48	00:03		
4-23-3B TNNL WST OF BLD20	02:58	00:10		
24-21 SB EST WALL EQ.RM	03:00	00:02		
23-21 BW COMPUTER ROOM	03:02	00:02		
35-21-1NW	03:04	00:02		
20-42-7W COMPUTER ROOM	03:05	00:01		
19-42-B 1/2 PENTHS CENTER	03:07	00:02		
42-5C COMPUTER ROOM	03:09	00:02		
17-BW AC&R ROOM	03:11	00:02		
18-42-BW KITCHEN AREA	03:18	00:07		
22-42-1 WST ENT VESTIBULE	03:20	00:02		
******* END SHIFT *******	03:32			

03/29/98
21:18:26

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Aft

Guard Name : SCHMECK, HEIDI

Start Shift : 03/29/98 15:09
End Shift : 03/29/98 16:04
Total Time : 00:55

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	15:09			
3-22-1 "A" SECTION NRTHWT	15:17	00:08		
1-22-3 SOUTH @ COLUMN 6?	15:17	00:00		
16-24-1 SOUTHWEST STORAGE	15:20	00:03		
14-24-2 SOUTHEAST	15:22	00:02		
13-24-2 WEST END	15:24	00:02		
15-24-1 Z&L CALENDER	15:24	00:00		
10-24 MEZZ POST C4 CENTER	15:25	00:01		
9-24 MEZZANINE SOUTHEAST	15:27	00:02		
8-24 PIPE TNNL SO OF STRN	15:29	00:02		
11-24-1 COL.S.PAINT SHOP	15:30	00:01		
7-23-1 "D" SECTION CTR	15:31	00:01		
5-23-3 SOUTH @ COLUMN 68	15:32	00:01		
6-23-2 CNTR @ COLUMN 37	15:34	00:02		
34-51 SO EAST BY TANKS	15:36	00:02		
25-26-1 SO EAST TERMINAL	15:38	00:02		
1-2 3B TNNL WST OF BLD20	15:39	00:01		
5-20-3B TNNL TO 21 RT SD	15:40	00:01		
4-21 SB EST WALL EQ.RM	15:42	00:02		
3-21 BW COMPUTER ROOM	15:44	00:02		
8-42-BW KITCHEN AREA	15:44	00:00		
8-42-BW KITCHEN AREA	15:49	00:05		
7-BW AC&R ROOM	15:50	00:01		
2-42-1 WST ENT VESTIBULE	15:51	00:01		
0-42-7W COMPUTER ROOM	15:51	00:00		
2-5C COMPUTER ROOM	15:59	00:08		
9-42-B 1/2 PENTHS CENTER	16:04	00:05		
****** END SHIFT *******	16:04			

03/28/98
02:33:17

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : PETERSON, DON

Start Shift : 03/28/98 02:14
End Shift : 03/28/98 03:23
Total Time : 01:09

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	02:14			
3-22-1 "A" SECTION NRTHWT	02:15	00:01		
1-22-3 SOUTH @ COLUMN 6?	02:19	00:04		
KEYPOINT 192695 NOT FOUND	02:20	00:01		
4-23-3B TNNL WST OF BLD20	02:22	00:02		
24-21 SB EST WALL EQ.RM	02:24	00:02		
23-21 BW COMPUTER ROOM	02:27	00:03		
35-21-1NW	02:29	00:02		
20-42-7W COMPUTER ROOM	02:31	00:02		
19-42-B 1/2 PENTHS CENTER	02:33	00:02		
42-5C COMPUTER ROOM	02:35	00:02		
22-42-1 WST ENT VESTIBULE	02:37	00:02		
17-BW AC&R ROOM	02:40	00:03		
18-42-BW KITCHEN AREA	02:42	00:02		
25-26-1 SO EAST TERMINAL	02:47	00:05		
26-51-1 NW SECT WST WALL	02:50	00:03		
-51 SO EAST BY TANKS	02:51	00:01		
5-23-3 SOUTH @ COLUMN 68	02:54	00:03		
6-23-2 CNTR @ COLUMN 37	02:55	00:01		
7-23-1 "D" SECTION CTR	02:57	00:02		
12-24-1 NORTH WEST	02:59	00:02		
15-24-1 Z&L CALENDER	03:00	00:01		
13-24-2 WEST END	03:01	00:01		
10-24 MEZZ POST C4 CENTER	03:05	00:04		
9-24 MEZZANINE SOUTHEAST	03:07	00:02		
11-24-1 COL.S.PAINT SHOP	03:09	00:02		
8-24 PIPE TNNL SO OF STRN	03:10	00:01		
16-24-1 SOUTHWEST STORAGE	03:15	00:05		
14-24-2 SOUTHEAST	03:20	00:05		
******* END SHIFT *******	03:23			

24

03/28/98
02:33:16

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : SCHMECK, HEIDI

Start Shift : 03/27/98 18:36
End Shift : 03/27/98 19:45
Total Time : 01:09

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	18:36			
KEYPOINT 192695 NOT FOUND	18:41	00:05		
1-22-3 SOUTH @ COLUMN 6?	18:43	00:02		
3-22-1 "A" SECTION NRTHWT	18:46	00:03		
14-24-2 SOUTHEAST	18:51	00:05		
13-24-2 WEST END	18:53	00:02		
15-24-1 Z&L CALENDER	18:53	00:00		
10-24 MEZZ POST C4 CENTER	18:56	00:03		
9-24 MEZZANINE SOUTHEAST	18:58	00:02		
8-24 PIPE TNNL SO OF STRN	19:00	00:02		
11-24-1 COL.S.PAINT SHOP	19:06	00:06		
7-23-1 "D" SECTION CTR	19:08	00:02		
6-23-2 CNTR @ COLUMN 37	19:08	00:00		
5-23-3 SOUTH @ COLUMN 68	19:11	00:03		
34-51 SO EAST BY TANKS	19:13	00:02		
26-51-1 NW SECT WST WALL	19:15	00:02		
-26-1 SO EAST TERMINAL	19:17	00:02		
4-23-3B TNNL WST OF BLD20	19:18	00:01		
25-20-3B TNNL TO 21 RT SD	19:18	00:00		
24-21 SB EST WALL EQ.RM	19:21	00:03		
23-21 BW COMPUTER ROOM	19:22	00:01		
20-42-7W COMPUTER ROOM	19:22	00:00		
18-42-BW KITCHEN AREA	19:27	00:05		
17-BW AC&R ROOM	19:28	00:01		
22-42-1 WST ENT VESTIBULE	19:40	00:12		
42-5C COMPUTER ROOM	19:44	00:04		
19-42-B 1/2 PENTHS CENTER	19:45	00:01		
******* END SHIFT *******	19:45			

03/25/98
05:33:54

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

ard Name : SCHMECK, HEIDI

Start Shift : 03/25/98 01:07
End Shift : 03/25/98 02:18
Total Time : 01:11

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	01:07			
KEYPOINT 192695 NOT FOUND	01:13	00:06		
1-22-3 SOUTH @ COLUMN 6?	01:15	00:02		
3-22-1 "A" SECTION NRTHWT	01:19	00:04		
14-24-2 SOUTHEAST	01:25	00:06		
13-24-2 WEST END	01:26	00:01		
12-24-1 NORTH WEST	01:27	00:01		
15-24-1 Z&L CALENDER	01:31	00:04		
10-24 MEZZ POST C4 CENTER	01:32	00:01		
9-24 MEZZANINE SOUTHEAST	01:34	00:02		
8-24 PIPE TNNL SO OF STRN	01:35	00:01		
11-24-1 COL.S.PAINT SHOP	01:37	00:02		
7-23-1 "D" SECTION CTR	01:39	00:02		
6-23-2 CNTR @ COLUMN 37	01:42	00:03		
34-51 SO EAST BY TANKS	01:43	00:01		
26-51-1 NW SECT WST WALL	01:47	00:04		
23-3B TNNL WST OF BLD20	01:48	00:01		
25-20-3B TNNL TO 21 RT SD	01:49	00:01		
24-21 SB EST WALL EQ.RM	01:51	00:02		
~~25-21-BW COMPUTER ROOM~~	~~01:53~~	~~00:02~~		
20-42-7W COMPUTER ROOM	01:55	00:02		
17-BW AC&R ROOM	02:01	00:06		
22-42-1 WST ENT VESTIBULE	02:01	00:00		
42-5C COMPUTER ROOM	02:13	00:12		
19-42-B 1/2 PENTHS CENTER	02:18	00:05		
******* END SHIFT *******	02:18			

03/24/98
05:30:51

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : SCHMECK, HEIDI

Start Shift : 03/24/98 01:10
End Shift : 03/24/98 02:14
Total Time : 01:04

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	01:10			
KEYPOINT 192695 NOT FOUND	01:16	00:06		
KEYPOINT 192695 NOT FOUND	01:20	00:04		
1-22-3 SOUTH @ COLUMN 6?	01:20	00:00		
3-22-1 "A" SECTION NRTHWT	01:21	00:01		
16-24-1 SOUTHWEST STORAGE	01:22	00:01		
14-24-2 SOUTHEAST	01:30	00:08		
13-24-2 WEST END	01:30	00:00		
12-24-1 NORTH WEST	01:31	00:01		
15-24-1 Z&L CALENDER	01:32	00:01		
10-24 MEZZ POST C4 CENTER	01:34	00:02		
9-24 MEZZANINE SOUTHEAST	01:35	00:01		
8-24 PIPE TNNL SO OF STRN	01:37	00:02		
11-24-1 COL.S.PAINT SHOP	01:38	00:01		
7-23-1 "D" SECTION CTR	01:39	00:01		
5-23-3 SOUTH @ COLUMN 68	01:41	00:02		
6-[illegible] 2 CNTR @ COLUMN 37	01:42	00:01		
34-51 SO EAST BY TANKS	01:44	00:02		
26-51-1 NW SECT WST WALL	01:45	00:01		
25-26-1 SO EAST TERMINAL	01:47	00:02		
4-23-3B TNNL WST OF BLD20	01:49	00:02		
25-20-3B TNNL TO 21 RT SD	01:50	00:01		
24-21 SB EST WALL EQ.RM	01:51	00:01		
23-21 BW COMPUTER ROOM	01:56	00:05		
18-42-BW KITCHEN AREA	01:58	00:02		
17-BW AC&R ROOM	02:00	00:02		
22-42-1 WST ENT VESTIBULE	02:01	00:01		
19-42-B 1/2 PENTHS CENTER	02:07	00:06		
42-5C COMPUTER ROOM	02:09	00:02		
20-42-7W COMPUTER ROOM	02:12	00:03		
******* END SHIFT *******	02:14			

03/23/98
05:19:37

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : BLOEMERS, MARK G

Start Shift : 03/23/98 01:35
End Shift : 03/23/98 02:54
Total Time : 01:19

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	01:35			
35-21-1NW	01:45	00:10		
19-42-B 1/2 PENTHS CENTER	01:47	00:02		
42-5C COMPUTER ROOM	01:49	00:02		
20-42-7W COMPUTER ROOM	01:50	00:01		
22-42-1 WST ENT VESTIBULE	01:52	00:02		
17-BW AC&R ROOM	01:52	00:00		
18-42-BW KITCHEN AREA	02:13	00:21		
23-21 BW COMPUTER ROOM	02:16	00:03		
24-21 SB EST WALL EQ.RM	02:17	00:01		
4-23-3B TNNL WST OF BLD20	02:19	00:02		
25-26-1 SO EAST TERMINAL	02:21	00:02		
34-51 SO EAST BY TANKS	02:22	00:01		
26-51-1 NW SECT WST WALL	02:23	00:01		
12-24-1 NORTH WEST	02:25	00:02		
7-23-1 "D" SECTION CTR	02:27	00:02		
23-2 CNTR @ COLUMN 37	02:29	00:02		
5-23-3 SOUTH @ COLUMN 68	02:30	00:01		
8-24 PIPE TNNL SO OF STRN	02:31	00:01		
11-24-1 COL.S.PAINT SHOP	02:33	00:02		
9-24 MEZZANINE SOUTHEAST	02:34	00:01		
10-24 MEZZ POST C4 CENTER	02:35	00:01		
13-24-2 WEST END	02:37	00:02		
14-24-2 SOUTHEAST	02:47	00:10		
16-24-1 SOUTHWEST STORAGE	02:52	00:05		
KEYPOINT 192695 NOT FOUND	02:53	00:01		
1-22-3 SOUTH @ COLUMN 6?	02:54	00:01		
******* END SHIFT *******	02:54			

03/23/98
05:19:35

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : MANN, KEVIN L

Start Shift : 03/22/98 14:34
End Shift : 03/22/98 22:04
Total Time : 07:30

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	14:34			
24-21 SB EST WALL EQ.RM	14:38	00:04		
23-21 BW COMPUTER ROOM	14:39	00:01		
35-21-1NW	14:42	00:03		
20-42-7W COMPUTER ROOM	14:44	00:02		
42-5C COMPUTER ROOM	14:45	00:01		
19-42-B 1/2 PENTHS CENTER	14:47	00:02		
22-42-1 WST ENT VESTIBULE	14:49	00:02		
17-BW AC&R ROOM	14:49	00:00		
17-BW AC&R ROOM	14:49	00:00		
18-42-BW KITCHEN AREA	15:05	00:16		
25-26-1 SO EAST TERMINAL	15:09	00:04		
26-51-1 NW SECT WST WALL	15:11	00:02		
34-51 SO EAST BY TANKS	15:12	00:01		
12-24-1 NORTH WEST	15:14	00:02		
15-24-1 Z&L CALENDER	15:14	00:00		
-24 MEZZ POST C4 CENTER	15:15	00:01		
9-24 MEZZANINE SOUTHEAST	15:16	00:01		
7-23-1 "D" SECTION CTR	15:18	00:02		
6-23-2 CNTR @ COLUMN 37	15:19	00:01		
5-23-3 SOUTH @ COLUMN 68	15:20	00:01		
11-24-1 COL.S.PAINT SHOP	15:21	00:01		
8-24 PIPE TNNL SO OF STRN	15:22	00:01		
16-24-1 SOUTHWEST STORAGE	15:23	00:01		
3-22-1 "A" SECTION NRTHWT	15:24	00:01		
KEYPOINT 192695 NOT FOUND	15:25	00:01		
1-22-3 SOUTH @ COLUMN 6?	15:27	00:02		
14-24-2 SOUTHEAST	20:31	05:04		
13-24-2 WEST END	20:34	00:03		
12-24-1 NORTH WEST	20:35	00:01		
15-24-1 Z&L CALENDER	20:36	00:01		
10-24 MEZZ POST C4 CENTER	20:37	00:01		
9-24 MEZZANINE SOUTHEAST	20:38	00:01		
7-23-1 "D" SECTION CTR	20:40	00:02		
7-23-1 "D" SECTION CTR	20:40	00:00		
6-23-2 CNTR @ COLUMN 37	20:41	00:01		
5-23-3 SOUTH @ COLUMN 68	20:43	00:02		
11-24-1 COL.S.PAINT SHOP	20:44	00:01		
8-24 PIPE TNNL SO OF STRN	20:45	00:01		
16-24-1 SOUTHWEST STORAGE	20:47	00:02		
3-22-1 "A" SECTION NRTHWT	20:48	00:01		
1 POINT 192695 NOT FOUND	20:49	00:01		
1-22-3 SOUTH @ COLUMN 6?	20:51	00:02		
4-23-3B TNNL WST OF BLD20	20:53	00:02		
24-21 SB EST WALL EQ.RM	20:55	00:02		

03/22/98
05:31:21

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

uard Name : KARL, BRADLY V

Start Shift : 03/21/98 08:52
End Shift : 03/21/98 15:25
Total Time : 06:33

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	08:52			
14-24-2 SOUTHEAST	08:53	00:01		
16-24-1 SOUTHWEST STORAGE	08:56	00:03		
11-24-1 COL.S.PAINT SHOP	09:01	00:05		
9-24 MEZZANINE SOUTHEAST	09:03	00:02		
10-24 MEZZ POST C4 CENTER	09:04	00:01		
13-24-2 WEST END	09:05	00:01		
15-24-1 Z&L CALENDER	09:06	00:01		
12-24-1 NORTH WEST	09:07	00:01		
26-51-1 NW SECT WST WALL	09:08	00:01		
34-51 SO EAST BY TANKS	09:09	00:01		
25-26-1 SO EAST TERMINAL	09:10	00:01		
3-22-1 "A" SECTION NRTHWT	09:11	00:01		
4-23-3B TNNL WST OF BLD20	09:13	00:02		
25-20-3B TNNL TO 21 RT SD	09:15	00:02		
24-21 SB EST WALL EQ.RM	09:16	00:01		
`-21 BW COMPUTER ROOM	09:17	00:01		
18-42-BW KITCHEN AREA	09:21	00:04		
17-BW AC&R ROOM	09:22	00:01		
22-42-1 WST ENT VESTIBULE	09:23	00:01		
22-42-1 WST ENT VESTIBULE	09:23	00:00		
35-21-1NW	09:25	00:02		
19-42-B 1/2 PENTHS CENTER	09:27	00:02		
42-5C COMPUTER ROOM	09:28	00:01		
KEYPOINT 192695 NOT FOUND	09:40	00:12		
1-22-3 SOUTH @ COLUMN 6?	09:42	00:02		
******* END SHIFT *******	15:25			

03/20/98
05:23:31

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : BENDER, GERALD P

Start Shift : 03/20/98 05:34
End Shift : 03/20/98 06:30
Total Time : 00:56

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	05:34			
14-24-2 SOUTHEAST	05:36	00:02		
13-24-2 WEST END	05:39	00:03		
12-24-1 NORTH WEST	05:40	00:01		
10-24 MEZZ POST C4 CENTER	05:42	00:02		
9-24 MEZZANINE SOUTHEAST	05:44	00:02		
11-24-1 COL.S.PAINT SHOP	05:45	00:01		
8-24 PIPE TNNL SO OF STRN	05:46	00:01		
7-23-1 "D" SECTION CTR	05:48	00:02		
5-23-3 SOUTH @ COLUMN 68	05:50	00:02		
6-23-2 CNTR @ COLUMN 37	05:51	00:01		
34-51 SO EAST BY TANKS	05:53	00:02		
26-51-1 NW SECT WST WALL	05:54	00:01		
25-26-1 SO EAST TERMINAL	05:56	00:02		
4-23-3B TNNL WST OF BLD20	05:57	00:01		
1-22-3 SOUTH @ COLUMN 6?	06:00	00:03		
EYPOINT 192695 NOT FOUND	06:01	00:01		
3-22-1 "A" SECTION NRTHWT	06:02	00:01		
22-42-1 WST ENT VESTIBULE	06:12	00:10		
35-21-1NW	06:14	00:02		
23-21 BW COMPUTER ROOM	06:15	00:01		
24-21 SB EST WALL EQ.RM	06:17	00:02		
18-42-BW KITCHEN AREA	06:19	00:02		
17-BW AC&R ROOM	06:21	00:02		
19-42-B 1/2 PENTHS CENTER	06:24	00:03		
42-5C COMPUTER ROOM	06:26	00:02		
20-42-7W COMPUTER ROOM	06:27	00:01		
******* END SHIFT *******	06:30			

03/20/98
05:23:29

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : KARL, BRADLY V

Start Shift : 03/19/98 18:53
End Shift : 03/19/98 23:15
Total Time : 04:22

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	18:53			
14-24-2 SOUTHEAST	19:05	00:12		
16-24-1 SOUTHWEST STORAGE	19:06	00:01		
7-23-1 "D" SECTION CTR	19:08	00:02		
11-24-1 COL.S.PAINT SHOP	19:09	00:01		
9-24 MEZZANINE SOUTHEAST	19:10	00:01		
9-24 MEZZANINE SOUTHEAST	19:10	00:00		
10-24 MEZZ POST C4 CENTER	19:11	00:01		
13-24-2 WEST END	19:12	00:01		
15-24-1 Z&L CALENDER	19:13	00:01		
12-24-1 NORTH WEST	19:14	00:01		
26-51-1 NW SECT WST WALL	19:15	00:01		
34-51 SO EAST BY TANKS	19:16	00:01		
25-26-1 SO EAST TERMINAL	19:17	00:01		
4-23-3B TNNL WST OF BLD20	19:19	00:02		
25-20-3B TNNL TO 21 RT SD	19:19	00:00		
4-21 SB EST WALL EQ.RM	19:20	00:01		
23-21 BW COMPUTER ROOM	19:21	00:01		
18-42-BW KITCHEN AREA	19:23	00:02		
17-BW AC&R ROOM	19:24	00:01		
22-42-1 WST ENT VESTIBULE	19:25	00:01		
19-42-B 1/2 PENTHS CENTER	19:27	00:02		
42-5C COMPUTER ROOM	19:28	00:01		
20-42-7W COMPUTER ROOM	19:30	00:02		
35-21-1NW	19:32	00:02		
3-22-1 "A" SECTION NRTHWT	19:42	00:10		
KEYPOINT 192695 NOT FOUND	19:43	00:01		
1-22-3 SOUTH @ COLUMN 6?	19:44	00:01		
******* END SHIFT *******	23:15			

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : BLOEMERS, MARK G

Start Shift : 03/18/98 23:14
End Shift : 03/19/98 00:36
Total Time : 01:22

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	23:14			
KEYPOINT 192695 NOT FOUND	23:17	00:03		
1-22-3 SOUTH @ COLUMN 6?	23:19	00:02		
3-22-1 "A" SECTION NRTHWT	23:20	00:01		
3-22-1 "A" SECTION NRTHWT	23:20	00:00		
25-26-1 SO EAST TERMINAL	23:21	00:01		
34-51 SO EAST BY TANKS	23:23	00:02		
26-51-1 NW SECT WST WALL	23:24	00:01		
12-24-1 NORTH WEST	23:25	00:01		
7-23-1 "D" SECTION CTR	23:29	00:04		
6-23-2 CNTR @ COLUMN 37	23:31	00:02		
5-23-3 SOUTH @ COLUMN 68	23:32	00:01		
11-24-1 COL.S.PAINT SHOP	23:34	00:02		
9-24 MEZZANINE SOUTHEAST	23:35	00:01		
10-24 MEZZ POST C4 CENTER	23:37	00:02		
13-24-2 WEST END	23:41	00:04		
1-24-2 SOUTHEAST	23:45	00:04		
6-24 PIPE TNNL SO OF STRN	23:46	00:01		
16-24-1 SOUTHWEST STORAGE	23:48	00:02		
4-23-3B TNNL WST OF BLD20	23:52	00:04		
25-20-3B TNNL TO 21 RT SD	23:53	00:01		
24-21 SB EST WALL EQ.RM	23:54	00:01		
23-21 BW COMPUTER ROOM	23:55	00:01		
		00:06	MISC. RESPONSE LOCATION: 00 INCIDENT END: 00:02	00:01
18-42-BW KITCHEN AREA	00:02	00:01		
		00:00	INCIDENT 99 NOT FOUND	00:02
KEYPOINT 293326 NOT FOUND	19:70	20:08		

03/18/98
05:37:36

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : GUARD 335042 NOT FOUND

Start Shift : 03/17/98 18:40
End Shift : 03/17/98 23:16
Total Time : 04:36

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	18:40			
1-22-3 SOUTH @ COLUMN 6?	18:42	00:02		
1-22-3 SOUTH @ COLUMN 6?	18:42	00:00		
KEYPOINT 192695 NOT FOUND	18:43	00:01		
3-22-1 "A" SECTION NRTHWT	18:44	00:01		
4-23-3B TNNL WST OF BLD20	18:46	00:02		
24-21 SB EST WALL EQ.RM	18:48	00:02		
18-42-BW KITCHEN AREA	18:50	00:02		
17-BW AC&R ROOM	18:53	00:03		
19-42-B 1/2 PENTHS CENTER	19:01	00:08		
42-5C COMPUTER ROOM	19:03	00:02		
20-42-7W COMPUTER ROOM	19:04	00:01		
22-42-1 WST ENT VESTIBULE	19:06	00:02		
35-21-1NW	19:10	00:04		
23-21 BW COMPUTER ROOM	19:11	00:01		
25-26-1 SO EAST TERMINAL	19:16	00:05		
4-51 SO EAST BY TANKS	19:18	00:02		
26-51-1 NW SECT WST WALL	19:18	00:00		
5-23-3 SOUTH @ COLUMN 68	19:22	00:04		
6-23-2 CNTR @ COLUMN 37	19:23	00:01		
7-23-1 "D" SECTION CTR	19:25	00:02		
11-24-1 COL.S.PAINT SHOP	19:26	00:01		
9-24 MEZZANINE SOUTHEAST	19:28	00:02		
10-24 MEZZ POST C4 CENTER	19:29	00:01		
15-24-1 Z&L CALENDER	19:30	00:01		
12-24-1 NORTH WEST	19:32	00:02		
13-24-2 WEST END	19:34	00:02		
14-24-2 SOUTHEAST	19:36	00:02		
16-24-1 SOUTHWEST STORAGE	19:38	00:02		
8-24 PIPE TNNL SO OF STRN	19:40	00:02		
******* END SHIFT *******	23:16			

03/16/98
05:22:56

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

ard Name : MANN, KEVIN L

Start Shift : 03/16/98 05:12
End Shift : 03/16/98 06:29
Total Time : 01:17

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	05:12			
14-24-2 SOUTHEAST	05:14	00:02		
13-24-2 WEST END	05:19	00:05		
12-24-1 NORTH WEST	05:20	00:01		
15-24-1 Z&L CALENDER	05:21	00:01		
10-24 MEZZ POST C4 CENTER	05:22	00:01		
9-24 MEZZANINE SOUTHEAST	05:23	00:01		
7-23-1 "D" SECTION CTR	05:24	00:01		
6-23-2 CNTR @ COLUMN 37	05:26	00:02		
5-23-3 SOUTH @ COLUMN 68	05:27	00:01		
11-24-1 COL.S.PAINT SHOP	05:28	00:01		
8-24 PIPE TNNL SO OF STRN	05:30	00:02		
16-24-1 SOUTHWEST STORAGE	05:31	00:01		
3-22-1 "A" SECTION NRTHWT	05:33	00:02		
KEYPOINT 192695 NOT FOUND	05:34	00:01		
KEYPOINT 192695 NOT FOUND	05:34	00:00		
22-3 SOUTH @ COLUMN 6?	05:35	00:01		
23-3B TNNL WST OF BLD20	05:38	00:03		
24-21 SB EST WALL EQ.RM	05:40	00:02		
35-21-1NW	05:42	00:02		
20-42-7W COMPUTER ROOM	05:44	00:02		
42-5C COMPUTER ROOM	05:45	00:01		
19-42-B 1/2 PENTHS CENTER	05:50	00:05		
22-42-1 WST ENT VESTIBULE	05:52	00:02		
17-BW AC&R ROOM	05:53	00:01		
18-42-BW KITCHEN AREA	05:55	00:02		
23-21 BW COMPUTER ROOM	06:19	00:24		
25-26-1 SO EAST TERMINAL	06:23	00:04		
26-51-1 NW SECT WST WALL	06:25	00:02		
34-51 SO EAST BY TANKS	06:26	00:01		
******* END SHIFT *******	06:29			

03/16/98
05:22:53

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : STEELE, EDWARD J

Start Shift : 03/15/98 15:27
End Shift : 03/15/98 22:33
Total Time : 07:06

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	15:27			
3-22-1 "A" SECTION NRTHWT	15:29	00:02		
KEYPOINT 192695 NOT FOUND	15:30	00:01		
1-22-3 SOUTH @ COLUMN 6?	15:31	00:01		
16-24-1 SOUTHWEST STORAGE	15:32	00:01		
14-24-2 SOUTHEAST	15:34	00:02		
13-24-2 WEST END	15:38	00:04		
12-24-1 NORTH WEST	15:39	00:01		
12-24-1 NORTH WEST	15:39	00:00		
15-24-1 Z&L CALENDER	15:40	00:01		
7-23-1 "D" SECTION CTR	15:41	00:01		
10-24 MEZZ POST C4 CENTER	15:43	00:02		
9-24 MEZZANINE SOUTHEAST	15:44	00:01		
11-24-1 COL.S.PAINT SHOP	15:45	00:01		
6-23-2 CNTR @ COLUMN 37	15:48	00:03		
5-23-3 SOUTH @ COLUMN 68	15:49	00:01		
-51 SO EAST BY TANKS	15:51	00:02		
26-51-1 NW SECT WST WALL	15:52	00:01		
25-26-1 SO EAST TERMINAL	15:54	00:02		
4-23-3B TNNL WST OF BLD20	15:56	00:02		
24-21 SB EST WALL EQ.RM	15:58	00:02		
23-21 BW COMPUTER ROOM	16:00	00:02		
17-BW AC&R ROOM	16:02	00:02		
18-42-BW KITCHEN AREA	16:06	00:04		
19-42-B 1/2 PENTHS CENTER	16:11	00:05		
42-5C COMPUTER ROOM	16:15	00:04		
20-42-7W COMPUTER ROOM	16:17	00:02		
35-21-1NW	16:18	00:01		
22-42-1 WST ENT VESTIBULE	16:22	00:04		
3-22-1 "A" SECTION NRTHWT	21:39	05:17		
KEYPOINT 192695 NOT FOUND	21:40	00:01		
1-22-3 SOUTH @ COLUMN 6?	21:41	00:01		
16-24-1 SOUTHWEST STORAGE	21:42	00:01		
13-24-2 WEST END	21:46	00:04		
12-24-1 NORTH WEST	21:47	00:01		
15-24-1 Z&L CALENDER	21:47	00:00		
7-23-1 "D" SECTION CTR	21:49	00:02		
10-24 MEZZ POST C4 CENTER	21:51	00:02		
9-24 MEZZANINE SOUTHEAST	21:52	00:01		
11-24-1 COL.S.PAINT SHOP	21:54	00:02		
6-23-2 CNTR @ COLUMN 37	21:56	00:02		
23-3 SOUTH @ COLUMN 68	21:57	00:01		
34-51 SO EAST BY TANKS	21:59	00:02		
26-51-1 NW SECT WST WALL	22:00	00:01		
26-51-1 NW SECT WST WALL	22:00	00:00		

ıard Name : JACOBSEN, ROBERT H

Start Shift : 03/14/98 08:48
End Shift : 03/14/98 09:52
Total Time : 01:04

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	08:48			
4-23-3B TNNL WST OF BLD20	09:01	00:13		
24-21 SB EST WALL EQ.RM	09:03	00:02		
18-42-BW KITCHEN AREA	09:05	00:02		
17-BW AC&R ROOM	09:07	00:02		
19-42-B 1/2 PENTHS CENTER	09:10	00:03		
42-5C COMPUTER ROOM	09:12	00:02		
20-42-7W COMPUTER ROOM	09:14	00:02		
22-42-1 WST ENT VESTIBULE	09:15	00:01		
35-21-1NW	09:18	00:03		
23-21 BW COMPUTER ROOM	09:19	00:01		
25-26-1 SO EAST TERMINAL	09:23	00:04		
26-51-1 NW SECT WST WALL	09:25	00:02		
34-51 SO EAST BY TANKS	09:26	00:01		
5-23-3 SOUTH @ COLUMN 68	09:29	00:03		
6-23-2 CNTR @ COLUMN 37	09:29	00:00		
·23-1 "D" SECTION CTR	09:31	00:02		
ıı-24-1 COL.S.PAINT SHOP	09:32	00:01		
8-24 PIPE TNNL SO OF STRN	09:33	00:01		
9-24 MEZZANINE SOUTHEAST	09:35	00:02		
10-24 MEZZ POST C4 CENTER	09:36	00:01		
15-24-1 Z&L CALENDER	09:39	00:03		
12-24-1 NORTH WEST	09:40	00:01		
13-24-2 WEST END	09:41	00:01		
14-24-2 SOUTHEAST	09:46	00:05		
16-24-1 SOUTHWEST STORAGE	09:48	00:02		
3-22-1 "A" SECTION NRTHWT	09:49	00:01		
1-22-3 SOUTH @ COLUMN 6?	09:50	00:01		
KEYPOINT 192695 NOT FOUND	09:51	00:01		
******* END SHIFT *******	09:52			

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : MANN, KEVIN L

Start Shift : 03/13/98 05:09
End Shift : 03/13/98 06:29
Total Time : 01:20

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	05:09			
14-24-2 SOUTHEAST	05:11	00:02		
13-24-2 WEST END	05:16	00:05		
12-24-1 NORTH WEST	05:17	00:01		
15-24-1 Z&L CALENDER	05:18	00:01		
10-24 MEZZ POST C4 CENTER	05:18	00:00		
9-24 MEZZANINE SOUTHEAST	05:20	00:02		
7-23-1 "D" SECTION CTR	05:21	00:01		
6-23-2 CNTR @ COLUMN 37	05:23	00:02		
5-23-3 SOUTH @ COLUMN 68	05:24	00:01		
11-24-1 COL.S.PAINT SHOP	05:25	00:01		
8-24 PIPE TNNL SO OF STRN	05:26	00:01		
3-22-1 "A" SECTION NRTHWT	05:29	00:03		
KEYPOINT 192695 NOT FOUND	05:30	00:01		
1-22-3 SOUTH @ COLUMN 6?	05:31	00:01		
4-23-3B TNNL WST OF BLD20	05:33	00:02		
-21 SB EST WALL EQ.RM	05:35	00:02		
35-21-1NW	05:38	00:03		
20-42-7W COMPUTER ROOM	05:39	00:01		
42-5C COMPUTER ROOM	05:41	00:02		
19-42-B 1/2 PENTHS CENTER	05:43	00:02		
22-42-1 WST ENT VESTIBULE	05:46	00:03		
17-BW AC&R ROOM	05:47	00:01		
18-42-BW KITCHEN AREA	05:54	00:07		
23-21 BW COMPUTER ROOM	06:19	00:25		
25-26-1 SO EAST TERMINAL	06:23	00:04		
26-51-1 NW SECT WST WALL	06:25	00:02		
34-51 SO EAST BY TANKS	06:26	00:01		
******* END SHIFT *******	06:29			

03/12/98
05:22:28

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

G..rd Name : MANN, KEVIN L

Start Shift : 03/12/98 05:06
End Shift : 03/12/98 06:30
Total Time : 01:24

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	05:06			
14-24-2 SOUTHEAST	05:08	00:02		
13-24-2 WEST END	05:11	00:03		
12-24-1 NORTH WEST	05:12	00:01		
15-24-1 Z&L CALENDER	05:13	00:01		
10-24 MEZZ POST C4 CENTER	05:14	00:01		
9-24 MEZZANINE SOUTHEAST	05:15	00:01		
7-23-1 "D" SECTION CTR	05:17	00:02		
6-23-2 CNTR @ COLUMN 37	05:19	00:02		
5-23-3 SOUTH @ COLUMN 68	05:20	00:01		
11-24-1 COL.S.PAINT SHOP	05:21	00:01		
8-24 PIPE TNNL SO OF STRN	05:23	00:02		
16-24-1 SOUTHWEST STORAGE	05:32	00:09		
3-22-1 "A" SECTION NRTHWT	05:34	00:02		
KEYPOINT 192695 NOT FOUND	05:35	00:01		
1-22-3 SOUTH @ COLUMN 6?	05:36	00:01		
4 3-3B TNNL WST OF BLD20	05:38	00:02		
24-21 SB EST WALL EQ.RM	05:40	00:02		
35-21-1NW	05:42	00:02		
20-42-7W COMPUTER ROOM	05:44	00:02		
42-5C COMPUTER ROOM	05:46	00:02		
19-42-B 1/2 PENTHS CENTER	05:47	00:01		
22-42-1 WST ENT VESTIBULE	05:56	00:09		
17-BW AC&R ROOM	05:57	00:01		
18-42-BW KITCHEN AREA	06:00	00:03		
23-21 BW COMPUTER ROOM	06:20	00:20		
25-26-1 SO EAST TERMINAL	06:24	00:04		
26-51-1 NW SECT WST WALL	06:26	00:02		
34-51 SO EAST BY TANKS	06:27	00:01		
******* END SHIFT *******	06:30			

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : JACOBSEN, ROBERT H

Start Shift : 03/11/98 18:31
End Shift : 03/11/98 20:04
Total Time : 01:33

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	18:31			
1-22-3 SOUTH @ COLUMN 6?	18:36	00:05		
KEYPOINT 192695 NOT FOUND	18:37	00:01		
3-22-1 "A" SECTION NRTHWT	18:38	00:01		
4-23-3B TNNL WST OF BLD20	18:40	00:02		
24-21 SB EST WALL EQ.RM	18:42	00:02		
23-21 BW COMPUTER ROOM	18:43	00:01		
18-42-BW KITCHEN AREA	18:45	00:02		
17-BW AC&R ROOM	18:47	00:02		
19-42-B 1/2 PENTHS CENTER	18:50	00:03		
42-5C COMPUTER ROOM	18:52	00:02		
20-42-7W COMPUTER ROOM	18:54	00:02		
22-42-1 WST ENT VESTIBULE	18:56	00:02		
35-21-1NW	18:58	00:02		
25-26-1 SO EAST TERMINAL	19:26	00:28		
26-51-1 NW SECT WST WALL	19:28	00:02		
51 SO EAST BY TANKS	19:29	00:01		
5-23-3 SOUTH @ COLUMN 68	19:32	00:03		
6-23-2 CNTR @ COLUMN 37	19:33	00:01		
7-23-1 "D" SECTION CTR	19:34	00:01		
11-24-1 COL.S.PAINT SHOP	19:35	00:01		
8-24 PIPE TNNL SO OF STRN	19:37	00:02		
9-24 MEZZANINE SOUTHEAST	19:39	00:02		
10-24 MEZZ POST C4 CENTER	19:40	00:01		
15-24-1 Z&L CALENDER	19:41	00:01		
12-24-1 NORTH WEST	19:42	00:01		
16-24-1 SOUTHWEST STORAGE	19:44	00:02		
14-24-2 SOUTHEAST	20:00	00:16		
******* END SHIFT *******	20:04			

03/10/98
05:38:20

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Gu d Name : KARL, BRADLY V

Start Shift : 03/10/98 03:32
End Shift : 03/10/98 05:09
Total Time : 01:37

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	03:32			
25-20-3B TNNL TO 21 RT SD	03:33	00:01		
~~24-21-SB-EST-WALL-EQ-RM~~	~~03:34~~	~~00:01~~		
23-21 BW COMPUTER ROOM	03:35	00:01		
18-42-BW KITCHEN AREA	03:37	00:02		
17-BW AC&R ROOM	03:38	00:01		
22-42-1 WST ENT VESTIBULE	03:39	00:01		
19-42-B 1/2 PENTHS CENTER	03:41	00:02		
42-5C COMPUTER ROOM	03:43	00:02		
35-21-1NW	03:46	00:03		
4-23-3B TNNL WST OF BLD20	03:48	00:02		
25-26-1 SO EAST TERMINAL	03:50	00:02		
34-51 SO EAST BY TANKS	03:51	00:01		
26-51-1 NW SECT WST WALL	03:52	00:01		
12-24-1 NORTH WEST	03:54	00:02		
15-24-1 Z&L CALENDER	03:55	00:01		
10 `4 MEZZ POST C4 CENTER	03:56	00:01		
13 24-2 WEST END	03:57	00:01		
13-24-2 WEST END	03:57	00:00		
9-24 MEZZANINE SOUTHEAST	03:59	00:02		
11-24-1 COL.S.PAINT SHOP	04:00	00:01		
7-23-1 "D" SECTION CTR	04:01	00:01		
16-24-1 SOUTHWEST STORAGE	04:03	00:02		
14-24-2 SOUTHEAST	04:04	00:01		
KEYPOINT 192695 NOT FOUND	04:39	00:35		
1-22-3 SOUTH @ COLUMN 6?	04:40	00:01		
3-22-1 "A" SECTION NRTHWT	05:03	00:23		
******* END SHIFT *******	05:09			

Guard Name : STEELE, EDWARD J

Start Shift : 03/09/98 05:10
End Shift : 03/09/98 06:26
Total Time : 01:16

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	05:10			
3-22-1 "A" SECTION NRTHWT	05:12	00:02		
KEYPOINT 192695 NOT FOUND	05:13	00:01		
1-22-3 SOUTH @ COLUMN 6?	05:14	00:01		
16-24-1 SOUTHWEST STORAGE	05:16	00:02		
16-24-1 SOUTHWEST STORAGE	05:16	00:00		
14-24-2 SOUTHEAST	05:18	00:02		
13-24-2 WEST END	05:22	00:04		
12-24-1 NORTH WEST	05:24	00:02		
15-24-1 Z&L CALENDER	05:24	00:00		
10-24 MEZZ POST C4 CENTER	05:27	00:03		
9-24 MEZZANINE SOUTHEAST	05:29	00:02		
11-24-1 COL.S.PAINT SHOP	05:31	00:02		
5-23-3 SOUTH @ COLUMN 68	05:33	00:02		
6-23-2 CNTR @ COLUMN 37	05:34	00:01		
34-51 SO EAST BY TANKS	05:36	00:02		
5-51-1 NW SECT WST WALL	05:37	00:01		
25-26-1 SO EAST TERMINAL	05:40	00:03		
25-26-1 SO EAST TERMINAL	05:40	00:00		
24-21 SB EST WALL EQ.RM	05:44	00:04		
23-21 BW COMPUTER ROOM	05:45	00:01		
35-21-1NW	06:05	00:20		
20-42-7W COMPUTER ROOM	06:07	00:02		
19-42-B 1/2 PENTHS CENTER	06:09	00:02		
42-5C COMPUTER ROOM	06:11	00:02		
22-42-1 WST ENT VESTIBULE	06:16	00:05		
17-BW AC&R ROOM	06:17	00:01		
18-42-BW KITCHEN AREA	06:19	00:02		
18-42-BW KITCHEN AREA	06:19	00:00		
18-42-BW KITCHEN AREA	06:19	00:00		
18-42-BW KITCHEN AREA	06:19	00:00		
4-23-3B TNNL WST OF BLD20	06:22	00:03		
******* END SHIFT *******	06:26			

03/09/98
05:19:46

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : GAHLER, WILLIAM J.

Start Shift : 03/08/98 08:40
End Shift : 03/08/98 09:59
Total Time : 01:19

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	08:40			
14-24-2 SOUTHEAST	08:43	00:03		
13-24-2 WEST END	08:48	00:05		
15-24-1 Z&L CALENDER	08:49	00:01		
12-24-1 NORTH WEST	08:50	00:01		
10-24 MEZZ POST C4 CENTER	08:52	00:02		
9-24 MEZZANINE SOUTHEAST	08:54	00:02		
11-24-1 COL.S.PAINT SHOP	08:56	00:02		
7-23-1 "D" SECTION CTR	08:58	00:02		
5-23-3 SOUTH @ COLUMN 68	09:00	00:02		
6-23-2 CNTR @ COLUMN 37	09:01	00:01		
8-24 PIPE TNNL SO OF STRN	09:03	00:02		
16-24-1 SOUTHWEST STORAGE	09:05	00:02		
3-22-1 "A" SECTION NRTHWT	09:06	00:01		
1-22-3 SOUTH @ COLUMN 6?	09:08	00:02		
KEYPOINT 192695 NOT FOUND	09:08	00:00		
23-3B TNNL WST OF BLD20	09:10	00:02		
24-21 SB EST WALL EQ.RM	09:12	00:02		
23-21 BW COMPUTER ROOM	09:19	00:07		
18-42-BW KITCHEN AREA	09:21	00:02		
19-42-B 1/2 PENTHS CENTER	09:24	00:03		
42-5C COMPUTER ROOM	09:26	00:02		
20-42-7W COMPUTER ROOM	09:29	00:03		
35-21-1NW	09:31	00:02		
22-42-1 WST ENT VESTIBULE	09:41	00:10		
17-BW AC&R ROOM	09:42	00:01		
25-26-1 SO EAST TERMINAL	09:53	00:11		
26-51-1 NW SECT WST WALL	09:55	00:02		
34-51 SO EAST BY TANKS	09:56	00:01		
******* END SHIFT *******	09:59			

03/08/98
05:32:20

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : STEELE, EDWARD J

Start Shift : 03/07/98 05:12
End Shift : 03/07/98 08:37
Total Time : 03:25

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	05:12			
3-22-1 "A" SECTION NRTHWT	05:14	00:02		
3-22-1 "A" SECTION NRTHWT	05:14	00:00		
KEYPOINT 192695 NOT FOUND	05:15	00:01		
1-22-3 SOUTH @ COLUMN 6?	05:16	00:01		
16-24-1 SOUTHWEST STORAGE	05:17	00:01		
14-24-2 SOUTHEAST	05:26	00:09		
13-24-2 WEST END	05:30	00:04		
12-24-1 NORTH WEST	05:31	00:01		
15-24-1 Z&L CALENDER	05:32	00:01		
7-23-1 "D" SECTION CTR	05:33	00:01		
10-24 MEZZ POST C4 CENTER	05:35	00:02		
9-24 MEZZANINE SOUTHEAST	05:36	00:01		
11-24-1 COL.S.PAINT SHOP	05:38	00:02		
6-23-2 CNTR @ COLUMN 37	05:40	00:02		
5-23-3 SOUTH @ COLUMN 68	05:41	00:01		
-51 SO EAST BY TANKS	05:43	00:02		
26-51-1 NW SECT WST WALL	05:44	00:01		
25-26-1 SO EAST TERMINAL	05:47	00:03		
4-23-3B TNNL WST OF BLD20	05:49	00:02		
24-21 SB EST WALL EQ.RM	05:53	00:04		
23-21 BW COMPUTER ROOM	05:55	00:02		
35-21-1NW	05:57	00:02		
22-42-1 WST ENT VESTIBULE	05:59	00:02		
17-BW AC&R ROOM	06:00	00:01		
18-42-BW KITCHEN AREA	06:03	00:03		
19-42-B 1/2 PENTHS CENTER	06:17	00:14		
42-5C COMPUTER ROOM	06:19	00:02		
20-42-7W COMPUTER ROOM	06:22	00:03		
******* END SHIFT *******	08:37			

Guard Name : SCHWALBE, JON R

Start Shift : 03/01/98 08:50
End Shift : 03/01/98 09:58
Total Time : 01:08

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	08:50			
14-24-2 SOUTHEAST	08:58	00:08		
13-24-2 WEST END	09:13	00:15		
15-24-1 Z&L CALENDER	09:15	00:02		
10-24 MEZZ POST C4 CENTER	09:16	00:01		
9-24 MEZZANINE SOUTHEAST	09:17	00:01		
8-24 PIPE TNNL SO OF STRN	09:18	00:01		
16-24-1 SOUTHWEST STORAGE	09:20	00:02		
1-22-3 SOUTH @ COLUMN 6?	09:21	00:01		
		00:01	SAFETY HAZARD LOCATION: 22 3 2 ELV.GATE LEFTUNLOCKED	09:22
KEYPOINT 192695 NOT FOUND	09:24	00:02		
3-22-1 "A" SECTION NRTHWT	09:25	00:01		
5-23-3 SOUTH @ COLUMN 68	09:28	00:03		
		00:00	SAFETY HAZARD LOCATION: 23 3 2 ELV.GATES LEFT UNLOCKED	09:28
6-23-2 CNTR @ COLUMN 37	09:29	00:01		
7-23-1 "D" SECTION CTR	09:30	00:01		
11-24-1 COL.S.PAINT SHOP	09:31	00:01		
12-24-1 NORTH WEST	09:33	00:02		
26-51-1 NW SECT WST WALL	09:34	00:01		
34-51 SO EAST BY TANKS	09:35	00:01		
25-26-1 SO EAST TERMINAL	09:37	00:02		
4-23-3B TNNL WST OF BLD20	09:38	00:01		
24-21 SB EST WALL EQ.RM	09:40	00:02		
23-21 BW COMPUTER ROOM	09:41	00:01		
18-42-BW KITCHEN AREA	09:44	00:03		
17-BW AC&R ROOM	09:47	00:03		
22-42-1 WST ENT VESTIBULE	09:47	00:00		
19-42-B 1/2 PENTHS CENTER	09:50	00:03		
42-5C COMPUTER ROOM	09:52	00:02		
20-42-7W COMPUTER ROOM	09:53	00:01		
35-21-1NW	09:55	00:02		
******* END SHIFT *******	09:58			

03/01/98
05:30:19

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : MCCORMICK, DON

Start Shift : 02/28/98 08:43
End Shift : 02/28/98 09:56
Total Time : 01:13

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	08:43			
14-24-2 SOUTHEAST	08:47	00:04		
16-24-1 SOUTHWEST STORAGE	08:48	00:01		
11-24-1 COL.S.PAINT SHOP	08:49	00:01		
8-24 PIPE TNNL SO OF STRN	08:50	00:01		
6-23-2 CNTR @ COLUMN 37	08:53	00:03		
5-23-3 SOUTH @ COLUMN 68	08:55	00:02		
7-23-1 "D" SECTION CTR	08:56	00:01		
9-24 MEZZANINE SOUTHEAST	08:57	00:01		
10-24 MEZZ POST C4 CENTER	08:59	00:02		
13-24-2 WEST END	08:59	00:00		
15-24-1 Z&L CALENDER	09:01	00:02		
12-24-1 NORTH WEST	09:02	00:01		
26-51-1 NW SECT WST WALL	09:03	00:01		
34-51 SO EAST BY TANKS	09:04	00:01		
25-26-1 SO EAST TERMINAL	09:05	00:01		
3 2-1 "A" SECTION NRTHWT	09:07	00:02		
KEYPOINT 192695 NOT FOUND	09:08	00:01		
1-22-3 SOUTH @ COLUMN 6?	09:09	00:01		
22-42-1 WST ENT VESTIBULE	09:12	00:03		
17-BW AC&R ROOM	09:13	00:01		
18-42-BW KITCHEN AREA	09:16	00:03		
19-42-B 1/2 PENTHS CENTER	09:31	00:15		
42-5C COMPUTER ROOM	09:32	00:01		
20-42-7W COMPUTER ROOM	09:34	00:02		
35-21-1NW	09:36	00:02		
23-21 BW COMPUTER ROOM	09:50	00:14		
24-21 SB EST WALL EQ.RM	09:52	00:02		
4-23-3B TNNL WST OF BLD20	09:54	00:02		
******* END SHIFT *******	09:56			

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : BLOEMERS, MARK G

Start Shift : 02/27/98 18:32
End Shift : 02/27/98 19:58
Total Time : 01:26

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	18:32			
KEYPOINT 192695 NOT FOUND	18:36	00:04		
1-22-3 SOUTH @ COLUMN 6?	18:37	00:01		
3-22-1 "A" SECTION NRTHWT	18:38	00:01		
25-26-1 SO EAST TERMINAL	18:39	00:01		
34-51 SO EAST BY TANKS	18:40	00:01		
26-51-1 NW SECT WST WALL	18:41	00:01		
12-24-1 NORTH WEST	18:43	00:02		
7-23-1 "D" SECTION CTR	18:44	00:01		
6-23-2 CNTR @ COLUMN 37	18:46	00:02		
5-23-3 SOUTH @ COLUMN 68	18:47	00:01		
11-24-1 COL.S.PAINT SHOP	18:49	00:02		
9-24 MEZZANINE SOUTHEAST	18:50	00:01		
10-24 MEZZ POST C4 CENTER	18:52	00:02		
13-24-2 WEST END	18:56	00:04		
14-24-2 SOUTHEAST	18:59	00:03		
24 PIPE TNNL SO OF STRN	19:01	00:02		
16-24-1 SOUTHWEST STORAGE	19:02	00:01		
35-21-1NW	19:37	00:35		
20-42-7W COMPUTER ROOM	19:38	00:01		
19-42-B 1/2 PENTHS CENTER	19:41	00:03		
42-5C COMPUTER ROOM	19:43	00:02		
22-42-1 WST ENT VESTIBULE	19:45	00:02		
17-BW AC&R ROOM	19:46	00:01		
18-42-BW KITCHEN AREA	19:48	00:02		
23-21 BW COMPUTER ROOM	19:53	00:05		
24-21 SB EST WALL EQ.RM	19:54	00:01		
4-23-3B TNNL WST OF BLD20	19:56	00:02		
******* END SHIFT *******	19:58			

02/26/98
05:45:48

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : JACOBSEN, ROBERT H

Start Shift : 02/26/98 04:26
End Shift : 02/26/98 05:44
Total Time : 01:18

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	04:26			
4-23-3B TNNL WST OF BLD20	04:34	00:08		
24-21 SB EST WALL EQ.RM	04:35	00:01		
18-42-BW KITCHEN AREA	04:38	00:03		
17-BW AC&R ROOM	04:39	00:01		
19-42-B 1/2 PENTHS CENTER	04:42	00:03		
42-5C COMPUTER ROOM	04:44	00:02		
20-42-7W COMPUTER ROOM	04:45	00:01		
22-42-1 WST ENT VESTIBULE	04:52	00:07		
35-21-1NW	04:53	00:01		
23-21 BW COMPUTER ROOM	04:54	00:01		
25-26-1 SO EAST TERMINAL	05:04	00:10		
26-51-1 NW SECT WST WALL	05:06	00:02		
34-51 SO EAST BY TANKS	05:07	00:01		
7-23-1 "D" SECTION CTR	05:09	00:02		
12-24-1 NORTH WEST	05:11	00:02		
0-24 MEZZ POST C4 CENTER	05:14	00:03		
9-24 MEZZANINE SOUTHEAST	05:17	00:03		
11-24-1 COL.S.PAINT SHOP	05:19	00:02		
5-23-3 SOUTH @ COLUMN 68	05:22	00:03		
6-23-2 CNTR @ COLUMN 37	05:23	00:01		
8-24 PIPE TNNL SO OF STRN	05:26	00:03		
16-24-1 SOUTHWEST STORAGE	05:28	00:02		
1-22-3 SOUTH @ COLUMN 6?	05:31	00:03		
KEYPOINT 192695 NOT FOUND	05:33	00:02		
14-24-2 SOUTHEAST	05:36	00:03		
******* END SHIFT *******	05:44			

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : SCHWALBE, JON R

Start Shift : 02/25/98 18:38
End Shift : 02/25/98 19:56
Total Time : 01:18

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	18:38			
14-24-2 SOUTHEAST	18:53	00:15		
1-22-3 SOUTH @ COLUMN 6?	18:55	00:02		
KEYPOINT 192695 NOT FOUND	18:58	00:03		
3-22-1 "A" SECTION NRTHWT	18:59	00:01		
5-23-3 SOUTH @ COLUMN 68	19:01	00:02		
6-23-2 CNTR @ COLUMN 37	19:02	00:01		
7-23-1 "D" SECTION CTR	19:03	00:01		
11-24-1 COL.S.PAINT SHOP	19:04	00:01		
8-24 PIPE TNNL SO OF STRN	19:06	00:02		
9-24 MEZZANINE SOUTHEAST	19:08	00:02		
10-24 MEZZ POST C4 CENTER	19:09	00:01		
15-24-1 Z&L CALENDER	19:10	00:01		
13-24-2 WEST END	19:12	00:02		
12-24-1 NORTH WEST	19:13	00:01		
26-51-1 NW SECT WST WALL	19:14	00:01		
[illegible]-51 SO EAST BY TANKS	19:15	00:01		
25-26-1 SO EAST TERMINAL	19:17	00:02		
24-21 SB EST WALL EQ.RM	19:25	00:08		
23-21 BW COMPUTER ROOM	19:27	00:02		
18-42-BW KITCHEN AREA	19:30	00:03		
17-BW AC&R ROOM	19:33	00:03		
22-42-1 WST ENT VESTIBULE	19:33	00:00		
19-42-B 1/2 PENTHS CENTER	19:36	00:03		
42-5C COMPUTER ROOM	19:38	00:02		
20-42-7W COMPUTER ROOM	19:39	00:01		
35-21-1NW	19:40	00:01		
4-23-3B TNNL WST OF BLD20	19:54	00:14		
16-24-1 SOUTHWEST STORAGE	19:56	00:02		
******* END SHIFT *******	19:56			

02/24/98
05:17:32

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : GAHLER, WILLIAM J.

Start Shift : 02/24/98 05:13
End Shift : 02/24/98 06:22
Total Time : 01:09

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	05:13			
14-24-2 SOUTHEAST	05:14	00:01		
13-24-2 WEST END	05:17	00:03		
15-24-1 Z&L CALENDER	05:18	00:01		
12-24-1 NORTH WEST	05:19	00:01		
10-24 MEZZ POST C4 CENTER	05:21	00:02		
9-24 MEZZANINE SOUTHEAST	05:22	00:01		
11-24-1 COL.S.PAINT SHOP	05:24	00:02		
7-23-1 "D" SECTION CTR	05:25	00:01		
5-23-3 SOUTH @ COLUMN 68	05:27	00:02		
6-23-2 CNTR @ COLUMN 37	05:28	00:01		
8-24 PIPE TNNL SO OF STRN	05:31	00:03		
16-24-1 SOUTHWEST STORAGE	05:32	00:01		
3-22-1 "A" SECTION NRTHWT	05:33	00:01		
1-22-3 SOUTH @ COLUMN 6?	05:36	00:03		
KEYPOINT 192695 NOT FOUND	05:37	00:01		
23-3B TNNL WST OF BLD20	05:38	00:01		
24-21 SB EST WALL EQ.RM	05:41	00:03		
23-21 BW COMPUTER ROOM	05:45	00:04		
18-42-BW KITCHEN AREA	05:47	00:02		
19-42-B 1/2 PENTHS CENTER	05:49	00:02		
42-5C COMPUTER ROOM	05:51	00:02		
20-42-7W COMPUTER ROOM	05:54	00:03		
35-21-1NW	05:55	00:01		
22-42-1 WST ENT VESTIBULE	05:57	00:02		
17-BW AC&R ROOM	05:58	00:01		
25-26-1 SO EAST TERMINAL	06:16	00:18		
26-51-1 NW SECT WST WALL	06:18	00:02		
34-51 SO EAST BY TANKS	06:19	00:01		
******* END SHIFT *******	06:22			

02/25/98 3M CORPORATION - ST. PAUL PAGE: 1
05:30:18 SECURITY SHIFT REPORT

Guard Name : SCHWALBE, JON R

Start Shift : 02/23/98 18:41
End Shift : 02/23/98 20:01
Total Time : 01:20

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	18:41			
1-22-3 SOUTH @ COLUMN 6?	18:43	00:02		
		00:01	SAFETY HAZARD LOCATION: 22 3 2 ELV.GATES LEFT UNLOCKED	18:44
KEYPOINT 192695 NOT FOUND	18:46	00:02		
3-22-1 "A" SECTION NRTHWT	18:47	00:01		
5-23-3 SOUTH @ COLUMN 68	18:50	00:03		
		00:00	SAFETY HAZARD LOCATION: 23 3 2 ELV.GATES LEFT UNLOCKED	18:50
6-23-2 CNTR @ COLUMN 37	18:52	00:02		
7-23-1 "D" SECTION CTR	18:53	00:01		
7-23-1 "D" SECTION CTR	18:53	00:00		
11-24-1 COL.S.PAINT SHOP	18:54	00:01		
8-24 PIPE TNNL SO OF STRN	18:56	00:02		
9 1 MEZZANINE SOUTHEAST	18:58	00:02		
10-24 MEZZ POST C4 CENTER	18:59	00:01		
15-24-1 Z&L CALENDER	19:00	00:01		
14-24-2 SOUTHEAST	19:18	00:18		
13-24-2 WEST END	19:22	00:04		
12-24-1 NORTH WEST	19:23	00:01		
26-51-1 NW SECT WST WALL	19:29	00:06		
34-51 SO EAST BY TANKS	19:30	00:01		
25-26-1 SO EAST TERMINAL	19:31	00:01		
4-23-3B TNNL WST OF BLD20	19:33	00:02		
24-21 SB EST WALL EQ.RM	19:35	00:02		
		00:00	SECURITY VIOLATION LOCATION: 21 SB FIRE PRO.STOR.RM.UNLOCKED	19:35
23-21 BW COMPUTER ROOM	19:40	00:05		
18-42-BW KITCHEN AREA	19:48	00:08		
17-BW AC&R ROOM	19:51	00:03		
22-42-1 WST ENT VESTIBULE	19:52	00:01		
42-5C COMPUTER ROOM	19:55	00:03		
20-42-7W COMPUTER ROOM	19:57	00:02		
35-21-1NW	19:58	00:01		
******* END SHIFT *******	20:01			

02/23/98
03:58:34

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : KARL, BRADLY V

Start Shift : 02/22/98 08:40
End Shift : 02/22/98 22:33
Total Time : 13:53

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	08:40			
16-24-1 SOUTHWEST STORAGE	08:46	00:06		
14-24-2 SOUTHEAST	08:47	00:01		
13-24-2 WEST END	08:53	00:06		
10-24 MEZZ POST C4 CENTER	08:53	00:00		
9-24 MEZZANINE SOUTHEAST	08:55	00:02		
15-24-1 Z&L CALENDER	08:57	00:02		
11-24-1 COL.S.PAINT SHOP	08:58	00:01		
7-23-1 "D" SECTION CTR	09:21	00:23		
12-24-1 NORTH WEST	09:23	00:02		
26-51-1 NW SECT WST WALL	09:24	00:01		
34-51 SO EAST BY TANKS	09:25	00:01		
25-26-1 SO EAST TERMINAL	09:26	00:01		
4-23-3B TNNL WST OF BLD20	09:27	00:01		
25-20-3B TNNL TO 21 RT SD	09:28	00:01		
24-21 SB EST WALL EQ.RM	09:29	00:01		
[illegible]-21 BW COMPUTER ROOM	09:30	00:01		
1[illegible]-42-BW KITCHEN AREA	09:31	00:01		
17-BW AC&R ROOM	09:33	00:02		
22-42-1 WST ENT VESTIBULE	09:34	00:01		
19-42-B 1/2 PENTHS CENTER	09:36	00:02		
19-42-B 1/2 PENTHS CENTER	09:36	00:00		
42-5C COMPUTER ROOM	09:37	00:01		
35-21-1NW	09:42	00:05		
4-23-3B TNNL WST OF BLD20	09:45	00:03		
3-22-1 "A" SECTION NRTHWT	09:46	00:01		
KEYPOINT 192695 NOT FOUND	09:47	00:01		
1-22-3 SOUTH @ COLUMN 6?	09:48	00:01		
3-22-1 "A" SECTION NRTHWT	15:26	05:38		
KEYPOINT 192695 NOT FOUND	15:28	00:02		
1-22-3 SOUTH @ COLUMN 6?	15:29	00:01		
1-22-3 SOUTH @ COLUMN 6?	15:29	00:00		
16-24-1 SOUTHWEST STORAGE	15:30	00:01		
14-24-2 SOUTHEAST	15:33	00:03		
13-24-2 WEST END	15:36	00:03		
12-24-1 NORTH WEST	15:38	00:02		
12-24-1 NORTH WEST	15:38	00:00		
12-24-1 NORTH WEST	15:38	00:00		
15-24-1 Z&L CALENDER	15:39	00:01		
7-23-1 "D" SECTION CTR	15:40	00:01		
10-24 MEZZ POST C4 CENTER	15:42	00:02		
9-24 MEZZANINE SOUTHEAST	15:43	00:01		
11-24-1 COL.S.PAINT SHOP	15:44	00:01		
6-23-2 CNTR @ COLUMN 37	15:46	00:02		
5-23-3 SOUTH @ COLUMN 68	15:47	00:01		

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

(rd Name : SCHMECK, HEIDI

Start Shift : 02/21/98 05:09
End Shift : 02/21/98 06:20
Total Time : 01:11

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	05:09			
1-22-3 SOUTH @ COLUMN 6?	05:16	00:07		
KEYPOINT 192695 NOT FOUND	05:18	00:02		
3-22-1 "A" SECTION NRTHWT	05:20	00:02		
16-24-1 SOUTHWEST STORAGE	05:21	00:01		
14-24-2 SOUTHEAST	05:23	00:02		
13-24-2 WEST END	05:25	00:02		
12-24-1 NORTH WEST	05:27	00:02		
15-24-1 Z&L CALENDER	05:29	00:02		
10-24 MEZZ POST C4 CENTER	05:31	00:02		
9-24 MEZZANINE SOUTHEAST	05:32	00:01		
8-24 PIPE TNNL SO OF STRN	05:34	00:02		
11-24-1 COL.S.PAINT SHOP	05:35	00:01		
7-23-1 "D" SECTION CTR	05:36	00:01		
5-23-3 SOUTH @ COLUMN 68	05:38	00:02		
34-51 SO EAST BY TANKS	05:42	00:04		
2[illegible] 51-1 NW SECT WST WALL	05:42	00:00		
2[illegible] 26-1 SO EAST TERMINAL	05:45	00:03		
25-20-3B TNNL TO 21 RT SD	05:47	00:02		
24-21 SB EST WALL EQ.RM	05:48	00:01		
23-21 BW COMPUTER ROOM	05:50	00:02		
18-42-BW KITCHEN AREA	05:54	00:04		
17-BW AC&R ROOM	05:56	00:02		
22-42-1 WST ENT VESTIBULE	05:57	00:01		
19-42-B 1/2 PENTHS CENTER	06:00	00:03		
42-5C COMPUTER ROOM	06:06	00:06		
20-42-7W COMPUTER ROOM	06:09	00:03		
4-23-3B TNNL WST OF BLD20	06:13	00:04		
******* END SHIFT *******	06:20			

02/20/98
05:25:26

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

G rd Name : GUARD 29~~8~~675 ~~NOT FOUND~~
Schmeck, Heidi

Start Shift : 02/20/98 05:05
End Shift : 02/20/98 06:25
Total Time : 01:20

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	05:05			
1-22-3 SOUTH @ COLUMN 6?	05:22	00:17		
KEYPOINT 192695 NOT FOUND	05:23	00:01		
3-22-1 "A" SECTION NRTHWT	05:24	00:01		
16-24-1 SOUTHWEST STORAGE	05:27	00:03		
14-24-2 SOUTHEAST	05:28	00:01		
13-24-2 WEST END	05:30	00:02		
12-24-1 NORTH WEST	05:33	00:03		
15-24-1 Z&L CALENDER	05:34	00:01		
10-24 MEZZ POST C4 CENTER	05:36	00:02		
9-24 MEZZANINE SOUTHEAST	05:37	00:01		
8-24 PIPE TNNL SO OF STRN	05:39	00:02		
11-24-1 COL.S.PAINT SHOP	05:40	00:01		
7-23-1 "D" SECTION CTR	05:41	00:01		
6-23-2 CNTR @ COLUMN 37	05:43	00:02		
5-23-3 SOUTH @ COLUMN 68	05:44	00:01		
3[illegible] 51 SO EAST BY TANKS	05:52	00:08		
2[illegible] 51-1 NW SECT WST WALL	05:53	00:01		
25-26-1 SO EAST TERMINAL	05:55	00:02		
25-20-3B TNNL TO 21 RT SD	05:58	00:03		
24-21 SB EST WALL EQ.RM	05:59	00:01		
23-21 BW COMPUTER ROOM	06:00	00:01		
18-42-BW KITCHEN AREA	06:02	00:02		
17-BW AC&R ROOM	06:04	00:02		
22-42-1 WST ENT VESTIBULE	06:05	00:01		
19-42-B 1/2 PENTHS CENTER	06:08	00:03		
42-5C COMPUTER ROOM	06:10	00:02		
20-42-7W COMPUTER ROOM	06:16	00:06		
4-23-3B TNNL WST OF BLD20	06:19	00:03		
******* END SHIFT *******	06:25			

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

ard Name : SCHMECK, HEIDI

Start Shift : 02/19/98 05:06
End Shift : 02/19/98 06:18
Total Time : 01:12

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	05:06			
1-22-3 SOUTH @ COLUMN 6?	05:12	00:06		
KEYPOINT 192695 NOT FOUND	05:13	00:01		
3-22-1 "A" SECTION NRTHWT	05:16	00:03		
16-24-1 SOUTHWEST STORAGE	05:17	00:01		
14-24-2 SOUTHEAST	05:18	00:01		
13-24-2 WEST END	05:21	00:03		
12-24-1 NORTH WEST	05:22	00:01		
15-24-1 Z&L CALENDER	05:25	00:03		
10-24 MEZZ POST C4 CENTER	05:27	00:02		
9-24 MEZZANINE SOUTHEAST	05:28	00:01		
8-24 PIPE TNNL SO OF STRN	05:30	00:02		
11-24-1 COL.S.PAINT SHOP	05:31	00:01		
7-23-1 "D" SECTION CTR	05:33	00:02		
6-23-2 CNTR @ COLUMN 37	05:35	00:02		
5-23-3 SOUTH @ COLUMN 68	05:37	00:02		
[illegible]-51 SO EAST BY TANKS	05:39	00:02		
[illegible]-51-1 NW SECT WST WALL	05:40	00:01		
25-26-1 SO EAST TERMINAL	05:42	00:02		
25-20-3B TNNL TO 21 RT SD	05:45	00:03		
24-21 SB EST WALL EQ.RM	05:46	00:01		
23-21 BW COMPUTER ROOM	05:48	00:02		
18-42-BW KITCHEN AREA	05:51	00:03		
17-BW AC&R ROOM	05:57	00:06		
22-42-1 WST ENT VESTIBULE	05:58	00:01		
19-42-B 1/2 PENTHS CENTER	06:01	00:03		
42-5C COMPUTER ROOM	06:03	00:02		
20-42-7W COMPUTER ROOM	06:07	00:04		
4-23-3B TNNL WST OF BLD20	06:15	00:08		
******* END SHIFT *******	06:18			

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Gu__d Name : APPLETON, SCOTT

Start Shift : 02/15/98 08:43
End Shift : 02/15/98 09:50
Total Time : 01:07

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	08:43			
1-22-3 SOUTH @ COLUMN 6?	08:45	00:02		
KEYPOINT 192695 NOT FOUND	08:46	00:01		
3-22-1 "A" SECTION NRTHWT	08:47	00:01		
11-24-1 COL.S.PAINT SHOP	08:49	00:02		
8-24 PIPE TNNL SO OF STRN	08:49	00:00		
5-23-3 SOUTH @ COLUMN 68	08:52	00:03		
6-23-2 CNTR @ COLUMN 37	08:53	00:01		
7-23-1 "D" SECTION CTR	08:54	00:01		
34-51 SO EAST BY TANKS	08:55	00:01		
26-51-1 NW SECT WST WALL	08:56	00:01		
12-24-1 NORTH WEST	08:57	00:01		
15-24-1 Z&L CALENDER	08:58	00:01		
9-24 MEZZANINE SOUTHEAST	08:59	00:01		
10-24 MEZZ POST C4 CENTER	09:00	00:01		
13-24-2 WEST END	09:01	00:01		
1/ `4-2 SOUTHEAST	09:04	00:03		
16-24-1 SOUTHWEST STORAGE	09:05	00:01		
20-42-7W COMPUTER ROOM	09:08	00:03		
19-42-B 1/2 PENTHS CENTER	09:10	00:02		
42-5C COMPUTER ROOM	09:12	00:02		
22-42-1 WST ENT VESTIBULE	09:13	00:01		
17-BW AC&R ROOM	09:13	00:00		
18-42-BW KITCHEN AREA	09:15	00:02		
35-21-1NW	09:21	00:06		
23-21 BW COMPUTER ROOM	09:24	00:03		
24-21 SB EST WALL EQ.RM	09:45	00:21		
4-23-3B TNNL WST OF BLD20	09:47	00:02		
25-26-1 SO EAST TERMINAL	09:48	00:01		
******* END SHIFT *******	09:50			

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

uard Name : APPLETON, SCOTT

Start Shift : 02/14/98 08:46
End Shift : 02/14/98 12:54
Total Time : 04:08

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	08:46			
1-22-3 SOUTH @ COLUMN 6?	08:58	00:12		
1-22-3 SOUTH @ COLUMN 6?	08:58	00:00		
KEYPOINT 192695 NOT FOUND	08:59	00:01		
3-22-1 "A" SECTION NRTHWT	09:00	00:01		
11-24-1 COL.S.PAINT SHOP	09:01	00:01		
8-24 PIPE TNNL SO OF STRN	09:02	00:01		
5-23-3 SOUTH @ COLUMN 68	09:05	00:03		
6-23-2 CNTR @ COLUMN 37	09:06	00:01		
7-23-1 "D" SECTION CTR	09:07	00:01		
34-51 SO EAST BY TANKS	09:08	00:01		
26-51-1 NW SECT WST WALL	09:09	00:01		
12-24-1 NORTH WEST	09:11	00:02		
15-24-1 Z&L CALENDER	09:11	00:00		
9-24 MEZZANINE SOUTHEAST	09:12	00:01		
10-24 MEZZ POST C4 CENTER	09:13	00:01		
3-24-2 WEST END	09:15	00:02		
4-24-2 SOUTHEAST	09:20	00:05		
16-24-1 SOUTHWEST STORAGE	09:22	00:02		
20-42-7W COMPUTER ROOM	09:26	00:04		
19-42-B 1/2 PENTHS CENTER	09:27	00:01		
42-5C COMPUTER ROOM	09:29	00:02		
22-42-1 WST ENT VESTIBULE	09:34	00:05		
17-BW AC&R ROOM	09:34	00:00		
18-42-BW KITCHEN AREA	09:36	00:02		
35-21-1NW	09:40	00:04		
23-21 BW COMPUTER ROOM	09:41	00:01		
24-21 SB EST WALL EQ.RM	09:54	00:13		
4-23-3B TNNL WST OF BLD20	09:55	00:01		
26 - Pipe Shop	9 57			
******* END SHIFT *******	12:54			

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

d Name : HIRTE, MARTIN S

Start Shift : 02/08/98 03:56
End Shift : 02/08/98 05:27
Total Time : 01:31

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	03:56			
1-22-3 SOUTH @ COLUMN 6?	04:00	00:04		
KEYPOINT 192695 NOT FOUND	04:01	00:01		
3-22-1 "A" SECTION NRTHWT	04:02	00:01		
16-24-1 SOUTHWEST STORAGE	04:03	00:01		
11-24-1 COL.S.PAINT SHOP	04:04	00:01		
5-23-3 SOUTH @ COLUMN 68	04:05	00:01		
6-23-2 CNTR @ COLUMN 37	04:06	00:01		
6-23-2 CNTR @ COLUMN 37	04:06	00:00		
6-23-2 CNTR @ COLUMN 37	04:06	00:00		
7-23-1 "D" SECTION CTR	04:07	00:01		
9-24 MEZZANINE SOUTHEAST	04:09	00:02		
10-24 MEZZ POST C4 CENTER	04:10	00:01		
15-24-1 Z&L CALENDER	04:10	00:00		
13-24-2 WEST END	04:11	00:01		
12-24-1 NORTH WEST	04:12	00:01		
26 1-1 NW SECT WST WALL	04:14	00:02		
34-1 SO EAST BY TANKS	04:15	00:01		
25-26-1 SO EAST TERMINAL	04:16	00:01		
14-24-2 SOUTHEAST	04:21	00:05		
8-24 PIPE TNNL SO OF STRN	04:27	00:06		
4-23-3B TNNL WST OF BLD20	04:31	00:04		
24-21 SB EST WALL EQ.RM	04:33	00:02		
23-21 BW COMPUTER ROOM	04:38	00:05		
35-21-1NW	04:42	00:04		
20-42-7W COMPUTER ROOM	04:46	00:04		
18-42-BW KITCHEN AREA	04:49	00:03		
22-42-1 WST ENT VESTIBULE	04:53	00:04		
17-BW AC&R ROOM	04:58	00:05		
42-5C COMPUTER ROOM	05:02	00:04		
19-42-B 1/2 PENTHS CENTER	05:11	00:09		
******* END SHIFT *******	05:27			

/98
6:47

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

d d Name : HIRTE, MARTIN S

Start Shift : 02/07/98 00:55
End Shift : 02/07/98 02:21
Total Time : 01:26

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	00:55			
1-22-3 SOUTH @ COLUMN 6?	00:55	00:00		
KEYPOINT 192695 NOT FOUND	00:56	00:01		
3-22-1 "A" SECTION NRTHWT	00:57	00:01		
16-24-1 SOUTHWEST STORAGE	00:58	00:01		
14-24-2 SOUTHEAST	01:00	00:02		
11-24-1 COL.S.PAINT SHOP	01:05	00:05		
5-23-3 SOUTH @ COLUMN 68	01:06	00:01		
6-23-2 CNTR @ COLUMN 37	01:07	00:01		
7-23-1 "D" SECTION CTR	01:09	00:02		
9-24 MEZZANINE SOUTHEAST	01:10	00:01		
10-24 MEZZ POST C4 CENTER	01:11	00:01		
15-24-1 Z&L CALENDER	01:12	00:01		
13-24-2 WEST END	01:13	00:01		
12-24-1 NORTH WEST	01:14	00:01		
26-51-1 NW SECT WST WALL	01:16	00:02		
34 `1 SO EAST BY TANKS	01:17	00:01		
25-26-1 SO EAST TERMINAL	01:18	00:01		
8-24 PIPE TNNL SO OF STRN	01:24	00:06		
4-23-3B TNNL WST OF BLD20	01:44	00:20		
24-21 SB EST WALL EQ.RM	01:46	00:02		
23-21 BW COMPUTER ROOM	01:48	00:02		
35-21-1NW	01:53	00:05		
20-42-7W COMPUTER ROOM	01:56	00:03		
18-42-BW KITCHEN AREA	01:59	00:03		
22-42-1 WST ENT VESTIBULE	02:02	00:03		
17-BW AC&R ROOM	02:05	00:03		
42-5C COMPUTER ROOM	02:08	00:03		
19-42-B 1/2 PENTHS CENTER	02:13	00:05		
******* END SHIFT *******	02:21			

02/02/98
01:04:32

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

G rd Name : GAHLER, WILLIAM J.

Start Shift : 02/01/98 14:08
End Shift : 02/01/98 15:27
Total Time : 01:19

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	14:08			
14-24-2 SOUTHEAST	14:09	00:01		
13-24-2 WEST END	14:13	00:04		
15-24-1 Z&L CALENDER	14:14	00:01		
12-24-1 NORTH WEST	14:15	00:01		
11-24-1 COL.S.PAINT SHOP	14:21	00:06		
10-24 MEZZ POST C4 CENTER	14:23	00:02		
9-24 MEZZANINE SOUTHEAST	14:24	00:01		
7-23-1 "D" SECTION CTR	14:27	00:03		
5-23-3 SOUTH @ COLUMN 68	14:29	00:02		
6-23-2 CNTR @ COLUMN 37	14:30	00:01		
8-24 PIPE TNNL SO OF STRN	14:32	00:02		
16-24-1 SOUTHWEST STORAGE	14:34	00:02		
3-22-1 "A" SECTION NRTHWT	14:35	00:01		
1-22-3 SOUTH @ COLUMN 6?	14:37	00:02		
KEYPOINT 192695 NOT FOUND	14:38	00:01		
4- 3-3B TNNL WST OF BLD20	14:40	00:02		
24 21 SB EST WALL EQ.RM	14:42	00:02		
23-21 BW COMPUTER ROOM	14:49	00:07		
18-42-BW KITCHEN AREA	14:51	00:02		
19-42-B 1/2 PENTHS CENTER	14:54	00:03		
42-5C COMPUTER ROOM	14:56	00:02		
20-42-7W COMPUTER ROOM	15:03	00:07		
35-21-1NW	15:05	00:02		
22-42-1 WST ENT VESTIBULE	15:10	00:05		
17-BW AC&R ROOM	15:11	00:01		
25-26-1 SO EAST TERMINAL	15:18	00:07		
26-51-1 NW SECT WST WALL	15:21	00:03		
34-51 SO EAST BY TANKS	15:22	00:01		
******* END SHIFT *******	15:27			

02/01/98
05:31:11

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : GAHLER, WILLIAM J.

Start Shift : 01/31/98 14:03
End Shift : 01/31/98 15:26
Total Time : 01:23

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	14:03			
14-24-2 SOUTHEAST	14:05	00:02		
13-24-2 WEST END	14:12	00:07		
15-24-1 Z&L CALENDER	14:14	00:02		
12-24-1 NORTH WEST	14:14	00:00		
10-24 MEZZ POST C4 CENTER	14:16	00:02		
9-24 MEZZANINE SOUTHEAST	14:18	00:02		
11-24-1 COL.S.PAINT SHOP	14:19	00:01		
7-23-1 "D" SECTION CTR	14:21	00:02		
5-23-3 SOUTH @ COLUMN 68	14:23	00:02		
6-23-2 CNTR @ COLUMN 37	14:24	00:01		
8-24 PIPE TNNL SO OF STRN	14:26	00:02		
16-24-1 SOUTHWEST STORAGE	14:27	00:01		
3-22-1 "A" SECTION NRTHWT	14:29	00:02		
1-22-3 SOUTH @ COLUMN 6?	14:30	00:01		
KEYPOINT 192695 NOT FOUND	14:31	00:01		
3-3B TNNL WST OF BLD20	14:33	00:02		
24-21 SB EST WALL EQ.RM	14:35	00:02		
23-21 BW COMPUTER ROOM	14:39	00:04		
18-42-BW KITCHEN AREA	14:41	00:02		
19-42-B 1/2 PENTHS CENTER	14:44	00:03		
42-5C COMPUTER ROOM	14:46	00:02		
20-42-7W COMPUTER ROOM	14:52	00:06		
35-21-1NW	14:53	00:01		
22-42-1 WST ENT VESTIBULE	14:57	00:04		
17-BW AC&R ROOM	14:57	00:00		
25-26-1 SO EAST TERMINAL	15:19	00:22		
26-51-1 NW SECT WST WALL	15:21	00:02		
34-51 SO EAST BY TANKS	15:22	00:01		
******* END SHIFT *******	15:26			

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : APPLETON, SCOTT

Start Shift : 01/30/98 01:43
End Shift : 01/30/98 02:15
Total Time : 00:32

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	01:43			
19-42-B 1/2 PENTHS CENTER	01:44	00:01		
42-5C COMPUTER ROOM	01:45	00:01		
18-42-BW KITCHEN AREA	01:47	00:02		
23-21 BW COMPUTER ROOM	01:49	00:02		
35-21-1NW	01:53	00:04		
24-21 SB EST WALL EQ.RM	02:01	00:08		
34-51 SO EAST BY TANKS	02:08	00:07		
26-51-1 NW SECT WST WALL	02:09	00:01		
12-24-1 NORTH WEST	02:11	00:02		
******* END SHIFT *******	02:15			

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

ard Name : APPLETON, SCOTT

Start Shift : 01/29/98 22:17
End Shift : 01/29/98 23:25
Total Time : 01:08

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	22:17			
1-22-3 SOUTH @ COLUMN 6?	22:19	00:02		
KEYPOINT 192695 NOT FOUND	22:21	00:02		
3-22-1 "A" SECTION NRTHWT	22:22	00:01		
25-26-1 SO EAST TERMINAL	22:23	00:01		
34-51 SO EAST BY TANKS	22:24	00:01		
26-51-1 NW SECT WST WALL	22:26	00:02		
12-24-1 NORTH WEST	22:27	00:01		
15-24-1 Z&L CALENDER	22:28	00:01		
11-24-1 COL.S.PAINT SHOP	22:29	00:01		
5-23-3 SOUTH @ COLUMN 68	22:31	00:02		
6-23-2 CNTR @ COLUMN 37	22:33	00:02		
7-23-1 "D" SECTION CTR	22:34	00:01		
8-24 PIPE TNNL SO OF STRN	22:36	00:02		
9-24 MEZZANINE SOUTHEAST	22:38	00:02		
10-24 MEZZ POST C4 CENTER	22:39	00:01		
-24-2 WEST END	22:40	00:01		
14-24-2 SOUTHEAST	22:43	00:03		
16-24-1 SOUTHWEST STORAGE	22:47	00:04		
20-42-7W COMPUTER ROOM	22:54	00:07		
19-42-B 1/2 PENTHS CENTER	22:55	00:01		
42-5C COMPUTER ROOM	22:57	00:02		
22-42-1 WST ENT VESTIBULE	23:01	00:04		
17-BW AC&R ROOM	23:01	00:00		
18-42-BW KITCHEN AREA	23:03	00:02		
23-21 BW COMPUTER ROOM	23:05	00:02		
35-21-1NW	23:16	00:11		
24-21 SB EST WALL EQ.RM	23:22	00:06		
4-23-3B TNNL WST OF BLD20	23:24	00:02		
******* END SHIFT *******	23:25			

98
:11

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

ame : GAHLER, WILLIAM J.

Start Shift : 01/28/98 01:05
End Shift : 01/28/98 02:34
Total Time : 01:29

ypoint	Key Time	Elapsed Time	Incident	Incident Time
**** START SHIFT ******	01:05			
-24-2 SOUTHEAST	01:12	00:07		
-24-2 WEST END	01:21	00:09		
-24-1 Z&L CALENDER	01:22	00:01		
-24-1 NORTH WEST	01:23	00:01		
-24 MEZZ POST C4 CENTER	01:25	00:02		
24 MEZZANINE SOUTHEAST	01:26	00:01		
-24-1 COL.S.PAINT SHOP	01:28	00:02		
23-1 "D" SECTION CTR	01:30	00:02		
23-3 SOUTH @ COLUMN 68	01:32	00:02		
23-2 CNTR @ COLUMN 37	01:33	00:01		
24 PIPE TNNL SO OF STRN	01:36	00:03		
-24-1 SOUTHWEST STORAGE	01:37	00:01		
22-1 "A" SECTION NRTHWT	01:39	00:02		
22-3 SOUTH @ COLUMN 6?	01:41	00:02		
YPOINT 192695 NOT FOUND	01:41	00:00		
23-[illegible] TNNL WST OF BLD20	01:43	00:02		
-21 [illegible]B EST WALL EQ.RM	01:46	00:03		
-21 BW COMPUTER ROOM	01:48	00:02		
-42-BW KITCHEN AREA	01:50	00:02		
-42-B 1/2 PENTHS CENTER	01:54	00:04		
-5C COMPUTER ROOM	01:56	00:02		
-42-7W COMPUTER ROOM	01:57	00:01		
-21-1NW	01:59	00:02		
-42-1 WST ENT VESTIBULE	02:01	00:02		
-BW AC&R ROOM	02:02	00:01		
-26-1 SO EAST TERMINAL	02:26	00:24		
-51-1 NW SECT WST WALL	02:28	00:02		
-51 SO EAST BY TANKS	02:30	00:02		
***** END SHIFT *******	02:34			

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : SCHMECK, HEIDI

Start Shift : 01/27/98 17:41
End Shift : 01/27/98 19:00
Total Time : 01:19

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	17:41			
1-22-3 SOUTH @ COLUMN 6?	17:43	00:02		
KEYPOINT 192695 NOT FOUND	17:44	00:01		
3-22-1 "A" SECTION NRTHWT	17:46	00:02		
16-24-1 SOUTHWEST STORAGE	17:47	00:01		
14-24-2 SOUTHEAST	17:50	00:03		
13-24-2 WEST END	17:53	00:03		
12-24-1 NORTH WEST	17:55	00:02		
15-24-1 Z&L CALENDER	17:56	00:01		
10-24 MEZZ POST C4 CENTER	17:58	00:02		
9-24 MEZZANINE SOUTHEAST	18:00	00:02		
8-24 PIPE TNNL SO OF STRN	18:03	00:03		
11-24-1 COL.S.PAINT SHOP	18:05	00:02		
5-23-3 SOUTH @ COLUMN 68	18:08	00:03		
6-23-2 CNTR @ COLUMN 37	18:10	00:02		
34-51 SO EAST BY TANKS	18:14	00:04		
26 1-1 NW SECT WST WALL	18:16	00:02		
25-26-1 SO EAST TERMINAL	18:18	00:02		
24-21 SB EST WALL EQ.RM	18:23	00:05		
23-21 BW COMPUTER ROOM	18:27	00:04		
18-42-BW KITCHEN AREA	18:31	00:04		
17-BW AC&R ROOM	18:37	00:06		
22-42-1 WST ENT VESTIBULE	18:38	00:01		
19-42-B 1/2 PENTHS CENTER	18:41	00:03		
42-5C COMPUTER ROOM	18:44	00:03		
20-42-7W COMPUTER ROOM	18:47	00:03		
35-21-1NW	18:51	00:04		
4-23-3B TNNL WST OF BLD20	18:55	00:04		
******* END SHIFT *******	19:00			

01/26/98
05:25:08

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : GAHLER, WILLIAM J.

Start Shift : 01/26/98 04:01
End Shift : 01/26/98 05:24
Total Time : 01:23

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	04:01			
14-24-2 SOUTHEAST	04:03	00:02		
13-24-2 WEST END	04:08	00:05		
15-24-1 Z&L CALENDER	04:09	00:01		
12-24-1 NORTH WEST	04:10	00:01		
10-24 MEZZ POST C4 CENTER	04:12	00:02		
9-24 MEZZANINE SOUTHEAST	04:13	00:01		
11-24-1 COL.S.PAINT SHOP	04:15	00:02		
7-23-1 "D" SECTION CTR	04:17	00:02		
5-23-3 SOUTH @ COLUMN 68	04:19	00:02		
6-23-2 CNTR @ COLUMN 37	04:20	00:01		
8-24 PIPE TNNL SO OF STRN	04:22	00:02		
16-24-1 SOUTHWEST STORAGE	04:24	00:02		
3-22-1 "A" SECTION NRTHWT	04:25	00:01		
1-22-3 SOUTH @ COLUMN 6?	04:27	00:02		
KEYPOINT 192695 NOT FOUND	04:28	00:01		
4- -3B TNNL WST OF BLD20	04:30	00:02		
24- 21 SB EST WALL EQ.RM	04:33	00:03		
23-21 BW COMPUTER ROOM	04:35	00:02		
18-42-BW KITCHEN AREA	04:38	00:03		
19-42-B 1/2 PENTHS CENTER	04:42	00:04		
42-5C COMPUTER ROOM	04:43	00:01		
20-42-7W COMPUTER ROOM	04:47	00:04		
35-21-1NW	04:49	00:02		
22-42-1 WST ENT VESTIBULE	04:51	00:02		
17-BW AC&R ROOM	04:51	00:00		
25-26-1 SO EAST TERMINAL	05:18	00:27		
26-51-1 NW SECT WST WALL	05:20	00:02		
34-51 SO EAST BY TANKS	05:21	00:01		
******* END SHIFT *******	05:24			

01/25/98
05:21:58

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : BENDER, GERALD P

Start Shift : 01/25/98 04:08
End Shift : 01/25/98 05:23
Total Time : 01:15

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	04:08			
14-24-2 SOUTHEAST	04:11	00:03		
13-24-2 WEST END	04:15	00:04		
12-24-1 NORTH WEST	04:16	00:01		
10-24 MEZZ POST C4 CENTER	04:18	00:02		
11-24-1 COL.S.PAINT SHOP	04:23	00:05		
8-24 PIPE TNNL SO OF STRN	04:24	00:01		
7-23-1 "D" SECTION CTR	04:26	00:02		
5-23-3 SOUTH @ COLUMN 68	04:28	00:02		
6-23-2 CNTR @ COLUMN 37	04:29	00:01		
34-51 SO EAST BY TANKS	04:31	00:02		
26-51-1 NW SECT WST WALL	04:32	00:01		
25-26-1 SO EAST TERMINAL	04:34	00:02		
4-23-3B TNNL WST OF BLD20	04:36	00:02		
1-22-3 SOUTH @ COLUMN 6?	04:39	00:03		
KEYPOINT 192695 NOT FOUND	04:39	00:00		
22-1 "A" SECTION NRTHWT	04:41	00:02		
16-24-1 SOUTHWEST STORAGE	04:42	00:01		
22-42-1 WST ENT VESTIBULE	04:58	00:16		
19-42-B 1/2 PENTHS CENTER	05:00	00:02		
42-5C COMPUTER ROOM	05:02	00:02		
17-BW AC&R ROOM	05:05	00:03		
18-42-BW KITCHEN AREA	05:07	00:02		
24-21 SB EST WALL EQ.RM	05:09	00:02		
20-42-7W COMPUTER ROOM	05:11	00:02		
35-21-1NW	05:13	00:02		
23-21 BW COMPUTER ROOM	05:15	00:02		
******* END SHIFT *******	05:23			

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : SCHWALBE, JON R

Start Shift : 01/24/98 13:51
End Shift : 01/24/98 15:26
Total Time : 01:35

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	13:51			
1-22-3 SOUTH @ COLUMN 6?	14:29	00:38		
KEYPOINT 192695 NOT FOUND	14:30	00:01		
3-22-1 "A" SECTION NRTHWT	14:31	00:01		
5-23-3 SOUTH @ COLUMN 68	14:32	00:01		
6-23-2 CNTR @ COLUMN 37	14:33	00:01		
7-23-1 "D" SECTION CTR	14:34	00:01		
11-24-1 COL.S.PAINT SHOP	14:35	00:01		
8-24 PIPE TNNL SO OF STRN	14:37	00:02		
9-24 MEZZANINE SOUTHEAST	14:39	00:02		
10-24 MEZZ POST C4 CENTER	14:45	00:06		
		00:19	MISC. RESPONSE LOCATION: 24MEZZ RELOCATE STA 10 INCIDENT END: 15:10	15:04
15-24-1 Z&L CALENDER	15:11	00:07		
1[illegible]4-2 WEST END	15:12	00:01		
12-24-1 NORTH WEST	15:13	00:01		
26-51-1 NW SECT WST WALL	15:14	00:01		
34-51 SO EAST BY TANKS	15:15	00:01		
25-26-1 SO EAST TERMINAL	15:17	00:02		
4-23-3B TNNL WST OF BLD20	15:18	00:01		
24-21 SB EST WALL EQ.RM	15:19	00:01		
23-21 BW COMPUTER ROOM	15:21	00:02		
35-21-1NW	15:22	00:01		
20-42-7W COMPUTER ROOM	15:24	00:02		
******* END SHIFT *******	15:26			

01/24/98
05:26:18

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : BENDER, GERALD P

Start Shift : 01/23/98 22:13
End Shift : 01/23/98 23:12
Total Time : 00:59

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	22:13			
16-24-1 SOUTHWEST STORAGE	22:19	00:06		
3-22-1 "A" SECTION NRTHWT	22:20	00:01		
1-22-3 SOUTH @ COLUMN 6?	22:22	00:02		
KEYPOINT 192695 NOT FOUND	22:23	00:01		
25-26-1 SO EAST TERMINAL	22:25	00:02		
26-51-1 NW SECT WST WALL	22:27	00:02		
34-51 SO EAST BY TANKS	22:27	00:00		
5-23-3 SOUTH @ COLUMN 68	22:30	00:03		
6-23-2 CNTR @ COLUMN 37	22:31	00:01		
7-23-1 "D" SECTION CTR	22:32	00:01		
8-24 PIPE TNNL SO OF STRN	22:34	00:02		
11-24-1 COL.S.PAINT SHOP	22:35	00:01		
10-24 MEZZ POST C4 CENTER	22:37	00:02		
12-24-1 NORTH WEST	22:38	00:01		
13-24-2 WEST END	22:40	00:02		
14-24-2 SOUTHEAST	22:42	00:02		
22-42-1 WST ENT VESTIBULE	22:47	00:05		
19-42-B 1/2 PENTHS CENTER	22:49	00:02		
42-5C COMPUTER ROOM	22:51	00:02		
20-42-7W COMPUTER ROOM	22:52	00:01		
35-21-1NW	22:55	00:03		
23-21 BW COMPUTER ROOM	22:57	00:02		
18-42-BW KITCHEN AREA	23:01	00:04		
17-BW AC&R ROOM	23:03	00:02		
24-21 SB EST WALL EQ.RM	23:06	00:03		
4-23-3B TNNL WST OF BLD20	23:07	00:01		
******* END SHIFT *******	23:12			

01/23/98
05:21:23

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

G rd Name : BENDER, GERALD P

Start Shift : 01/22/98 22:17
End Shift : 01/22/98 23:11
Total Time : 00:54

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	22:17			
16-24-1 SOUTHWEST STORAGE	22:22	00:05		
3-22-1 "A" SECTION NRTHWT	22:23	00:01		
1-22-3 SOUTH @ COLUMN 6?	22:24	00:01		
KEYPOINT 192695 NOT FOUND	22:25	00:01		
25-26-1 SO EAST TERMINAL	22:28	00:03		
26-51-1 NW SECT WST WALL	22:30	00:02		
34-51 SO EAST BY TANKS	22:31	00:01		
7-23-1 "D" SECTION CTR	22:32	00:01		
8-24 PIPE TNNL SO OF STRN	22:34	00:02		
11-24-1 COL.S.PAINT SHOP	22:36	00:02		
10-24 MEZZ POST C4 CENTER	22:37	00:01		
12-24-1 NORTH WEST	22:39	00:02		
13-24-2 WEST END	22:40	00:01		
14-24-2 SOUTHEAST	22:43	00:03		
24-21 SB EST WALL EQ.RM	22:48	00:05		
1 42-BW KITCHEN AREA	22:51	00:03		
1 BW AC&R ROOM	22:53	00:02		
19-42-B 1/2 PENTHS CENTER	22:56	00:03		
42-5C COMPUTER ROOM	22:58	00:02		
20-42-7W COMPUTER ROOM	23:02	00:04		
22-42-1 WST ENT VESTIBULE	23:03	00:01		
35-21-1NW	23:05	00:02		
23-21 BW COMPUTER ROOM	23:06	00:01		
4-23-3B TNNL WST OF BLD20	23:09	00:03		
******* END SHIFT *******	23:11			

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

G..rd Name : ECKERT, TIMOTHY D

Start Shift : 01/21/98 17:25
End Shift : 01/21/98 18:43
Total Time : 01:18

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	17:25			
3-22-1 "A" SECTION NRTHWT	17:37	00:12		
KEYPOINT 192695 NOT FOUND	17:38	00:01		
1-22-3 SOUTH @ COLUMN 6?	17:39	00:01		
16-24-1 SOUTHWEST STORAGE	17:47	00:08		
8-24 PIPE TNNL SO OF STRN	17:48	00:01		
11-24-1 COL.S.PAINT SHOP	17:49	00:01		
6-23-2 CNTR @ COLUMN 37	17:50	00:01		
5-23-3 SOUTH @ COLUMN 68	17:52	00:02		
7-23-1 "D" SECTION CTR	17:53	00:01		
9-24 MEZZANINE SOUTHEAST	17:54	00:01		
13-24-2 WEST END	17:56	00:02		
15-24-1 Z&L CALENDER	17:57	00:01		
12-24-1 NORTH WEST	17:58	00:01		
26-51-1 NW SECT WST WALL	17:59	00:01		
34-51 SO EAST BY TANKS	18:00	00:01		
2 26-1 SO EAST TERMINAL	18:01	00:01		
4-23-3B TNNL WST OF BLD20	18:03	00:02		
24-21 SB EST WALL EQ.RM	18:05	00:02		
23-21 BW COMPUTER ROOM	18:07	00:02		
18-42-BW KITCHEN AREA	18:11	00:04		
17-BW AC&R ROOM	18:12	00:01		
22-42-1 WST ENT VESTIBULE	18:13	00:01		
19-42-B 1/2 PENTHS CENTER	18:15	00:02		
42-5C COMPUTER ROOM	18:17	00:02		
20-42-7W COMPUTER ROOM	18:20	00:03		
35-21-1NW	18:22	00:02		
14-24-2 SOUTHEAST	18:36	00:14		
******* END SHIFT *******	18:43			

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : HIRTE, MARTIN S

Start Shift : 01/18/98 07:31
End Shift : 01/18/98 08:58
Total Time : 01:27

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	07:31			
1-22-3 SOUTH @ COLUMN 6?	07:31	00:00		
KEYPOINT 192695 NOT FOUND	07:32	00:01		
3-22-1 "A" SECTION NRTHWT	07:33	00:01		
16-24-1 SOUTHWEST STORAGE	07:34	00:01		
11-24-1 COL.S.PAINT SHOP	07:35	00:01		
5-23-3 SOUTH @ COLUMN 68	07:37	00:02		
6-23-2 CNTR @ COLUMN 37	07:37	00:00		
7-23-1 "D" SECTION CTR	07:38	00:01		
9-24 MEZZANINE SOUTHEAST	07:40	00:02		
10-24 MEZZ POST C4 CENTER	07:41	00:01		
15-24-1 Z&L CALENDER	07:41	00:00		
13-24-2 WEST END	07:42	00:01		
12-24-1 NORTH WEST	07:43	00:01		
26-51-1 NW SECT WST WALL	07:44	00:01		
34-51 SO EAST BY TANKS	07:45	00:01		
-26-1 SO EAST TERMINAL	07:46	00:01		
14-24-2 SOUTHEAST	07:54	00:08		
8-24 PIPE TNNL SO OF STRN	08:04	00:10		
4-23-3B TNNL WST OF BLD20	08:09	00:05		
24-21 SB EST WALL EQ.RM	08:13	00:04		
23-21 BW COMPUTER ROOM	08:24	00:11		
35-21-1NW	08:28	00:04		
20-42-7W COMPUTER ROOM	08:33	00:05		
22-42-1 WST ENT VESTIBULE	08:39	00:06		
17-BW AC&R ROOM	08:41	00:02		
18-42-BW KITCHEN AREA	08:45	00:04		
42-5C COMPUTER ROOM	08:49	00:04		
19-42-B 1/2 PENTHS CENTER	08:52	00:03		
******* END SHIFT *******	08:58			

12/98
:34:19

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : ECKERT, TIMOTHY D

Start Shift : 01/12/98 04:32
End Shift : 01/12/98 05:35
Total Time : 01:03

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	04:32			
3-22-1 "A" SECTION NRTHWT	04:33	00:01		
KEYPOINT 192695 NOT FOUND	04:34	00:01		
1-22-3 SOUTH @ COLUMN 6?	04:35	00:01		
16-24-1 SOUTHWEST STORAGE	04:36	00:01		
8-24 PIPE TNNL SO OF STRN	04:37	00:01		
11-24-1 COL.S.PAINT SHOP	04:38	00:01		
6-23-2 CNTR @ COLUMN 37	04:39	00:01		
5-23-3 SOUTH @ COLUMN 68	04:40	00:01		
7-23-1 "D" SECTION CTR	04:41	00:01		
9-24 MEZZANINE SOUTHEAST	04:43	00:02		
13-24-2 WEST END	04:50	00:07		
15-24-1 Z&L CALENDER	04:52	00:02		
12-24-1 NORTH WEST	04:52	00:00		
26-51-1 NW SECT WST WALL	04:53	00:01		
34-51 SO EAST BY TANKS	04:54	00:01		
-26-1 SO EAST TERMINAL	04:55	00:01		
4-23-3B TNNL WST OF BLD20	04:56	00:01		
24-21 SB EST WALL EQ.RM	04:57	00:01		
23-21 BW COMPUTER ROOM	04:59	00:02		
18-42-BW KITCHEN AREA	05:02	00:03		
17-BW AC&R ROOM	05:03	00:01		
22-42-1 WST ENT VESTIBULE	05:04	00:01		
19-42-B 1/2 PENTHS CENTER	05:06	00:02		
42-5C COMPUTER ROOM	05:07	00:01		
20-42-7W COMPUTER ROOM	05:08	00:01		
35-21-1NW	05:20	00:12		
14-24-2 SOUTHEAST	05:33	00:13		
******* END SHIFT *******	05:35			

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : ANDERSON, PHYLLIS E

Start Shift : 01/11/98 07:31
End Shift : 01/11/98 10:24
Total Time : 02:53

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	07:31			
14-24-2 SOUTHEAST	07:35	00:04		
13-24-2 WEST END	07:50	00:15		
12-24-1 NORTH WEST	07:51	00:01		
15-24-1 Z&L CALENDER	07:51	00:00		
10-24 MEZZ POST C4 CENTER	07:53	00:02		
9-24 MEZZANINE SOUTHEAST	07:54	00:01		
11-24-1 COL.S.PAINT SHOP	07:55	00:01		
8-24 PIPE TNNL SO OF STRN	07:57	00:02		
7-23-1 "D" SECTION CTR	07:59	00:02		
6-23-2 CNTR @ COLUMN 37	08:01	00:02		
5-23-3 SOUTH @ COLUMN 68	08:02	00:01		
16-24-1 SOUTHWEST STORAGE	08:04	00:02		
3-22-1 "A" SECTION NRTHWT	08:06	00:02		
KEYPOINT 192695 NOT FOUND	08:08	00:02		
1-22-3 SOUTH @ COLUMN 6?	08:09	00:01		
2 26-1 SO EAST TERMINAL	08:11	00:02		
26-51-1 NW SECT WST WALL	08:13	00:02		
34-51 SO EAST BY TANKS	08:14	00:01		
******* END SHIFT *******	10:24			

01/10/98
21:37:36

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

Guard Name : APPLETON, SCOTT

Start Shift : 01/10/98 14:14
End Shift : 01/10/98 15:28
Total Time : 01:14

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	14:14			
1-22-3 SOUTH @ COLUMN 6?	14:17	00:03		
KEYPOINT 192695 NOT FOUND	14:21	00:04		
3-22-1 "A" SECTION NRTHWT	14:22	00:01		
11-24-1 COL.S.PAINT SHOP	14:24	00:02		
12-24-1 NORTH WEST	14:25	00:01		
15-24-1 Z&L CALENDER	14:26	00:01		
8-24 PIPE TNNL SO OF STRN	14:27	00:01		
5-23-3 SOUTH @ COLUMN 68	14:31	00:04		
6-23-2 CNTR @ COLUMN 37	14:32	00:01		
7-23-1 "D" SECTION CTR	14:33	00:01		
4-23-3B TNNL WST OF BLD20	14:35	00:02		
24-21 SB EST WALL EQ.RM	14:37	00:02		
23-21 BW COMPUTER ROOM	14:39	00:02		
17-BW AC&R ROOM	14:40	00:01		
22-42-1 WST ENT VESTIBULE	14:41	00:01		
3 21-1NW	14:43	00:02		
20-42-7W COMPUTER ROOM	14:44	00:01		
19-42-B 1/2 PENTHS CENTER	14:46	00:02		
42-5C COMPUTER ROOM	14:48	00:02		
18-42-BW KITCHEN AREA	14:50	00:02		
25-26-1 SO EAST TERMINAL	15:15	00:25		
34-51 SO EAST BY TANKS	15:16	00:01		
26-51-1 NW SECT WST WALL	15:17	00:01		
16-24-1 SOUTHWEST STORAGE	15:20	00:03		
14-24-2 SOUTHEAST	15:22	00:02		
13-24-2 WEST END	15:24	00:02		
10-24 MEZZ POST C4 CENTER	15:25	00:01		
9-24 MEZZANINE SOUTHEAST	15:26	00:01		
******* END SHIFT *******	15:28			

01/02/98
05:29:45

3M CORPORATION - ST. PAUL
SECURITY SHIFT REPORT

ıard Name : AGUIRRE, ROBERT

Start Shift : 01/01/98 10:21
End Shift : 01/01/98 12:34
Total Time : 02:13

Keypoint	Key Time	Elapsed Time	Incident	Incident Time
****** START SHIFT ******	10:21			
3-22-1 "A" SECTION NRTHWT	10:25	00:04		
KEYPOINT 192695 NOT FOUND	10:27	00:02		
1-22-3 SOUTH @ COLUMN 6?	10:28	00:01		
1-22-3 SOUTH @ COLUMN 6?	10:28	00:00		
25-26-1 SO EAST TERMINAL	10:31	00:03		
34-51 SO EAST BY TANKS	10:33	00:02		
26-51-1 NW SECT WST WALL	10:35	00:02		
12-24-1 NORTH WEST	10:40	00:05		
		00:00	INCIDENT 99 NOT FOUND	10:40
		:	INCIDENT 33 NOT FOUND	* :
		:	INCIDENT 99 NOT FOUND	10:40
		:	INCIDENT 33 NOT FOUND	* :
		:	INCIDENT 99 NOT FOUND	10:40
		:	INCIDENT 33 NOT FOUND	* :

Attachment G

3M -St. Paul Tape Manufacturing Plant
Hazardous Waste Satellite and 90 day Accumulation Areas

Building 20-5

5F area located on north end of building 20- 5th floor is a 90-day accumulation area. Spill equipment is located south side of 5F area and phones are in the 5F area and aisle outside 5F area. All other locations as shown on the 5th Floor of Building 20 map are satellite accumulation areas with no more than 55 gals in any workcell.

Building 22 – Churn Rooms (A & B)

These are 90-day accumulation areas and are located on the northeast and southeast sections of building 22. Spill equipment is located in the building 22 aisle between coating and churns and a phone is in the churn office.

Building 23 – Churn Room (C & D)

These are 90-day accumulation areas and are located on the northeast and southeast sections of building 23. Spill equipment is located in the building 23 aisle between coating and churns and a phone is in the churn office.

Building 22 – Coating Bays (A &B)

These are 90-day accumulation areas and are located in the northwestern and southwestern quarters of building 22. Spill equipment is located in the building 22 aisle between coating and churns and a phone is at the A side desk.

Building 23 – Coating Bays (C&D)

These are 90-day accumulation areas and are located in the northwestern and southwestern quarters of building 23. Spill equipment is located in the building 23 aisle between coating and churns and a phone is at the C side desk.

Building 22 – Cleaning, Wet Scrap and Decontamination Room

This is a 90-day accumulation area located in a separate room in the far northwestern corner of Building 22. This area serves as the decontamination point for all areas except the moguls. Spill equipment is located in the building 22 aisle between coating and churns and a phone is at the A side desk.

Building 26 – Moguls

The Cleaning, Wet Scrap and Decontamination room is a 90-day accumulation area and is located in the northeast section of building 26. This area is the decontamination point for the moguls. Spill equipment is located near the east wall of building 26 and a phone is in the supervisor office. The 5 Mogul Bays are satellite accumulation areas.

Building 26 –Pipe Shop

This area is a satellite accumulation area located in a separate room in the southwestern corner of building 26

Building 51 - Warehouse

Aisle area in southeastern quarter of building 51 and the area around the hazardous waste tank is a 90-day accumulation area. Spill equipment is located on the east end of the 90-day area and a phone is just north of the spill equipment.

Building 50 - Tank Farm

This is a satellite accumulation area

Building 24 – Labs

There are 2 labs in building 24 located in the center of the first and second floors and both are satellite accumulation areas.

Building 24- 2 West End Premix area

This is a 90-day accumulation area located in a Premix room on the western end of building 24. The spill equipment is located at the southern end of the Premix area and the phone is near the 5J Extruder.

Building 24-2 West End 8F area

This is a satellite accumulation area located in the center section of the western section of building 24, second floor.

Building 24-1 Z Calender area

This is a 90-day accumulation area located in the western section of building 24 on the first floor. The spill equipment is located on the east wall of the calender area and the phone is in the breakroom also at the east end of the calender area.

Building 24-1 Z Milling area

This is a satellite accumulation area located on the southwestern wall of building 24

Building 24 Maintenance Shop areas

Three satellite accumulations areas located in the western, northern and southeastern sections accumulating batteries, spray cans and one drum of rags, bags and gloves

Building 24 Mezzanine Banbury area

This is satellite accumulation area located at the western wall of building 24 mezzanine.

Building 24 Repair Shop

This is a satellite accumulation area located in the center west section of the Building 24 mezzanine.

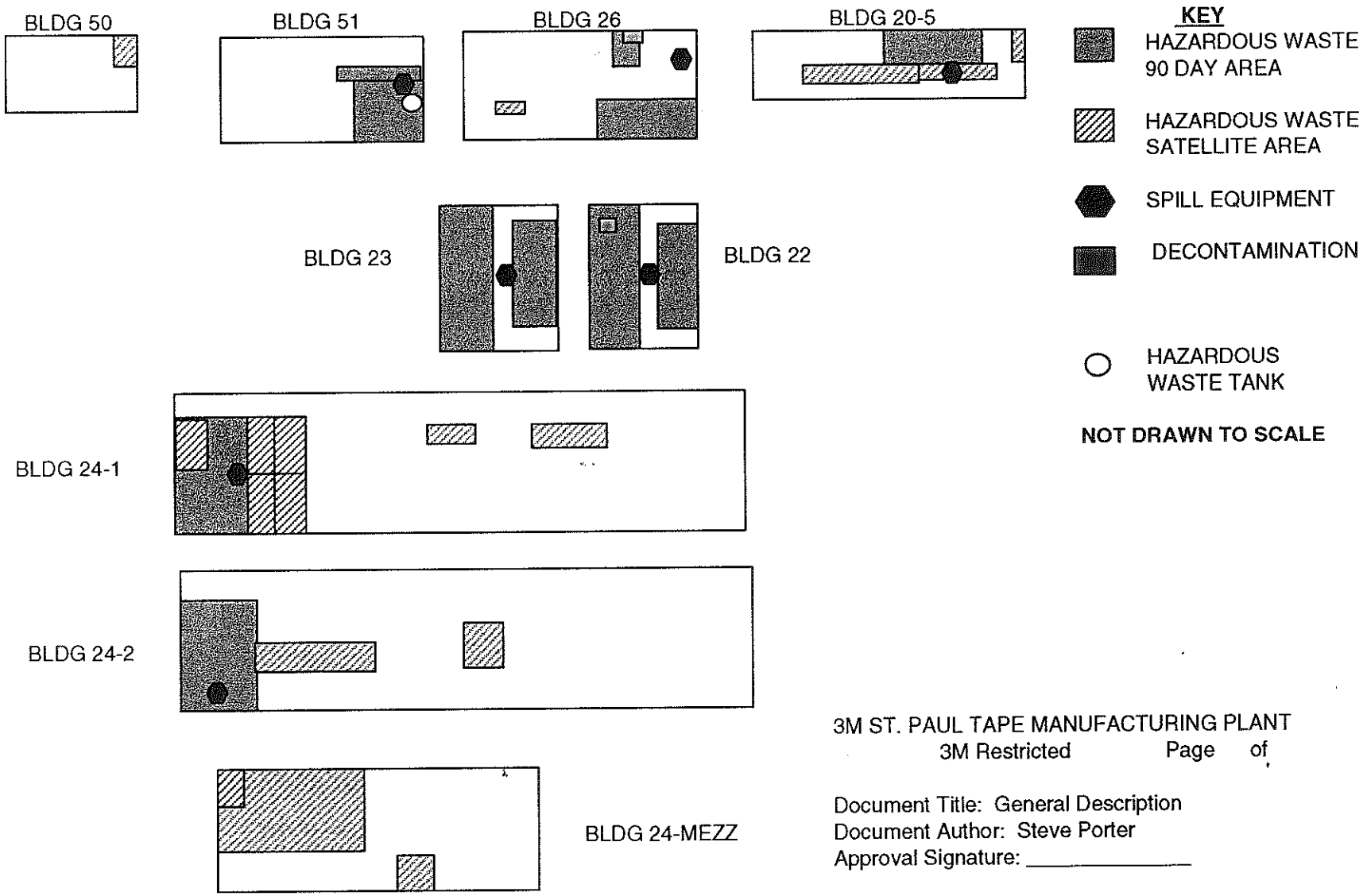
Building 24 Cage

This is a satellite accumulation area for fluorescent bulbs located in the south central section of the building 24 mezzanine.

Building 24-1Paint Booth

This a Satellite Accumulation Area located in the center of building 24, first floor.

3M-St. Paul Tape Manufacturing Plant
Hazardous Waste Storage Areas



3M ST. PAUL TAPE MANUFACTURING PLANT
3M Restricted Page of

Document Title: General Description
Document Author: Steve Porter
Approval Signature: _____

Effective Date: 11/23/99 Supersedes:8/20/98

3M -St. Paul Abrasives Manufacturing Plant
Hazardous Waste Satellite and 90 day Accumulation Areas

Building 1 Basement

There is a red label room in the northwest corner of the building. Satellite accumulation area is just outside this room against the south wall. The spill equipment is located outside the east entrance to the building.

Building 1 – First Floor

This area is a satellite accumulation area located in the laboratory. Spill equipment is located in the north side of the room.

Building 1 – Second Floor

Satellite accumulation area is located in the middle of the floor in this building.

Building 47 – Floor B

There is 90-day hazardous waste storage area in the south end of the building. This area is a satellite accumulation area located in the south end of the building. Spill equipment is located in the south east end of the building outside the 8-Maker. There is telephone inside the office on the south side of the building. There is another spill equipment located west on the south wall. The maintenance truck shop on the northwest wall also has a satellite accumulation area..

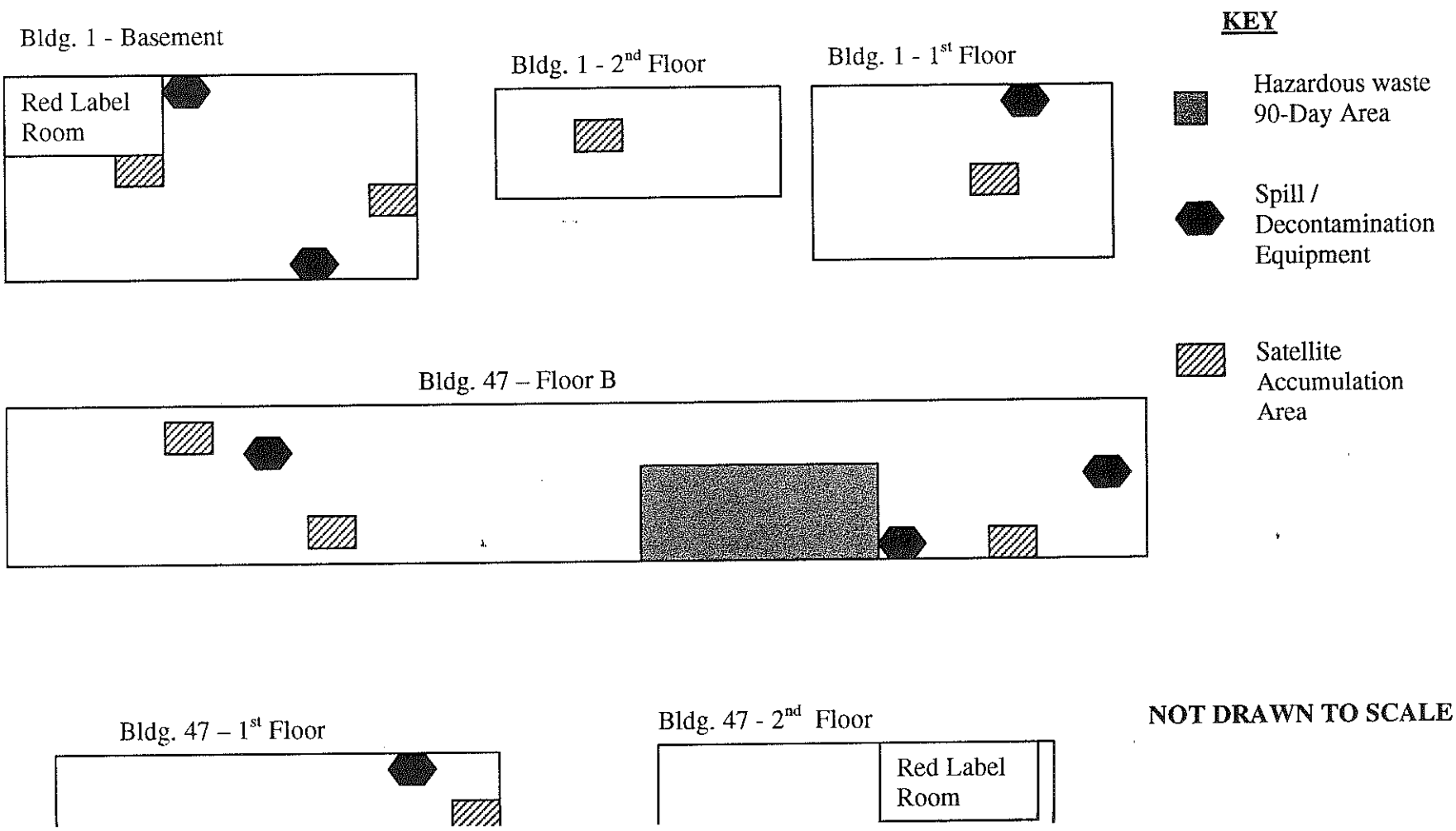
Building 47 – First Floor

This area is a satellite accumulation area located in the south east entry with a spill equipment is located in the middle of the floor.

Building 47 – Second Floor

The red label room is on the south wall. There is a satellite accumulation area located just outside on the south end of the floor.

3M – St. Paul Abrasives Manufacturing Plant
Hazardous Waste Storage Areas



Minnesota Pollution Control Agency

November 15, 1999

CERTIFIED MAIL NO. Z 101 652 646
RETURN RECEIPT REQUESTED

Mr. Livio Desimone
Chief Executive Officer
3M Center
Building 220-14W-05
St. Paul, Minnesota 55144-1000

RE: State Hazardous Waste Inspection
3M St. Paul, Main Plant, Abrasives and Tape Manufacturing
St. Paul, MND000824029, Large Quantity Generator

Dear Mr. Desimone:

The Minnesota Pollution Control Agency (MPCA) is carrying out the provisions of the Minnesota Hazardous Waste Rules (Chapter 7045) and is conducting inspections of companies that are engaged in the generation, storage, treatment, or disposal of hazardous wastes. This letter acknowledges that the MPCA and the U.S. Environmental Protection Agency (EPA) conducted a hazardous waste compliance inspection at 3M St. Paul, Main Plant, Abrasives and Tape Manufacturing (Company) on June 23 and 24, 1999. Greg Berger of the MPCA Metro District Office, Major Facilities Section and Tamara Ohl of the EPA, Region V led the inspection. Also attending was Greg LaMere of the Ramsey County Division of Environmental Health. Belinda Wirth, Ade Babatunde, Stephen Radtke, Ron Graves, Steven Porter, John Kleven and Leon Johnson represented the Company.

During the course of the inspection, the Company was found in violation of the Minnesota Hazardous Waste Rules. Enclosed is a Notice of Violation (Notice) that documents the violations. Please respond within 10 days after receipt of this letter and Notice, and advise us of your intent with respect to the actions described in the Notice.

Please read the enclosed Notice carefully. If you have any questions or comments, or require assistance, please contact Greg Berger of my staff at (651) 296-8374

Sincerely,

Darryl J. Weakley
Supervisor, Sector I
Major Facilities Section
Metro District

DJW:lao

cc: Ms. Belinda Wirth, 3M Environmental Technology and Services
Ade Babatunde, 3M Environmental Technology and Services
Ms. Tamara Ohl, EPA, Region V
Greg LaMere, Ramsey County Division of Environmental Health

STATE OF MINNESOTA

Minnesota Pollution Control Agency

In the Matter of Alleged Violations by 3M St. Paul, Main Plant, of the Minnesota Hazardous Waste Rules

NOTICE OF VIOLATION

To: Mr. Livio Desimone
Chief Executive Officer
3M Center
Building 220-14W-05
St. Paul, Minnesota 55144-1000

PLEASE BE ADVISED that the Minnesota Pollution Control Agency (MPCA) has sufficient information to document that 3M St. Paul, Main Plant (Company) has violated the Minnesota Hazardous Waste Rules by improperly managing hazardous waste at its facility located in St. Paul, Minnesota. The MPCA staff observed the following violations during an June 23, 1999 and June 24, 1999, inspection:

Abrasives Manufacturing

1. Minn. R. 7045.0265, subp. 1, item D [USE OF MANIFEST, General requirements]

> The Company failed to send to the MPCA the initial generator copy of hazardous waste manifests within five workings days of the transporter's acceptance of the hazardous waste shipment. This was noted for sixteen shipments originating from the Abrasives and/or Tape Manufacturing Plants from January 1997 through May 1999.

2. Minn. R. 7045.0292, subp. 1, item A [ACCUMULATION OF HAZARDOUS WASTE, Large quantity generator]

> The Company failed to ship off-site for disposal four full 55-gallon drums of lead contaminated rags, gloves, filters, etc. (D008) within 90 days of their accumulation start dates. Three of the four drums, which were all found stored at the Oilers Satellite Accumulation Area in Building 1B, had accumulation start dates from February (2 drums) and July 1998. The remaining drum was not dated.

3. Minn. R. 7045.0292, subp. 1, item C

The Company failed to label a full drum of lead contaminated rags, gloves, filters, etc. (D008) stored at the Oilers Satellite Accumulation Area in Building 1B with an accumulation start date.

4. Minn. R. 7045.0292, subp. 1, item F

The Company failed to label a 55-gallon drum accumulating waste aerosol cans with the words "Hazardous Waste." The drum was stored in the Oilers Satellite Accumulation Area in Building 1B.

5. Minn. R. 7045.0292, subp. 1, item G which references Minn. R. 7045.0558, subp. 6, items A & B [PERSONNEL TRAINING, Personnel records]

The Company failed to maintain up-to-date job titles and descriptions for all employees with positions related to hazardous waste management.

6. Minn. R. 7045.0292, subp. 1, item G which references Minn. R. 7045.0566, subp. 3, Item C [PREPAREDNESS AND PREVENTION, Required equipment]

The Company failed to maintain adequate spill control and decontamination equipment in relative close proximity to its 90-day hazardous waste storage areas. Also, the available equipment was not well organized and kept in stock and up-to-date.

7. Minn. R. 7045.0292, subp. 1, item G which references Minn. R. 7045.0566, subp. 6 [Required aisle space]

The Company failed to maintain adequate aisle space in its glue room 90-day hazardous waste storage area (Building 47-3). A forklift obstructed the aisle way next to the hazardous waste drums stored in the glue room. In addition, there was inadequate aisle space for the hazardous waste drums stored in the Oilers Satellite Accumulation Area in Building 1B.

8. Minn. R. 7045.0292, subp. 8, item D.(2) [Satellite accumulation]

The Company failed to transfer hazardous waste from a satellite accumulation area to a 90-day storage area within the allowed three days once it had exceeded the permissible satellite storage limit of 55-gallons per waste stream. Four full 55-gallon drums of lead contaminated rags, gloves, filters, etc. (D008) were found stored at the Oilers Satellite Accumulation Area in Building 1B.

Tape Manufacturing

1. Minn. R. 7045.0265, subp. 1, item D [USE OF MANIFEST, General requirements]

The Company failed to send to the MPCA the initial generator copy of hazardous waste manifests within five workings days of the transporter's acceptance of the hazardous waste shipment. This was noted for sixteen shipments originating from the Abrasives and/or Tape Manufacturing Plants from January 1997 through May 1999.

2. Minn. R. 7045.0292, subp. 1, item B [ACCUMULATION OF HAZARDOUS WASTE, Large quantity generator] which references Minn. R. 7045.0628, subp. 7, item C [TANK SYSTEMS, Inspections]

The Company failed to document daily inspections of its hazardous waste storage tank and its ancillary equipment located in Building 51. Incomplete inspection logs were noted for January, February, and March 1998.

3. Minn. R. 7045.0292, subp. 1, item E

The Company failed to store hazardous waste drums, which held free liquids and were stored outside, on a curbed containment surface that was impermeable to the wastes stored. Three 55-gallon drums labeled "wet scrap pumpable" were stored outside on the north side of Building 23. The concrete pavement on which the drums were stored did not meet the outdoor hazardous waste storage requirements noted above.

4. Minn. R. 7045.0292, subp. 1, item G which references Minn. R. 7045.0558, subp. 6, items A & B [PERSONNEL TRAINING, Personnel records]

The Company failed to maintain up-to-date job titles and descriptions for all employees with positions related to hazardous waste management.

5. Minn. R. 7045.0292, subp. 1, item G, which references Minn. R. 7045.0566, subp. 2 [PREPAREDNESS AND PREVENTION; Operation of facility]

> The Company failed to operate its facility in a manner to minimize the possibility of a sudden or non-sudden release to the air, land, or water of hazardous waste or hazardous waste constituents which could threaten human health or the environment when it improperly stored hazardous waste outdoors (as described in number 3 above, under Tape Manufacturing).

REQUIREMENTS

The MPCA requires that the Company accomplish the following items:

Abrasives Manufacturing

1. Immediately upon receipt of this Notice the Company shall:

    a. Manage all hazardous wastes in accordance with the applicable Minnesota Hazardous Waste Rules.

    b. Submit initial copies of hazardous waste manifests to the MPCA within five working days of the initial transporter's acceptance of a hazardous waste shipment.

    c. Verify (submit copy of hazardous waste manifest) that the four over-accumulated drums of lead contaminated waste, found at the Oilers Satellite Accumulation Area/Building 1B, have been properly managed (off-site disposal) and that the Company will comply with the 90-day hazardous waste storage limit and satellite accumulation rules in the future.

    d. Label all drums/containers holding hazardous waste with the date the accumulation begins, the words "Hazardous Waste," and with a clear description of the waste.

    e. Maintain proper hazardous waste personnel training records, including job titles and job descriptions for each position related to the Company's hazardous waste management (i.e. for all applicable supervisors, engineers, and production personnel). This must also include the name of the employee filling each job. See the enclosed fact sheet: "Hazardous Waste LQG and TSD Personnel Training Requirements." Please submit to the MPCA the job titles and descriptions described above for the Abrasives Manufacturing Plant.

f. Maintain up-to-date and in stock its hazardous waste spill control and decontamination equipment. This equipment should be maintained in relative close proximity to its 90-day hazardous waste storage areas. The equipment should include at minimum: shovels, brooms, floor dry, absorbent pads/socks, latex rubber boots and gloves, face shields and/or splash goggles, 55-gallon drum, 5-gallon polyethylene pails. Please submit to the MPCA a list of the spill control/decontamination equipment that is available and its location(s) in the Abrasives Manufacturing Plant.

g. Maintain adequate aisle space at all its hazardous waste 90-day and satellite accumulation storage areas. The aisle space must be wide enough for drum inspections and the unobstructed movement of spill control and decontamination equipment.

h. At all hazardous waste satellite accumulation areas, once 55-gallons of hazardous waste per waste stream (or one quart of acutely hazardous waste) has accumulated, transfer the waste to a 90-day storage area within the allowed three days.

2. Located in Building 1 was an area designated for hazardous waste storage (sign attached or painted on wall) that appeared to be no longer used for this purpose. A similar situation was also observed in Building 47-1 near the "6 maker" staging area. The MPCA requests that the Company immediately remove or paint over the hazardous waste storage signs located in these areas if it no longer plans to use them for hazardous waste storage.

   Also, in this regard, please identify and confirm all hazardous waste 90-day and satellite accumulation storage areas located in the Abrasives Manufacturing Plant and provide to the MPCA a list of these storage areas within 45 days after receipt of this Notice. This list must include a specific building number, floor, production area location, etc. for each storage area.

3. Within 45 days after receipt of this Notice the Company shall submit a written response describing the steps taken to address each of the requirements listed in No. 1 (a.- h.) and 2 above (Abrasives Manufacturing Plant Requirements). Please include documentation of the completion of each requirement as appropriate.

Tape Manufacturing

1. Immediately upon receipt of this Notice the Company shall:

   a. Manage all hazardous wastes in accordance with the applicable Minnesota Hazardous Waste Rules.

   b. Submit initial copies of hazardous waste manifests to the MPCA within five working days of the initial transporter's acceptance of a hazardous waste shipment.

c. Inspect its hazardous waste storage tank and ancillary equipment daily and keep an up-to-date daily inspection log. Completed inspection logs should be kept in the Company's permanent records for at least three years. For inspection requirements see Minn. R. 7045.0628, subp. 7.

d. As instructed during the June 24, 1999 inspection, discontinue storing liquid hazardous waste outdoors in the area outside of Building 23 unless the storage area complies with the outdoor hazardous waste storage requirements. See the enclosed fact sheet: "Mark and Store Waste Correctly."

e. Maintain proper hazardous waste personnel training records, including job titles and job descriptions for each position related to the Company's hazardous waste management. (i.e. for all applicable supervisors, engineers, and production personnel).
This must also include the name of the employee filling each job. See the enclosed fact sheet: "Hazardous Waste LQG and TSD Personnel Training Requirements." Please submit to the MPCA the job titles and descriptions described above for the Tape Manufacturing Plant.

f. Submit to the MPCA a list of the spill control/decontamination equipment that is available and its location(s) in the Tape Manufacturing Plant.

2. It was noted during the inspection that many of the Tape Manufacturing Plant's hazardous waste storage areas were designated as 90-day accumulation areas. It appeared that many of these should be designated as satellite accumulation areas, especially if the waste streams accumulate slowly in these areas (takes longer than 90 days to accumulate a full 55-gallon drum for each different waste stream stored).

   In this regard, please identify and confirm all hazardous waste 90-day and satellite accumulation storage areas located in the Tape Manufacturing Plant and provide to the MPCA a list of these storage areas within 45 days after receipt of this Notice. This list must include a specific building number, floor, production area location, etc. for each storage area.

3. Within 45 days after receipt of this Notice the Company shall submit a written response describing the steps taken to address each of the requirements listed in No. 1 (a.-f.) and No. 2 above (Tape Manufacturing Plant Requirements). Please include documentation of the completion of each requirement as appropriate.

NOTICE

The Company is hereby given notice that these violations have been recorded by the MPCA. This Notice does not preclude the MPCA from taking further action with respect to the above violations. In addition. Continued violation of the Minnesota Hazardous Waste Rules will result in initiation of further administrative or judicial enforcement action. If you believe the allegations in this Notice are incorrect, please respond in writing within 10 days after receiving this Notice, and explain any inaccuracies.

DATE: 11/15/99

Richard J. Sandberg, Manager
Major Facilities Section
Metro District

CERTIFIED MAIL NO. Z 101 652 646
RETURN RECEIPT REQUESTED

For further information, please contact:

Greg A. Berger
Minnesota Pollution Control Agency
Major Facilities/Metro District
520 Lafayette Road North
St. Paul, Minnesota 55155-4194
(651) 296-8374

3M Environmental Technology and Services

PO Box 33331
St. Paul, MN 55133-3331
651 778 6442

3M

October 25, 1999

Certified Mail

Mr. Patrick Kuefler
Enforcement and Compliance Assurance Branch
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

RE: Response to EPA Hazardous Waste Inspection Letter – October 4, 1999
EPA I.D. No. MN 000824029
3M Main Plant
900 Bush Avenue
St. Paul, MN 55106

Dear Mr. Kuefler:

This is in response to your letter of October 4, 1999. The following action has been taken to address the concerns resulting from EPA RCRA compliance inspection at the subject facility on June 23-24, 1999. This response, for your convenience, will follow the item numbering of your October 4, 1999 letter.

Item 1, page 1 Tank Level 1 Controls

Further review of the hazardous waste tank system has revealed that the tank is, and always has been equipped with conservation vent. Unfortunately, this vent was misidentified during the inspection. The term "breather vent" was also inappropriately used by 3M to describe the vent. The tank is equipped with a Morrison Bros. #153A pressure/vacuum vent (see Attachment 1 for diagram and description). This vent remains in the closed position (i.e., with no visible openings) when the tank's internal pressure is within the internal pressure operating range.

The vent was inspected and had annual preventive maintenance (PM) performed on September 16, 1999. The inspection schedule has just been changed to semi-annual according to the manufacturer's recommendation. Copies of this inspection will be kept with the tank implementation guide. The tank, fixed roof and all closure devices were also visually inspected on October 20, 1999. No visible defects were found. This annual visual inspection of this vent will be added to our preventive maintenance schedule (see Attachment 2 for visual inspection report). The tank has been routinely visually inspected thoroughly in accordance to 3M Above Ground Tank Inspection standard (see Attachment 4). Visible and readily accessible portions of the tank system, including the tank, piping, pumps, secondary containment, etc., are examined daily for evidence of active leaks.

Unusual conditions are noted and investigated. We are including the inspection logs from 1997 through 1999, but others are also available (see Attachment 2).

Item 2, page 2 Applicability of Air Emission Standards for Equipment Leaks
The tank has not been in use since April 21, 1999 when the recirculating pump was removed. The small amount of hazardous waste (approx. 265 gallons; tank capacity ~ 3,800 gallons) that was in the tank during the EPA inspection has been removed and disposed. Provided in Attachment 3 is the inspection/test report that was conducted on June 23, 1999. The inspection/test was conducted by Precision Environmental. The inspector's name and signature have been added to this report. Furthermore, the ancillary equipment has been individually marked with numbered coin tags. The description of these tags/pieces of equipment are included in the 3M Implementation Guide for identification (see Attachment 6).

Item 3, page 3 Standards; Pumps in Light Liquid Service
We have every reason to believe that repairs to the subject pump were made in a timely and appropriate manner. However, the plant's system for executing repairs did not facilitate clear documentation of this work. As noted for this item, the pump was removed in April 1999 (see Attachment 5). The pump and the entire tank system have been out of service since this time. 3M Engineering is in the process of obtaining a suitable replacement pump.

As indicated above, the tank and ancillary equipment have been routinely visually inspected thoroughly in accordance to 3M Above Ground Tank Inspection standard. Visible and readily accessible portions of the tank system, including the tank, piping, pumps, secondary containment, etc., are examined daily for evidence of active leaks. Unusual conditions are noted and investigated. Monthly monitoring and weekly inspections will be conducted and documented upon startup of the new pump. This will include logs of any corrective actions. The attached document by Precision Environmental for the June 23, 1999 inspection has been updated to include the name and signature of the inspector.

Item 4, page 3 Standards: Valves in gas/vapor service or light liquid service
As indicated above, the tank and ancillary equipment have been routinely visually inspected thoroughly in accordance to 3M Above Ground Tank Inspection standard. Visible and readily accessible portions of the tank system, including the tank, piping, pumps, secondary containment, etc., are examined daily for evidence of active leaks. Unusual conditions are noted and investigated. Monthly testing will resume when we install a new recirculating pump and resume use of the hazardous waste tank. The attached document by Precision Environmental for the June 23, 1999 inspection has been updated to include the name and signature of the inspector (see Attachment 3).

Item 5, page 4 Inspection Requirements for Tanks
The plant recordkeeping for the leaks and subsequent repairs detected will be upgraded to include notation of repairs made.

We trust that this provides additional information and assists in addressing your concerns regarding the hazardous waste management issues at the facility. If you have any

additional questions or concerns, please contact me at (651) 778-7674. Thank you for your assistance.

Sincerely

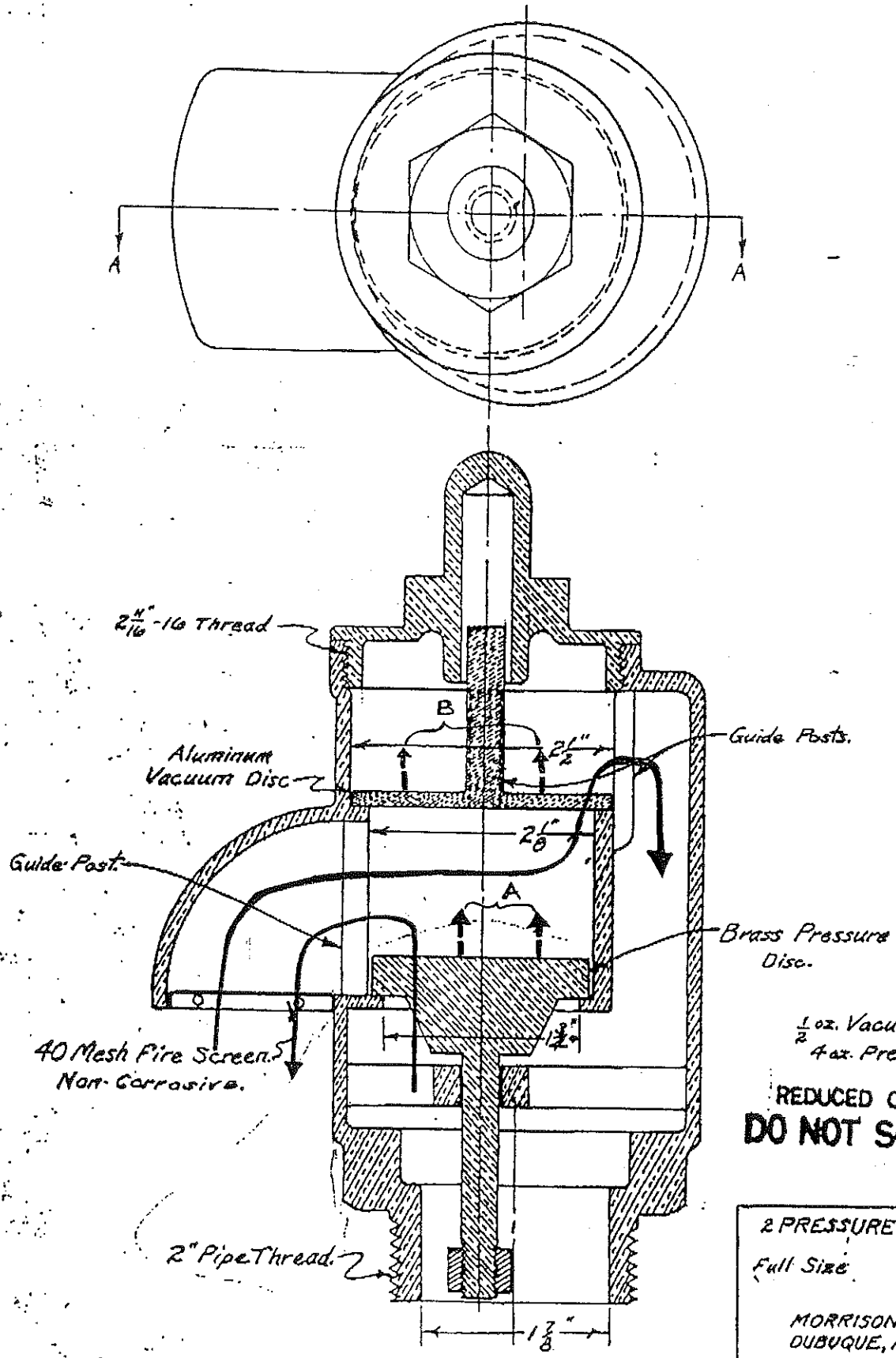
Adé Babatunde

Adé Babatunde
Advanced Environmental Engineer
Building 42-2E-27

Enclosures

cc: Greg Berger, MPCA
Greg LaMere, Ramsey County, Dept. of Public Health

ATTACHMENT 1



Section A-A.

1/2 oz. Vacuum.
4 oz. Pressure.

REDUCED COPY
DO NOT SCALE

2 PRESSURE VENT.
Full Size Fig. 153-A

MORRISON BROS.,
DUBUQUE, IOWA.

Drawn By J.M.K.
2-22-24. B-3053.

1960 Catalog

MORRISON BROS. CO.

 ATTN: STEVE PORTER

WITH GAUGE OPENING

VENT VALVES

Bulk Storage Tank Pressure Vent

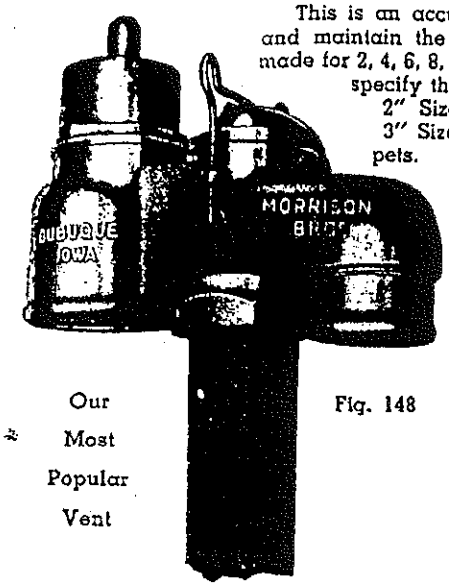
This is an accurate pressure vent built to actually hold and maintain the pressure for which it is indicated. It is made for 2, 4, 6, 8, 16 and 32 oz. pressure. In ordering, please specify the pressure for which this valve is desired.

2" Size—Body—Poppets and cages all bronze.

3" Size—Iron body. Brass insert seats and poppets.

Both openings screened. Quick acting gauge hatch for straight through gauging.

In all cases this vent should be installed 12 to 18 inches above top of tank or any platform on the top of the tank.



Our Most Popular Vent

Fig. 148

Size	Pressure	Vacuum	Weight
2"	2 oz.	1 oz.	8 lbs. 10 oz.
2"	4 oz.	1 oz.	9 lbs.
2"	6 oz.	1 oz.	9 lbs. 12 oz.
2"	8 oz.	1 oz.	10 lbs. 8 oz.
2"	16 oz.	1 oz.	11 lbs. 6 oz.
2"	32 oz.	1 oz.	15 lbs. 8 oz.
3"	2 oz.	1 oz.	29 lbs.
3"	4 oz.	1 oz.	29 lbs. 14 oz.
3"	6 oz.	1 oz.	31 lbs.
3"	8 oz.	1 oz.	32 lbs.
3"	16 oz.	1 oz.	35 lbs. 12 oz.

3" Size made with Iron Body, Brass Trim.

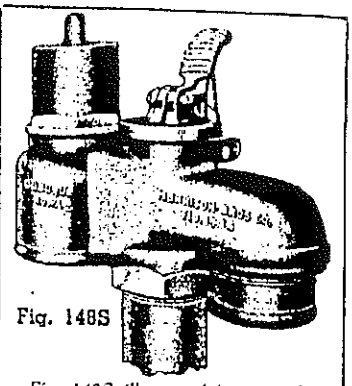


Fig. 148S

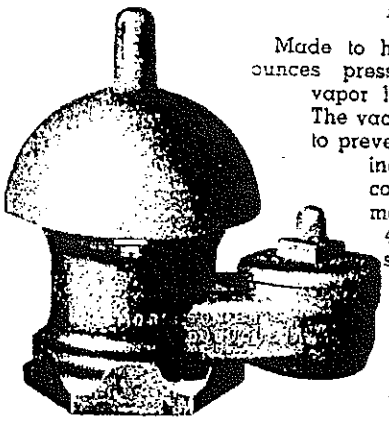
Fig. 148S illustrated here is identical with Fig. 148 except for the gauge hatch. Fig 148S is provided with a convenient non-skid foot pedal for opening the hatch for gauging. Closes automatically when pressure is released. May be locked shut to prevent pilfering.

2" SIZE ONLY

Prices Same as 2" Fig. 148

FIELD TANK PRESSURE VENTS

Made to hold from two to 16 ounces pressure, thus reducing vapor losses in field tanks. The vacuum side is sufficient to prevent danger of collapsing the tank when the content is being removed. 2" size set for 4 oz. vacuum. 3" size set for 3 oz. vacuum.



—SIZES—
2"—3"

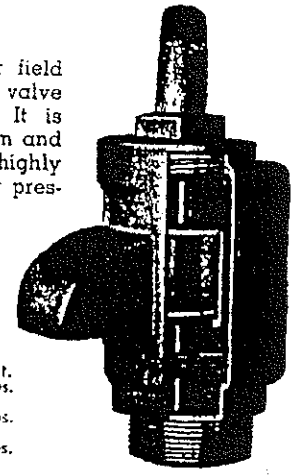
Fig. 149

Weights

2"—2 oz. Pressure . . 4¾ lbs.
2"—4 oz. Pressure . . 5 lbs.
Made for 2 to 16 oz. pressure.
3"—2 oz. Pressure . . . 7 lbs.
3"—4 oz. Pressure . . . 9 lbs.

The vent is designed for field storage tanks. It is a relief valve for pressure and vacuum. It is made to hold 1¼ oz. vacuum and 1½ oz. pressure. This is a highly useful field tank vent. Other pressures on application.

Fig. 153A



Sizes	Net Wt.
2" All Brass, Male Thread	6¼ lbs.
3" Iron Body, Brass Poppets, Female Thread	12½ lbs.
4" Iron Body, Brass Poppets, Female Thread	22½ lbs.
6" Iron Body, Brass Poppets, Female Thread	54 lbs.

PARTS FOR FIG. 149 VENT

Part No.
1. Body
2. Pressure Valve Cap 2 to 8 oz.
3. Pressure Valve Cap, 16 oz.
4. Vacuum Valve Plunger only
5. Vacuum Valve Disc only
6. Vaccum Valve Disc Nut
7. Vacuum Valve Cap
8. Pressure Valve Plunger only, 2 to 8 oz.
9. Pressure Valve Plunger only, 16 oz.
10. Pressure Valve Disc only
11. Pressure Valve Disc Nut
12. Pressure Valve Weight 2 to 4 oz.
13. Hex Head Stove Bolt
14. Lock Washer

PARTS FOR FIG. 148 VENT

Part No.
1. Body
2. Pressure Valve Cap (2 to 8 oz.)
3. Pressure Valve Cap (16 oz.)
3A. Pressure Valve Cap (32 oz.)
4. Gauge Hole Cap
5. Gauge Hole Cap Leather Washer
5N. Gauge Hole Cap Neoprene Washer
6. Gauge Hole Cap Metal Washer
7. Gauge Hole Cap, Cap Screw
8. Gauge Hole Cap, Hold Down Spring
9. Vacuum Valve Seat

Part No.
10. Vacuum Valve Seat Leather Washer
11. Vaccum Valve Poppet
12. Pressure Valve Poppet to 8 oz.
12A. Pressure Valve Poppet—16 oz.
12B. Pressure Valve Poppet—32 oz.
13. Vacuum Valve Screen
14. Vacuum Valve Screen Snap Spring
15. Pressure Valve Screen
16. Pressure Valve Screen Snap Spring
17. Gauge Hole Cap Rivet
18. Pressure Weights, 4 oz.
19. Pressure Weights, 6 oz.
20. Pressure Weights, 8 oz.
21. Pressure Weights, 16 oz.
22. Pressure Weights, 32 oz.

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5
WASTE, PESTICIDES AND TOXICS DIVISION
ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

RCRA Compliance Evaluation Inspection Report

Facility Name and Location: 3M Main Plant

St. Paul, Minnesota
MND 000 824 029

Type of Facility: Large quantity generator

Date of Inspection: June 23-24, 1999. Facility was notified on June 21, 1999.

Facility Representative:

<u>Abrasive Manufacturing</u>
Belinda Wirth
Senior Environmental Engineer
Building 42-2E-27
P.O. Box 33331
St. Paul, MN 55133-3331
(651) 778-6014

Stephen Radtke
Senior Safety Engineer
935 Bush Avenue
Building 2-1E-08
St. Paul, MN 55144-1000
(651) 778-6316

<u>Tape Manufacturing</u>
R.A. Graves
Plant Services Manager
751 Mendota Avenue
3M Center, Bldg. 24-2E-03
St. Paul, MN 55144-1000
(651) 778-7486

Ade' Babatunde
Advanced Environmental Engineer
Building 42-2E-27
P.O. Box 33331
St. Paul, MN 55133-3331
(651) 778-7674

Steven M. Porter
Environmental Engineering Specialist
3M Center, Building 24-2E-02
St. Paul, MN 44144-1000
(651) 778-4686

Name of Inspectors: Greg Berger, MPCA
520 Lafayette Road
St. Paul, MN 55155-3898
(651) 296-8374

Greg LaMere
St. Paul-Ramsey County
Department of Public
Health
1670 Beam Avenue, Suite A
Maplewood, MN 55109-1176
(651) 773-4461

Tamara Ohl, U.S.EPA
77 West Jackson Boulevard
Mail Code: DE-9J
Chicago, IL 60604
(312) 886-0991

Type of Inspection: RCRA Compliance Evaluation Inspection

Facility Inspection

Abrasives Plant:
The inspection at the Abrasives plant began in the afternoon of July 23, 1999. After the opening meeting, the file review was initiated, followed by a facility walk-through. Walk-through included process areas, satellite accumulation areas, and less than 90 day storage areas. The Abrasives Plant produces sandpaper products using aluminum oxide, silicone carbide and resins. Hazardous wastes are stored in 55 gallon drums. Hazardous wastes generated include, off-specification materials, waste resins and solvent, rags, filters, batteries, and flourescent bulbs. Drummed wastes are sent to the 3M incinerator. Buildings 11,12, and 20 are used for crushing and screening minerals and for storage (no hazardous waste generation). Coating operations are located in Building 47 as well as the less than 90 day storage areas. At the time of the inspection 5 drums containing D001 waste, 2 drums containing F005 and D001 waste, and 1 drum containing F002, F003, F005, and D001, D003, D008, D019 were located in the Glue Room less than 90 day storage area. The Oilers Satellite Accumulation Area in Building 1B, contained: 2-55 gallon drums of oily rags, gloves and filters (D008)dated February 25, 1998, 1 drum of oily rags, gloves and filters (D008) dated July 27, 1998, 1 undated drum of oily rags, gloves and filters(D008), and 2 partially full, unlabeled, drums of used aerosol cans.

Tape Plant:
The inspection at the Tape Plant began the morning of July 24, 1999. After the opening meeting, the file review was initiated, followed by a facility walk-through. Walk-through included process areas, satellite accumulation areas, and the less than 90 day storage area. Additional files were reviewed after the walk-through was completed.

During the file review, the inspector requested to review documentation regarding the facility's implementation of the air emissions requirements of Subpart BB and CC (40 CFR Part 265). Inspector reviewed and was provided copies of the Hazardous Waste Storage Tank Subpart BB and CC Implementation Guide, Plate 1 3M Company-St. Paul Tape Plant, Scrap Solvent Waste Storage System, the Daily Inspection Logs since December, 1996, a Work Order History Inquiry for the pump on the tank in Building 51, and an estimate of the amount of wastes managed by the tank for 1997, 1998, and 1999. Documentation provided is attached to this report.

Building 51 contains a 3,500 gallon hazardous waste tank that was installed in 1988. Waste heptane, xylene, and toluene (F001, F003, and F005) generated in Building 22 are taken to the pump waste transfer room. Wastes were poured into a 55 gallon drum and then pumped to the waste tank. Equipment at the transfer station included a pump, flanges, and valves. Equipment was tagged with brass tags for Subpart BB purposes. The pipe conveying waste from Building 22 to Building 51 is encased within another pipe, but is not tagged. Building 51 houses the hazardous waste tank as well as four additional product storage tanks. Ancillary equipment associated with the tank is tagged for the purposes of BB. Inspector asked when the equipment was tagged, Mr. Steve Porter indicated that it was tagged on June 22, 1999. Inspection logs contained in the Implementation Guide list June 23, 1999, as the date of the first inspection (See Sections A through F, Implementation Guide). At the time of the inspection, facility representatives estimated that the tank contained about 200 gallons of waste (D001, D035, F003, F005). Facility representatives indicated that no additional wastes have been added to the tank because they are determining if it is feasible to close the tank. Review of facility repair logs identified problems with a tank pump in January of 1999, and February, July, and August of 1998, although the date of repair is not listed on the log. A Work Order History Inquiry indicated removal of pump on April 22, 1999.

3M has a Clean Air Act Permit issued by MPCA ("Pressure Sensitive Tape and Label Manufacturing Plant and Air Pollution Control Equipment" (23GS-93-0T-1) for a thermal oxidizer in 1993. Emissions from tanks 1 through 5 in Building 51 (emission points 89 to 93) were evaluated in the permit. Although not certain which emission point is associated with the hazardous waste tank, facility representatives believed it to be emission point 91. While the file review continued, Steve Porter climbed to the roof of Building 51 to view the vent on the hazardous waste tank. He indicated that the vent was a straight breather-type vent, and not a conservation vent. The hazardous waste tank vents to the atmosphere, not the thermal oxidizer.

Mr. R.A. Graves was provided with a fact sheet regarding requirements of Part 265 Subparts AA, BB, and CC.

6-23-99

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:
DE-9J

Certified Mail (P 140 777 380)
Return Receipt Requested

Mr. Ade' Babatunde
Advanced Environmental Engineer
3M Environmental Technology and Services
Building 42-2E-27
PO Box 33331
St. Paul, Minnesota 55133-33331

Re: Notice of Violation
Minnesota Mining and Manufacturing
Company, Main Plant
St. Paul, Minnesota
MND 000 824 029

Dear Mr. Babatunde:

On June 23 and 24, 1999, the United States Environmental Protection Agency (U.S. EPA), Minnesota Pollution Control Agency, and St. Paul-Ramsey County Department of Public Health conducted a compliance inspection at the 3M Main Plant, located at 850 thru 935 Bush Avenue, St. Paul, Minnesota (the facility). The purpose of the inspection was to evaluate the facility's compliance with applicable standards for generators of hazardous waste set forth at 40 C.F.R. Part 262, and standards for owners and operators of treatment, storage, and disposal facilities set forth at 40 C.F.R. Part 265. I have included a copy of U.S. EPA's inspection report for your reference.

Based upon information collected during the inspection, U.S. EPA has determined the facility to be in violation of the following requirements of RCRA.

1. 40 C.F.R. Part 265.1085(c)(2); Tank Level 1 controls

"The tank shall be equipped with a fixed roof designed to meet the following specifications: ...(iii) Each opening in the fixed roof and any manifold system associated with the fixed roof, shall be either: (A) Equipped with a closure device designed to operate such that when the closure device is secured in the closed position there are no visible

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cracks, holes, gaps, or other open spaces in the closure device or between the perimeter of the opening and the closure device; or (B) Connected by a closed vent system that is vented to a control device."

40 C.F.R. 265.1085(c)(4); Inspection Requirements for Tanks

"The owner or operator shall inspect the air emission control equipment in accordance with the following requirements. (i) The fixed roof and its closure devices shall be visually inspected by the owner or operator to check for defects that could result in air pollutant emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in the roof sections or between the roof and the tank wall; broken, cracked or otherwise damaged seals or gaskets on closure devices; and broken or missing hatches, access covers, caps, or other closure devices. (ii) The owner or operator shall perform an initial inspection of the fixed roof and its closure devices on or before the date that the tank becomes subject to this section. Thereafter, the owner or operator shall perform the inspection at least once every year...."

At the time of the inspection, facility personnel indicated that the 3,500 gallon tank located in Building 51 was equipped with a breather vent. Breather vents do not satisfy the requirement of a closure device. The facility must document installation of a closure device that will remain in the closed position, with no detectable emissions, when the tank's internal pressure is within the internal pressure operating range based on manufacturer recommendations. The facility must also document that the closure devise and tank will be inspected annually.

2. 40 C.F.R. Part 265.1050(b) and (c); Applicability of Air Emission Standards for Equipment Leaks

"(b)Except as provided in 265.1064(k), this subpart applies to equipment that contains or contacts hazardous wastes with organic concentrations of at least 10 percent by weight that are managed in one of the following: ...(3) A unit that is exempt from permitting under the provisions of 40 CFR 262.34(a) (i.e., a 90-day tank or container) and is not a recycling unit under the provisions of 40 CFR 261.6). (c)Each piece of equipment in which this subpart applies shall be marked in such a manner that it can be distinguished readily from other pieces of equipment."

At the time of the inspection, the facility was managing hazardous waste containing greater than 10 percent organics in the tank in Building 51 and its ancillary equipment in Building 22. Each piece of equipment must be properly marked so that it can be distinguished from other pieces of equipment as required by 40 C.F.R. Part 265.1050(c). Facility representatives indicated that equipment was marked on June 22, 1999. According to the table "Section A - Sub Part BB Equipment List" included in the 3M Implementation Guide, each piece of equipment is not individually marked. Based on the documentation provided, the inspection of ancillary equipment was completed once, on June 23, 1999. Inspection logs did not identify the inspector or contain his/her signature. The facility must document proper identification and marking of equipment.

3. 40 C.F.R. 265.1052 (a)and (c) Standards; Pumps in light liquid service

   "(a)(1) Each pump in light liquid service shall be monitored monthly to detect leaks by the methods specified in Part 265.1063(b)....(2)Each pump in light liquid service shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal.
   (c)(1) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected....(2) A first attempt at repair .... shall be made no later than 5 calendar days after each leak is detected."

The weekly and monthly inspection logs contained in Sections B and C of the 3M Subpart CC Implementation Guide document the pump in Building 22 - Haz. Waste Transfer Room (Tag #30) as being inspected only on June 23, 1999. The inspection logs are not signed by the inspector. The facility must document performance of monthly and weekly inspections. Facility representatives also indicated that a pump associated with the tank in Building 51 had been removed in April, 1999. The daily tank inspection logs document leaking at the pump on 01/27/99, 08/14/98, and 02/02/98. The inspection logs do not identify when the pump was repaired after leaks were detected on 08/14/98 or 02/02/98.

4. 40 C.F.R. Part 265.1057 (a); Standards: Valves in gas/vapor service or light liquid service.

   "(a) Each valve in gas/vapor or light liquid service shall be monitored monthly to detect leaks by the methods specified in Part 265.1063(b) and shall comply with paragraphs (b) through (e) of this section...."

The monthly inspection logs contained in Section F of the 3M Subpart CC Implementation Guide document the valves in Buildings 51 (Tags 2, 4, 9, 10, 13, 18, 20, and 28)and 22 - Haz. Waste Transfer Room (Tags 32, 33, 34, and 35) as being inspected only on June 23, 1999. The inspection logs are not signed by the inspector. The facility must document performance of monthly inspections.

5. 40 C.F.R. Part 265.1064(d); Recordkeeping Requirements.

> "When each leak is detected as specified in Part 265.1052..., the following information shall be recorded in an inspection log and shall be kept in the facility operating record: (1) The instrument and operator identification numbers and equipment identification number. ...(3) The date the leak was detected and the dates of each attempt to repair the leak....(5) Repair methods applied to each attempt to repair the leak....(10)The date of successful repair of the leak.

The daily tank inspection logs document leaking at the pump associated with the tank in Building 51 on 01/27/99, 08/14/98, and 02/02/98. The inspection logs do not identify when or how the pump was repaired after leaks were detected on 08/14/98 or 02/02/98. The facility must document equipment repairs in the inspection log.

Pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a) U.S. EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified period of time, or both. Although this letter is not such an order, I request that you submit a written response documenting the actions, if any, that have been taken since the inspection to establish compliance with the above requirements. The requested information should be sent no later than October 25, 1999, to:

Patrick Kuefler(DE-9J)
Enforcement and Compliance Assurance Branch
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

If you have any questions and/or concerns regarding this matter, please contact Mr. Patrick Kuefler at (312) 353-6268.

Sincerely,

Lorna M. Jereza

Lorna Jereza, Chief
Compliance Section 1
Enforcement and Compliance Assurance Branch

Enclosure

cc: Greg Berger, MPCA
Greg LaMere, Ramsey County, Dept. of Public Health

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:
DE-9J

OCT 04 1999

Certified Mail (P 140 777 380)
Return Receipt Requested

Mr. Ade' Babatunde
Advanced Environmental Engineer
3M Environmental Technology and Services
Building 42-2E-27
PO Box 33331
St. Paul, Minnesota 55133-33331

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St. Paul, Minnesota
MND 000 824 029

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"The owner or operator shall inspect the air emission control equipment in accordance with the following requirements. (i) The fixed roof and its closure devices shall be visually inspected by the owner or operator to check for defects that could result in air pollutant emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in the roof sections or between the roof and the tank wall; broken, cracked or otherwise damaged seals or gaskets on closure devices; and broken or missing hatches, access covers, caps, or other closure devices. (ii) The owner or operator shall perform an initial inspection of the fixed roof and its closure devices on or before the date that the tank becomes subject to this section. Thereafter, the owner or operator shall perform the inspection at least once every year...."

At the time of the inspection, facility personnel indicated that the 3,500 gallon tank located in Building 51 was equipped with a breather vent. Breather vents do not satisfy the requirement of a closure device. The facility must document installation of a closure device that will remain in the closed position, with no detectable emissions, when the tank's internal pressure is within the internal pressure operating range based on manufacturer recommendations. The facility must also document that the closure devise and tank will be inspected annually.

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At the time of the inspection, the facility was managing hazardous waste containing greater than 10 percent organics in the tank in Building 51 and its ancillary equipment in Building 22. Each piece of equipment must be properly marked so that it can be distinguished from other pieces of equipment as required by 40 C.F.R. Part 265.1050(c). Facility representatives indicated that equipment was marked on June 22, 1999. According to the table "Section A - Sub Part BB Equipment List" included in the 3M Implementation Guide, each piece of equipment is not individually marked. Based on the documentation provided, the inspection of ancillary equipment was completed once, on June 23, 1999. Inspection logs did not identify the inspector or contain his/her signature. The facility must document proper identification and marking of equipment.

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   (c)(1) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected....(2) A first attempt at repair .... shall be made no later than 5 calendar days after each leak is detected."

The weekly and monthly inspection logs contained in Sections B and C of the 3M Subpart CC Implementation Guide document the pump in Building 22 - Haz. Waste Transfer Room (Tag #30) as being inspected only on June 23, 1999. The inspection logs are not signed by the inspector. The facility must document performance of monthly and weekly inspections. Facility representatives also indicated that a pump associated with the tank in Building 51 had been removed in April, 1999. The daily tank inspection logs document leaking at the pump on 01/27/99, 08/14/98, and 02/02/98. The inspection logs do not identify when the pump was repaired after leaks were detected on 08/14/98 or 02/02/98.

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The monthly inspection logs contained in Section F of the 3M Subpart CC Implementation Guide document the valves in Buildings 51 (Tags 2, 4, 9, 10, 13, 18, 20, and 28)and 22 - Haz. Waste Transfer Room (Tags 32, 33, 34, and 35) as being inspected only on June 23, 1999. The inspection logs are not signed by the inspector. The facility must document performance of monthly inspections.

5. 40 C.F.R. Part 265.1064(d); Recordkeeping Requirements.

> "When each leak is detected as specified in Part 265.1052..., the following information shall be recorded in an inspection log and shall be kept in the facility operating record: (1) The instrument and operator identification numbers and equipment identification number. ...(3) The date the leak was detected and the dates of each attempt to repair the leak....(5) Repair methods applied to each attempt to repair the leak....(10)The date of successful repair of the leak.

The daily tank inspection logs document leaking at the pump associated with the tank in Building 51 on 01/27/99, 08/14/98, and 02/02/98. The inspection logs do not identify when or how the pump was repaired after leaks were detected on 08/14/98 or 02/02/98. The facility must document equipment repairs in the inspection log.

Pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a) U.S. EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified period of time, or both. Although this letter is not such an order, I request that you submit a written response documenting the actions, if any, that have been taken since the inspection to establish compliance with the above requirements. The requested information should be sent no later than October 25, 1999, to:

Patrick Kuefler(DE-9J)
Enforcement and Compliance Assurance Branch
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

If you have any questions and/or concerns regarding this matter, please contact Mr. Patrick Kuefler at (312) 353-6268.

Sincerely,

Lorna M. Jereza

Lorna Jereza, Chief
Compliance Section 1
Enforcement and Compliance Assurance Branch

Enclosure

cc: Greg Berger, MPCA
Greg LaMere, Ramsey County, Dept. of Public Health

P 993 304 484

Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

UNITED STATES POSTAL SERVICE

Sent to MR. Robert P. Bringer Staff Vice President	
Street and No. 3M Co., Bldg 21-2W-05 900 Bush Ave.	
P.O., State and ZIP Code St. Paul, Minnesota 55106	
Postage	$ 2.90
Certified Fee	1.00
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	1.00
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$ 4.90
Postmark or Date	

PS Form 3800, June 1991

J. ROJO / HRP-85, Section 1 UMD, OR RPB

Juana Rojo

SENDER:
- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece next to the article number.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Mr. Robert P. Bringer
Staff Vice President
Environmental Eng. & Pollution Control
3M COMPANY (Bldg 21-2W-05)
900 Bush Avenue
St. Paul, Minnesota 55106

4a. Article Number
P993 304 484

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

Return Receipt Requested

7. Date of Delivery

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

ST. PAUL, MN 55101 SEP 17 1994 9720 BOX SECTION

PS Form 3811, October 1990 ☆U.S. GPO: 1990—273-861 **DOMESTIC RETURN RECEIPT**

Part A
000-824-029
MND 000 824 011

3 MAR 1986

Brian Davis
Office of General Counsel
Minnesota Mining and Manufacturing Company
P.O. Box 33428
St. Paul, Minnesota 55133

Re: Waiver of Claim of Business Confidentiality by Minnesota Mining and Manufacturing Company (3M) Relating to Information Obtained in the McKesson Corporation's December 6, 1984, Response to an Information Request Regarding Seymour Recycling.

Dear Mr. Davis:

On September 1, 1985, you received a letter from me providing notice of an opportunity to submit comments substantiating 3M's claim of business confidentiality for information obtained by the United States Environmental Protection Agency (U.S. EPA) in McKesson Corporation's information request response relating to Seymour Recycling. The notice informed 3M that comments must be made within fifteen days unless a request for an extension of time was made and granted by U.S. EPA. No such request was made by 3M.

The notice also informed 3M that a failure to submit comments shall be construed as a waiver of its claim of confidentiality pursuant to 40 C.F.R. Part 2.205(d)(1). On February 27, 1986, Bernard Landman of my office contacted you in regard to the comments to be submitted by 3M. Mr. Landman was informed that 3M had not sent, nor was 3M going to send, comments to substantiate its claim of business confidentiality.

Based on the foregoing, and pursuant to 40 C.F.R. Part 2.205(d)(1), 3M's claim of business confidentiality for the information obtained via McKesson Corporation's information request response has been determined to have been waived. Therefore, the information is not entitled to the treatment given to confidential business information.

Please feel free to contact Bernard Landman, Assistant Regional Counsel, at 312/886-5323, if you have any questions.

Sincerely,

BL ORC 2/27/86

Robert B. Schaefer
Regional Counsel

MG 2/28/86

bcc: Larry Kyte
Jeanne Griffin
Gus Bloom

3/3/86

PS Form 3811, July 1983 447-845

DOMESTIC RETURN RECEIPT

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. ☐ Show to whom, date and address of delivery.
2. ☐ Restricted Delivery.

3. Article Addressed to: Brian Dennis
Office of Genl Counsel
P.O. Box 33428
St Paul, Minnesota 55133

4. Type of Service:

☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Article Number
P 615 268 169

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee
X

6. Signature — Agent
X

7. Date of Delivery

8. Addressee's Address *(ONLY if requested and fee paid)*

Paul Little

Minnesota Pollution Control Agency

November 5, 1987

Mr. D. J. Schutt
3M
Environmental Engineering and Pollution Control
Building 21-2W-05
P. O. Box 33331
St. Paul, Minnesota 55133-33331

Dear Mr. Schutt:

RE: October 29, 1987 Response Letter
3M Main Plant, 900 Bush Avenue
St. Paul, MND000824029, Generator

This letter acknowledges receipt of your October 29, 1987 letter in which you responded to violations of the federal land ban restrictions which were observed during the Minnesota Pollution Control Agency staff hazardous waste inspection conducted at the 3M Main Plant on September 28, 1987. We have determined that the information submitted adequately resolves the noted violation.

Thank you for your cooperation.

Sincerely,

Raymond T. Bissonnette

Raymond T. Bissonnette
Hazardous Waste Enforcement Unit
Hazardous Waste Section
Hazardous Waste Division

RTB:cv

Paul Little

Minnesota Pollution Control Agency

October 1, 1987 NOV N

Mr. David J. Schutt
3M
Environmental Engineering and Pollution Control
Building 21-2W-05
P. O. Box 33331
St. Paul, Minnesota 55106

Dear Mr. Schutt:

RE: F001-F005 Hazardous Waste Land Ban Inspection only LB

The Minnesota Pollution Control Agency (MPCA) is cooperating with the U.S. Environmental Protection Agency (EPA), Region V, in conducting Land Ban Disposal Inspections (40 CFR Part 268). The EPA has determined that land disposal of F001-F005 solvent wastes creates severe environmental problems. Therefore, on November 8, 1986 EPA restricted the land disposal of all F001-F005 solvent wastes. To ensure compliance with these new regulations, MPCA staff are conducting inspections of companies in Minnesota that are engaged in the generation, storage, treatment, or disposal of hazardous waste materials.

This letter acknowledges that 3M, Bush Avenue was inspected on September 28, 1987 by David Pehoski and Ray Bissonnette of the Solid and Hazardous Waste Division of the MPCA. The Tape Division was represented by Bob Childs and yourself and the Abrasives Division was represented by Dave Krear and Paul Severson.

During the course of the inspection the following land ban restriction requirements for F001-F005 solvent wastes were discussed. (The F001-F005 waste streams are listed under Minn. Rules pt. 7045.0135, subp. 2.)

1. Written notification to the receiving facility must accompany every shipment of F001-F005 hazardous waste. The notification must include:

   a. EPA hazardous waste number;

   b. Applicable treatment standards.

Phone:
520 Lafayette Road, St. Paul, Minnesota 55155
Regional Offices • Duluth/Brainerd/Detroit Lakes/Marshall/Rochester
Equal Opportunity Employer

c The manifest number associated with the shipment of waste; and

d. Waste analyses data, where available.

2. The generator/hazardous waste facility must have current analyses of its F001-F005 solvent waste stream including mixtures.

3. The generator/hazardous waste facility must have copies of manifests to document the proper disposal of its F001-F005 solvent wastes.

Based on the results of the inspection, the Abrasives Division is in compliance with the Land Disposal Restrictions. However, the Tape Division is in violation of the federal rule which requires written notification of the receiving facility for each shipment of its "F001-F005" solvent wastes.

Please submit a written response within 30 days of receipt of this letter describing the steps taken to address the above violations.

If you have any questions please feel free to contact me at 612/296-7266.

Sincerely,

Raymond T. Bissonnette

Raymond T. Bissonnette
Hazardous Waste Enforcement Unit
Hazardous Waste Section
Solid and Hazardous Waste Division

RTB/cv

cc: Paul Severson, 3M, St. Paul

Paul Little

F001 - F005 SOLVENT WASTE LAND BAN DISPOSAL

INSPECTION

I. PRE-INSPECTION REVIEW:

INSPECTION DATE 9/28/87
INSPECTORS INITIALS RTB

A. SITE IDENTIFICATION

SITE NAME 3M - Saint Paul Main Plant
ADDRESS 850-935 Bush Avenue
CITY St. Paul 55106

EPA ID# MND000824029
COUNTY Ramsey

B. FACILITY CONTACT (Name and Phone Number) David Schutt: 778-5563
Paul Severson: 778-6278

C. ACTIVITIES: (Check appropriate boxes)

SQG ☐ 0 - 100 kg/mo.
☐ 100 - 1000 kg/mo
GENERATOR ☒
HAULER ☐

FACILITY: INTERIM STATUS ☐ PERMITTED ☐
STORAGE ☐
TREATMENT ☐
DISPOSAL ☐ (Specify Type)____

D. Brief Description of Company's Operation:
3M manufactures adhesive tape products and abrasive products at two plants on this contiguous site.

(Attach a copy of waste stream information to checklist)

II. ON-SITE INSPECTION REVIEW

A. GENERATOR NOTIFICATION:
Has the Generator notified the receiving facility that it generates F001 - F005 solvent wastes?
Yes ✓ No____ Form currently in use is being revised.

B. WASTE ANALYSES:
Does the Generator/TSD have current analyses of its F-solvent waste streams including mixtures?
Remarks:

Yes ✓ No____

C. STORAGE: N/A.
Does the owner/operator of the TSD have each container clearly marked as to container content and date entered into storage for F-solvent wastes.
Yes_____ No_____ Length of time in storage_____

D. MANIFESTS
1. Does the Generator/TSD have copies of manifests to document the proper disposal of its F-solvent wastes?
Yes ✓ No_____

E. MANAGEMENT METHOD
Confirm that the receiving facility and management method for F-solvent are the same as specified in current annual report.

Additional Comments: All "F" listed wastes aside from the Bulk Wet Scrap are incinerated at Chemolite. 3M is considering the possibility of incinerating the bulk scrap in the future.

3M ST PAUL MAIN PLANT MND000824029 850-935 BUSH AV SAINT PAUL 55106	F~~002~~005 ~~30000.00 GA~~ 5400 gal. Cleanup. 4F/~~19F~~WASTE Incineration/Thermal Treatment	TRANSPORTER IS ~~3M CENTER MAINTENANCE/RESEARCH/ADMIN~~ FACILITY IS 3M-CHEMOLITE	Larson Transfer and Storage MND041773714
3M - SAINT PAUL MAIN PLANT MND000824029 850-935 BUSH AV SAINT PAUL 55106	F005 10000.00 GA WET SCRAP PUMPABLE Incineration/Thermal Treatment	TRANSPORTER IS ~~3M CENTER MAINTENANCE/RESEARCH/ADMIN~~ FACILITY IS 3M-CHEMOLITE	Larson Transfer and Storage
3M - SAINT PAUL MAIN PLANT MND000824029 850-935 BUSH AV SAINT PAUL 55106	F005 200000.00 GA WET SCRAP NON-PUMPABLE Incineration/Thermal Treatment	TRANSPORTER IS ~~3M CENTER MAINTENANCE/RESEARCH/ADMIN~~ FACILITY IS 3M-CHEMOLITE	Larson Transfer and Storage
3M - SAINT PAUL MAIN PLANT MND000824029 850-935 BUSH AV SAINT PAUL 55106	F002 ~~30000.00 GA~~ 5000 gal. 11X WASTE Incineration/Thermal Treatment	TRANSPORTER IS ~~3M CENTER MAINTENANCE/RESEARCH/ADMIN~~ FACILITY IS 3M-CHEMOLITE	Larson Transfer and Storage
3M-Saint Paul Main Plant MND000824029 850-935 Bush Ave. Saint Paul 55106	F005 120,000 gal. Wet Scrap-Bulk Burned as fuel in process boilers	Facility is 3M-St Paul Main Plant MND000824029	
3M-Saint Paul Main Plant MN 000824029 850-935 Bush Ave. Saint Paul 55106	F002 5000 gal SF Flush Incineration/Thermal Treatment	Transporter is Larson Transfer and Storage Facility is 3M-Chemolite	
3M-Saint Paul Main Plant MND000824029 850-935 Bush Ave. Saint Paul 55106	F003/F005 60,000 gal. Scotchmesh Waste Incineration/Thermal Treatment	Transporter is Larson Transfer and Storage Facility is 3M-Chemolite	

DIVISION OF SOLID AND HAZARDOUS WASTE
1935 WEST COUNTY ROAD B2
ROSEVILLE, MN 55113-2785
ATTN: HWIMS

3M In case of Emergency or Spill, Immediately call 3M (612) 733-6100

For MPCA use only

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Instructions on back of form.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MND000824029
Manifest Document No. 41084
2. Page 1 of 2
Information in shaded area not required by Federal law. Minnesota rules require Items H. and I.

3. Generator's Name and Mailing Address
3M 1025 E. 7TH ST. (DAVID KREAR, 47-B-38) STPN
ST. PAUL, MN. 55144

A. State Manifest Document Number MN 0041084

B. State Generator's ID

4. Generator's Phone (612) 778-4577

5. Transporter 1 Company Name: LARSON
6. US EPA ID Number: MND041773714
C. State Transporter's ID
D. Transporter's Phone 887-6730

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
3M CHEMOLITE, BLDG. 47
HWY. 61 AND COUNTY ROAD 19
COTTAGE GROVE, MN. 55016
10. U.S EPA ID Number: MND006172969
G. State Facility's ID
H. Facility's Phone 612-458-2141

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

	HM	11. US DOT Description	12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	WASTE FLAMMABLE LIQUID, NOS* FLAMMABLE LIQUID UN 1993 (ETHYL CELLOSOLVE & PHENOLIC RESIN)	17	DM	7,650	P	F005
b.	X	WASTE FLAMMABLE LIQUID, NOS* FLAMMABLE LIQUID UN 1993 (PHENOLIC RESIN & SOLVENT)	11	DM	4,950	P	D001
c.	X	WASTE FLAMMABLE LIQUID, NOS* FLAMMABLE LIQUID UN 1993 (XYLENE AND TOLUENE)	3	DM	1,350	P	F003 F005
d.	X	WASTE COMBUSTIBLE LIQUID, NOS* COMBUSTIBLE LIQUID NA 1993 (CELLOSOLVE)	8	DF	3,600	P	F005

J. Additional Descriptions for Materials Listed Above
a.
b.
c.
d.

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
TRAILER #

PLACARDS REQUIRED:
FLAMMABLE

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name: Allen Krumme
Signature: Allen Krumme
Date: Month 9 Day 1 Year 87

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: T O [illegible]
Signature
Date: Month / Day / Year /

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Date: Month Day Year

In case of spill or emergency, immediately call the Minnesota Pollution Control Agency at 612/296-7373; the Minnesota Division of Emergency Services Center at 612/778-0800; the National Response Center at 800/424-8802. Outside Minnesota, call the National Resp... Center and appropriate state agency.

GENERATOR

Minnesota Form PQ-00371-01(10 84)

COPY 8- GENERATOR RETAIN

Please print or type. (Form designed for use on el... (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST
(Continuation Sheet)

21. Generator's US EPA ID No.: MND000824029

Manifest Document No.: 41084

22. Page: 2 of 2

Information in the shaded areas is not required by Federal law.

23. Generator's Name
3M COMPANY (DAVID KREAR, 47-B-38)
1025 E. 7TH ST.
ST. PAUL, MN. 55144

L. State Manifest Document Number: 0041084

M. State Generator's ID

24. Transporter ____ Company Name

25. US EPA ID Number

N. State Transporter's ID

26. Transporter ____ Company Name

27. US EPA ID Number

O. Transporter's Phone

P. State Transporter's ID

Q. Transporter's Phone

28. US DOT Description *(Including Proper Shipping Name, Hazard Class, and ID Number)*

	HM	28. US DOT Description	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a.	X	HAZARDOUS WASTE LIQUID, NOS* ORM-E NA 9189 (RESIN CONTAINING FORMALDEHYDE)	2	DM	900	P	U122
b.		NONREGULATED WASTE (#6 FUEL OIL)	2	DM	1,000	P	NONH
c.		NONREGULATED WASTE (WASTE OIL PAILS)	1	DM	250	P	NONH
d.		NONREGULATED WASTE (RESIN & WATER)	16	DF	8,000	P	NONH
e.		NONREGULATED WASTE (RESIN & WATER	8	DM	4,000	P	NONH
f.		EMPTY FIBRE DRUMS	11	DF	220	P	NONH
g.		NONREGULATED WASTE (FLOOR SWEEPINGS)	1	DF	400	P	NONH
h.							
i.							

S. Additional Descriptions for Materials Listed Above

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

GENERATOR

33. Transporter ____ Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date (Month Day Year)

34. Transporter ____ Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date (Month Day Year)

TRANSPORTER

35. Discrepancy Indication Space

FACILITY

m 27193-A (5-87)

Notification To Treatment Facility
Restricted F001 - F005 Waste Requires Treatment Prior To Land Disposal

Pursuant to the requirements of 40 CFR 268.7, this notification applies to the waste stream identified on

Page 0MC (Page number from Item 2 or 22 of Manifest) Item 11C (Letter from line Item 11 or 28 of Manifest) on the following Uniform Hazardous Waste Manifest:

MND0020824029 (Generator's EPA ID Number)

41084 (Manifest Document Number, 5-digit number from Item 1 of Manifest)

This waste stream is identified by the following U.S. EPA Hazardous Waste Number(s) *(check all applicable)*.

☐ F001 ☐ F002 ☒ F003 ☐ F004 ☒ F005

2. The following F001 - F005 spent solvent(s) checked in Column I is believed to exist in the waste stream at a concentration(s) above the applicable treatment standard(s).
(Check all applicable solvents in Column I; and, check either Column III or Co[illegible]s the applicable standard.)

Table CCWE — Constituent Concentrations In Waste Extract

Column I (Check if solvent concentration exceeds applicable standard)	Column II F001 - F005 Spent Solvents	☐ Column III Treatment Standard For Wastewaters Containing Spent Solvents	or	☐ Column IV Treatment Standard For All Other Spent Solvent Wastes
☐	Acetone	0.05 mg/l		0.59 mg/l
☐	n-Butyl alcohol	5.0		5.0
☐	Carbon disulfide	1.05		4.81
☐	Carbon tetrachloride	0.05		0.96
☐	Chlorobenzene	0.15		0.05
☐	Cresols (and cresylic acid)	2.82		0.75
☐	Cyclohexanone	0.125		0.75
☐	1, 2-Dichlorobenzene	0.65		0.125
☐	Ethyl acetate	0.05		0.75
☐	Ethylbenzene	0.05		0.053
☐	Ethyl ether	0.05		0.75
☐	Isobutanol	5.0		5.0
☐	Methanol	0.25		0.75
☐	Methylene chloride	0.20		0.96
☐	Methylene chloride (from the pharmaceutical industry)	12.7		0.96
☐	Methyl ethyl ketone	0.05		0.75
☐	Methyl isobutyl ketone	0.05		0.33
☐	Nitrobenzene	0.66		0.125
☐	Pyridine	1.12		0.33
☐	Tetrachloroethylene	0.079		0.05
☒	Toluene	1.12		0.33
☐	1, 1, 1-Trichloroethane	1.05		0.41
☐	1, 1, 2-Trichloro-1, 2, 2-trifluoroethane	1.05		0.96
☐	Trichloroethylene	0.062		0.091
☐	Trichlorofluoromethane	0.05		0.96
☒	Xylene	0.05		0.15

The above information was obtained by *(check one)*:

☒ Using knowledge of the waste ☐ Waste analysis data *(attached)*

Further instructions for filling out this form are found on the back of this form and in the Shipping Papers Section of the 3M Waste Disposal Procedures Manual.

White - Generator retain with [illegible]

RCRA INSPECTION OVERSIGHT

I. Installation: 3-M TAPE DIVISION

EPA ID.#: MND 000 824 029 ? (MND 000 685677?)

Check Either: X Major Installation

____ Non-Major Installation

Installation Activities:

X Generator

____ Transporter

____ Treatment/Storage/Disposal Facility

Authorized State?: X Yes ____ No

II. Inspector: SHERRYL LIVINGSTON

Organization: MINNESOTA POLLUTION CONTROL AGENCY

Telephone: (612) 297-1782

III. Evaluator: PAUL DIMOCK

Organization: U. S. EPA

Telephone: (312) 886-4436

IV. Date of Inspection: 11/15/85 Time: (from) 11:00 AM (to) 12:30 P.M

V. Inspection Evaluation

A) Pre-inspection Preparation	Yes	No	Remarks
1) Did the inspector have a complete set of RCRA regulations with him?	X		
2) Did the inspector review the Part A application or effective permit before beginning the inspection?			N/A GENERATOR ONLY

PLEASE FORWARD A COPY OF THE FRONT SHEET ONLY OF THIS EVALUATION FORM WITHIN 5 DAYS FROM THE DATE OF INSPECTION TO Ken Skahn, 5HW, STU #2. (THE ORIGINAL SHOULD GO TO THE STATE COMPLIANCE OFFICER FOR ENTRY INTO HWDMS AND FILING IN THE INSTALLATION COMPLIANCE FILE.)

	Yes	No	Remarks
3) Did the inspe or have the appropriate personal safety equipment?	X		
B) Owner/Operator Interview			
1) Did the inspector present an identity document showing the authority to perform RCRA inspections?	X		
2) Did the inspector advise the owner/operator of the purpose of the inspection and briefly describe the agenda?	X		
3) Was the inspector helpful to the owner/operator by giving explanations and guidance?	X		
C) Document Inspection			
1) Documents reviewed by the inspector:			
a) Part A application or issued permit			N/A
b) [redacted] inspection log and schedule		X	
c) Personnel training record	X		
d) Operating record			N/A
e) Contingency plan	X		
f) Waste analysis [redacted]	X		PRIOR TO VISIT
g) Closure & Post Closure plan			N/A
h) Financial Instruments			N/A
i) Manifests	X		
j) Ground Water Monitoring Reports			N/A
k) Other _____			N/A

	Yes	No	Remarks
2) Were documents reviewed thoroughly?	X		
D) Facility Inspection			
1) Did the inspector observe all required items and correctly record the observations?	X		
2) Did the inspector ask pertinent questions regarding the processes and wastes management practices used at the facility?	X		
3) Did the inspector ask questions about non-regulated activities of the facility?	X		
4) Did the inspector identify any activities which are regulated but not on the Part A or Permit?			N/A GENERATOR ONLY
E) Knowledge of the Regulations			
1) Was the inspector knowledgeable of RCRA regulations applicable to the facility?	X		
2) Was the inspector aware of recent amendments to the regulations that may affect the conduct of this inspection?	X		
3) Was the inspector able to answer questions accurately?	X		
4) Did the inspector commit to get answers to questions that couldn't be answered during the inspection?	X		
F) Completion of Inspection Forms			
1) Did the inspector fully complete the inspection forms during the inspection?	X		

	Yes	No	Remarks
2) Did the inspector make adequate use of written comments to clarify the report?	X		
3) Were the inspector's comments factual observations rather than opinion?		X	PORTIONS OF THE INSPECTION REPORT REQUIRING PHYSICAL OBSERVATIONS WERE COMPLETED PRIOR TO THE PLANT INSPECTION *
4) Does the inspector's report accurately reflect your observations at the facility?	X		

G) Remarks

1) What is your overall assessment of the inspection and the inspection report?

GOOD INSPECTION, GOOD INTERVIEW AND THOROUGH PLANT INSPECTION, INSPECTION REPORT CLEAR AND CONCISE. THE INSPECTION WAS CONDUCTED IN A PROFESSIONAL MANNER

2) What, if anything, would you recommend that the inspector do differently?

DISCUSS ALL REGULATED ASPECTS EVEN IF THEY WERE REVIEWED AT THE OFFICE PRIOR TO THE VISIT.
KEEP UP THE GOOD WORK!

3) Additional remarks from other sections:

* EVEN THOUGH YOU ARE CONFIDENT DURING THE INTERVIEW HOLD OFF FILLING OUT THE PORTIONS REQUIRING A PLANT TOUR UNTIL AFTER ITS COMPLETED

RCRA INSPECTION OVERSIGHT

I. Installation: 3-M ABRASIVES DIVISION

EPA ID.#: MND 000 824 029

Check Either: X Major Installation

____ Non-Major Installation

Installation Activities:

X Generator

____ Transporter

____ Treatment/Storage/Disposal Facility

Authorized State?: X Yes ____ No

II. Inspector: SHERRYL LIVINGSTON

Organization: MINNESOTA POLLUTION CONTROL AGENCY

Telephone: (612) 297-1782

III. Evaluator: PAUL DIMOCK

Organization: U.S. EPA

Telephone: (312) 886-4436

IV. Date of Inspection: 11/15/85 Time: (from) 9:15 A.M. (to) 11:30 A.M

V. Inspection Evaluation

A) Pre-inspection Preparation	Yes	No	Remarks
1) Did the inspector have a complete set of RCRA regulations with him?	X		
2) Did the inspector review the Part A application or effective permit before beginning the inspection?			N/A GENERATOR ONLY

PLEASE FORWARD A COPY OF THE FRONT SHEET ONLY OF THIS EVALUATION FORM WITHIN 5 DAYS FROM THE DATE OF INSPECTION TO Ken Skahn, 5HW, STU #2. (THE ORIGINAL SHOULD GO TO THE STATE COMPLIANCE OFFICER FOR ENTRY INTO HWDMS AND FILING IN THE INSTALLATION COMPLIANCE FILE.)

	Yes	No	Remarks
3) Did the inspe r have the appropriate personal safety equipment?	X		
B) Owner/Operator Interview			
1) Did the inspector present an identity document showing the authority to perform RCRA inspections?	X		
2) Did the inspector advise the owner/operator of the purpose of the inspection and briefly describe the agenda?	X		
3) Was the inspector helpful to the owner/operator by giving explanations and guidance?	X		
C) Document Inspection			
1) Documents reviewed by the inspector:			
a) Part A application or issued permit			N/A
b) [redacted] inspection log and schedule		X	
c) Personnel training record	X		
d) Operating record			N/A
e) Contingency plan	X		
f) Waste analysis [redacted]	X		PRIOR TO VISIT
g) Closure & Post Closure plan			N/A
h) Financial Instruments			N/A
i) Manifests	X		
j) Ground Water Monitoring Reports			N/A
k) Other _____			N/A

	Yes	No	Remarks
2) Were documents reviewed thoroughly?	X		
D) Facility Inspection			
1) Did the inspector observe all required items and correctly record the observations?	X		
2) Did the inspector ask pertinent questions regarding the processes and wastes management practices used at the facility?	X		
3) Did the inspector ask questions about non-regulated activities of the facility?	X		
4) Did the inspector identify any activities which are regulated but not on the Part A or Permit?			N/A GENERATOR ONLY
E) Knowledge of the Regulations			
1) Was the inspector knowledgeable of RCRA regulations applicable to the facility?	X		
2) Was the inspector aware of recent amendments to the regulations that may affect the conduct of this inspection?	X		
3) Was the inspector able to answer questions accurately?	X		
4) Did the inspector commit to get answers to questions that couldn't be answered during the inspection?	X		
F) Completion of Inspection Forms			
1) Did the inspector fully complete the inspection forms during the inspection?	X		

	Yes	No	Remarks
2) Did the inspector make adequate use of written comments to clarify the report?	X		
3) Were the inspector's comments factual observations rather than opinion?	X		
4) Does the inspector's report accurately reflect your observations at the facility?	X		

G) Remarks

1) What is your overall assessment of the inspection and the inspection report?

VERY GOOD INSPECTION, A THOROUGH PLANT INSPECTION AND CLEAR AND CONCISE INSPECTION REPORT. THE INSPECTION WAS CONDUCTED IN A PROFESSIONAL MANNER

2) What, if anything, would you recommend that the inspector do differently?

DISCUSS ALL REGULATED ASPECTS EVEN THOUGH THEY WERE REVIEWED AT THE OFFICE PRIOR TO THE INSPECTION

3) Additional remarks from other sections:

29 AUG 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Brian Davis
Senior Attorney
Office of General Counsel
Minnesota Mining & Manufacturing Co.
P.O. Box 33428
St. Paul, Minnesota 55133

RE: Notice of Opportunity to Submit Comments Substantiating Claim of Business Confidentiality by Minnesota Mining & Manufacturing Company Relating to Information Obtained in the McKesson Corporation's December 6, 1984 Response to Information Request Regarding Seymour Recycling.

Dear Mr. Davis:

I am writing in response to your telephone discussion of May 8, 1985, with Mr. Lawrence W. Kyte, Assistant Regional Counsel, in which you discussed your business confidentiality claim. We are now in the process of making a determination if any of the information subject to your claim is entitled to confidential treatment.

Pursuant to 40 C.F.R. §2.204(d) and (e), your company has the right to submit comments in support of its claim of confidentiality. These comments must be received by this office no later than fifteen working days following receipt of this notice. The comments should be addressed to Robert B. Schaefer, Regional Counsel, Attn: Bernard Landman, U.S. Environmental Protection Agency, Region V, 230 South Dearborn Street, Chicago, Illinois 60604. Failure to comment within fifteen working days will be construed as a waiver of your claim of confidentiality under 40 C.F.R. §204(e)(1). Should extraordinary circumstances necessitate a time extension, please refer to the procedures stated at 40 C.F.R. §2.205(b) which must be initiated prior to the expiration of the fifteen working days.

Please include in your comments complete information on the following:

1. The portions of the information which you still assert are entitled to confidential treatment.

2. The period of time for which confidential treatment is desired (e.g. until a certain date, until the occurrence of a specified event, or indefinitely).

3. The extent to which the information claimed to be confidential has been disclosed to organizations or individuals other than EPA and its agents;

4. Measures which have been taken to guard against undesired disclosure of the information contained in the response;

5. Pertinent confidentiality determinations, if any, by EPA or any other Federal agency or court (supply a copy of any such determination, or reference to it, if available);

6. Whether you assert that disclosure of the information would be likely to result in substantial harmful effect on Minnesota Mining & Manufacturing Company's competitive position and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.

The burden of proving that information subject to a claim of confidentiality is entitled to confidential treatment is on the party asserting the claim. 40 C.F.R. §2.208(e)(1). Consequently, substantiation consisting of merely a brief, conclusory statement that disclosure could reveal trade secrets, financial, or commercial information to competitors is an insufficient basis for a determination that release of any or all of the information would cause harm to 3M's competitive position.

Specific information is required to support your claim. You should explain for each item claimed as confidential how release of this information could substantially harm 3M's competitive position. For example, if you assert that knowledge of a particular item would reveal a trade secret you should explain exactly what the trade secret is, why it is not general knowledge, and how release of it could be used to harm your competitive position. For additional guidance, I suggest that you familiarize yourself with the provisions in 40 C.F.R. Part 2 concerning business confidentiality.

You may also assert a business confidentiality claim covering all or part of any comments which you submit to substantiate your claim. These comments claimed as confidential should be clearly identified. Comments that have been indicated as confidential are entitled to confidential treatment. 40 C.F.R. 2.203(a), 41 FR 36902, Sept. 1, 1976.

Please contact Bernard Landman, Paralegal Specialist at 312/353-2094, if you have any questions.

Sincerely Yours,

Robert B. Schaefer
Regional Counsel

8/26 8/22/85

8/20/85

P 557 097 468

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Brian Davis	
Street and No. P.O. Box 33428	
P.O., State and ZIP Code St. Paul, Minnesota 55133	
Postage	$.22
Certified Fee	.75
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	.70
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$1.67
Postmark or Date	

CHICAGO ILL LOOP STA. USPO 1985

PS Form 3800, Feb. 1982 ★ U.S.G.P.O. 1983-403-517

PS Form 3811, July 1983

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. ☒ Show to whom, date and address of delivery.
2. ☐ Restricted Delivery.

3. Article Addressed to:
Brian Davis
Minnesota Mining & Manufacturing
P.O. Bxo 33428
St. Paul, Minnesota 55133

4. Type of Service:
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Article Number
P 557 097 468

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature – Addressee
X

6. Signature – Agent
X

7. Date of Delivery
9-1-85

8. Addressee's Address *(ONLY if requested and fee paid)*

DOMESTIC RETURN RECEIPT

McKesson Corp. Law Department
One Post Street, San Francisco CA 94104 Tel 415 983 8319

Ivan D. Meyerson Associate General Counsel

McKesson

March 5, 1985

Lawrence W. Kyte, Esq.
Assistant Regional Counsel
United States Environmental
Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Re: Seymour Recycling; Claim of Confidentiality

Dear Mr. Kyte:

In accordance with our telephone conversation of last week, please be advised that with respect to documents previously submitted to your office by McKesson Corporation concerning Seymour Recycling, it has been determined that -- with the exception set forth below -- we will not pursue our claim of confidentiality.

However, in reviewing the documents submitted, I discovered that the attached five (5) pages set forth raw material specifications of Minnesota Mining & Manufacturing Company for two products. Obviously, I do not feel that it would be proper for me to waive any claim of confidentiality with respect to information belonging to another corporation. I have brought this matter to the attention of Brian Davis, counsel for 3M. I would be grateful if you would contact Mr. Davis at (612) 733-5553 in ten days or so for purposes of ascertaining whether 3M may wish to assert a claim of confidentiality encompassing the attached material.

Thank you very much for your cooperation.

Sincerely,

Ivan D. Meyerson

IDM/smc

Encl.

cc: Brian Davis, Esq. (w/encl.)

3-18-85
B. Davis, says likely won't claim as CBI, but he will get back to me in a few days with definite answer
L Kyte

5-8-85
Brian forgot, had talked to technical people who said it was type of info they kept confidential, but they would look into this in more detail; he has not heard back from them. He will phone in a week. He is not answering
L Kyte for paperwork

E03 Status 3

Minnesota Pollution Control Agency

December 6, 1984

Mr. Dave Schutt
Environmental Engineering
and Pollution Control
3M
Building 21-2W-05
P.O. Box 33331
St. Paul, Minnesota 55133

Dear Mr. Schutt:

RE: RCRA Hazardous Waste Inspection
3M Bush Avenue, Tape and Abrasives Divisions
St. Paul, MND000824029, Generator

The Minnesota Pollution Control Agency (MPCA) is cooperating with the U.S. Environmental Protection Agency (EPA), Region V, in carrying out the provisions of the Resource Conservation and Recovery Act (RCRA) of 1976, Public Law 94-580. In this effort, personnel of the MPCA are conducting inspections of companies in Minnesota that are engaged in the generation, transportation, storage, treatment, or disposal of hazardous waste.

This letter acknowledges that 3M Bush Avenue was inspected on October 31, 1984 by Patricia Chabot, William Libro and William Thompson of the Solid and Hazardous Waste Division of the MPCA. The Tape Division was represented by John Pilney, Robert Childs and yourself. During our inspection you stated that the Tape Division generates large quantities of pumpable and nonpumpable wet scrap wastes which are hazardous due to flammability.

The Abrasives Division was represented by Alan Staples and Mark Reed. Mr. Staples indicated that the Abrasives Division generates approximately 40 drums per week of caustic sludges and off-specification materials, in addition to wet scrap wastes. Both divisions send their wastes to 3M's Chemolite Plant for incineration. Based on this information and our inspections, your company is classified as a hazardous waste generator subject to the federal requirements of 40 CFR Parts 262 through 265, as well as the State Hazardous Waste Rules Chapter 7045.

During our inspections of the Tape and Abrasives Divisions, we noted the failure to fully document personnel training records which is in violation of 40 CFR 265.16. Accordingly, we are requesting that both divisions of your company

Phone: 612/296-7394
1935 West County Road B2, Roseville, Minnesota 55113-2785
Regional Offices • Duluth/Brainerd/Detroit Lakes/Marshall/Rochester
Equal Opportunity Employer

develop written documentation to show compliance with these requirements. Please submit samples of the personnel training records to our office within 60 days of your receipt of this letter. We appreciate your time in meeting with us and showing us your company's operations.

A copy of this letter and the inspection report will be sent to the EPA, Region V office in Chicago, Illinois. If you have any questions, please contact me at 612/296-7394 or Mr. Kenneth Skahn at 312/886-6198 of the EPA, Region V.

Sincerely,

Patricia M. Chabot

Patricia M. Chabot
Hazardous Waste Enforcement Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division

PMC/pak

cc: Ms. Rose Freeman, U.S. Environmental Protection Agency, Chicago
Mr. Alan Staples, 3M, St. Paul
Mr. Lee Holden, Ramsey County, Roseville

1. (TAPE PLANT)

RCRA INSPECTION REPORT

EPA Identification Number: M N D 0 0 0 8 2 4 0 2 9

Installation Name: 3-M

Location Address: 900 BUSH AVE.

City: ST. PAUL State: MINNESOTA

Date of Inspection: 10/31/84 Time of Inspection (from) 8:30 AM (to) 12:30 PM

*Person(s) Interviewed	Title	Telephone
DAVE SCHUTT	ENV. ENGINEER	612/778-5563
JOHN PILNEY	" " SUPERVISOR	612/778-4451
ROBERT CHILDS	GEN. PRODUCTION SUPER	612/778-4647

Inspector(s)	Agency/Title	Telephone
PAT CHABOT	MPCA/POLL. CONTROL SPEC	612/296-7394
BILL LIBBO	" " "	" 612/296-7277
BILL THOMPSON	" " " "	

*Installation Activity (mark only one box)

		Inspection Form(s)
___	Treatment/Storage/Disposal per 40 CFR 265.1 and Generation and/or Transportation	A
___	Treatment/Storage/Disposal (no generation or Transportation)	A
___	Generation and Transportation	B, C
✓	Generation Only	B
___	Transportation Only	C

Section A: SCOPE OF INSPECTION

1. Interim status standards for treatment, storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.

2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendices.

Permit application process(es) (EPA Form 3510-3)			Inspection Form A section(s)
S01	✓	storage in containers	I
S02	✓	storage in tanks	J
T01	___	treatment in tanks	J
S04	___	storage in surface impoundment	K, F
T02	___	treatment in surface impoundment	K, F
D83	___	disposal in surface impoundment	K, F
S03	___	storage in waste pile	L
D81	___	disposal by land application	M, F
D80	___	disposal in landfill	N, F
T03	___	treatment by incineration	O/P
T04	___	treatment in devices other than tanks, impoundments, or incinerators	Q

Other activities

GENERATOR	___	APPENDIX GN
TRANSPORTER	___	APPENDIX TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

___ *ocean disposal*

___ *underground injection*

___ *POTW*

___ *permitted by authorized state*

___ *handling only small quantity generator waste*

___ *treatment/storage for recycle (see 261.6(b))*

___ *onsite accumulation <90 days*

___ *farmer*

___ *"totally enclosed" treatment facil.*

___ *WWTP*

___ *transporter storing manifested waste <10 days*

Section A: Scope of Inspection

Standards for generators of HAZARDOUS WASTE subject to 40 CFR 262.10.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	REMARKS
1. Does the generator have copies of the manifest available for review?	✓			
2. Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.	2/WEEK			
3. Do the manifest forms examined contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements.)	✓			
a. Manifest document number?	✓			
b. Name, mailing address, telephone number, and EPA ID number of generator?	✓			
c. Name and EPA ID number of transporter(s)?	✓			
d. Name, address, and EPA ID number of designated permitted facility and alternate facility?	✓			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
f. The total quantity of waste(s) and the type and number of containers loaded?	✓			
g. Required certification?	✓			
h. Required signatures?	✓			

	YES	NO	NI	REMARKS
4. Reportable exceptions				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. 0				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator.				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	REMARKS
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site.)	✓			
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste material? (Required prior to movement of hazardous waste off-site.)	✓			
3. If required, are placards available to transporter?	✓			
*4. Pre-shipment Accumulation				

*Applies only to GENERATORS that store hazardous waste on-site for 90 days or less without a permit. These items do not apply to generators whose waste is immediately transported off-site.

	YES	NO	NI	REMARKS
a. Is hazardous waste accumulated in containers? If no, skip to b.	✓			
i. Is each container clearly marked with the date on which the period of accumulation began?	✓			
ii. Have more than 90 days elapsed since the dates marked?		✓		
iii. Is each container labeled or marked clearly with the words "Hazardous Wastes?"	✓			
iv. Are containers in good condition?	✓			
v. Are containers compatible with waste in them?	✓			
vi. Are containers managed to prevent leaks?	✓			
vii. Are containers stored closed?	✓			

	YES	NO	NI	REMARKS
viii. Are containers inspected weekly for leaks and defects?			✓	EVERYTHING SHIPPED OFF-SITE WITHIN 1 WK.
ix. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	✓			
x. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	✓			
xi. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	✓			
b. Is hazardous waste accumulated in tanks? If no, skip to c.	✓			
i. Is each tank labeled or marked clearly with the words "Hazardous Wastes"?	✓			
ii. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	✓			
iii. Do uncovered tanks have at least 60 cm (2 feet) of freeboard or dikes or other containment structures?	✓			PIT
iv. Do continuous feed systems have a waste-feed cutoff?			✓	
v. Are waste analyses done before the tanks are used to store a substantially different waste than before?				PROCESS NOT CHANGED
vi. Are required daily and weekly inspections done?	✓			

	YES	NO	NI	REMARKS
vii. Are reactive and ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
viii. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.)	✓			
ix. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?				

Tank capacity: 3500 gallons

Tank diameter: 7 feet

Distance of tank from property line: MORE THAN 50 feet

(see Tables 2-1 through 2-6 of NFPA/s "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

c. Is hazardous waste accumulated in other than tanks or containers?		✓		
d. Personnel training:				
Do personnel training records include:				
i. Job titles?		✓		
ii. Job descriptions?		✓		
iii. Description of training?		✓		
iv. Records of training?		✓		
v. Did personnel receive the required training by 5/19/81?		✓		

	YES	NO	NI	REMARKS
vi. Do new personnel receive required training within six months?		✓		
vii. Do personnel training records indicate that personnel have taken part in an annual review of initial training?		✓		
e. Preparedness and prevention:				
i. Maintenance and operation of facility:				
Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		✓		
ii. If required, does this facility have the following equipment:				
Internal communications or alarm systems?	✓			
Telephone or 2-way radios at the scene of the operations?	✓			TELEPHONES - ALSO, GUARDSTATION - CAN CONTACT ANY PHONE IN BLDG IN EMERGENCY WITH MESSAGE
Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			CO_2 SPRINKLER SYSTEM

Indicate the volume of water and/or foam available for fire control:

CITY WATER & PRIVATE WELL

iii. Testing and maintenance of emergency equipment:

Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			IN-HOUSE FIRE PROTECTION GROUP

	YES	NO	NI	REMARKS
Is emergency equipment maintained in operable condition?	✓			CHECKED EVERY MONTH
iv. Has owner/operator provided immediate access to internal alarms (if needed)?	✓			
v. Is there adequate aisle space for unobstructed movement?				
vi. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	✓			

f. Contingency plan and emergency procedures:

Does the contingency plan contain the following information:

i. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Plan, Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this pare (as applicable).)	✓			

§265.51 - minimize hazards to health/environment due to release
§265.56 - emergency actions and procedures

	YES	NO	NI	REMARKS
ii. Arrangements agreed to by local police departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services, pursuant to §265.37?				
- *if arrangements are refused, this must be documented*				
iii. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator?	✓			
iv. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?	✓			
v. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.)	✓			
vi. Are copies of the Contingency Plan available at site and local emergency organizations?		✓		
vii. Is the facility emergency coordinator identified?	✓			
viii. Is coordinator familiar with all aspects of site operation and emergency procedures?	✓			

	YES	NO	NI	REMARKS
ix. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
x. If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 256.56?		✓		

Section D: RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	REMARKS
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years?	✓			

Section E: INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

	YES	NO	NI	REMARKS
1. Has the installation imported or exported hazardous waste? If "no," skip a and b.		✓		
a. Exporting hazardous waste, has a generator:				
i. Notified the Administrator in writing?				
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
iii. Met the manifest requirements?				
b. Impounding hazardous waste, has the generator met the manifest requirements?				

Remarks: 3-M TAPE PLANT HAS A 3500 GALLON TANK FOR STORING THE PUMPABLE WET SCRAP, AND THIS IS FILLED AND THE WASTES ARE TRANSPORTED TO CHEMOLITE WITHIN 90 DAYS.

2. (ABRASIVES & MT)

RCRA INSPECTION REPORT

EPA Identification Number: M N D 0 0 0 8 2 4 0 2 9

Installation Name: 3-M

Location Address: 900 BUSH AVE.

City: ST. PAUL State: MN

Date of Inspection: 10/31/84 Time of Inspection (from) 8:30 AM (to) 12:30 PM

*Person(s) Interviewed	Title	Telephone
ALAN STAPLES		
MARK REED	PROCESS ENGINEER	612/778-6952
STEVE YOUS	" "	

Inspector(s)	Agency/Title	Telephone
PAT CHABOT	MPCA/POLL. CONTROL SPEC.	612/296-7394
BILL LIBRO	" " " "	612/296-7277
BILL THOMPSON		

*Installation Activity (mark only one box)	Inspection Form(s)
___ Treatment/Storage/Disposal per 40 CFR 265.1 and Generation and/or Transportation	A
___ Treatment/Storage/Disposal (no generation or Transportation)	A
___ Generation and Transportation	B, C
✓ Generation Only	B
___ Transportation Only	C

Section A: SCOPE OF INSPECTION

1. Interim status standards for treatment, storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.

2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendices.

Permit application process(es) (EPA Form 3510-3)			Inspection Form A section(s)
S01	___	storage in containers	I
S02	___	storage in tanks	J
T01	___	treatment in tanks	J
S04	___	storage in surface impoundment	K, F
T02	___	treatment in surface impoundment	K, F
D83	___	disposal in surface impoundment	K, F
S03	___	storage in waste pile	L
D81	___	disposal by land application	M, F
D80	___	disposal in landfill	N, F
T03	___	treatment by incineration	O/P
T04	___	treatment in devices other than tanks, impoundments, or incinerators	Q

Other activities

GENERATOR	___	APPENDIX GN
TRANSPORTER	___	APPENDIX TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

___ *ocean disposal*

___ *underground injection*

___ *POTW*

___ *permitted by authorized state*

___ *handling only small quantity generator waste*

___ *treatment/storage for recycle (see 261.6(b))*

___ *onsite accumulation <90 days*

___ *farmer*

___ *"totally enclosed" treatment facil.*

___ *WWTP*

___ *transporter storing manifested waste <10 days*

Section A: Scope of Inspection

Standards for generators of HAZARDOUS WASTE subject to 40 CFR 262.10.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	REMARKS
1. Does the generator have copies of the manifest available for review?	✓			
2. Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.	1/WEEK			
3. Do the manifest forms examined contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements.)	✓			
a. Manifest document number?	✓			
b. Name, mailing address, telephone number, and EPA ID number of generator?	✓			
c. Name and EPA ID number of transporter(s)?	✓			
d. Name, address, and EPA ID number of designated permitted facility and alternate facility?	✓			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
f. The total quantity of waste(s) and the type and number of containers loaded?	✓			
g. Required certification?	✓			
h. Required signatures?	✓			

	YES	NO	NI	REMARKS
4. Reportable exceptions				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. — 0 —				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. _____				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	REMARKS
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site.)	✓			
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste material? (Required prior to movement of hazardous waste off-site.)	✓			
3. If required, are placards available to transporter?	✓			
*4. Pre-shipment Accumulation				

*Applies only to GENERATORS that store hazardous waste on-site for 90 days or less without a permit. These items do not apply to generators whose waste is immediately transported off-site.

	YES	NO	NI	REMARKS
a. Is hazardous waste accumulated in containers? If no, skip to b.	✓			
i. Is each container clearly marked with the date on which the period of accumulation began?	✓			
ii. Have more than 90 days elapsed since the dates marked?		✓		
iii. Is each container labeled or marked clearly with the words "Hazardous Wastes?"	✓			
iv. Are containers in good condition?	✓			
v. Are containers compatible with waste in them?	✓			
vi. Are containers managed to prevent leaks?	✓			
vii. Are containers stored closed?	✓			

	YES	NO	NI	REMARKS
viii. Are containers inspected weekly for leaks and defects?	✓			
ix. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	✓			
x. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	✓			
xi. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	✓			
b. Is hazardous waste accumulated in tanks? If no, skip to c.		✓		
i. Is each tank labeled or marked clearly with the words "Hazardous Wastes"?				
ii. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?				
iii. Do uncovered tanks have at least 60 cm (2 feet) of freeboard or dikes or other containment structures?				
iv. Do continuous feed systems have a waste-feed cutoff?				
v. Are waste analyses done before the tanks are used to store a substantially different waste than before?				
vi. Are required daily and weekly inspections done?				

	YES	NO	NI	REMARKS
vii. Are reactive and ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
viii. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.)				
ix. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?				

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line: _____ feet

(see Tables 2-1 through 2-6 of NFPA/s "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

c. Is hazardous waste accumulated in other than tanks or containers?				
d. Personnel training:				
Do personnel training records include:				
i. Job titles?				
ii. Job descriptions?				
iii. Description of training?				
iv. Records of training?				
v. Did personnel receive the required training by 5/19/81?				

	YES	NO	NI	REMARKS
vi. Do new personnel receive required training within six months?	✓			
vii. Do personnel training records indicate that personnel have taken part in an annual review of initial training?		✓		

e. Preparedness and prevention:

i. Maintenance and operation of facility:				
Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		✓		
ii. If required, does this facility have the following equipment:				
Internal communications or alarm systems?	✓			
Telephone or 2-way radios at the scene of the operations?	✓			
Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			

Indicate the volume of water and/or foam available for fire control:

CITY WATER & WELL

iii. Testing and maintenance of emergency equipment:				
Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			INTERNAL COMMITTEE

	YES	NO	NI	REMARKS
Is emergency equipment maintained in operable condition?	✓			
iv. Has owner/operator provided immediate access to internal alarms (if needed)?	✓			
v. Is there adequate aisle space for unobstructed movement?	✓			
vi. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	✓			

f. Contingency plan and emergency procedures:

Does the contingency plan contain the following information:

i. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Plan, Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this pare (as applicable).)	✓			

§265.51 - minimize hazards to health/environment due to release
§265.56 - emergency actions and procedures

	YES	NO	NI	REMARKS
ii. Arrangements agreed to by local police departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services, pursuant to §265.37?	✓			
- *if arrangements are refused, this must be documented*				
iii. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator?	✓			
iv. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?	✓			
v. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.)	✓			
vi. Are copies of the Contingency Plan available at site and local emergency organizations?	✓			
vii. Is the facility emergency coordinator identified?	✓			
viii. Is coordinator familiar with all aspects of site operation and emergency procedures?	✓			

	YES	NO	NI	REMARKS
ix. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
x. If an emergency situation has occurred at this facility. has the Emergency Coordinator followed the emergency procedures listed in 256.56?		✓		

Section D: RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	REMARKS
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years?			✓	

Section E: INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

	YES	NO	NI	REMARKS
1. Has the installation imported or exported hazardous waste? If "no," skip a and b.		✓		
a. Exporting hazardous waste, has a generator:				
i. Notified the Administrator in writing?				
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
iii. Met the manifest requirements?				
b. Impounding hazardous waste, has the generator met the manifest requirements?				

Remarks: THIS PLANT PRODUCES SANDPAPERS. THE GLUES AND RESINS TO MAKE SANDPAPER ARE MIXED IN LARGE KETTLES. THE KETTLES ARE CLEANED IN A CAUSTIC CLEANING TANK, AND THE WASTE CAUSTIC IS SEWERED (CONTINUOUS MONITORING BY MWCC). THE SLUDGES ARE PUT IN DRUMS & SENT TO CHEMOLITE FOR INCINERATION.

Adé Babatunde
Advanced Environmental Engineer

3M Environmental Technology and Services
Building 42-2E-27
PO Box 33331
St. Paul, MN 55133-3331
651 778 7674
651 778 7203 Facsimile
ababatunde@mmm.com

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3P Pollution Prevention Pays

R. A. (Ron) Graves
Plant Services Manager
St. Paul Tape Plant

3M Tape Manufacturing
751 Mendota Avenue
Mail to: 3M Center, Bldg. 24-2E-03
St. Paul, MN 55144-1000
612 778 7486
612 778 4544 Facsimile
612 759 6617 Cellular

Leon Johnson
Manager, Plant Engineering
Environmental, Health and Safety

3M Abrasive Manufacturing Organization
3M Center, Building 2-1E-08
St. Paul, MN 55144-1000
651 778 6836
651 778 5268 Fax
612 621 3299 Pager

John J. Kleven, A.S.P.
Senior Safety Engineer

3M St. Paul Plant Engineering
900 Bush Avenue
Mail to: Building 42-BW-01
PO Box 33331
St. Paul, MN 55133-3331
612 778 6963 Office
612 622 5594 Pager
612 778 6158 Fax
jjkleven@mmm.com

Saint Paul - Ramsey County Department of Public Health
Environmental Health Section
1670 Beam Avenue, Suite A
Maplewood, MN 55109-1176

Greg LaMere
EHS II / Hazardous Waste Specialist
Solid & Hazardous Waste Compliance

(651) 773-4461 Fax: (651) 773-4454
Greg.Lamere@co.ramsey.mn.us

10% post-consumer content

Steven M. Porter
Environmental Engineering Specialist
St. Paul Tape Plant

3M Tape Manufacturing
3M Center, Building 24-2E-02
St. Paul, MN 55144-1000
651 ~~612~~ 778 4686 Office
612 778 5474 Fax

Joseph S. Potocnik
Plant Engineering Manager

3M Tape Manufacturing Division
Building 24-2E-03
St. Paul, MN 55144-1000
651 778 5951 Office
651 778 5474 Fax
jspotocnik@mmm.com E-mail

Stephen Radtke
Senior Safety Engineer

3M Abrasive Manufacturing Organization
935 Bush Avenue
Mail to: Building 2-1E-08
St. Paul, MN 55144-1000
651 778 6316 Office
651 778 5268 Fax
swradtke1@mmm.com E-mail

Belinda M. Wirth
Senior Environmental Engineer

3M Environmental Technology and Services
Building 42-2E-27
PO Box 33331
St. Paul, MN 55133-3331
651 778 6014
651 778 7203 Facsimile
bmwirth1@mmm.com

Recycled Paper

3P Pollution Prevention Pays

FOR COUNTY USE ONLY

SAINT PAUL - RAMSEY COUNTY
DEPARTMENT OF PUBLIC HEALTH
Environmental Health Section
1670 Beam Avenue, Suite A
Maplewood, MN 55109-1176

RAMSEY COUNTY

Hazardous Waste Generator
Annual Report and License Renewal Application

ALL SHADED AREAS MUST BE COMPLETED AND/OR UPDATED 2002

Generator Size: LARGE QUANTITY

EPA ID: MND00 0824029

Site Address:
STEVE PORTER
3M STPM
900 BUSH AVE
SAINT PAUL 55106

Mail Address:
WENDY RENO
BOX 33331 MAIN PLANT
SAINT PAUL MN 55133

Mail: (651) 778-7674
Site: (651) 778-7674
Email:
Fax: (651) 778-7203

HAZARDOUS WASTE MANAGEMENT INFORMATION FOR CALENDAR YEAR 2002

County Use Only	Waste Name A	All Waste Codes B	Waste Generated in 2002 (Gal/Lbs) C	Transporter Name and EPA ID D	Facility Name/Address and EPA ID E	Management OR Disposal Method F	Waste On Site G
H1162B	CLASS 9	D028 D035	1888 Gal Lbs	3M CENTER-MAINTENANCE- MND006173082	3M-COTTAGE GROVE MND006172969	INCINERATION	19
H15201B	CLASS 9 D006 D008	D006 D008	1400 Gal Lbs	3M CENTER-MAINTENANCE- MND006173082	3M-COTTAGE GROVE MND006172969	INCINERATION	14
H155B	CLASS 9 D006 D009 D011	D006 D009 D011	105 Gal Lbs	3M CENTER-MAINTENANCE- MND006173082	3M-COTTAGE GROVE MND006172969	INCINERATION	Ø
H3636B	CLASS 9 D008	D008	5264 Gal Lbs	3M CENTER-MAINTENANCE- MND006173082	3M-COTTAGE GROVE MND006172969	INCINERATION	53
H1278B	CLASS 9 D008 D009	D008 D009	792 Gal Lbs	3M CENTER-MAINTENANCE- MND006173082	3M-COTTAGE GROVE MND006172969	INCINERATION	Ø

IS A WASTE MINIMIZATION PLAN IN PLACE? Applicant must check one.

☒ YES Describe on the back of this form, or on attached sheets, efforts (such as process changes, solvent substitution, or on-site distillation) made during the year to reduce t volume and toxicity of waste generated, and a description of results achieved.

☐ NO (Large quantity generators must have a waste min. plan in place)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the informa believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I hereby apply for a Ramsey County Hazardous Waste Generator License subject to all conditions and provisions of Minnesota Rules ch. 7045 and the Ramsey County Hazardous Waste Management Ordinance.

Signature Wendy Reno Title Adv Env. Engineer Date 1/31/03

FORM MUST BE POSTMARKED BY JANUARY 31. TO AVOID REPORT PENALTIES, PLEASE SUBMIT YOUR RETURN ENVELOPE

MAIL TO: RAMSEY COUNTY
ENVIRONMENTAL HEALTH SECTION
1670 BEAM AVENUE, SUITE A
MAPLEWOOD, MN 55109-1176

FOR COUNTY USE ONLY
2002

Fee Code
Reviewer:
Data Entry: / /
Last Insp: 12/4/2002 OTH 1

	Supervision for	**Flexo**	**Employee Number**	**Shift**		**Phone #**		
	Dave Martell			Rot		8-4595		
Mark Larison	Dick Magnuson			Rot		8-4595		
325559	Chris Hallen			Mid		8-4595		
8-5413								
Supervisor	**Name**		**Employee Number**	**Shift**	**Note**	**Dept**	*Sen Date*	
Group 202								
			M-CREW	Rotating				tb
1	STGERMAIN		01046885	RM		1534 / 131534	8/11/69	D
2	JESKA		01047063	RM	restricted	1534 / 131534	9/29/69	B
3	FLIER		01047066	RM		1534 / 131534	9/29/69	D
4	CROSBY		01082911	RM		1534 / 131534	9/5/72	C
5	RAMBERG		01076699	RM		2934 / 131594	10/2/72	E
6	YOBBIE		01007396	RM		2934 / 131594	10/16/72	A
7	ORLOSKE		01022839	RM		1534 / 131534	12/11/72	A
8	EVERSON		01022829	RM		1534 / 131534	12/11/72	B
9	REMMEN		01099398	RM		2934 / 131594	12/18/72	A
10	DEYO		01022996	RM		2934 / 131594	1/3/73	B
			N-CREW	Rotating				
1	WOJCIK		01035035	RN		1534 / 131534	4/17/68	
2	HAMILTON		01035747	RN		2934 / 131594	2/10/69	C
3	MCMILLEN		01035884	RN		2934 / 131594	4/7/69	C
4	TOBRITZHOFER		01035906	RN		1534 / 131534	4/14/69	C
5	BURNS		01046912	RN		1534 / 131534	8/18/69	B
6	LUSK		01046974	RN		2934 / 131594	9/4/69	B
7	WOODY		01070886	RN	*4days/wk*	*1534 / 131534*	10/22/69	A
8	GAGLIARDI		01035961	RN		1534 / 131534	6/5/72	A
9	BENJAMIN		01099372	RN		2934 / 131594	11/10/72	
10	FISHER		01099377	RN		1534 / 131534	11/12/72	
			P-CREW					
1	SEIGLER		01032783	3		2934 / 131594	11/14/66	E
2	COREY		01035349	3		1534 / 131534	8/4/68	
3	BRUNO		01035886	3		1534 / 131534	4/14/69	A
4	KOCOUREK		01046962	3		1534 / 131534	9/8/69	A
5	HENDRICKSON		01047068	3		1534 / 131534	9/29/69	E
6	ERICKSON		01070871	3		2934 / 131594	10/20/69	H
7	JACKSON		01071012	3		2934 / 131592	11/18/69	C
8	PELTIER		01077412	3		1534 / 131534	12/10/69	
9	THOMPSON		01037345	3		2934 / 131592	2/28/72	D
10	MALKUSH		01007345	3		1534 / 131534	10/16/72	F

	20-5	Employee Number	Shift	Phone #				
Leader	Larison, Mark	325559		8-5413				
Supervisors:	Hallen, Chris	216318		8-4601/8-4595				
	Martell, Dave	62791		8-4601/8-4595				
	Magnuson, Dick (R.V.)	71050		8-4601/8-4595				
Supervisor	**Name**	**Employee Number**	**Shift**	**Machine**	**Dept**		**Sen Date**	
Group 502								
Hallen	RINEHART	01088666	3	20-5 Operator	131549		11/22/71	B
Hallen	DELMORE	01078375	3	20-5 Operator	131548		10/2/72	A
Hallen	JELINEK	01095309	3	20-5 Operator	131548		6/11/73	C
Hallen	EDBERG	01043394	3	20-5 Operator	131548		4/1/74	D
Hallen	CAGER	01245379	3	*20-5 Operator*	*131548*	*Temp*	10/7/81	A
Magnuson	CLEMONS	01099393	RA	20-5 Operator	131548		1/29/73	
Magnuson	CHURCHER	01021660	RA	20-5 Operator	131548		3/1/73	A
Magnuson	PARKMAN	01041605	RA	20-5 Operator	131548		3/7/73	
Magnuson	OLLILA	01002336	RA	20-5 Operator	131549		6/25/73	
Magnuson	SIEDOW	01216307	RA	*20-5 Operator*	*131549*	*TEMP*	1/15/79	D
Martell	STSAUVER	01077448	RB	20-5 Operator	131548		1/7/70	
Martell	PAUL	01062812	RB	20-5 Operator	131549		5/5/73	
Martell	BARRON	01002468	RB	20-5 Operator	131548		6/20/73	A
Martell	JACOBS	01036667	RB	20-5 Operator	131548		1/28/74	C
Martell	LENDT	01052603	RB	*20-5 Operator*	*131548*	*TEMP*	5/20/74	A

Supervisor	Supervision for Matl Handling	Employee Number	Shift	Phone #				
Randy Norton	Anderson, Ron		Days	778-4350				
216716								
778-5806								
Supervisor	**Name**	**Employee Number**	**Shift**	**Machine**		**Dept**	*Sen Date*	
Custodian = Group 711								
Anderson	**Patterson, Tom**	70858	Days	Custodian		1504		
Anderson	**Hunteman, Janet**	40708	Aft	Custodian		1504	2/19/1974	
Dock = Group 713								
Anderson	**TUCCITTO**	01032064	3	Dock		1531	4/6/67	
Anderson	**WAGGONER**	01034939	1	Dock		*1531*	3/18/68	A
Anderson	**WURZER**	01046924	R	Dock		1531	8/20/69	B
Anderson	**BARNHILL**	01070899	R	Dock		1531	10/23/69	
Anderson	**VIROCK**	01070938	1	Dock	*TEMP*	1531	11/3/69	C
Anderson	**VOLD**	01332155	1	Dock	*TEMP*	*1531*	7/14/97	K

Title: Safety Course Completion Sign-In
Effective: 71801 Supersedes: NEW

SPTP Safety Course Completion Sign-In

Course Name: RCRA + Haz Waste **Course Number:** SPT2515

Training Date: 12/30/02 **Trainer:** Mary Jo Westerberg

Employee Signature	Employee Number	Department	Supervisor
Randy Norton	216716	plant admin	McKenzie
Phil O'Gorman	027901	Flexo	Norton
ARTHUR RINEHART	088666	20-5	
Roger Jeska	47063	FLEXO	LARISON
Gary Wenzel	46924	Dock	D MAGNUSON
K Orloske	22839		
Russ Remmen	99390	FLEXO	
Charlie Bruno	36886	Flexo	Larison
Art Forgen	050173	FLEXO	LARISON
Dana Gagliardi	035961	FLEXO	LARISON
Tom Tuccitt	32064	MAT/HANDLING	
Bob Delmar	078375	20-5	HALLON
Al Edberg	43394		
Hugh Benjamin	099372	FLEXO	
W R Endale	047068	20-5/Flexo	Hallon
Ed Wajcer	035035	20-5/Flexo	MARTELL
J W Jelen	095309	20-5	—

*Return to Amy Johnson – SPTP Administration – 24-2E-03 – 778-5090

Employee Signature	Employee Number	Department	Supervisor
Bear Jacobs	36667	20-5	—
Les Woody	70886	Flexo	
BOB LANGE	50170	"	
G. Churcher	021660	20-5	—
John Hamilton	35747	FLEXO	LARISEN
Tom Flier	47066	Flexo	Larison
Scott Everson	22829	"	"
Daniel Lobyhan	35906	FLEXO	"
Bill Sauk	52172	20-5	Magnuson
J Baron	2468	Flexo	Larison
JERRY ST GERMAIN	046885	FLEXO	LARISON
DAN OLLILA	02336	FLEXO	LARISON
Bill Deyo	22996	Flexo	Larison
Ron Clemons	099393	"	"
* Jim Hamer	35669	Flexo	J Bruss
* Dominic Buster	344298	Flexo	Bruss
* JOHN BRUSS	265944	FLEXO	MCKENZIE
* Mary Shaw	76209	Flexo	Larison
Jerry Auge	211585	Compounding	Sinn
Tom Parkman	41605	20-5	Magnuson
MATT McKenzie	290136	ADMIN	
McMillen	35884	20-5	Magnuson

*Return to Amy Johnson – SPTP Administration – 24-2E-03 – 778-5090

* Not Req'd

Employee Signature	Employee Number	Department	Supervisor
Amy Johnson	281204	Plant	McKen
Brian Sinn	258855	Plant Admin.	McKenzie
Mark Larison	325559	Flexo 20-5	McKenzie
Ron Anderson	022841	Supv	Larison
Bob Insk	46974	FlEXO	" "
Rick Thompson	37345	"	"
Bill Koranda	99369	—	—
Dick Burns	46912	"	"
Ken Rumley	76699	"	"
Dave Martell	062791	20-5	Larison
Richard V. Magnuson	071050	"	"
Ron Ant	66420	20-5	Magnuson

*Return to Amy Johnson – SPTP Administration – 24-2E-03 – 778-5090

MINNESOTA POLLUTION CONTROL AGENCY
MINNESOTA LARGE QUANTITY GENERATOR INSPECTION CHECKLIST

I. GENERAL INSPECTION INFORMATION

Site Name: 3M	**EPA ID Number:** MND 000 824 029
Address: 900 BUSH AVE.	**Waste Activity:**
City: ST. PAUL	**Zip/9 Digit:** 55106
County: RAMSEY	**District:**
	Waste generated per month
Current Number of Employees:	**Years in Business or Date Company Started:**
Date of last MPCA Hazardous Waste Inspection:	
Inspection Date: 10-22-03	**Time: From** **to**

LEAD INSPECTOR: Phone #

Other People present: (name, title, organization)	Phone #

Company Products or Services:

II. LICENSING/IDENTIFICATION/PERMITS

IDENTIFICATION – WASTE TABLE

Waste Name/Code	Quantity Generated in (last year)	Changes

MINNESOTA POLLUTION CONTROL AGENCY
MINNESOTA LARGE QUANTITY GENERATOR INSPECTION CHECKLIST

G1: Licensing / EPA / Permits

Rule	Requirement	Compliance Status	Remarks
7045.0221	Has generator obtained a generator identification number?		
7045.1020 A	Metro Area – Does the generator have an approved license?		
7045.0225 1	Outstate – Does the site have a current hazardous waste generator license?		
7045.0230 1, B	Outstate – Did the company include all hazardous waste streams on its license application?		
7045.0225 2	Is the generators license displayed in a public area at the licensed site?		
7001.0520 1, A	Does the generator operate as a TSD without a permit?		

G1: General Management for Generators

Rule	Requirement	Compliance Status	Remarks
7045.02081, B	Is hazardous waste disposed of at a permitted TSD? (VSQGs can also deliver to a VSQG collection program site)		
7045.02945	Are the required records (training, analytical results, inspection reports, license renewal app, exception reports, manifests) located at the licensed site and available for inspection?		
7045.06265	Are weekly inspections of hazardous waste containers and their storage areas conducted AND documented?		
7045.05681	Have emergency response arrangements been made with local authorities and outside providers? (fire, police, local hospital, emergency responders)		

7045.0568 3	If the company was unable to make arrangements with local authorities, have they documented the attempts?		

G1: General Management for Generators

Rule	Requirement	Compliance Status	Remarks
7045.0208 1, E	Does the company comply with the POTW requirements for sewered hazardous waste?		
7045.0655 3, A	If there is an elementary neutralization unit, a pretreatment unit and/or wastewater treatment unit, does the owner or operator conduct timely inspections of the unit(s) for malfunction deterioration, operator error and discharges.		
7045.0655 3, B	If there is an elementary neutralization unit, a pretreatment unit and/or wastewater treatment unit, does the company follow a written inspection schedule for inspection of all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment.		
7045.0655 3, E	If there is an elementary neutralization unit, a pretreatment unit and/or wastewater treatment unit, are all applicable inspection (and repair) records (logs) kept for at least 3 years and available on-site?		

G1: Manifests

Rule	Requirement	Compliance Status	Remarks
7045.0261	Are shipments of hazardous waste made without using a manifest? (exceptions for VSQGs)		
7045.0261 7	Do manifests contain ALL of the following?: Manifest document number, generator data, transporter data, facility data, waste data, required signatures & dates, and a 24 hour emergency number. (document problem manifests in remarks and Description of Violation)		
7045.0294 1	Are signed facility copies of manifests available for review for 3 years from the date material was accepted by the initial transporter?		
7045.0265 1, D	Are two-signature (generator) copies of manifests set to MPCA within 5 days of shipment date?		
7045.0265 4, A	Does the generator ensure that out-of-state facility copies get to MPCA within 40 days of acceptance by the facility?		

G1: Manifests

Rule	Requirement	Compliance Status	Remarks
7045.0298	If applicable, has the generator submitted to the MPCA an exception report for manifest copies not received back from the TSDF within 45 days of the date the waste was initially shipped?		
7045.0302 1	If company exports hazardous waste, are all applicable rules being complied with? (notification, consent, EPA acknowledgement of consent, shipping papers or manifests, etc.)		

G1: Personnel Training

Rule	Requirement	Compliance Status	Remarks
7045.0558 2	Does the company have a hazardous waste program director trained in hazardous waste management procedures?		
7045.0558 1	Have employees that manage hazardous waste completed a hazardous waste training programs?		
7045.0558 3	Does the training program include hazardous waste management and emergency response procedures relevant to the positions held by facility personnel?		
7045.0558 4	Are new employees trained in hazardous waste management within 6 months of hire or transfer?		
7045.0558 6, D	Has the company kept records that document that the initial training and annual review training has been given?		
7045.0558 5	Is refresher training regarding the management of hazardous waste provided at least once per calendar year?		
7045.0558 6, A	Does the company maintain training records which include a job title for each position at the facility related to hazardous waste?		
7045.0558 6, B	Do the records include a job description for each position related to hazardous waste?		
7045.0558 C	Is a written description of the type and amount of training (initial & continuing) documented for each position related to hazardous waste?		

G1: Personnel Training

Rule	Requirement	Compliance Status	Remarks
7045.0558 7	Have training records been maintained for lifetime of facility (or 3 years after an employee leaves)?		

G1: Contingency Plan

Rule	Requirement	Compliance Status	Remarks
7045.0572 2	Does the company have a contingency plan?		
7045.0574 1	Does the company have an Emergency Coordinator on-site or on-call, and does s/he have authority to act (commit resources)?		
7045.0572 4, A	Does the contingency plan specify employees' emergency response actions?		
7045.0572 4, C	Does the plan describe arrangements agreed to with local emergency responders.		
7045.0572 4, D	Does the plan include up-to-date name, address and home and work phone numbers for emergency coordinators?		
7045.0572 4, E	Does the contingency plan include an up-to-date emergency equipment list?		
7045.0572 4, F	Is there an evacuation plan for employees that includes signals used to begin evacuation, and primary and alternate evacuation routes?		
7045.0572 5, A	Is a copy of the contingency plan maintained on-site?		
7045.0572 5, B	Have copies of the contingency plan been submitted to local authorities and emergency response teams?		
7045.0572 6	Has the contingency plan been amended when necessary? (rule change, emergency equipment change, process change, emergency coordination change, plan failed)		

MINNESOTA POLLUTION CONTROL AGENCY
MINNESOTA LARGE QUANTITY GENERATOR INSPECTION CHECKLIST

G1: Preparedness & Prevention

Rule	Requirement	Compliance Status	Remarks
7045.0566 2	Is hazardous waste managed to prevent or minimize releases?		
7045.0566 3, A	Is a suitable alarm or communication system in place to provide emergency instructions to company personnel?		
7045.0566 3, B	Is emergency communication equipment available to summon outside emergency responders.		
7045.0566 3, C	Is fire control equipment, decontamination equipment, and spill control equipment available?		
7045.0566 3, D	Is water available in adequate volume for fire control (i.e., firehose, sprinkler system and/or foam equipment)?		
7045,9566 4	Is emergency equipment tested and maintained?		
7045.0566 6	Is aisle space adequate for emergency operations (like fire fighting, spill cleanup, etc.)?		SF AISLE SPACE CRAMPED & LIMITED
7045.0275 2	If the company had a release to the environment, did the company immediately notify the agency?	N/A	
7045.0275 3	If the company has had a release, did the company recover as rapidly and as thoroughly as possible, any hazardous waste that has leaked, spilled, or otherwise escaped a container?	N/A	

G1: Waste Evaluation

Rule	Requirement	Compliance Status	Remarks
7045.0214 1	Have wastes been evaluated within 60 days of the date they were initially generated?		
7045.0294 3	Are test result records of waste analyses kept for 3 years from the last time the waste was sent to a TSDF (on- or off-site)?		

G1: Land Disposal Restrictions

Rule	Requirement	Compliance Status	Remarks
268.7 (a), (2)	For waste or contaminated soil that does not meet treatment standards, has the company sent a one-time land disposal restriction notification to the receiving treatment or storage facility? Is a copy of the notification available at the generators site? Have new notifications been sent when there are changes in wastestreams and to any new receiving facilities?		
268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(2), item 1 3	For waste or contaminated soil that does not meet the treatment standards, do land disposal restriction notifications contain the following: a. All applicable waste codes and Manifest numbers?		
268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(2), item 4 1	b. Treatability group (non-wastewater or wastewater) and subcategory (when applicable)		
268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(2), item 1 3	c. Constituents of concern for F001-F005, F039, and hazardous underlying constituents in characteristic waste (not managed in a CWA or CWA-equivalent facility)? Note: This requirement does not apply if the waste will be treated and monitored for ALL constituents.		
268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(2), item 7	d. For hazardous debris being treated with alternative treatment standards: the names of the contaminants subject to treatment, and an indication that these contaminants are being treated to comply with 268.45		

G1: Land Disposal Restrictions

Rule	Requirement	Compliance Status	Remarks
268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(2) , item 8	e. For contaminated soil of which the company has applied alternative treatment standards has the company included the constituents subject to treatment, and the statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with the soil treatment standards as provided by 268.49 (c) of the universal treatment standard.		
268.7 (a), (3), (i)	For all hazardous waste that does meet treatment standards at the point of generation, has the company sent a one-time notification with signed certifications to the receiving TSD and kept a copy in its file?		
268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(3) , item 1	For all waste that does meet treatment standards, do notifications contain the following: a. All applicable EPA waste codes and manifest number?		
268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(3) , item 9	b. Certification statement		
268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(4) , item I 4	For waste or contaminated soil that are subject to exemptions, does the notification contain: a. All applicable EPA waste codes; b. Manifest number?		

G1: Land Disposal Restrictions

Rule	Requirement	Compliance Status	Remarks
268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(4), item 2 1	c. The date the waste was subject to the prohibitions?		
268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(4), item 7	d. For debris being treated with alternative treatment standards, the contaminants subject to treatment, and an indication that these contaminants are being treated to comply with 268.45?		
7045.1305 A	Is dilution used as a substitute for adequate treatment?		
7045.1380 2	Does the company have justification for storage beyond one year?		
268.7 (a), (8)	Does the company retain, on site, copies of initial notifications, certifications, and other relevant documents for a period of 3 years?		
7045.1315 1, D	For companies that treat prohibited waste in tanks or containers to meet treatment standards, is a copy of the waste analysis plan for this treatment on-site, and available to inspectors?		
7045.1315 1, D, 1	For companies that treat prohibited waste in tanks or containers, is the waste analysis plan based on detailed chemical and physical analysis?		
7045.1315 1, B,1,a	For waste treated in tanks or containers and then shipped off-site, do notifications and certifications contain: a. All applicable EPA waste codes?		
7045.1315 1, B,1,b	b. Treatability group (non-wastewater or wastewater) and subcategory (when applicable)		

7045.1315 1, B,1,c	c. Manifest number?		

G1: Land Disposal Restrictions

Rule	Requirement	Compliance Status	Remarks
268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(3) item 3	d. Constituents of concern for F001-F005, F039, and hazardous underlying constituents (not managed in a CWA or CWA-equivalent facility)? Note: This requirement does not apply if the waste will be treated and monitored for ALL constituents.		
7045.1315 1, B,1,d	e. Waste analysis data (where available)		
7045.1315 1, E	For generators that use "knowledge" to evaluate wastes, does the generator retain on-site all supporting data for waste determinations?		
268.7 (a), (9), (i)	For companies that are using alternative treatment standards for lab packs of hazardous wastes, has the company submitted on-time notification that contains EPA waste codes, manifest number and a one-time certification signed by an authorized representative?		
268.7 (a), (9), (ii)	Due to changes with the lab pack wastes, or receiving facility, has the company submitted additional notification and certifications, and kept a copy on-site?		

G1: Pre-Transport

Rule	Requirement	Compliance Status	Remarks
7045.0270 1	Prior to shipment, are hazardous waste containers marked according to US DOT hazardous materials regulations, including: the words "HAZARDOUS WASTE Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.", the name and address of the generator, and the manifest number?		
7045.0270 4	Prior to shipment, are wastes packaged according to US DOT hazardous materials regulations?		

7045.0270 5	Prior to transport, have the applicable warning labels been placed on each package in accordance with US DOT regulations?		

G1: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0292 1, A	Has the generator stored hazardous waste for more than 90 days beyond the waste accumulation start date?		
7045.0292 1, C	Are hazardous waste containers and tanks labeled with the waste accumulation start date and is it visible for inspection? OR is the accumulation start date recorded in a clear and legible log for non-shipping containers or tanks?		
7045.0292 1, F	Are hazardous waste containers and tanks properly labeled with the words "Hazardous Waste" and a description that clearly identifies their contents to employees and emergency personnel?		
7045.0292 1, D	Are hazardous waste storage areas (outdoors) protected from unauthorized access and inadvertent damage from vehicles and equipment?		
7045.0292 1, E	Are hazardous waste containers that hold free liquid placed on an impermeable containment surface? If outdoors, is the surface curbed?		
7045.0626 2, A	Are hazardous waste storage containers in good condition and leakproof?		
7045.0626 2, B	Are there suitable leakproof covers for the hazardous waste containers?		
7045.0626 4	Are hazardous waste storage containers closed? Are waste containers which can be degraded when exposed to moisture or sunlight covered by an overhead roof or other suitable covering that does not hide the labels?		
7045.0626 3	Are hazardous waste storage containers compatible with the waste stored in them?		
7045.0626 6	Are incompatible wastes adequately separated?		
7045.0685 2, A	Are spent lead-acid batteries that are stored indoors on an impermeable curbed surface AND are provisions made to recontainerize leaking batteries, AND are there regular inspections to assure the integrity of the batteries?		

G1: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0685 2, B,1	Are spend lead-acid batteries that are stored indoors on an impermeable curbed surface AND are provisions made to recontainerize leaking batteries, AND are there regular inspections to assure the integrity of the batteries AND is the containment area covered to prevent precipitation run on?		
7060.0600 2	Has the company discharged waste or pollutants to the unsaturated zone, through spills, dumping, sewering or other means?		
7045.0855 2, C	If used oil is stored, is it stored in containers or tanks that are in good condition, stored on impermeable surfaces, kept closed, and labeled "Used Oil" (including tanks, containers and piping)?		
7045.0292 8, B,2	Are satellite accumulation containers properly labeled with "Hazardous Waste" and a clear description of their contents?		
7045.0292 8, C,2	For satellite accumulation containers, if located away from the point of generation, are they inspected weekly, and are written records kept?		
7045.0292 8, D,1	For satellite accumulation containers, is fill date marked on the containers?		
7045.0292 8, D,2	For satellite accumulation containers, are they moved within 3 days of fill date to storage area?		

Mark Larison Prod. Svc.
3M St.Paul Tape Plant
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3M

Date

Course Activity Report

Report Criteria:

Course Nbr = SPT2515
Sponsor Code = SP
Completion Date between 1/1/2002 and 12/30/2002
Inactive Courses = Y
Inactive Persons = Y

October 22, 2003

This report lists the names of persons enrolled in courses administered by US-STP-Tape-MN. This report does not include records for courses administered by other 3M learning organizations.

Person ID	Org. Code	Co.	Person Name	Present Dept. #	Regis. Dept. #	Current Location	Recharge	Hours	Credits	Begin Date	Completion Date	Expiration Date	Grade	Status
SPT2515 Waste Mgt, RCRA and SPCC														
01099369	USA	FT	KORANDA, RICHARD	811100	131534	MAPLEWOOD	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01041613	USA	FT	ROBINETTE, DENNIS L	811100	131535	MAPLEWOOD	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01052172	USA	FT	SAUKA, WILLIAM A	811100	131548	MAPLEWOOD	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01219420	USA	FT	SEATON, STEVEN D	811100	131590	MAPLEWOOD	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01052114	USA	FT	KROMSCHROEDER, JAMES A	811100	131594	MAPLEWOOD	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01216314	USA	FT	BRADLEY, MARK D	811020	131594	MAPLEWOOD	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01035620	USA	FT	CLARK, CARL A	811020	131690	MAPLEWOOD	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01324421	USA	FT	DUERSCHERL, ROBERT R	810510	131524	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01088655	USA	FT	BRANDT, MICHAEL	458160	131540	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01234852	USA	FT	SYMON, PAUL J	458060	131542	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01324377	USA	FT	ANDERSON, JEFFREY M	458010	131590	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01082905	USA	FT	DESPEN, PETER M	458010	131594	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01324402	USA	FT	PETERSON, JESSE C	290030	131591	COTTAGE GR	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01050170	USA	FT	LANGE, ROBERT V	131940	131534	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01332100	USA	FT	ZWEBER, PATRICIA R	131940	131591	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01050173	USA	FT	LONGEN, ARTHUR G	131940	131594	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01062788	USA	FT	PEDGINSKI, MICHAEL E	131940	131690	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01227382	USA	FT	TONEY, GREGORY R	131940	131692	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01050173	USA	FT	LONGEN, ARTHUR G	131940	131940	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01245358	USA	FT	SANDBERG, RANDY	131870	131590	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01332164	USA	FT	BURCH, EDWARD R	131692	131524	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01332155	USA	FT	VOLD, LAURIE L	131692	131524	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01067611	USA	FT	DARST, BILL J	131692	131548	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01034939	USA	FT	WAGGONER, CHARLES M	131692	131591	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01070899	USA	FT	BARNHILL, LEONARD C	131692	131690	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed

Course Activity Report

Report Criteria:

Course Nbr = SPT2515
Sponsor Code = SP
Completion Date between 1/1/2002 and 12/30/2002
Inactive Courses = Y
Inactive Persons = Y

October 22, 2003

This report lists the names of persons enrolled in courses administered by US-STP-Tape-MN. This report does not include records for courses administered by other 3M learning organizations.

Person ID	Org. Code	Co.	Person Name	Present Dept. #	Regis. Dept. #	Current Location	Recharge	Hours	Credits	Begin Date	Completion Date	Expiration Date	Grade	Status
SPT2515	***Waste Mgt, RCRA and SPCC***													
01030191	USA	FT	CROWNHART, ROBERT J	131692	131690	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01035095	USA	FT	GABBERT, ROBERT J	131692	131690	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01035009	USA	FT	ANDERSON, JEROME D	131692	131692	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01076533	USA	FT	BUCKLEY, WAYNE C	131692	131692	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01029820	USA	FT	FITZGERALD, MICHAEL J	131692	131692	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01034924	USA	FT	HAGEMAN, GENE F	131692	131692	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01034928	USA	FT	HENDRICKSON, DALE L	131692	131692	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01032642	USA	FT	JOHNSON, ROBERT G	131692	131692	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01032118	USA	FT	JORDAN, GARY D	131692	131692	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01030721	USA	FT	REED, BARBARA J	131692	131692	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01029537	USA	FT	RUCKER, JERRY A	131692	131692	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01030281	USA	FT	SCHROEDER, ALFRED L	131692	131692	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01029722	USA	FT	SPILLMAN, ROLAND R	131692	131692	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01032916	USA	FT	TIBESAR, DANIEL A	131692	131692	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01032682	USA	FT	TROUT, RUSSELL W	131692	131692	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01032064	USA	FT	TUCCITTO, THOMAS A	131692	131692	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01046924	USA	FT	WURZER, GARY F	131692	131692	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01029655	USA	FT	BERBERICH, GERALD E	131690	131690	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01018898	USA	FT	GRAVES, ROLAND A	131690	131690	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01035660	USA	FT	LENDWAY, ALAN J	131690	131690	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01029720	USA	FT	NOSBISH, MICHAEL F	131690	131690	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01032643	USA	FT	SUERTH, THOMAS M	131690	131690	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01046941	USA	FT	CARDENAS, MICHAEL D	131680	131680	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01040980	USA	FT	DIXON, ANTHONY	131680	131680	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01035616	USA	FT	ELFSTRUM, HARLAND R	131680	131680	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed

Course Activity Report

Report Criteria:

Course Nbr = SPT2515
Sponsor Code = SP
Completion Date between 1/1/2002 and 12/30/2002
Inactive Courses = Y
Inactive Persons = Y

October 22, 2003

This report lists the names of persons enrolled in courses administered by US-STP-Tape-MN. This report does not include records for courses administered by other 3M learning organizations.

Person ID	Org. Code	Co.	Person Name	Present Dept. #	Regis. Dept. #	Current Location	Recharge	Hours	Credits	Begin Date	Completion Date	Expiration Date	Grade	Status
SPT2515	***Waste Mgt, RCRA and SPCC***													
01088687	USA	FT	HOLLMAN, MARY	131680	131680	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01216716	USA	FT	NORTON, RANDY A	131660	131630	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01281204	USA	FT	JOHNSON, AMY A	131660	131660	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01290136	USA	FT	MCKENZIE, MATTHEW D	131660	131660	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01258855	USA	FT	SINN, BRIAN D	131660	131660	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01070996	USA	FT	KICKBUSH, GARY L	131660	131680	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01070885	USA	FT	FILIPKOWSKI, JAMES P	131620	131620	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01032440	USA	FT	TODD, WILLIAM M	131620	131620	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01216318	USA	FT	HALLEN, CHRISTOPHER N	131615	131610	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01022841	USA	FT	ANDERSON, RONALD L	131615	131613	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01022841	USA	FT	ANDERSON, RONALD L	131615	131613	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01265944	USA	FT	BRUSS, JOHN A	131615	131615	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01344298	USA	FT	BUSTA, DOMINIC W	131615	131615	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01325559	USA	FT	LARISON, MARK S	131615	131615	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01325559	USA	FT	LARISON, MARK S	131615	131615	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01062791	USA	FT	MARTELL, DAVID J	131615	131615	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01027901	USA	FT	O'GORMAN, PHILIP J	131615	131615	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01076209	USA	FT	SHAW, MARY A	131615	131615	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01071050	USA	FT	MAGNUSON, RICHARD V	131615	131690	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01052092	USA	FT	KLAGES, SCOTT F	131614	131524	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01211585	USA	FT	AUGE, JEROME W	131611	131611	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01022996	USA	FT	DEYO, WILLIAM J	131594	131535	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01037345	USA	FT	THOMPSON, RICHARD M	131594	131535	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01047068	USA	FT	HENDRICKSON, WALTER R	131594	131548	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01035884	USA	FT	MCMILLEN, MARIE I	131594	131548	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed

Course Activity Report

Report Criteria:

Course Nbr = SPT2515
Sponsor Code = SP
Completion Date between 1/1/2002 and 12/30/2002
Inactive Courses = Y
Inactive Persons = Y

October 22, 2003

This report lists the names of persons enrolled in courses administered by US-STP-Tape-MN. This report does not include records for courses administered by other 3M learning organizations.

Person ID	Org. Code	Co.	Person Name	Present Dept. #	Regis. Dept. #	Current Location	Recharge	Hours	Credits	Begin Date	Completion Date	Expiration Date	Grade	Status
SPT2515	***Waste Mgt, RCRA and SPCC***													
01037345	USA	FT	THOMPSON, RICHARD M	131594	131592	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01030775	USA	FT	BEEDLE, JOHN P	131594	131594	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01099372	USA	FT	BENJAMIN, GEORGE W	131594	131594	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01030550	USA	FT	CASSAVANT, ARCHIE	131594	131594	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01022996	USA	FT	DEYO, WILLIAM J	131594	131594	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01035747	USA	FT	HAMILTON, JOHN E	131594	131594	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01046974	USA	FT	LUSK, ROBERT D	131594	131594	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01035884	USA	FT	MCMILLEN, MARIE I	131594	131594	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01076699	USA	FT	RAMBERG, KEVIN L	131594	131594	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01099398	USA	FT	REMMEN, RUSSELL	131594	131594	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01034959	USA	FT	SANDIFER, WILLIAM L	131594	131594	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01032783	USA	FT	SEIGLER, DENNIS M	131594	131594	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01031980	USA	FT	VOGHT, VERNON G	131592	131592	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01219407	USA	FT	ENTWISTLE, PATRICIA M	131591	131591	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01332104	USA	FT	HEIR, JASON L	131590	131541	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01332098	USA	FT	LOUN, JEFFREY P	131590	131541	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01031018	USA	FT	RITTER, SANDRA M	131590	131541	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01052276	USA	FT	SUERTH, VIRGINIA L	131590	131541	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01335967	USA	FT	SEMPLE, JULIE A	131590	131542	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01219416	USA	FT	CARDINAL, STEPHANIE A	131590	131590	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01332154	USA	FT	GARVEY, MICHAEL P	131590	131590	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01218394	USA	FT	JOHNSON, DARRYL R	131590	131590	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01332157	USA	FT	KEMSKI, TODD A	131590	131590	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01332168	USA	FT	MELSON, JAMES S	131590	131590	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01245361	USA	FT	HONDLIK, RUSS	131549	131542	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed

Course Activity Report

Report Criteria:

Course Nbr = SPT2515
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Completion Date between 1/1/2002 and 12/30/2002
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Inactive Persons = Y

October 22, 2003

This report lists the names of persons enrolled in courses administered by US-STP-Tape-MN. This report does not include records for courses administered by other 3M learning organizations.

Person ID	Org. Code	Co.	Person Name	Present Dept. #	Regis. Dept. #	Current Location	Recharge	Hours	Credits	Begin Date	Completion Date	Expiration Date	Grade	Status
SPT2515	***Waste Mgt, RCRA and SPCC***													
01002468	USA	FT	BARRON, TERRANCE M	131549	131549	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01088666	USA	FT	RINEHART, ARTHUR	131549	131549	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01002468	USA	FT	BARRON, TERRANCE M	131549	131594	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01002336	USA	FT	OLLILA, DANIEL W	131549	131940	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01099393	USA	FT	CLEMONS, RONALD	131548	131534	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01099393	USA	FT	CLEMONS, RONALD	131548	131534	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01324406	USA	FT	FISHER, TROY A	131548	131534	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01082924	USA	FT	GENSKAY, WILLIAM J	131548	131542	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01035561	USA	FT	JOHNSTON, RICHARD R	131548	131544	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01245379	USA	FT	CAGER, CHARLES E	131548	131548	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01021660	USA	FT	CHURCHER, GAYLORD	131548	131548	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01078375	USA	FT	DELMORE, ROBERT J	131548	131548	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01043394	USA	FT	EDBERG, ALLAN R	131548	131548	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01036667	USA	FT	JACOBS, GEAROLD F	131548	131548	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01095309	USA	FT	JELINEK, JEFFREY W	131548	131548	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01041439	USA	FT	LINDAU, BURTON F	131548	131548	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01041605	USA	FT	PARKMAN, TOMMIE C	131548	131548	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01041605	USA	FT	PARKMAN, TOMMIE C	131548	131548	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01035489	USA	FT	TAYLOR, JOHN A	131548	131548	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01245354	USA	FT	VILKS, KATHY	131548	131548	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01021660	USA	FT	CHURCHER, GAYLORD	131548	131591	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01095309	USA	FT	JELINEK, JEFFREY W	131548	131592	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01332097	USA	FT	STROM, WAYNE R	131542	131542	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01036019	USA	FT	CHAMBERLAIN, JERRY M	131541	131541	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01245333	USA	FT	HEILMAN, DAVID A	131540	131540	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed

Course Activity Report

Report Criteria:

Course Nbr = SPT2515
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Completion Date between 1/1/2002 and 12/30/2002
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Inactive Persons = Y

October 22, 2003

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Person ID	Org. Code	Co.	Person Name	Present Dept. #	Regis. Dept. #	Current Location	Recharge	Hours	Credits	Begin Date	Completion Date	Expiration Date	Grade	Status
SPT2515	***Waste Mgt, RCRA and SPCC***													
01245392	USA	FT	KUEHN, EMMETT P	131540	131540	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01035809	USA	FT	LADWIG, SHARON L	131540	131540	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01332108	USA	FT	WALSH, PATRICK C	131540	131540	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01070875	USA	FT	WOLFARD, MICHAEL L	131540	131540	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01035033	USA	FT	CAMPBELL, EDMUND W	131537	131537	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01036627	USA	FT	LEDESMA, BARTOLO S	131537	131537	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01035882	USA	FT	PETERS, JEROME S	131537	131537	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01332175	USA	FT	DEERING, KYLE L	131537	131541	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01036762	USA	FT	AANENSON, RONALD A	131535	131535	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01245371	USA	FT	JOHNSON, ROBERT	131535	131535	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01035795	USA	FT	WYLIE, CHARLES W	131535	131535	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01077412	USA	FT	PELTIER, ANTHONY P	131534	131522	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01052228	USA	FT	ALBERT, TERRY E	131534	131534	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01029857	USA	FT	BENEDICT, CLIFTON G	131534	131534	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01046912	USA	FT	BURNS, RICHARD J	131534	131534	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01047066	USA	FT	FLIER, THOMAS J	131534	131534	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01035961	USA	FT	GAGLIARDI, DANA R	131534	131534	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01041135	USA	FT	GONSOSKI, DANIEL M	131534	131534	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01035879	USA	FT	HEMMESCH, HOWARD L	131534	131534	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01047063	USA	FT	JESKA, ROGER D	131534	131534	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01047063	USA	FT	JESKA, ROGER D	131534	131534	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01034945	USA	FT	JORGENSON, ROBERT T	131534	131534	ST PAUL	0.00	1	0.1 CEU	N.A.	3/8/2002	3/8/2003		completed
01034691	USA	FT	MALITZ, LELA M	131534	131534	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01022839	USA	FT	ORLOSKE, KENNETH D	131534	131534	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01046885	USA	FT	STGERMAIN, JEROME L	131534	131534	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed

Course Activity Report

Report Criteria:

Course Nbr = SPT2515
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Completion Date between 1/1/2002 and 12/30/2002
Inactive Courses = Y
Inactive Persons = Y

October 22, 2003

This report lists the names of persons enrolled in courses administered by US-STP-Tape-MN. This report does not include records for courses administered by other 3M learning organizations.

Person ID	Org. Code	Co.	Person Name	Present Dept. #	Regis. Dept. #	Current Location	Recharge	Hours	Credits	Begin Date	Completion Date	Expiration Date	Grade	Status
SPT2515 Waste Mgt, RCRA and SPCC														
01035035	USA	FT	WOJCIK, E A	131534	131534	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01070886	USA	FT	WOODY, LESLIE H	131534	131534	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01070886	USA	FT	WOODY, LESLIE H	131534	131534	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01046885	USA	FT	STGERMAIN, JEROME L	131534	131535	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01035035	USA	FT	WOJCIK, E A	131534	131548	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01332174	USA	FT	SOULE, BRIAN M	131534	131590	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01046912	USA	FT	BURNS, RICHARD J	131534	131591	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01035349	USA	FT	COREY, JERRY O	131534	131591	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01022839	USA	FT	ORLOSKE, KENNETH D	131534	131591	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01035886	USA	FT	BRUNO, CHARLES J	131534	131592	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01035886	USA	FT	BRUNO, CHARLES J	131534	131592	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01022829	USA	FT	EVERSON, SCOTT E	131534	131592	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01022829	USA	FT	EVERSON, SCOTT E	131534	131592	ST PAUL	0.00	1	0.1 CEU	N.A.	3/8/2002	3/8/2003		completed
01035906	USA	FT	TOBRITZHOFER, DANIEL J	131534	131592	ST PAUL	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01075106	USA	FT	LING, MICHAEL S	131534	131680		0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01324398	USA	FT	DELOIA, DAVID M	131524	131524	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01324423	USA	FT	HUBLEY, KENNETH A	131524	131524	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01219417	USA	FT	JOHNSON, RONALD	131524	131524	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01052110	USA	FT	MATHIAS, MICHAEL B	131524	131524	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01332106	USA	FT	TOTH, BRIAN S	131524	131524	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01032669	USA	FT	BAUMAN, ROLLAND L	131524	131591	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01324405	USA	FT	HARRIES, THOMAS E	131524	131591	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01117496	USA	FT	KUCHINSKI, TIM J	131524	131591	ST PAUL	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01324422	USA	FT	PEARSON, JENNIFER L	131524	131591	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01245380	USA	FT	CODDINGTON, JUDITH A	131523	131534	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed

Course Activity Report

Report Criteria:

Course Nbr = SPT2515
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Completion Date between 1/1/2002 and 12/30/2002
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October 22, 2003

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Person ID	Org. Code	Co.	Person Name	Present Dept. #	Regis. Dept. #	Current Location	Recharge	Hours	Credits	Begin Date	Completion Date	Expiration Date	Grade	Status
SPT2515 Waste Mgt, RCRA and SPCC														
01332092	USA	FT	PRAY, ANDREW J	131521	131590	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01324416	USA	FT	NGUYEN, DUC K	131521	131591	ST PAUL	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01332109	USA	FT	BETTERLEY, SARAH J	120048	131524	HUTCHINSON	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01035669	USA	FT	HAMER, J. D	116115	131615	FAIRMONT	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01324403	USA	FT	GREZEK, JERAMY J	116054	131591	FAIRMONT	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01216319	USA	FT	HAUSER, GREGORY A	110827	131534	COTTAGE GR	0.00	1	0.1 CEU	N.A.	3/11/2002	3/11/2003		completed
01218413	USA	FT	AARTHUN, ERICK	110827	131591	COTTAGE GR	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed
01066410	USA	FT	HART, KENNETH R	110479	131548	COTTAGE GR	0.00	1	0.1 CEU	N.A.	12/30/2002	12/30/2003		completed
01097915	USA	FT	LUCCI, LARRY H	110110	131620	COTTAGE GR	0.00	1	0.1 CEU	N.A.	3/20/2002	3/20/2003		completed

Course totals:	184 records	$0.00	184 hours
Company totals:	184 records	$0.00	184 hours
Report totals:	184 records	$0.00	184 hours

Section L: DIFFICULT VALVES WRITTEN PLAN

SECTION M - FLANGES AND CONNECTORS FORM

Equipment I.D. #	Date Tested	Instrument I.D. #	Operator I.D. #	Background (ppm)	Test (ppm)	Date Repair Begun	Date Repair Finished	Repair Method	Signature

SECTION N - INACCESSIBLE CONNECTOR LIST

Equipment I.D. #	Instrument I.D. #	Operator I.D. #	Background (ppm)	Reason Determined To Be Inaccessible	Signature

SECTION Q - ALTERNATIVE VALVES (3rd Quarter)

Equipment I.D. #	Equipment I.D. #	Operator I.D. #	Background (ppm)	3rd (ppm)	Haz. Was. Unit #	Valves/ Unit	Val. Leak/ Unit	% leak/ Unit

SECTION Q - ALTERNATIVE VALVES (2nd Quarter)

Equipment I.D. #	Equipment I.D. #	Operator I.D. #	Background (ppm)	2 nd (ppm)	Haz. Was. Unit #	Valves/ Unit	Val. Leak/ Unit	% leak/ Unit

SECTION Q - ALTERNATIVE VALVES (1st Quarter)

Equipment I.D. #	Equipment I.D. #	Operator I.D. #	Background (ppm)	1st (ppm)	Haz. Was. Unit #	Valves/ Unit	Val. Leak/ Unit	% leak/ Unit

SECTION P - DELAYED REPAIR PUMPS AND VALVES

Valves					Pumps			
Repair Emissions Greater Than Delay (Y/N)	Waste Material Collected & Destroyed (Y/N)	Replacement Required During H.W.U. Shutdown (Y/N)	Valve Assembly Supplies Depleted (Y/N)	Valve Assembly Supplies Adequately Stocked (Y/N)	Waste Material Recovered In Con. Dev. (Y/N)	Repair Require D.M. Seal & B.F. System (Y/N)	Date Repair Begun	Date Repair Finished

SECTION O - DELAY OF REPAIR -EQUIPMENT

Delay due To Shut Down Haz Waste Unit (Y/N)	Date Repair Begun	Date Repair Finished	Delay Due Isolated Equipment Waste Unit (Y/N)	Date Repair Begun	Date Repair Finished	Signature

SECTION N - INACCESSIBLE CONNECTOR LIST

Equipment I.D. #	Instrument I.D. #	Operator I.D. #	Background (ppm)	Reason Determined To Be Inaccessible	Signature

SECTION O - DELAY OF REPAIR -EQUIPMENT

Delay due To Shut Down Haz Waste Unit (Y/N)	Date Repair Begun	Date Repair Finished	Delay Due Isolated Equipment Waste Unit (Y/N)	Date Repair Begun	Date Repair Finished	Signature

SECTION P - DELAYED REPAIR PUMPS AND VALVES

Valves					Pumps			
Repair Emissions Greater Than Delay (Y/N)	Waste Material Collected & Destroyed (Y/N)	Replacement Required During H.W.U. Shutdown (Y/N)	Valve Assembly Supplies Depleted (Y/N)	Valve Assembly Supplies Adequately Stocked (Y/N)	Waste Material Recovered In Con. Dev. (Y/N)	Repair Require D.M. Seal & B.F. System (Y/N)	Date Repair Begun	Date Repair Finished

SECTION Q - ALTERNATIVE VALVES (1st Quarter)

Equipment I.D. #	Equipment I.D. #	Operator I.D. #	Background (ppm)	1st (ppm)	Haz. Was. Unit #	Valves/ Unit	Val. Leak/ Unit	% leak/ Unit

SECTION Q - ALTERNATIVE VALVES (2nd Quarter)

Equipment I.D. #	Equipment I.D. #	Operator I.D. #	Background (ppm)	2 nd (ppm)	Haz. Was. Unit #	Valves/ Unit	Val. Leak/ Unit	% leak/ Unit

SECTION Q - ALTERNATIVE VALVES (3rd Quarter)

Equipment I.D. #	Equipment I.D. #	Operator I.D. #	Background (ppm)	3rd (ppm)	Haz. Was. Unit #	Valves/ Unit	Val. Leak/ Unit	% leak/ Unit

SECTION Q - ALTERNATIVE VALVES (4th Quarter)

Equipment I.D. #	Equipment I.D. #	Operator I.D. #	Background (ppm)	4th (ppm)	Haz. Was. Unit #	Valves/ Unit	Val. Leak/ Unit	% leak/ Unit

SUBPART CC IMPLEMENTATION GUIDE

Instructions Guide For Subpart CC

This manual has been prepared to assist your plant with compliance with the Part CC rule. It will not automatically assure compliance with the Part CC rule. Some activities that do not require documentation have been excluded. For this reason, it is imperative that you read the rule summary at the beginning of the manual before using it as a compliance aid.

To use the manual, turn to the rule directory that reviews the various sections of the parts that were considered pertinent to our St. Paul Tape Manufacturing Plant. Then go to the section that is indicated in the directory to access the appropriate form for reporting or proof of compliance purposes.

If you should have any questions concerning the rule or suggestions for the manual, you can call Adé Babatunde at (651) 778-7674.

Note: All rule references are Part 265, for interim status TSDs and generators. Part 264 has similar, but not identical, requirements for TSDS.

Manual Directory

SUBPART CC AIR EMISSION STANDARDS (40 CFR 264.1080 and 40 CFR 265.1080)

BACKGROUND

Under the authority of the Resource Conservation and Recovery Act (RCRA), as amended, the EPA has published standards (59 FR 62896, December 6, 1996) to reduce organic air emissions from certain hazardous waste management activities to levels that are protective of human health and the environment.

WHO IS SUBJECT TO THESE REGULATIONS?

Application of controls are based on organic content of hazardous waste. Units that manage waste with volatile organic (VO) concentrations at point of origination greater than or equal to 500 ppmw are covered under this subpart. These units can be **permitted TSD's**, **interim status TSD's**, or less-than-90-day **large quantity generators** that manage hazardous waste and are not expressly exempted from the rule. Management under this subpart is applicable from generation through treatment.

WHAT UNITS ARE SUBJECT TO REGULATION?

Subpart CC applies to :

1. **Tanks;**
2. **Containers;**
3. **Surface impoundment;**
4. **Certain miscellaneous Subpart X units**

Exemptions-

The following units are exempt from Subpart CC standards:

1. Wastewater treatment units;
2. Elementary neutralization units;
3. Emergency or spill management units;
4. Totally enclosed treatment units;
5. Hazardous waste recycling units;
6. Conditionally exempt small quantity generators;
7. Small quantity generators;
8. Satellite accumulation units;
9. RCRA empty containers;
10. Other permitting exemption.

Exclusions-

The following units are excluded from Subpart CC standards:

1. Units used on-site for federal or state clean-up;
2. Containers of less than $0.1m^3$ (approximately 26.4 gallons) ;
3. 3. Mixed radioactive and hazardous waste;
4. 4. Organic peroxide manufacturing waste;
5. Pre-October 6, 1996 units (units that do not manage H.W. received on or after this date).

6. Tanks with process vents that could be manage under Subpart AA;
7. Units in closure;
8. Biological treatment of hazardous waste in accordance with 40 CFR 2664.1082(c)(2)(vi) or 40 CFR 265.1082(c)(2)(vi) in surface impoundment or tanks;
9. Units that manage hazardous waste which meet LDR standards under 40 CFR 268.40 (Treatment Standard for Hazardous waste) that has been treated by the treatment technology established for the waste in 40 CFR 268.42(c), or treated by an equivalent method of treatment approval;
10. Units with Clean Air Act (CAA), National Emission Standard for Hazardous Air Pollutants (NESHAP) or New Source Performance Standard (NSAP) control.

WHAT IS REQUIRED?

Subpart CC includes

1. **Recordkeeping requirements** (e.g. waste determination documentation),
2. **Inspection requirements**, and the application of **control devices and procedures.** (Please see attached tables)

WHEN DOES IT APPLY?

Subpart CC is a Hazardous and Solid Waste Amendment (HSWA) rule. The effective date is December 6, 1996. Companies were required to be in compliance by December 6, 1996, or have an implementation plan and schedule documented and available at the company. In that instance, compliance must be achieved as soon as possible, but no later than December 8, 1997.

Subpart CC: Tank Inspection and Monitoring Requirements

	Fixed roof 265.1085(C)(4) or 264.1084(C)(4)	External floating roof 265.1085(f)(3) or 264.1084(f)(3)	Pressure tank 265.1085(h)(4) or 264.1084(h)(4)	Fixed roof vented to control device 265.1085(g)(3) or 264.1084(g)(3)	Fixed roof with internal floating roof 265.1085(e)(3) or 264.1084(e)(3)	Enclosure vented to enclosed combustion devices 265.1085(I)(3) or 264.1084(I)(3)
Initial inspections required for all parts of all tanks and closure devices, if applicable	√	√	√	√	√	√
Visually inspect for defects in cover and closure device or "air emission equipment" on or before date tank becomes subject to subpart CC	√	√	√	√		√
After initial check, visually inspect, at least annually, cover and closure device, except when unsafe, and conditions for delay are met. 265.1085(I)(1) & (2)	√	√	√	√		√
If unsafe to monitor cover, record why, and develop and follow plan to inspect as frequently as practicable(265.1085(I)(1) & (2))	√	√	√	√	√	√
Perform all inspection and monitoring requirements according to written plan for fixed roof, vent and closure devices (265.1085(g)(3)(ii))	√	√	√	√	√	√
Keep written plan, schedule and records of inspection plan in General Facility Inspection Plan required in 265.15	√	√		√	√	√
One-year inspection required for above-ground or ground portions of partially or fully buried tanks	√	√		√	√	√
Perform initial leak detection monitoring of closed vent system on or before date tank is subject to the Rule				√ 265.1088(b)(4)		
Annually visually inspect and monitor, per 265.1033(k), closed vent systems connections for defects. Monitor per 265.1034(b)				√		√
Monitor other closed vent system components annually, or at the Regional Administrator's request				√		√
Visually inspect closed vent system designed to operate below atmospheric pressure per 265.1033(j)(2)				√		
Measure gap between tank wall and seals within 60 days of initial operation or if tank is empty more than 1 year ; then annually for secondary and every 5 years for primary seals	√ 265.1085(f)(1)					
Visually inspect seals, gaskets and membranes after each emptying or degassing; thereafter once every 10 years. If equipped with 2 continuous seals, visually inspect after each emptying or degassing; thereafter once every 5 years					√	
Prepare written notification to Regional Administrator (RA)30 days prior to inspection, unless inspection unplanned		√ 265.1085(f)(3)(III)			√ 265.1085(e)(3)(iv)	
For an unplanned inspection, notify RA as soon as possible, and no later than 7 days prior to refilling the tank		√			√	

Subpart CC: Tank Recordkeeping Requirements

	Fixed roof	External floating roof	Pressure tank	Fixed roof vented to control device	Fixed roof with internal floating roof	Enclosure vented to enclosed combustion devices
Record and maintain unique ID number	√		√	√	√	√
For as long as the tank is in service, maintain records on-site of unit dimensions and analysis of capacity		√			√	
Record and maintain records of inspections, including unit number, inspection date and defects, if any, for 3 years	√	√	√	√	√	√
For closed vent system and control device, maintain records per 265.1088, that unit is designed for the required performance level; either signed certification or performance test results				√		√
For each defect found, maintain records on-site of: -location of problem; description of defect; date it was found; corrective action taken; date of repair or emptying and removal of unit from service; if repair delayed more than 45 days due to lack of alternative tank capacity, reason for delay and expected completion date of repair	√	√	√	√	√ Record should also include floating design per 265.1090(b)(2)(ii)	√
Maintain record of maximum organic vapor pressure of hazardous waste in the tank. If testing used, include date and time samples were collected, analysis method and analysis results	√		√			√
Record and maintain semiannual updates for planned routine maintenance operations for 3 years				√		√
Record and maintain unexpected malfunctions, duration and corrective actions for 3 years				√		√
If devices other than thermal vapor indicator, flare, boiler, process heater, condenser or carbon absorber are used to control emissions from the tank, maintain records of how device is operated, including proper use and maintenance of the device				√		
Record and maintain until air emission control equipment is replaced or taken out of service: -description and date of modifications to closed vent system or control device and identification of operating parameters, -description of monitoring device and diagram of continuous monitoring sensor location(s) used				√		
Maintain records of most recent calculations and measurements used to verify enclosure in accordance with Procedure T requirements(265.1088(iv))						√

Subpart CC: Container Controls, Inspection and Recordkeeping Requirements

Level 1	Level 2	Level 3
Larger than 26.4 gallons and less than or equal to 122 gallons, or larger than 122 gallons and do not manage H.W. in light material service	Larger than 122 gallons and manage H.W. "in light material service" [1]	Larger than 26.4 gallons and treat H.W. by a stabilization [2] process
Controls		
One of the following: -Use containers that meet DOT requirements -Use a cover and control with no visible gaps -Use organic vapor suppression on or above the container 40 CFR 264.1086© / 265.1087©	One of the following: • Use containers that meet DOT requirements • Use containers that operate with no detectable emissions (method 21) [3] • Use containers that are demonstrated to be vapor- • tight within the last 12 months (method 27) [4] 40 CFR 264.1086(d) / 265.1087(d)	• Containers used to stabilize H.W. with volatile organics grater than 500 ppm • For waste stabilized in a container either: 1. container must be vented directly to a control device [5]; or 2. container is vented inside an enclosure which is exhausted through a closed vent [6]to a control device • Conservation vents are not allowed 40 CFR 264.1086(b)(2) / 265.1087(b)(2)
Waste Transfer Requirements		
No waste transfer requirements apply	-Waste transfer requirements apply regardless of container alternative used in level 2 -Transfer waste into or out of a container in such a manner as to minimize exposure of the waste to the atmosphere 40 CFR 264.1086(b)(3)/265.1087(b)(3)	Not applicable
Operating Requirements		
The covers, openings, and closure devices should be closed except: 1. When transferring H.W. in and out of the containers 2. between batch transfer not exceeding 15 minutes between transfer 3. While performing sampling and equipment access 4. Conservation vents are allowed 5. Safety vents are allowed 40 CFR 264.1086© / 265.1087©	• All covers and closure devices must be kept closed and secured, except while transferring • Containers may be open while performing sampling or equipment access • Safety valves and conservation vents may be used if normally left in close position • A cover need not to be on a RCRA empty container, as defined in 40 CFR 261.7 40 CFR 264.1086© / 265.1087©	• If the vapors are directly vented to a control device, there are specific design and operating criteria that must be met same as tanks that have closed vent and control device systems • If an enclosure is used, the enclosure must meet the design and operating criteria specified in "Procedure T-Criteria for and Verification of a Permanent or Temporary Total Enclosure" under 40 CFR 52.741 The container, enclosure, control device or closed vent system may have safety relief devices.
Inspection Requirements (40 CFR 264.1088 / 265.1089)		
Minimal inspection required: • when transferring waste, check to make sure closure devices are in good condition • if unloading of off-site waste takes longer than 24 hours, then container must be visually checked • repair any noted defects	Same as Level 1 requirements, plus • if wastes are stored greater than a year, then visually inspect once a year	Inspection requirements are the same as for tanks
Repair Requirements (40 CFR 264.1088(f)(7) / 265.1089(f)(7))		
When a defect is detected; attempt to repair within 24 hours must be made and: 1. Repair within 5 Calendar days or empty and remove the container from service 2. Do not use until defect is repaired	Same as Level 1 requirements	Necessary corrective measures shall be immediately implemented to ensure that the control device is operated in compliance
Reordkeeping Requirements (40 CFR 264.1089 / 265.1090)		
• Volatile organic waste determination records • If container exceeds 26.4 gallons and does not meet DOT standards, records indicating that the container is not managing H.W. "in light material service"	Since Level 2 waste is "in light material service", no records need to be kept	Depends upon how the organic emissions are vented: • If an enclosure is used, records must be maintained for the most recent set of calculations and measurements performed to verify that the enclosure meets the criteria of a permanent total enclosure (Procedure T) • Records for the closed vent and control device system are the same for those used on tanks

(1) - "In light material service": It means that one or more of the organic constituents in the hazardous waste in the container has a vapor pressure greater than 0.3 Kilopascal (kPa) at 20°C, and total concentration of the pure organic constituents having a vapor pressure greater than 0.3 kPa at 20°C is equal to or greater than 20% by weight.

(2) - Waste stabilization: Stabilization involves adding material to waste that render the waste immobile or less mobile through a process of curing (adding absorbent is not stabilization since no curing occurs). Stabilization also involves adding materials to the waste and physically mixing.

(3) - Method 21: Identifies leaks, does not quantify emissions, and is Published in 40 CFR part 60, Appendix A. Instrument must respond to specific compounds, sample gas flow rate should be between 0.1 and 3.0 liters per minute. The instrument must be intrinsically safe. Flame ionization (FID), catalytic combustion, photoionization (PID), and infrared are the types of portable organic analyzers which could be used for the testing.

(4) - Method 27: This test defines tank truck or rail car satisfying the control requirements of Subpart CC for a container. It applies to containers and associated pipes and fittings. It involves pressure test, and is appropriate for use on units not equipped with vapor recovery. This method is an alternative to leak testing container using EPA method 21, and is published in 40 CFR Part 60, Appendix A.

(5) - Control Devices

A. Vapor recovery/reduction systems: Designed and operated with an organic recovery or reduction efficiency greater than 95% by weight (examples are: Condensers, carbon absorbers).

B. Enclosed combustion devices: Designed and operated with an organic destruction greater than 95% by weight, or residence time greater than 0.5 seconds and temperature of greater than 760°C (examples are: Incinerators, boilers and process heaters).

C. Flare requirements: It should have no visible emissions and flame must be present at all times. It also requires a net heating value, plus the exit velocity.

(6) - Closed-vent Systems

A. Designed and operated as specified in Subpart AA, which requires :

1. No detectable emissions, monitored annually
2. No monitoring is necessary if operated below atmospheric pressure (equipped with pressure gauge).

Any by-pass devices capable of diverting vapors and gases must have either a flow indicator (15 minutes intervals), or a car-seal or lock-and-key valve.

Subpart CC: Control Requirements for Tanks

TANK LEVEL 1 CONTROLS:

Tank Level 1 Controls apply only to a fixed roof tank that meets the following conditions: maximum organic vapor pressure of waste is less than cutoff for tank design capacity; contents are not heated to temperatures above the temperature of vapor pressure determination; no waste stabilization conducted in tank.

Tank Level 1- Vapor pressure limits

Tank Design Capacity	Waste Maximum Organic Vapor Pressure
$\geq 151m^3$	$<5.2kPa$
$\geq 75m^3$ But $<151m^3$	$<27.6kPa$
$<75m^3$	$<76.6kPa$

kPa - Kilopascal

REQUIREMENTS: The actual control requirements are found at 40 CFR 264 1084/ 265.1085(c) and include: a continuous barrier over the entire tank; no visible cracks, holes, gaps, or open space on fixed roof or any openings; and fixed roof and openings must be constructed of suitable materials.

TANK LEVEL 2 CONTROLS:

- Tanks that do not exceed the Level 1 vapor pressures and capacities may use Level 2 controls.
- Tanks that exceed the Level 1 criteria MUST use Level 2 controls.
- There are five design options for tanks using Level 2 controls:

TANK	REQUIREMENTS
Fixed roof with internal	Requirements are found at 40 CFR 264.1084(e)/ 265.1085(e) and include: continuous floating roof seals for the floating roof; specifications for each opening and penetration; and filling procedures
External floating roof	Requirements are found at 40 CFR 264.1084(f)/ 265.1085(f) and include: two continuous seals for the floating roof; specifications for each opening and penetration; equipment seals; and operation specifications
Cover vented to control	Requirements are found at 40 CFR 264.1084(g)/ 265.1085(g) and include: a continuous device barrier over the entire tank ; closure device for each opening; and venting specifications
Pressure tank	Requirements are found at 40 CFR 264.1084(h)/ 265.1085(h) and include: vent/compression controls; closure device for each opening
Tank in enclosure	Requirements are found at 40 CFR 264.1084(i)/ 265.1085(i) and include: enclosure vented to combustion specifications; vent specifications device

Transfer of hazardous waste among tanks and surface impoundments subject to Subpart CC must be conducted using hard-piping or other closed system that does not allow exposure of the waste to the atmosphere. Waste exempted from Subpart CC controls are exempt from waste transfer requirements of 40 CFR 264.1084(j) or 40 CFR 265.1085(j).

Safety devices that vent directly to the atmosphere may be used on all tank air emission controls required under Subpart CC. Safety devices are to remain in closed position except when needed to prevent physical damage or permanent deformation of the tank or control equipment due to an emergency or unplanned event.

3M WASTE STREAM PROFILE PROGRAM
Profile (w3522)

********** A. Identification **********

3M Cordova BE
EPA Id No: ILD054236443 Plant Code: CORD
Division: Specialty Matl Div-Chemicals
Contact: Pat Sheller
Name: Bulk Waste Fuel
Process: Chemical Manufacture
Type: Regulated

Waste Stream No: 13-0086-2085-1
Original Date: 12/10/91
Supersedes Date: 01/27/97
Effective Date: 10/02/97
Expires Date:

********** B. Composition **********

See Following Page(s) For Components

********** C. Characteristics **********

Physical State: Pumpable Liquid (<2,000 Cp)
Heating Value: >= 12,000
Flash Point: < 100
Land Ban: Yes Waste Water: No
Subpart CC VOC: >= 500 ppmw by process knowledge

Fahrenheit pH: N/A
PIH: N/A

I/O: Organic
Water Reactive: No
PIH Zone: N/A

********** D. Classification **********

Ship Name: Waste Flammable Liquid, N.O.S.
Hazard Class: 3, II
DOT Id No: UN1993
EPA No: F003 F005 D001 D018 D035
LDR Category: H

Generator St No: NONE
Destination St No: NONE

********** E. Management Practices **********

Managed Offsite: Incinerate
3M Cottage Grove Center Cottage Grove MN 55016
MND006172969

Containers Used:
UN TANK TRUCK Tank Truck RQ

********** F. Waste Generation **********

Volumes:	Year	Volume	Unit	Year	Volume	Unit	Year	Volume	Unit
Continuous	1993	6330	P	1993	917802	G	1994	815614	G
	1995	916367	G	1996	181228	G	1997	12760	P
	1997	65171	G						

Reviewed by: David L. Clifton

MSDS Required: No

****
3M Cordova BE
****

A. Identification **********
Waste Stream No: 13-0086-2085-1

B. Composition **********

CAS No	Component	%Concentration	Remarks
***	Generator Must Enter Major Hazardous Component(s)	100.00000 to 100.00000	SIG
67561	Methanol	5.00000 to 75.00000	RQ
111966	Diethylene Glycol Dimethyl Ether	0.00000 to 50.00000	
141786	Ethyl Acetate	5.00000 to 50.00000	
108838	Diisobutyl Ketone	0.00000 to 40.00000	
78933	Methyl Ethyl Ketone	5.00000 to 40.00000	TCLP RQ
67641	Acetone	3.00000 to 30.00000	
67630	Isopropyl Alcohol	3.00000 to 30.00000	
108883	Toluene	3.00000 to 30.00000	RQ
1330207	Xylene	2.00000 to 25.00000	RQ
142825	Heptane	1.00000 to 15.00000	
107982	Propylene Glycol Monomethyl Ether	0.10000 to 15.00000	
111762	2-Butoxyethanol	0.10000 to 10.00000	
1274	Lubricating Oil	0.10000 to 10.00000	
7732185	Water	0.10000 to 9.00000	
1296	Miscellaneous Resins	0.10000 to 5.00000	
1310	Polymer Waste	0.10000 to 5.00000	
64175	Ethyl Alcohol	0.10000 to 1.00000	
2105	Polyol	0.10000 to 1.00000	
71432	Benzene	0.00010 to 0.00400	TCLP MKG

********** A. Identification **********

3M St. Paul - Main Plant AS 18-26
EPA Id No:MND000824029 Plant Code: STPM
Division: Tape Manufacturing Div.
Contact: Ron Graves
Name: Bulk Tape Manufacturing Bldg.18-26 &51
Process: Tape Manufacturing Process
Type: Regulated

Waste Stream No: 13-0011-3730-9
Original Date: 12/11/92
Supersedes Date: 05/09/97
Effective Date: 10/15/98
Expires Date:

********** B. Composition **********

Cas No	Component Description	% Concentration	Remarks
142825	Heptane	40.00000 to 59.00000	SIG
64475850	Naphtha/Mineral Spirits	10.00000 to 26.00000	
1330207	Xylene	15.00000 to 25.00000	SIG
1274	Lubricating Oil	0.00000 to 10.00000	
1296	Miscellaneous Resins	2.00000 to 10.00000	
1150	Synthetic Rubber	2.00000 to 10.00000	
7732185	Water	0.00000 to 10.00000	
108883	Toluene	9.00000 to 9.00000	
67630	Isopropyl Alcohol	0.00000 to 3.00000	
78933	Methyl Ethyl Ketone	0.00000 to 2.00000	TCLP

********** C. Characteristics **********

Physical State: Pumpable Liquid (<2,000 Cp) I/O: Organic
Heating Value: >= 12,000 Water Reactive: No
Flash Point: < 100 Fahrenheit pH: N/A
Land Ban: Yes Waste Water: No PIH: N/A PIH Zone: N/A
Subpart CC VOC: >= 500 ppmw by process knowledge

********** D. Classification **********

Ship Name: Waste Flammable Liquid, N.O.S.
Hazard Class: 3, II Generator St No: NONE
DOT Id No: UN1993 Destination St No: NONE
EPA No: F003 F005 D001 D035
LDR Category: H

********** E. Management Practices **********

Managed Offsite: Incinerate
3M Cottage Grove Center Cottage Grove MN 55016
MND006172969

Containers Used:
UN TANK TRUCK Tank Truck RQ

********** F. Waste Generation **********

Volumes:	Year	Volume	Unit	Year	Volume	Unit	Year	Volume	Unit
Continuous	1993	456000	P	1994	312000	P	1995	264000	P
	1996	226840	P	1997	268000	P	1998	240000	P
	1999	100800	P						

Reviewed by: David L. Clifton MSDS Required: No

********** Identification **********

3M St. Paul - Main Plant AS 18-26 Waste Stream No: 13-0011-3730-9
EPA Id No:MND000824029 Plant Code: STPM Original Date: 12/11/92
Division: Tape Manufacturing Div. Supersedes Date: 05/09/97
Name: Bulk Tape Manufacturing Bldg.18-26 &51 Effective Date: 10/15/98
Process: Tape Manufacturing Process Expires Date:

********** Destination **********

3M Cottage Grove Center MND006172969
10746 Innovation Road
Cottage Grove MN 55016

********** Packaging **********

UN TANK TRUCK Tank Truck

********** Labeling **********

Contact 3M Transportation for Placarding/Labeling Requirements
BULK Contact 3M Trans. &/or 3M Package Eng. for Requirements

********** Marking **********

Contact 3M Transportation for marking requirements
Contact 3M Trans. &/or 3M Package Eng. for Requirements

********** Shipping Description **********

SEE SPECIAL INSTRUCTIONS.
Waste Flammable Liquid, N.O.S.,(HEPTANE, XYLENE), 3, UN1993,II, (F003, F005, D001, D035) RQ
EPA Waste No(s): F003 F005 D001 D035
Land Disposal Restrictions Notification is Required
Reviewed by: David L. Clifton Effective: 10/15/98 Expires:

********** SPECIAL INSTRUCTIONS **********

This is a Bulk Waste Stream. It requires the placarding of the package and the truck with a combined UN/NA Placard. The Placard would show the specific UN/NA number for this stream in the center. You should consult your 3M Guide to Regulated Materials Packaging and Transportation manual.

3M St. Paul - Main Plant MND000824029 STPM
AS Tape Manufacturing Div. Building:18-26

Stream Number	Stream Name	Waste Nbr	Management	Destination
13-0011-3730-9	Bulk Tape Manufacturing Bldg.18-26 &51	F003 F005 D001 D035	Incinerate	3M Cottage Grove Center Cottage Grove, MN 55016 MND006172969

Table I
Temperatures Used For Vapor Pressure Determination

Method	Facility	Location	Temp °F	Temp °C	Month	Max Temp °F	Max Temp °C	Min Temp °F	Min Temp °C	Avg Temp °F	Avg Temp °C
Highest Historical Temp	CORD	Moline	103	39.44							
Highest Historical Temp	DCTR	Huntsville	104	40.00							
Highest Historical Temp	C. Grove	MPLS-St. Paul	105	40.56							
Highest Calendar-month average	CORD	Springfield, IL			July	87.1	30.61	65.9	18.83	76.5	24.72
Highest Calendar-month average	DCTR	Biringham, AL			July	90.3	32.39	69.8	21.00	80.05	26.69
Highest Calendar-month average	C. Grove	MPLS-St. Paul			July	83.4	28.56	62.7	17.06	73.05	22.81
Average Annual Ambient Temp	CORD	Moline	49.5	9.72							
Average Annual Ambient Temp	DCTR	Huntsville	60.6	15.89							
Average Annual Ambient Temp	C. Grove	MPLS-St. Paul	44.7	7.06							

Table 2
Calculations of Pure Vapor Pressures

Compound	Effect. Range	Antoine A	Antoine B	Antoine C	Temp °C	log p	Anti log p
Acetone	liq	7.11714	1210.595	229.664	7.06	2.00318873	100.736935
		7.11714	1210.595	229.664	9.72	2.06001421	114.819119
		7.11714	1210.595	229.664	15.89	2.18708388	153.845176
		7.11714	1210.595	229.664	22.81	2.32221062	209.995806
		7.11714	1210.595	229.664	22.83	2.32259043	210.179535
		7.11714	1210.595	229.664	24.72	2.35821255	228.145839
		7.11714	1210.595	229.664	25	2.36344494	230.911166
		7.11714	1210.595	229.664	26.67	2.39441496	247.979033
		7.11714	1210.595	229.664	26.69	2.39478341	248.189506
		7.11714	1210.595	229.664	26.72	2.39533599	248.50549
		7.11714	1210.595	229.664	27.22	2.40452652	253.8204
		7.11714	1210.595	229.664	39.44	2.61852608	415.457
		7.11714	1210.595	229.664	40	2.62786817	424.490686
		7.11714	1210.595	229.664	40.56	2.63717153	433.682132
Methanol	(-14 to 65)	7.8975	1474.08	229.13	7.06	1.6564229	45.3338811
		7.8975	1474.08	229.13	9.72	1.72592788	53.2019908
		7.8975	1474.08	229.13	15.89	1.88133805	76.0918344
		7.8975	1474.08	229.13	22.81	2.04658312	111.322542
		7.8975	1474.08	229.13	22.83	2.04704755	111.441653
		7.8975	1474.08	229.13	24.72	2.09060617	123.198711
		7.8975	1474.08	229.13	25	2.09700419	125.027109
		7.8975	1474.08	229.13	26.67	2.13487295	136.418399
		7.8975	1474.08	229.13	26.69	2.13532347	136.559988
		7.8975	1474.08	229.13	26.72	2.13599912	136.772606
		7.8975	1474.08	229.13	27.22	2.14723669	140.357844
		7.8975	1474.08	229.13	39.44	2.40887506	256.374638
		7.8975	1474.08	229.13	40	2.42029567	263.205933
		7.8975	1474.08	229.13	40.56	2.43166886	270.189744
Ethyl Acetate	15 to 76	7.10179	1244.95	217.88	7.06	1.567203	36.9150107
		7.10179	1244.95	217.88	9.72	1.63188666	42.8436695

Table 2
Calculations of Pure Vapor Pressures

Ethyl Acetate (Continued)	15 to 76	7.10179	1244.95	217.88	15.89	1.77625636	59.7387809
		7.10179	1244.95	217.88	22.81	1.92936904	84.9902376
		7.10179	1244.95	217.88	22.83	1.92979881	85.0743828
		7.10179	1244.95	217.88	24.72	1.97009173	93.3451443
		7.10179	1244.95	217.88	25	1.97600772	94.6253983
		7.10179	1244.95	217.88	26.67	2.01101102	102.567795
		7.10179	1244.95	217.88	26.69	2.01142732	102.666161
		7.10179	1244.95	217.88	26.72	2.01205165	102.813857
		7.10179	1244.95	217.88	27.22	2.02243463	105.301519
		7.10179	1244.95	217.88	39.44	2.26365072	183.50619
		7.10179	1244.95	217.88	40	2.27415699	187.999629
		7.10179	1244.95	217.88	40.56	2.28461774	192.582906
Toluene	6 to 137	6.95464	1344.8	219.48	7.06	1.0183815	10.4323345
		6.95464	1344.8	219.48	9.72	1.08727525	12.2257427
		6.95464	1344.8	219.48	15.89	1.24108262	17.4213827
		6.95464	1344.8	219.48	22.81	1.40426648	25.3668465
		6.95464	1344.8	219.48	22.83	1.4047246	25.3936192
		6.95464	1344.8	219.48	24.72	1.44767849	28.0335755
		6.95464	1344.8	219.48	25	1.45398555	28.4436647
		6.95464	1344.8	219.48	26.67	1.49130464	30.9959274
		6.95464	1344.8	219.48	26.69	1.4917485	31.0276227
		6.95464	1344.8	219.48	26.72	1.49241417	31.0752168
		6.95464	1344.8	219.48	27.22	1.50348475	31.8775364
		6.95464	1344.8	219.48	39.44	1.76075772	57.6444792
		6.95464	1344.8	219.48	40	1.77196696	59.1516634
		6.95464	1344.8	219.48	40.56	1.78312792	60.6915075
Heptane	(-2 to 124)	6.89677	1264.9	216.54	7.06	1.23979326	17.3697375
		6.89677	1264.9	216.54	9.72	1.30629886	20.244118
		6.89677	1264.9	216.54	15.89	1.45470142	28.4905885
		6.89677	1264.9	216.54	22.81	1.61204052	40.929885
		6.89677	1264.9	216.54	22.83	1.61248208	40.9715201
		6.89677	1264.9	216.54	24.72	1.65387851	45.0690614
		6.89677	1264.9	216.54	25	1.65995622	45.7042116

Table 2
Calculations of Pure Vapor Pressures

Heptane (Continued)	(-2 to 124)	6.89677	1264.9	216.54	26.67	1.69591477	49.6494877
		6.89677	1264.9	216.54	26.69	1.69634242	49.6984016
		6.89677	1264.9	216.54	26.72	1.69698376	49.7718476
		6.89677	1264.9	216.54	27.22	1.70764955	51.0093223
		6.89677	1264.9	216.54	39.44	1.95536833	90.233609
		6.89677	1264.9	216.54	40	1.96615489	92.5028027
		6.89677	1264.9	216.54	40.56	1.97689447	94.8188023
MEK	43 to 88	7.06356	1261.34	221.97	7.06	1.55624655	35.9953622
		7.06356	1261.34	221.97	9.72	1.61947523	41.6365974
		7.06356	1261.34	221.97	15.89	1.76069277	57.6358586
		7.06356	1261.34	221.97	22.81	1.91060633	81.3966118
		7.06356	1261.34	221.97	22.83	1.91102732	81.4755536
		7.06356	1261.34	221.97	24.72	1.95050313	89.2284044
		7.06356	1261.34	221.97	25	1.95630001	90.4273927
		7.06356	1261.34	221.97	26.67	1.99060311	97.8595275
		7.06356	1261.34	221.97	26.69	1.99101114	97.9515106
		7.06356	1261.34	221.97	26.72	1.99162305	98.0896196
		7.06356	1261.34	221.97	27.22	2.0017999	100.415302
		7.06356	1261.34	221.97	39.44	2.23841942	173.148772
		7.06356	1261.34	221.97	40	2.24873387	177.310263
		7.06356	1261.34	221.97	40.56	2.25900433	181.553376
Xylene (m)	28 to 168	7.00908	1462.266	215.11	7.06	0.42733629	2.67507702
		7.00908	1462.266	215.11	9.72	0.50520596	3.20041253
		7.00908	1462.266	215.11	15.89	0.67892416	4.77445886
		7.00908	1462.266	215.11	22.81	0.86303931	7.29523547
		7.00908	1462.266	215.11	22.83	0.86355592	7.3039185
		7.00908	1462.266	215.11	24.72	0.91198623	8.16556472
		7.00908	1462.266	215.11	25	0.91909624	8.30034688
		7.00908	1462.266	215.11	26.67	0.9611604	9.14450925
		7.00908	1462.266	215.11	26.69	0.96166065	9.15504841
		7.00908	1462.266	215.11	26.72	0.96241085	9.17087665
		7.00908	1462.266	215.11	27.22	0.97488696	9.43815179
		7.00908	1462.266	215.11	39.44	1.26456615	18.3893404

Table 2
Calculations of Pure Vapor Pressures

Xylene (m)	28 to 168	7.00908	1462.266	215.11	40	1.27717612	18.9311116
(Continued)		7.00908	1462.266	215.11	40.56	1.28973084	19.4863653

Table 3

of Pure Compounds @ 44.7, 49.5, 60.6, 73.05, 76.5, 80.05, 103, 104, 105 and Degrees Farenheit

Compound	mm Hg 44.7 F	mm Hg 49.5 F	mm Hg 60.6 F	kPa 44.7 F	kPa 49.5 F	kPa 60.6 F	psi 44.7 F	psi 49.5 F	psi 60.6 F
Acetone	100.74	114.82	153.85	13.43	15.31	20.51	1.95	2.22	2.97
Methanol	45.33	53.2	76.09	6.04	7.09	10.14	0.88	1.03	1.47
Ethyl Acetate	36.92	42.84	59.74	4.92	5.71	7.96	0.71	0.83	1.16
MEK	36	41.64	57.64	4.80	5.55	7.68	0.70	0.81	1.11
Heptane	17.37	20.24	28.49	2.32	2.70	3.80	0.34	0.39	0.55
Toluene	10.43	12.23	17.42	1.39	1.63	2.32	0.20	0.24	0.34
Xylene	2.68	3.2	4.77	0.36	0.43	0.64	0.05	0.06	0.09

Compound	mm Hg 73.05 F	mm Hg 76.5 F	mm Hg 80.05 F	kPa 73.05 F	kPa 76.5 F	kPa 80.05 F	psi 73.05 F	psi 76.5 F	psi 80.05 F
Acetone	210	228.15	248.19	28.00	30.42	33.09	4.06	4.41	4.80
Methanol	111.32	123.2	136.56	14.84	16.43	18.21	2.15	2.38	2.64
Ethyl Acetate	84.99	93.35	102.67	11.33	12.45	13.69	1.64	1.81	1.99
MEK	81.4	89.23	97.95	10.85	11.90	13.06	1.57	1.73	1.89
Heptane	40.93	45.07	49.7	5.46	6.01	6.63	0.79	0.87	0.96
Toluene	25.37	28.03	31.03	3.38	3.74	4.14	0.49	0.54	0.60
Xylene	7.3	8.17	9.16	0.97	1.09	1.22	0.14	0.16	0.18

Table 3

Compound	mm Hg 103 F	mm Hg 104 F	mm Hg 105 F	kPa 103 F	kPa 104 F	kPa 105 F	psi 103 F	psi 104 F	psi 105 F
Acetone	415.46	424.49	433.52	55.39	56.59	57.80	8.03	8.21	8.38
Methanol	256.38	263.21	270.06	34.18	35.09	36.01	4.96	5.09	5.22
Ethyl Acetate	183.51	188	192.5	24.47	25.06	25.66	3.55	3.64	3.72
MEK	173.15	177.31	181.48	23.08	23.64	24.20	3.35	3.43	3.51
Heptane	90.23	92.5	94.78	12.03	12.33	12.64	1.74	1.79	1.83
Toluene	57.64	59.15	60.66	7.68	7.89	8.09	1.11	1.14	1.17
Xylene	18.39	18.93	19.48	2.45	2.52	2.60	0.36	0.37	0.38

SUBPART CC TANK LIST

Tank Number	Location	Capacity Gallons	Conservation Vent (Y/N)	Vapor Pressure Current WSP (psi)	Vapor Rressure Most Volatile Compound (psi)	Fill psi Setting	Empty psi Setting
Hazardous Waste Tank	Bldg. 51	4,000	Y	0.34	0.71		

HAZARDOUS WASTE TANK ANNUAL INSPECTION

Tank #	Date	Defect Found	Action Taken	Repair Completion Date	Signature
30	6/23/99	None			M. Kiemen

VAPOR PRESSURE CHANGE DOCUMENTATION

Tank No.	Date Of Change	Old V.P. psia	New V.P. psia	Old Waste 3M I.D. #	New Waste 3M I.D. #	Method V.P. Determination	Signature

PRECISION ENVIRONMENTAL
Field Monitoring and Testing Services

METHOD 21 DATA SHEET

Page 1 of 1

Name: 3M ET&S
935 Bush Ave
State Zip: St. Paul, MN 55113

Project Title: Haz. Waste System Leak Detection
Project Number:
Contact: Jeff Stock

	4400	Hexane	= 4400	
51	Ambient Air			
nd	3 ppm	Background	Result ppmv	Comments
	Ball valve	16	20	Background collect ~3' from valve
	valve	16	20	Background collected ~3' from valve
	valve	3	3	Background collected ~4' from vale
	threaded plugged open end	3	4	Background collected ~4' from sample
	Valve	4	4	Background collected ~2' away
	gauge	4	4	"
	checkvalve	4	4	"
	gate valve	4	4	Background collected ~3'
	valve	4	4	Background collected ~3' away
	open end	4	5	"
	capped open end	2	2	Background collected ~3' away
	gate valve	3	6	Background collected ~3' away
	plugged open end	3	3	"
g 22	Background	2		
	Description	Background	Result	Comment
	pump	2	2	Background collected ~4' away
	open end	2	2	"
#31	no handle valve	2	3	Background collected ~3' away
#33	Ball valve	2	2	Background collected ~3' away
#34	Ball valve	2	1	"
	Air actuated valve AOV	2	2	"
	open end	3	3	Background collected ~3' away
	cam lock	5	5	
	open end	5	5	
	cam lock	5	5	

Completed by: AVA | Date Completed: 6/23/99 | Present on Site: AVA

Solvents in H.W. Tanks for RCRA Subpart CC

Conversion Factor: To convert mmHg to psi, multiple by 0.0193368

Solvent	mmHg	psi			
	Temp °C (°F)				
	1	2	3	4	25°C (77°F)
Heptane	[illegible]	[illegible]			44.7 °F
Xylene	0.36	[illegible]			
Toluene	1.39	0.06			
Naphtha/Mineral Spirits					
Isopropyl Alcohol	1.854	0.2689			
Methyl Ethyl Ketone	[illegible]	0.70			
Methyl Iso Butyl Ketone	0.841	0.122			
Ethyl Acetate	[illegible]	0.71			

Vapor Pressure of Organic Compound

Based on following formula log p = A - B/t + C

Compound	Effective Ant. C Temp Range °C	Antoine A	Antoine B	Antoine C	Temp °C	log p	Vapor Press Anti log p
MIBK	(-2 to 100)	6.6727	1168.4	191.9	7.06	0.80016281	6.3119392

Note:
Antoine Coefficients and the temperature range for which they can be used can be found in Lange's Handbook of Chemistry

Boiling Point of Organic Compound

Based on following formula t = (B/A - log p) - C

Compound	Effective Ant. C Temp Range °C	Antoine A	Antoine B	Antoine C	log 760 mm	BP in °C
ethanol	(-2 to 100)	8.32109	1718.1	237.52	2.88081359	78.2911594

Note:
Antoine Coefficients and the temperature range for which they can be used can be found in Lange's Handbook of Chemistry

Compound	Effective Ant. C	Antoine A	Antoine B	Antoine C	Temp °C	log p	Anti log p
Triethyl Amine		6.85755	955.94	237.52	-80	0.78886031	6.14979034
		6.85755	955.94	237.52	-40	2.01783757	104.192766
		6.85755	955.94	237.52	3	2.88307802	763.973022
		6.85755	955.94	237.52	3.5	2.89132313	778.615654

Vapor Pressure of Organic Compound

Based on following formula log p = A - B/t + C

Compound	Effective Ant. C Temp Range °C	Antoine A	Antoine B	Antoine C	Temp °C	log p	Vapor Press Anti log p
IPA	(-2 to 100)	8.11778	1580.92	219.61	7.06	1.14323551	13.9070658

Note:
Antoine Coefficients and the temperature range for which they can be used can be found in Lange's Handbook of Chemistry

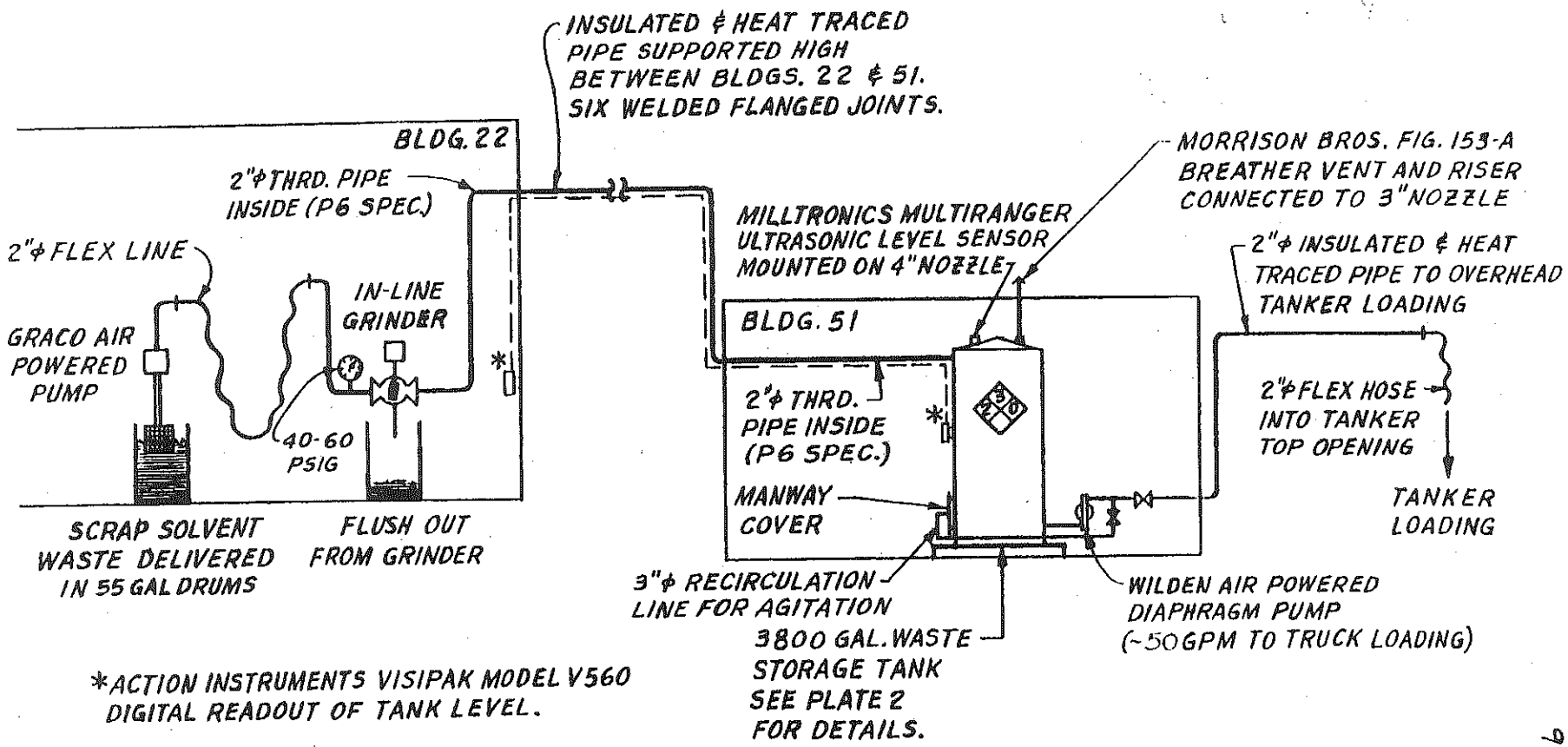
Boiling Point of Organic Compound

Based on following formula t = (B/A - log p) - C

Compound	Effective Ant. C Temp Range °C	Antoine A	Antoine B	Antoine C	log 760 mm	BP in °C
ethanol	(-2 to 100)	8.32109	1718.1	237.52	2.88081359	78.2911594

Note:
Antoine Coefficients and the temperature range for which they can be used can be found in Lange's Handbook of Chemistry

Compound	Effective Ant. C	Antoine A	Antoine B	Antoine C	Temp °C	log p	Anti log p
Triethyl Amine		6.85755	955.94	237.52	-80	0.78886031	6.14979034
		6.85755	955.94	237.52	-40	2.01783757	104.192766
		6.85755	955.94	237.52	3	2.88307802	763.973022
		6.85755	955.94	237.52	3.5	2.89132313	778.615654



*ACTION INSTRUMENTS VISIPAK MODEL V560 DIGITAL READOUT OF TANK LEVEL.

PLATE 1

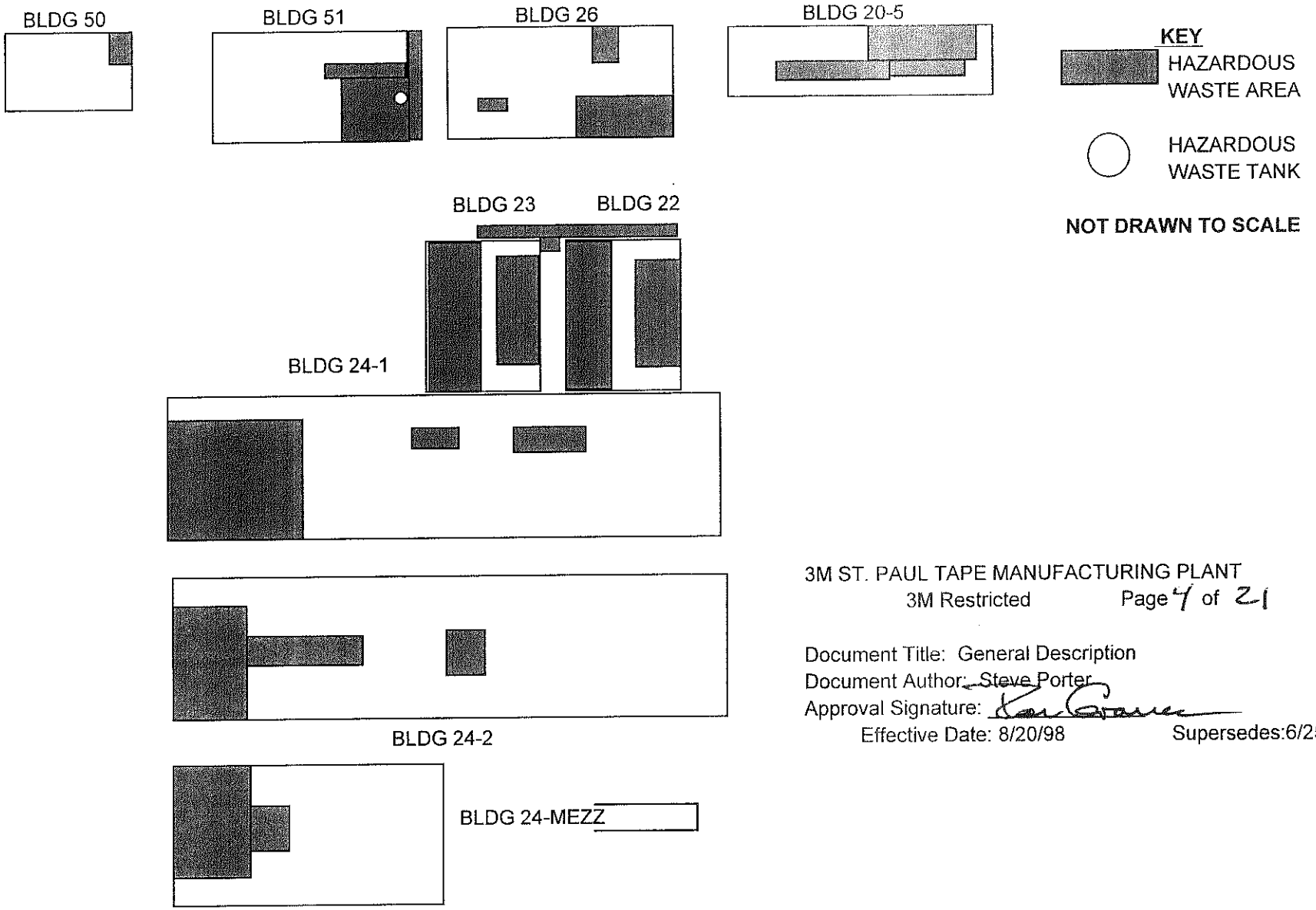
90-144

3 M COMPANY - ST. PAUL TAPE PLANT

SCRAP SOLVENT WASTE STORAGE SYSTEM

TERA, INC.

HAZARDOUS WASTE AREAS



3M ST. PAUL TAPE MANUFACTURING PLANT
3M Restricted Page 4 of 21

Document Title: General Description
Document Author: Steve Porter
Approval Signature:
Effective Date: 8/20/98 Supersedes:6/2598

Company Services
Main Plant Area
St. Paul, Minnesota

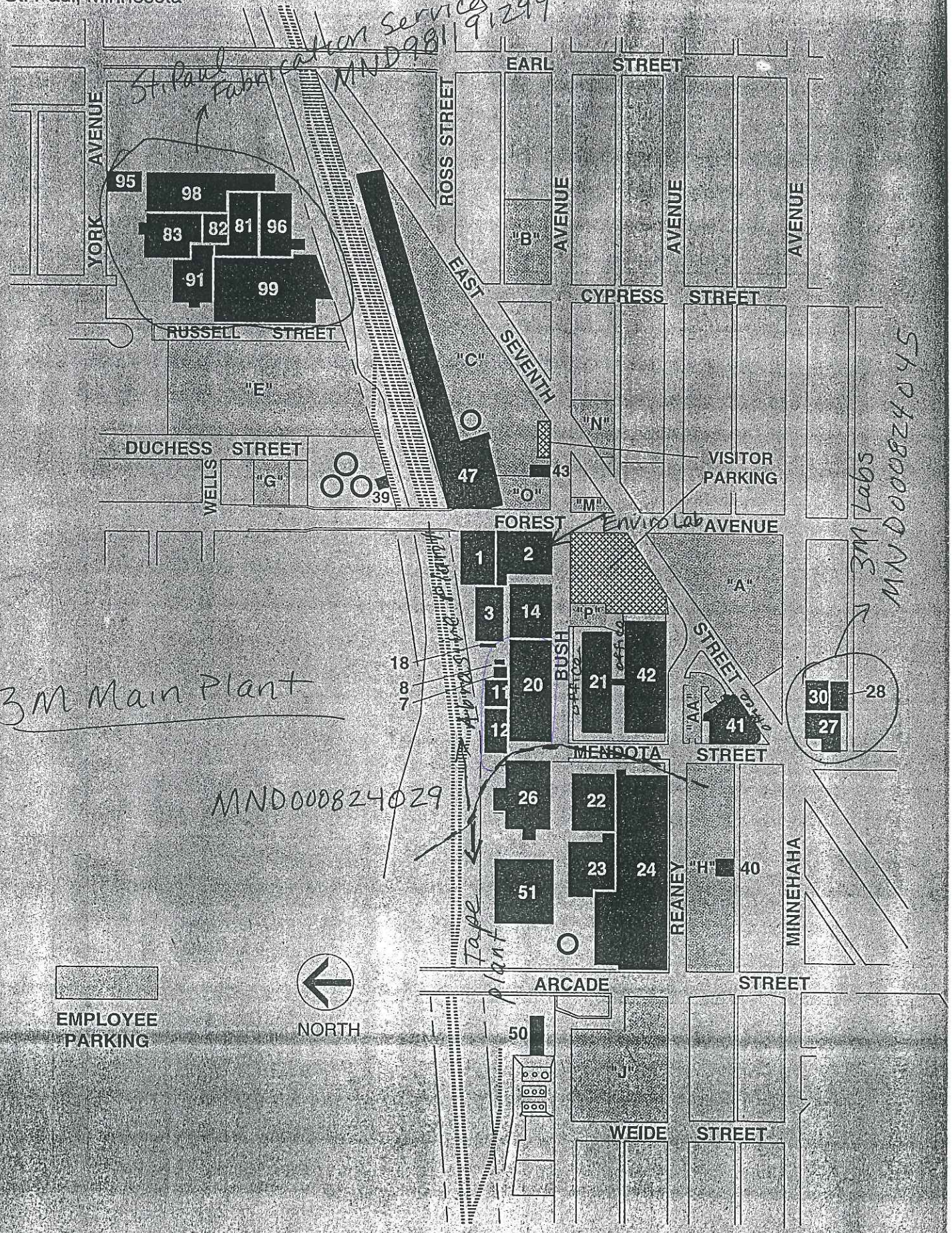


Table 4

Composition Of Waste Streams For Part CC Tanks

	St. Paul Main 13-0076-2660-2#1 %	St. Paul Main 13-0076-2660#2 %	Cordova 13-0086-2085 %	Decatur 41-2600-8968-9 %	Cott. Grove 13-0024-0265-2 %	Cottage Grove 13-0024-0362-7 %
Methanol			5 to 75	1 to 3		
Diethylene Glycol Dimethyl Ether			0 to 50			
Ethyl Acetate	0 to 2		5 to 50	17 to 22		10 to 50
Diisobutyl Ketone			0 to 40			
Methyl Ethyl Ketone	0 to 2	0 to 2	5 to 40		0 to 5	5 to 30
Acetone			3 to 30	52 to 67	90 to 97	
Isopropyl Alchol	0 to 3	0 to 3	3 to 30			
Toluene	9 to 9	9 to 9	3 to 30	14 to 19	0 to 2	2 to 5
Xylene	25 to 25	25 to 25	2 to 25		0 to 2	20 to 50
Heptane	50 to 59	50 to 59	1 to 15	<1		
Proplene Glycol Monomethyl Ether			0.1 to 15			
2-Butoxyethanol			0.1 to 10			
Lubricating Oil			0.1 to 10			
Water			0.1 to 9	3 to 8	0 to 10	0 to 10
Resins			0.1 to 5			
Polymer Waste			0.1 to 5			
Ethyl Alcohol			0.1 to 1	<1		
Polyol			0.1 to 1.0			
Benzene			0.01 to 0.01	<0.05		
Methyl Isobutyl Ketone	0 to 2			1		
Methylenr Chloride				<1		
Hexane				<0.1		
Cyclohexane				<0.05		
Octane				<0.05		
Msc. Resins	2 to 10	2 to 10				
Synthetic Rubber	2 to 10	2 to 10				
Naptha/Mineral Spirits	0 to 6	0 to 6				

Table 3

of Pure Compounds @ 44.7, 49.5, 60.6, 73.05, 76.5, 80.05, 103, 104, 105 and Degrees Farenheit

Compound	mm Hg 44.7 F	mm Hg 49.5 F	mm Hg 60.6 F	kPa 44.7 F	kPa 49.5 F	kPa 60.6 F	psi 44.7 F	psi 49.5 F	psi 60.6 F
Acetone	100.74	114.82	153.85	13.43	15.31	20.51	1.95	2.22	2.97
Methanol	45.33	53.2	76.09	6.04	7.09	10.14	0.88	1.03	1.47
Ethyl Acetate	36.92	42.84	59.74	4.92	5.71	7.96	0.71	0.83	1.16
MEK	36	41.64	57.64	4.80	5.55	7.68	0.70	0.81	1.11
Heptane	17.37	20.24	28.49	2.32	2.70	3.80	0.34	0.39	0.55
Toluene	10.43	12.23	17.42	1.39	1.63	2.32	0.20	0.24	0.34
Xylene	2.68	3.2	4.77	0.36	0.43	0.64	0.05	0.06	0.09

Compound	mm Hg 73.05 F	mm Hg 76.5 F	mm Hg 80.05 F	kPa 73.05 F	kPa 76.5 F	kPa 80.05 F	psi 73.05 F	psi 76.5 F	psi 80.05 F
Acetone	210	228.15	248.19	28.00	30.42	33.09	4.06	4.41	4.80
Methanol	111.32	123.2	136.56	14.84	16.43	18.21	2.15	2.38	2.64
Ethyl Acetate	84.99	93.35	102.67	11.33	12.45	13.69	1.64	1.81	1.99
MEK	81.4	89.23	97.95	10.85	11.90	13.06	1.57	1.73	1.89
Heptane	40.93	45.07	49.7	5.46	6.01	6.63	0.79	0.87	0.96
Toluene	25.37	28.03	31.03	3.38	3.74	4.14	0.49	0.54	0.60
Xylene	7.3	8.17	9.16	0.97	1.09	1.22	0.14	0.16	0.18

Table 3

Compound	mm Hg 103 F	mm Hg 104 F	mm Hg 105 F	kPa 103 F	kPa 104 F	kPa 105 F	psi 103 F	psi 104 F	psi 105 F
Acetone	415.46	424.49	433.52	55.39	56.59	57.80	8.03	8.21	8.38
Methanol	256.38	263.21	270.06	34.18	35.09	36.01	4.96	5.09	5.22
Ethyl Acetate	183.51	188	192.5	24.47	25.06	25.66	3.55	3.64	3.72
MEK	173.15	177.31	181.48	23.08	23.64	24.20	3.35	3.43	3.51
Heptane	90.23	92.5	94.78	12.03	12.33	12.64	1.74	1.79	1.83
Toluene	57.64	59.15	60.66	7.68	7.89	8.09	1.11	1.14	1.17
Xylene	18.39	18.93	19.48	2.45	2.52	2.60	0.36	0.37	0.38

SUBPART CC TANK LIST

Tank Number	Location	Capacity Gallons	Conservation Vent (Y/N)	Vapor Pressure Current WSP (psi)	Vapor Rressure Most Volatile Compound (psi)	Fill psi Setting	Empty psi Setting
Hazardous Waste Tank	Bldg. 51	4,000	Y	0.34	0.71		

HAZARDOUS WASTE TANK ANNUAL INSPECTION

Tank #	Date	Defect Found	Action Taken	Repair Completion Date	Signature
30	6/23/99	None			M. Kiemen

Hazardous Waste Storage Tank

Subpart BB and CC Implementation Guide

3M

St. Paul Tape Manufacturing Division St. Paul, Minnesota

EPA ID No.: MND000824029

3M Implementation

3M's approach to compliance with Subpart CC includes the following:

- Identify all regulated waste streams - to be done at corporate level, with plant assistance, using the Waste Stream Profile system
- Tanks - Identify if Level 1 or 2 (by plants, with ET&S assistance)
  Determine if already in compliance, or develop compliance schedule (by plants, with ET&S assistance)
- Containers - Determine if already in compliance. Modify procedures as necessary.
- All - begin required recordkeeping and documentation

Subparts AA and BB

EPA has also extended the requirements of RCRA Supart AA - Air Emission Standards for Process Vents, and Subpart BB - Air Emission Standards for Equipment Leaks to hazardous waste generators. TSDs are already covered by these two subparts.

Subpart AA regulates air emissions from process vents on distillation units, air stripping units, steam stripping units, solvent extraction units, etc., treating hazardous waste with greater than 10 ppmw organics. 3M generators sites do not generally have such units, except possibly for recycling, and recycling units are exempt from RCRA. Therefore, Subpart AA requirements are not summarized in this memo. Please contact ET&S if you have such a unit which may be subject to RCRA.

Subpart BB regulates equipment such as pumps, valves, compressors, flanges, sampling ports, and pressure relief devices, which contact hazardous waste ≥10% organics. Equipment that contains or contacts hazardous waste for less than 300 hours per year is exempt. Each piece of equipment subject to BB must be marked to be readily distinguished from other equipment. Although the effective date of Subpart BB is also December 6, 1996, an extension is allowed until as late as June 8, 1999 if documented in an implementation schedule.

Subpart BB requirements for pumps and valves in light liquid service include:

- Monitor monthly for leaks using Reference Method 21. Readings above 10,000 ppm indicate a leak.
- Visually inspect weekly for leaks
- If leak is detected, repair as soon as practicable, but must start within 5 days and complete within 15 days.
- Certain pumps may qualify as operating with no detectable emissions, eliminating the monthly monitoring requirement. If instrument readings indicate less than 500 ppm above background, work with your ET&S contact to take advantage of this designation.
- Certain valves may be designated as unsafe-to-monitor or difficult-to-monitor, allowing for reduced monitoring frequency. Again, work with your ET&S contact.
- Valves for which no leak is detected for two consecutive months can convert to a quarterly monitoring schedule.

Pumps and valves in heavy liquid service, flanges, and other connectors must be monitored within 5 days whenever a potential leak is found by visual, audible, olfactory or other means.

Recordkeeping requirements for each piece of equipment regulated under BB must include equipment identification number, approximate location, type of equipment, organics concentration (%) in waste stream, method of compliance with the standard ("monthly leak detection and repair"), and monitoring results. If leaks are detected, this must also be documented, and the leaking equipment must be tagged.

MANUAL DIRECTORY

265.1050 (b)

This requirement states that equipment that contacts hazardous waste with organic concentrations of at least 10% by weight is subject to the subpart. It will be assumed that all wastes fall into the >10% organic concentration.

265.1050 (3)©

This requirement states that all pieces of equipment to which this subpart applies must be marked. **Section A** of this manual contains forms for the labeling of equipment.

265.1050 (e)

This requirement states that equipment that contains organic wastes with a concentration >10 % by weight for a period of less than 300 hours per year is exempt from the requirements of this rule.

265.1052 (a)(1) Each pump in light liquid storage must be monitored monthly to detect leaks. **Section B** of this manual contains forms for recording this information.

265.1052 (2)

This requirement states that each pump in light liquid service should be checked by visual inspection each week for indicators of liquids dripping from pump seal. **Section C** of this manual contains forms for recording this information.

265.1052 (d)(1)(i)(ii)(iii), 265.1052 (d)(2), 265.1052 (d)(3), 265.1052 (d)(4), 265.1052 (d)(5), 265.1052 (d)(6) **(Optional Requirement)**

Pumps may be exempted from weekly and monthly monitoring if it has a dual mechanical seal system and barrier fluid system and:

1. The dual mechanical seal system is operated with a barrier fluid with a pressure that is greater than the pump stuffing box pressure **or,**
2. Or equipped with a barrier fluid degassing reservoir that is connected by a closed-vent system to a control device **or,**
3. Equipped with a system that purges the barrier fluid into a hazardous waste stream with no detectable emissions to the atmosphere.
4. The barrier fluid system must not be a hazardous waste with organic concentrations 10 % or greater by weight.
5. Each barrier fluid system must be equipped with a sensor that will detect failure of the seal system, the barrier fluid system or both.
6. Each pump must be checked by visual inspection each calendar week.
7. Each sensor must be checked daily or equipped with an audible alarm that must be checked monthly.

8. A criterion must be determined which indicates failure of the seal system, the barrier fluid system or both.
9. If there are indications of liquids dripping from the pump seal or the sensor indicates failure of the seal system, the barrier fluid system or both, a leak is detected.
10. When a leak is detected it must be repaired as soon as practicable but not latter than 15 days.
11. A first attempt at repair must be made no latter than 5 days after the leak is detected.

Section D of this manual contains forms for this information.

265.1052 (e)

If a pump has a reading of less than 500 ppm above background, than it is exempt from monitoring the weekly and monthly monitoring requirements and the pump exemption requirements. In addition to the <500 ppm requirement, the following conditions must be met:

1. Must have no externally actuated shaft penetrating the pump housing.
2. Must operate with no detectable emissions as indicated by < 500 ppm.
3. Must be tested initially, upon designation, and annually.

Section E of this manual contains forms for this information.

265.1057 (a), 265.1058 (b), 265.1058 (c), 261058 (d)

Each valve in gas/vapor or light liquid service shall be monitored monthly. A reading greater than 10,000 ppm is measured as a leak. Any valve for which a leak is not detected for two successive months may be monitored for the first month of each successive month of every succeeding quarter. If a leak is detected, the valve shall be monitored monthly until a leak is not detected for two successive months.

When a valve is found to be leaking, it shall be repaired as soon as practicable but no latter than 15 calendar says after the leak is detected. A first attempt shall be made no latter than 5 calendar days after the leak is detected. **Sections F and G** contain forms for this information.

265.1057 (f)

Any valve that shows an instrument reading of <500 ppm may be exempted from monthly monitoring if:

1. It has no external actuating mechanism.
2. It is operated with emissions less than 500 ppm.
3. It is tested for compliance initially and then annually.

Section H of this manual contains forms for this information.

265.1057 (g)

Valves are exempt from monthly monitoring if they are designated as unsafe to monitor and if:

1. They are determined to be unsafe because monitoring personnel would be exposed to immediate danger while monitoring.
2. The owner or operator adheres to a written plan that requires monitoring the valves as frequently as practicable during safe to monitor times.

Sections I and J contain forms for this information.

265.1057 (h)

Valves are exempt from monthly monitoring if they are designated as difficult-to-monitor and if:

1. They are determined to be difficult-to-monitor because monitoring personnel would be elevated more than 2 meters above a support surface.
2. The hazardous waste unit that contains the valve was in operation before June 21, 1990.
3. The owner or operator of the valve follows a written plan that requires monitoring at least once per year.

Sections K and L contain forms for this information.

265.1058 (a), 265.1058 (b)

Flanges and other connectors shall be monitored within 5 days if visual, audible, olfactory, or any other detection method finds evidence of a potential leak.

If an instrument reading of 10,000 ppm is measured, a leak is detected.

When a leak is detected, it shall be repaired as soon as practicable but not latter than 15 calendar days after it is detected.

Section M contains forms for this information.

265.1058 (e)

Any connector that is inaccessible is exempt from monitoring requirements. In addition, 3M found it difficult to label some other pieces of equipment. The labels will be held as a record and maps showing their location will be provided.

Section N of this manual contains forms for this information.

265.1059 (a), 265.1059 (b), 265.1059 (c), 265.1059 (d), 265.1059 (e)

Delay of repair will be allowed for equipment if the repair is technically infeasible without a hazardous waste management shutdown. In this case, repair of this equipment will occur before the end of the next hazardous waste management unit shutdown.

Delay of repair of equipment for which leaks have been detected will be allowed for equipment that is isolated from the hazardous waste management unit and that does not continue to contain or contact hazardous waste.

Delay for repair of valves will be allowed if:

1. Emissions from purged material resulting from repair are greater than the emissions to result from delay of repair.
2. When repair procedures are effected, the purged material is collected and destroyed or recovered in a control device.

Delay or repair of pumps will be allowed if:

1. Repair requires the use of a dual mechanical seal system that includes a barrier fluid system.
2. Repair is completed as soon as possible, but not latter than 6 months after the leak was detected.

Delay of repair beyond a hazardous waste management unit shutdown will be allowed for a valve if:

1. If valve assembly replacement is necessary during the hazardous waste management unit shutdown
2. Valve assembly supplies have been depleted.
3. Valve assembly supplies have been sufficiently stocked before the supplies were depleted

Delay of repair beyond the next hazardous waste management unit shutdown will not be allowed unless the next hazardous waste management unit shutdown occurs sooner than 6 months after the first hazardous waste management unit shutdown.

Sections O and P contains forms for this information.

265.1061 (a), 265.1061 (b), 265.1061 (c), 265.1061 (d)

An owner or operator may elect to have all valves within a hazardous waste unit comply with an alternative standard which allows no greater than 2 % of the valves to leak.

The following conditions must be met:

1. The Regional Administrator must be notified.
2. All valves must be in compliance with 265.1057 except as described below.
3. After 2 consecutive quarters with the % of valves leaking <2%, an owner or operator may skip 1 of the quarterly leak detection periods.
4. After 5 consecutive quarterly leak detection periods with the % of valves <2%, an owner or operator may begin to skip 3 of the quarterly leak detection periods.

Performance tests shall be conducted as follows:

1. All valves shall be monitored within one week.
2. A leak is >10,000 ppm.
3. The % shall be determined by dividing the number of valves that leak by the total number of valves in the hazardous waste unit.
4. The Regional Administrator must be informed if the operator decides to not longer comply with this section.

Section Q of this manual contains forms for this information.

265.1064 © (1), 265.1064 © (2), 265.1064 © (3)

When a leak is detected, the following requirements apply:

1. A weatherproof label with I.D. #, date of first evidence, and date of leak.
2. The label may be removed, except for valves, after repairs have been done.
3. The I.D. on a valve may be removed after it has been monitored for two successive months and no leaks are detected.

265.1057 (g)

Valves are exempt from monthly monitoring if they are designated as unsafe to monitor and if:

1. They are determined to be unsafe because monitoring personnel would be exposed to immediate danger while monitoring.
2. The owner or operator adheres to a written plan that requires monitoring the valves as frequently as practicable during safe to monitor times.

Sections I and J contain forms for this information.

265.1057 (h)

Valves are exempt from monthly monitoring if they are designated as difficult-to-monitor and if:

1. They are determined to be difficult-to-monitor because monitoring personnel would be elevated more than 2 meters above a support surface.
2. The hazardous waste unit that contains the valve was in operation before June 21, 1990.
3. The owner or operator of the valve follows a written plan that requires monitoring at least once per year.

Sections K and L contain forms for this information.

265.1058 (a), 265.1058 (b)

Flanges and other connectors shall be monitored within 5 days if visual, audible, olfactory, or any other detection method finds evidence of a potential leak.

If an instrument reading of 10,000 ppm is measured, a leak is detected.

When a leak is detected, it shall be repaired as soon as practicable but not latter than 15 calendar days after it is detected.

Section M contains forms for this information.

265.1058 (e)

Any connector that is inaccessible is exempt from monitoring requirements. In addition, 3M found it difficult to label some other pieces of equipment. The labels will be held as a record and maps showing their location will be provided.

Section N of this manual contains forms for this information.

8. A criterion must be determined which indicates failure of the seal system, the barrier fluid system or both.
9. If there are indications of liquids dripping from the pump seal or the sensor indicates failure of the seal system, the barrier fluid system or both, a leak is detected.
10. When a leak is detected it must be repaired as soon as practicable but not latter than 15 days.
11. A first attempt at repair must be made no latter than 5 days after the leak is detected.

Section D of this manual contains forms for this information.

265.1052 (e)

If a pump has a reading of less than 500 ppm above background, than it is exempt from monitoring the weekly and monthly monitoring requirements and the pump exemption requirements. In addition to the <500 ppm requirement, the following conditions must be met:

1. Must have no externally actuated shaft penetrating the pump housing.
2. Must operate with no detectable emissions as indicated by < 500 ppm.
3. Must be tested initially, upon designation, and annually.

Section E of this manual contains forms for this information.

265.1057 (a), 265.1058 (b), 265.1058 (c), 261058 (d)

Each valve in gas/vapor or light liquid service shall be monitored monthly. A reading greater than 10,000 ppm is measured as a leak. Any valve for which a leak is not detected for two successive months may be monitored for the first month of each successive month of every succeeding quarter. If a leak is detected, the valve shall be monitored monthly until a leak is not detected for two successive months.

When a valve is found to be leaking, it shall be repaired as soon as practicable but no latter than 15 calendar says after the leak is detected. A first attempt shall be made no latter than 5 calendar days after the leak is detected. **Sections F and G** contain forms for this information.

265.1057 (f)

Any valve that shows an instrument reading of <500 ppm may be exempted from monthly monitoring if:

1. It has no external actuating mechanism.
2. It is operated with emissions less than 500 ppm.
3. It is tested for compliance initially and then annually.

Section H of this manual contains forms for this information.

SUBPART BB AIR EMISSION STANDARDS

BACKGROUND

In 1984, Congress passed the Hazardous and Solid Waste Amendment (HSWA), amending the Resource Conservation and Recovery Act (RCRA). Section 3004(n) of RCRA, as amended by HSWA, directs EPA to " promulgate such regulations for monitoring and control of air emissions at hazardous waste treatment, storage, and disposal facilities, as may be necessary to protect human health and the environment." The Agency has issued a series of regulations to implement the section 3004(n) mandate; these regulations control air emissions from equipment leaks, and can be found at 40 CFR 264.1050 and 40 CFR 265.1050

WHO IS COVERED?

1. A unit that is subject to the permitting requirements of 40 CFR part 270, or
2. A unit (including a HW recycling unit) that is located at a Hazardous Waste Management facility subject to permitting requirements, or
3. **Generators** exempt from permitting under 40 CFR 262.34(a)

WHAT IS COVERED?

Equipment that contains or comes into contact with waste having an organic concentration of at least 10% by weight. The following equipment is covered:

1. Pumps;
2. Compressors;
3. Pressure relief devices;
4. Sampling connection systems;
5. Flanges and Connectors;
6. Valves;
7. Open-ended valves or lines.

This equipment is usually associated with tanks, distillation units, and other waste treatment and storage units. The equipment is under different standards depending on whether the hazardous waste is in:

1. **Light liquid service**: hazardous waste fluid is a liquid at operating condition, and the vapor pressure of at least one of the components in the stream is greater than 0.3 Kilopascals (Kpa) at 20 degree celsius.
2. **Gas/Vapor service**: hazardous waste is in the gaseous state at operating condition.
3. **Heavy liquid service**: hazardous waste not in gas/vapor, or light liquid state.

Exemption:

Equipment in vacuum service (40 CFR 264.1050(e) & 265.1050(d)) or equipment that contains or contacts hazardous waste less than 300 hours/calendar year (264.1050(f)&265.1050(e). Exempt equipment requires documentation / identification per 40 CFR 264.1064(g)(5)-(6)

WHAT IS REQUIRED?

Each piece of equipment to which Subpart BB applies must be marked in such a manner that it can be distinguished readily from other pieces of equipment. Each piece of equipment must also be monitored and inspected according to the required scheduled standards to detect and prevent leaks. All activities concerning monitoring, inspection, and repairs must be documented and kept for 3 years, as part of the recordkeeping requirement.

WHEN DOES IT APPLY?

Since the effective date of subpart CC (emissions from certain tanks, containers, and surface impoundment) on December 6, 1996, generators and all TSD's that manage hazardous waste with organic concentration of at least 10% by weight have become regulated under the subpart BB standards. Equipment must been in compliance by December 6,1996.

Subpart BB Monitoring Standards

	Light liquid services	**Gas/Vapor services**	**Heavy liquid services**
Pumps	Monthly inspection	NA	Monitor within 5 calendar days, if evidence of a **potential leak*** is found
Compressors	Barrier fluid system must be equipped with sensor which should be checked daily/ if the sensor equipped with audible alarm- check monthly	Same as light liquid	Same as light liquid
Pressure relief devices	Monitor within 5 calendar days, if evidence of a **potential leak** is found	No later than 5 Calendar days after the pressure release, the pressure relief device shall be monitored	Monitor within 5 calendar days, if evidence of a **potential leak** is found
Sampling connecting system	Each connection system must be equipped with a **closed-purge or closed-vent system**	Same as light liquid	Same as light liquid
Flanges and connectors	Monitor within 5 calendar days, if evidence of a **potential leak** is found	Monitor within 5 calendar days, if evidence of a **potential leak** is found	Monitor within 5 calendar days, if evidence of a **potential leak** is found
Valves or lines	Monthly inspection	Monthly inspection	Monitor within 5 calendar days, if evidence of a **potential leak** is found
Open-ended valves or lines	Monthly inspection	Monthly inspection	Monitor within 5 calendar days, if evidence of a **potential leak** is found

Note:

ALL EQUIPMENT MUST BE MARKED, INCLUDING ALL FLANGES AND THREADED CONNECTIONS.

Procedure Used in Determining VO Concentration Using Process Knowledge

3M has taken a conservative approach when applying process knowledge to determine VO concentrations of wastes. Rather than match wastes with the 500 ppmw limit, 3M has declared any waste to be covered by the Part CC rule if it contains an organic compound. This designation is indicated on the waste stream profiles by a Part CC flag. Any questions about this method of determining VO concentrations should be directed to Bob Cook at (612) 778-4353.

A memo concerning satellite accumulation and Subpart CC is contained in section G which should help to clarify point three above.

265.1087 (b)(1)(iii)

This section covers Level 2 containers. The container must be greater than 122 gallons and be in light material service. Section H contains a listing of Level 2 containers.

265.1087 (d)(1)(i), 265.1087 (d)(1)(ii), 265.1087 (d)(1)(iii)

Section H of this manual contains a listing of the Level 2 containers and which of the three methods is used for the container to show compliance. In order to be in compliance, one of three methods must be used:

1. The container must meet DOT regulations.
2. It operates with no detectable emissions as defined in 265.1081 and determined in accordance with the procedure in paragraph (g) of section 265.1087.
3. A container that has been demonstrated in the past 12 months to be vapor tight using 40 CFR part 60, appendix A, Method 27 in accordance with the procedure specified in paragraph (h) of 265.1087.

265.1087(d)(2)

Level 2 waste must be transferred in or out of the container in a way to minimize exposure to the atmosphere. The methods that may be used are:

1. A submerged fill pipe.
2. A vapor balancing system
3. Vapor recovery system
4. Top with fitted-opening and transfer line.

Section H indicates the method used to minimize exposure.

The repair may be delayed beyond 45 calendar days if the owner determines that repair of the defect requires emptying or temporary removal from service of the tank and no alternative tank capacity is available.

Section F of this manual contains a form for the initial and annual inspections. The defect and action taken should be recorded on this form. In addition, the date the defect was discovered and the date the repair was completed should be recorded.

265.1087 (b)(1)(i)

This section covers Level 1 containers. The container must be greater than 26.4 gallons and less than or equal to 122 gallons. Level 1 containers are also those that are not in light material service. This is defined as having one or more organic constituents with a vapor pressure greater than 0.3 kPa (0.04 psi) at 20° C and the constituent is 20% by weight or greater. Containers and container operations are exempt if they have a capacity less than or equal to 26.4 gallons, are used in satellite accumulation, are used by small quantity generators, or are RCRA empty containers.

265.1087 (c)(1)(i), 265.1087 (c)(1)(ii), 265.1087 (c)(1)(iii)

For Level 1 containers to be in compliance, one of three methods must be used:

1. The container must meet DOT regulations. These requirements are listed with each waste stream profile.
2. The container must have a closure or cover such that there are no visible holes gaps or other spaces. Level 1 and 2 containers may be opened when waste is being added, but must be closed when the container is filled to it's intended level; for batch loading, when no additional material is to be added within 15 minutes; when the person performing the filling leaves the immediate vicinity; or when the process generating the waste shuts down.
3. A container in which an organic-vapor suppressing barrier is placed. This method is not currently used at 3M SMD facilities.

Additional important points concerning containers include the following:

4. All Level 1 containers which are used for the storage of hazardous waste at this facility meet DOT regulations which are specified on waste stream profiles. When placed in storage, all containers are required to have covers containing an appropriate gasket. The cover must be tightly secured in such a manner that allows for it's legal transport to an approved offsite location for disposal.
5. If the container is opened for sample collection, the addition of, or the removal of waste, then it must be closed immediately or within 15 minutes after the activity is complete.
6. Waste handling in satellite accumulation areas is exempt from the requirements. All waste packaging requirements are reviewed annually during hazardous waste training.

Section D of this manual. The computer program, Aspen, was used to make the calculations

The emission modeling conducted for those tanks indicated that the vapor pressures of the tanks at the required average annual ambient temperature require Level 1 control (justification for using this temperature is given in a memo contained in "Part CC Rule Summary"). The calculations will be repeated whenever new components are added to the waste stream profile which could cause a tank to fall into the Level 2 classification.

Any questions concerning the method used in making the vapor pressure determinations should be directed to Mike Kemen at (612) 778-4133.

265.1085 (c)(1)-

This section deals with changes in the vapor pressure in a tank due to changes in the hazardous waste managed in the tank. Section E of this manual lists the former vapor pressure, the new vapor pressure, and the date of change. In addition, the status of the tank column indicates if the tank is level 1 or level 2.

Therefore, this section indicates whether a change in hazardous waste managed in the tank could cause the maximum vapor pressure to increase to a level that is greater than or equal to the maximum organic vapor pressure limit for the tank design capacity category specified in paragraph 265.1085 (b)(1)(i)(A)(B)(C)

265.1085 (c)(3)(B)(ii)

This section deals with the proper function of the conservation vent. When operating correctly, there must be no detectable leaks of organics when the vent is in the closed position. Any malfunction and repair of the conservation vent should be noted in Section F of this manual.

265.1085 (c)(4)(i) & 265.1085 (c)(4)(ii)

This section contains inspection requirements for the affected tanks. The owner must do an initial and then an annual inspection of the roof and closure devices for any visible cracks, holes, or gaps. These inspections must be documented. Section F of this manual documents any defects noted.

265.1085 (c)(4)(iii) & 265.1085 (k)(1)(2)
First efforts at repairs must be made within 5 calendar days after detection and must be completed no later than 45 days after detection.

It may be obvious that option 1 will always give a lower vapor pressure than option 2. The purpose of this memo is to explain how either method is justified under the rule. Either method may be chosen depending on site-specific circumstances. Regardless of the method used, documentation should be kept showing how the determination was made.

Please note that the above discussion is applicable only if the tanks are maintained at or near ambient conditions. For tanks that are heated, or that receive waste streams at elevated temperatures, it may be necessary to consider this in the calculation.

Vapor pressure data for pure substances at different temperatures are available from standard chemical or engineering handbooks, or other sources. Mike Kemen has a program to calculate the vapor pressure of mixtures at varying temperatures.

Please see me if you have any questions.

RS

RPS/rps

cc: M. A. Nash - 220-12E-02

File: RCRA Subpart CC

Manual Directory

265.1082 (a)(2)(ii), 265.1082 (a)(2)(iv)(iv)

The effective date of the Subpart CC rule was December 6, 1996. If control equipment is required, an additional 12 months is allowed for compliance until December 8, 1997. Section A of this manual contains an example of an implementation schedule prepared by Dana Schnobrich on January 27, 1996. A plan created by the plant must be readily available in this manual for inspection according to part iv.

265.1084 (a) (4)(a)(4)

These requirements apply to TSD facilities and large-quantity generators that manage hazardous wastes with VO concentrations of 500 ppmw or greater in tanks, surface impoundments, or containers. The VO concentrations may be determined using either direct measurement or process knowledge. For the most part, SMD facilities will be using process knowledge so we are required to prepare documentation which presents the information used as the basis for the owner's or operator's knowledge of the hazardous waste stream's average concentration. Section B of this manual contains this documentation. In addition, a sample Waste Stream Profile with the Subpart CC flag is provided in this section.

265.1085 (b)(1)(i)(A), 265.1085 (b)(1)(i)(B), 265.1085 (b)(1)(i)(C)

This requirement deals with the determination of whether SMD tanks are level 1 or level 2 tanks. The criteria used is vapor pressure and tank capacity. All tanks have conservation vents and a closure devices. Section C of this manual contains a listing of the tanks, their capacity, and whether they are supplied with a conservation vent. In addition, the vapor pressure of the waste stream currently in the tank is given for the % mixture that resulted in the highest value using Aspen. Another value is given for the single compound in the waste stream with the highest vapor pressure.

Tank Size	Vapor Pressure
>= 151 m^3 (approx. 40,000 gal.)	<=5.2 kPa (approx. 0.75 psi)
>= 75 m^3 and ,<151 m^3 (20,000-40,000 gal.)	<=27.6 kPa (4.0 psi)
<75 m^3 (20,000 gal.)	<=76.6 kPa (11.1 psi)

265.1085 (c)(1)

This section requires the maximum vapor pressure to be determined using procedures specified in 265.1084 (c) in order to determine if tanks fall into the level 1 or level 2 category. The SMD plants are using the option listed in section 265.1084 (c)(4), use of knowledge, to determine maximum organic vapor pressure of the hazardous waste. This was done in a memo from Mike Kemen dated February 4, 1997 and is contained in

MANUAL DIRECTORY

265.1050 (b)

This requirement states that equipment that contacts hazardous waste with organic concentrations of at least 10% by weight is subject to the subpart. It will be assumed that all wastes fall into the >10% organic concentration.

265.1050 (3)©

This requirement states that all pieces of equipment to which this subpart applies must be marked. **Section A** of this manual contains forms for the labeling of equipment.

265.1050 (e)

This requirement states that equipment that contains organic wastes with a concentration >10 % by weight for a period of less than 300 hours per year is exempt from the requirements of this rule.

265.1052 (a)(1) Each pump in light liquid storage must be monitored monthly to detect leaks. **Section B** of this manual contains forms for recording this information.

265.1052 (2)

This requirement states that each pump in light liquid service should be checked by visual inspection each week for indicators of liquids dripping from pump seal. **Section C** of this manual contains forms for recording this information.

265.1052 (d)(1)(i)(ii)(iii), 265.1052 (d)(2), 265.1052 (d)(3), 265.1052 (d)(4), 265.1052 (d)(5), 265.1052 (d)(6) **(Optional Requirement)**

Pumps may be exempted from weekly and monthly monitoring if it has a dual mechanical seal system and barrier fluid system and:

1. The dual mechanical seal system is operated with a barrier fluid with a pressure that is greater than the pump stuffing box pressure **or**,
2. Or equipped with a barrier fluid degassing reservoir that is connected by a closed-vent system to a control device **or**,
3. Equipped with a system that purges the barrier fluid into a hazardous waste stream with no detectable emissions to the atmosphere.
4. The barrier fluid system must not be a hazardous waste with organic concentrations 10 % or greater by weight.
5. Each barrier fluid system must be equipped with a sensor that will detect failure of the seal system, the barrier fluid system or both.
6. Each pump must be checked by visual inspection each calendar week.
7. Each sensor must be checked daily or equipped with an audible alarm that must be checked monthly.

Instructions Guide For Subpart BB

This manual has been prepared to assist your plant with compliance with the Part BB rule. It will not automatically assure compliance with the Part BB rule. Some activities that do not require documentation have been excluded. For this reason, it is imperative that you read the rule summary and rule located in the back of the manual before using it as a compliance aid.

To use the manual, turn to the rule directory that reviews the various sections of the parts that were considered pertinent to St. Paul Tape Manufacturing Plant. Then go to the section that is indicated in the directory to access the appropriate form for reporting or proof of compliance purposes. A plan created by the plant must be readily available in this manual for inspection.

If you should have any questions concerning the rule or suggestions for the manual, you can call Adé Babatunde at (651) 778-7674.

Manual Directory

265.1082 (a)(2)(ii), 265.1082 (a)(2)(iv)(iv)

The effective date of the Subpart CC rule was December 6, 1996. If control equipment is required, an additional 12 months is allowed for compliance until December 8, 1997. Section A of this manual contains an example of an implementation schedule prepared by Dana Schnobrich on January 27, 1996. A plan created by the plant must be readily available in this manual for inspection according to part iv.

265.1084 (a) (4)(a)(4)

These requirements apply to TSD facilities and large-quantity generators that manage hazardous wastes with VO concentrations of 500 ppmw or greater in tanks, surface impoundments, or containers. The VO concentrations may be determined using either direct measurement or process knowledge. For the most part, SMD facilities will be using process knowledge so we are required to prepare documentation which presents the information used as the basis for the owner's or operator's knowledge of the hazardous waste stream's average concentration. Section B of this manual contains this documentation. In addition, a sample Waste Stream Profile with the Subpart CC flag is provided in this section.

265.1085 (b)(1)(i)(A), 265.1085 (b)(1)(i)(B), 265.1085 (b)(1)(i)(C)

This requirement deals with the determination of whether SMD tanks are level 1 or level 2 tanks. The criteria used is vapor pressure and tank capacity. All tanks have conservation vents and a closure devices. Section C of this manual contains a listing of the tanks, their capacity, and whether they are supplied with a conservation vent. In addition, the vapor pressure of the waste stream currently in the tank is given for the % mixture that resulted in the highest value using Aspen. Another value is given for the single compound in the waste stream with the highest vapor pressure.

Tank Size	Vapor Pressure
>= 151m^3 (approx. 40,000 gal.)	<=5.2 kPa (approx. 0.75 psi)
>= 75m^3 and ,<151 m^3 (20,000-40,000 gal.)	<=27.6 kPa (4.0 psi)
<75 m^3 (20,000 gal.)	<=76.6 kPa (11.1 psi)

265.1085 (c)(1)

This section requires the maximum vapor pressure to be determined using procedures specified in 265.1084 (c) in order to determine if tanks fall into the level 1 or level 2 category. The SMD plants are using the option listed in section 265.1084 (c)(4), use of knowledge, to determine maximum organic vapor pressure of the hazardous waste. This was done in a memo from Mike Kemen dated February 4, 1997 and is contained in

Section D of this manual. The computer program, Aspen, was used to make the calculations

The emission modeling conducted for those tanks indicated that the vapor pressures of the tanks at the required average annual ambient temperature require Level 1 control (justification for using this temperature is given in a memo contained in "Part CC Rule Summary"). The calculations will be repeated whenever new components are added to the waste stream profile which could cause a tank to fall into the Level 2 classification.

Any questions concerning the method used in making the vapor pressure determinations should be directed to Mike Kemen at (612) 778-4133.

265.1085 (c)(1)

This section deals with changes in the vapor pressure in a tank due to changes in the hazardous waste managed in the tank. Section E of this manual lists the former vapor pressure, the new vapor pressure, and the date of change. In addition, the status of the tank column indicates if the tank is level 1 or level 2.

Therefore, this section indicates whether a change in hazardous waste managed in the tank could cause the maximum vapor pressure to increase to a level that is greater than or equal to the maximum organic vapor pressure limit for the tank design capacity category specified in paragraph 265.1085 (b)(1)(i)(A)(B)(C)

265.1085 (c)(3)(B)(ii)

This section deals with the proper function of the conservation vent. When operating correctly, there must be no detectable leaks of organics when the vent is in the closed position. Any malfunction and repair of the conservation vent should be noted in Section F of this manual.

265.1085 (c)(4)(i) & 265.1085 (c)(4)(ii)

This section contains inspection requirements for the affected tanks. The owner must do an initial and then an annual inspection of the roof and closure devices for any visible cracks, holes, or gaps. These inspections must be documented. Section F of this manual documents any defects noted.

265.1085 (c)(4)(iii) & 265.1085 (k)(1)(2)
First efforts at repairs must be made within 5 calendar days after detection and must be completed no later than 45 days after detection.

The repair may be delayed beyond 45 calendar days if the owner determines that repair of the defect requires emptying or temporary removal from service of the tank and no alternative tank capacity is available.

Section F of this manual contains a form for the initial and annual inspections. The defect and action taken should be recorded on this form. In addition, the date the defect was discovered and the date the repair was completed should be recorded.

265.1087 (b)(1)(i)

This section covers Level 1 containers. The container must be greater than 26.4 gallons and less than or equal to 122 gallons. Level 1 containers are also those that are not in light material service. This is defined as having one or more organic constituents with a vapor pressure greater than 0.3 kPa (0.04 psi) at 20° C and the constituent is 20% by weight or greater. Containers and container operations are exempt if they have a capacity less than or equal to 26.4 gallons, are used in satellite accumulation, are used by small quantity generators, or are RCRA empty containers.

265.1087 (c)(1)(i), 265.1087 (c)(1)(ii), 265.1087 (c)(1)(iii)

For Level 1 containers to be in compliance, one of three methods must be used:

1. The container must meet DOT regulations. These requirements are listed with each waste stream profile.
2. The container must have a closure or cover such that there are no visible holes gaps or other spaces. Level 1 and 2 containers may be opened when waste is being added, but must be closed when the container is filled to it's intended level; for batch loading, when no additional material is to be added within 15 minutes; when the person performing the filling leaves the immediate vicinity; or when the process generating the waste shuts down.
3. A container in which an organic-vapor suppressing barrier is placed. This method is not currently used at 3M SMD facilities.

Additional important points concerning containers include the following:

4. All Level 1 containers which are used for the storage of hazardous waste at this facility meet DOT regulations which are specified on waste stream profiles. When placed in storage, all containers are required to have covers containing an appropriate gasket. The cover must be tightly secured in such a manner that allows for it's legal transport to an approved offsite location for disposal.
5. If the container is opened for sample collection, the addition of, or the removal of waste, then it must be closed immediately or within 15 minutes after the activity is complete.
6. Waste handling in satellite accumulation areas is exempt from the requirements. All waste packaging requirements are reviewed annually during hazardous waste training.

A memo concerning satellite accumulation and Subpart CC is contained in section G which should help to clarify point three above.

265.1087 (b)(1)(iii)

This section covers Level 2 containers. The container must be greater than 122 gallons and be in light material service. Section H contains a listing of Level 2 containers.

265.1087 (d)(1)(i), 265.1087 (d)(1)(ii), 265.1087 (d)(1)(iii)

Section H of this manual contains a listing of the Level 2 containers and which of the three methods is used for the container to show compliance. In order to be in compliance, one of three methods must be used:

1. The container must meet DOT regulations.
2. It operates with no detectable emissions as defined in 265.1081 and determined in accordance with the procedure in paragraph (g) of section 265.1087.
3. A container that has been demonstrated in the past 12 months to be vapor tight using 40 CFR part 60, appendix A, Method 27 in accordance with the procedure specified in paragraph (h) of 265.1087.

265.1087(d)(2)

Level 2 waste must be transferred in or out of the container in a way to minimize exposure to the atmosphere. The methods that may be used are:

1. A submerged fill pipe.
2. A vapor balancing system
3. Vapor recovery system
4. Top with fitted-opening and transfer line.

Section H indicates the method used to minimize exposure.

LEAK DETECTION FORM

Operator Name and 3M ID# _____

Method Used for Leak Detection (Method 21 or Visual) _____

Leak Detection Instrument I.D. _____

Date Evidence of Leak Discovered: _____

Date Leak Detected: _____

Date of Successful Repair: _____

Repair Log

Date of Repair Attempt	Repair Method	Results	

Subpart AA

Subpart AA regulates air emissions from process vents on distillation units, air stripping units, steam stripping units, solvent extraction units, etc., treating hazardous waste with grater than 10 ppmw organics. We probably do not have such units so this part of the rule will not be covered in depth here. If we do feel that the rule applies to some processes, then I will investigate the regulation further.

EQUIPMENT INVENTORY

To be filled out for each pump, compressor, flange, sampling port, and pressure relief-device which contacts a liquid or vapor containing greater than 10% organics.

Equip> I.D.	Hazardous Waste Manage-ment Unit I.D.	Approx. Location	Type of Equipment	% weight by organics	Hazardous Waste State	Mouthed of Compliance (e.g. monthly inspections)

WEEKLY VISUAL INSPECTION FORM

Pumps, Valves, Compressors, Flanges, Sampling Ports, and Pressure Relief Devices

DATE _____ INSPECTED BY: _____

Equipment I.D.	Type of Equipment	Description of Defect Detected	Additional Comments

METHOD 21 MONTHLY INSPECTION FORM

Pumps, Valves, Compressors, Flanges, Sampling Ports, and Pressure Relief Devices

DATE _____ INSPECTED BY: _____

Equipment I.D.	Type of Equipment	PPM Level Detected	Additional Comments

1. Certain pumps may qualify as operating with no detectable emissions, eliminating the monthly monitoring requirement. If instrument readings indicated less than 500 ppmv above background , the frequency of monitoring may be reduced. Contact ET &S for more information.
2. Certain valves may be designated as unsafe-to-monitor or difficult to monitor, allowing for reduced monitoring frequency. Contact ET & S for more information.
3. Valves for which no leak is detected for two consecutive months can convert to a quarterly monitoring schedule.

IF A LEAK IS DETECTED

Pumps, Valves, Compressors, Flanges, Sampling Ports, and Pressure Relief Devices

These steps should be taken:

Labeling Problem Equipment:

1. A waterproof and readily visible identification, marked with the equipment identification number, date evidence of the leak was found, and date leak was detected.
2. The identification of the equipment (except on a valve) may be removed after the leak is repaired.
3. The identification on a valve may be removed after it has been monitored for 2 consecutive months and no leak has been detected during those 2 months.

Record-keeping:

When a leak is detected record the following information (form attached):

1. Instrument and operator identification numbers and equipment identification number.
2. Date evidence of a potential leak was found.
3. Date leak was detected.
4. Dates of each attempt to repair leak.
5. Repair methods applied in each attempt to repair leak.
6. If Method 21 for leak detection continues to read ppm levels greater than 10,000, write "Above 10,000" in "Results" section.
7. If repair is delayed, write "Repair Delayed" in "Repair Method" section, give a reason for the delay, and expected date of successful repair in "Results" section.
8. Date of successful repair.

Record Keeping

1. All leaks and measures taken to repair containers should be documented.
2. If a facility claiming that a waste stream is exempt based on VO concentration <500 ppmw, then the documentation must be kept on how this was determined.
3. A written report must be submitted within 15 days whenever a regulated waste is placed in a tank or container which was previously determined to be non regulated (e.g., based on VO concentration or vapor pressure).

Subpart BB

Subpart BB of RCRA regulates equipment such as pumps, valves, compressors, flanges, sampling ports, and pressure relief devices, which contact hazardous waste containing 10% or more organics. Equipment that contains or contacts hazardous waste for less than 300 hours per year is exempt.

To assure compliance with RCRA Subpart BB, the following are required for pumps and valves in light liquid service:

Work Practices:

1. Each piece of equipment subject to Subpart BB must be marked to be readily distinguished from other equipment (marking technique to be determined by plant personnel).

Inspections*

1. Monitor monthly for leaks using reference Method 21. Readings above 10,000 ppmv indicate a leak.
2. Visually inspect weekly for leaks.

Repairs

1. If a leak is detected, repair as soon as practicable, but must start within 5 days and be completed within 15 calendar days.

Record-Keeping (sample forms enclosed)

1. Equipment Inventory
2. Weekly Inspection sheets
3. Monthly Method 21 Inspection Sheets
4. Leak Detection and Repair Sheets

* To reduce frequency of inspections:

To assure compliance with RCRA Subpart CC, the following steps should be taken:

Container Requirements

Level 1 - One of the following must be met
1. A container meeting DOT regulations
2. Use of a cover and closure devices such that there are no visible holes, gaps, or other open spaces.
3. An open-top container with a vapor suppressing barrier (e.g., foam).

Level 2 - One of the following must be met
1. A container meeting DOT regulations
2. A container that operates with no detectable organic emissions, following a test method specified in the regulation
3. A container that has been demonstrated within the past 12 months to be vapor-tight using a test method in the regulation. (This is applicable to tank trucks and rail cars.)
4. Waste must be transferred into or out of the container in a way to minimize exposure to the atmosphere (submerged fills, vapor balancing systems, etc.).

Work Practices

Level 1 and 2 containers may be opened when waste is being added, but must be closed when:
1. the container is filled to it's intended level
2. for batch loading, when no additional material is to be added within 15 minutes
3. when the person performing the filling leaves the immediate vicinity
4. when the process generating the waste shuts down

Inspections

If Level 1 or 2 containers:
1. are received at a facility from off-site and not emptied within 24 hours, the containers must be visually inspected for visible cracks, holes, gaps, or other open spaces
2. if a level 1 or 2 container remains at a facility for more than 1 year, it must be visually inspected for cracks, holes, gaps, or other open spaces at least every 12 months

Repairs

1. If a defect is detected, repair must begin within 24 hours and be completed within 5 calendar days. If this is not feasible, the waste must be removed from the container.

Record Keeping

1. Inspection dates/results, determination of maximum organic vapor pressure

HAZARDOUS WASTE TANK ANNUAL INSPECTION

Date of Inspection: _____ Inspected By: _____

Location Of Defect Found	Description of Defect Found	Action Taken	Additional Comments

Containers

Similar to tanks, containers are classified into various levels under RCRA Subpart CC. Included in the definition of a container are drums, interim bulk containers (totes), roll-offs, rail cars, tank trucks, and similar portable units. Containers less than 26.4 gallons, containers used in satellite accumulation, and RCRA empty containers are exempt from his rule. Additionally, containers storing product or raw materials are not regulated under this rule.

Only containers containing 500 ppmv or more fall under this rule. This determination has done at corporate level with plant assistance using the Waste Stream Profile system.

Level 1 standards apply to containers <= 122 gallons or to any size container not in light storage service (Light Storage Service - one or more organic constituents with a vapor pressure greater than 0.3 kPa (0.04 psi) at 20 °C.

Level 2 containers apply to containers > 122 gallons that are in light material service.

RCRA Subpart CC and BB Compliance
3M St. Paul Tape Manufacturing Plant
August 20, 1997

Subpart CC - Tanks and Containers

Subpart CC applies to TSD facilities and large-quantity generators that utilize tanks, surface impoundments, or containers to manage hazardous wastes with volatile organic concentrations of 500 ppmw or greater.

Tanks

Within Subpart CC, two tank classifications are outlined. Level 1 tanks meet the following criteria. If a tank does not meet these criteria, it is classified as a level 2 tank.

Tank Size	Maximum Operating Vapor Pressure
>= 151 m^3 (approx. 40,000 gal)	<= 5.2 kPa (approx. 0.75 psi)
>= 75m^3 and < 151 m3 (20,000-40000 gal)	<= 27.6 kPa (4.0 psi)
<75 m^3 (20,000 gal)	<= 76.6 kPa (11.1 psi)

Adé Babatunde has determined the vapor pressures of the affected tanks at the St. Paul Tape. The calculations are contained in appendix of this Implementation. Based on these results, it appears that all tanks may be declared as level 1 if the annual average temperature used for vapor pressure determination. Therefore, no pollution control will be needed on the tanks that are affected by the rule.

To assure compliance with RCRA Subpart CC, the following steps must be taken:

Work Practices

1. Openings to the tank must be secured on the closed position except to provide access for sampling, inspection, maintenance, etc.
2. Check that the conservation vent is functioning properly. No detectable emissions should be present when the vent is in the closed position. (this should be included in the annual inspection)

Inspections

1. The roof and closure devices must be visually inspected annually for visible cracks, holes or gaps. These inspections must be documented. The last visual inspection occurred on _____ The next inspection should occur on _____.

Repairs

1. If defects are detected, repairs must begin within five calendar days and be completed within 45 calendar days

Record Keeping

1. Inspection dates/results, determination of maximum organic vapor pressure

HAZARDOUS WASTE TANK ANNUAL INSPECTION

Date of Inspection: _____ Inspected By: _____

Location Of Defect Found	Description of Defect Found	Action Taken	Additional Comments

Containers

Similar to tanks, containers are classified into various levels under RCRA Subpart CC. Included in the definition of a container are drums, interim bulk containers (totes), roll-offs, rail cars, tank trucks, and similar portable units. Containers less than 26.4 gallons, containers used in satellite accumulation, and RCRA empty containers are exempt from his rule. Additionally, containers storing product or raw materials are not regulated under this rule.

Only containers containing 500 ppmv or more fall under this rule. This determination has done at corporate level with plant assistance using the Waste Stream Profile system.

Level 1 standards apply to containers <= 122 gallons or to any size container not in light storage service (Light Storage Service - one or more organic constituents with a vapor pressure greater than 0.3 kPa (0.04 psi) at 20 °C.

Level 2 containers apply to containers > 122 gallons that are in light material service.

To assure compliance with RCRA Subpart CC, the following steps should be taken:

Container Requirements

Level 1 - One of the following must be met
1. A container meeting DOT regulations
2. Use of a cover and closure devices such that there are no visible holes, gaps, or other open spaces.
3. An open-top container with a vapor suppressing barrier (e.g., foam).

Level 2 - One of the following must be met
1. A container meeting DOT regulations
2. A container that operates with no detectable organic emissions, following a test method specified in the regulation
3. A container that has been demonstrated within the past 12 months to be vapor-tight using a test method in the regulation. (This is applicable to tank trucks and rail cars.)
4. Waste must be transferred into or out of the container in a way to minimize exposure to the atmosphere (submerged fills, vapor balancing systems, etc.).

Work Practices

Level 1 and 2 containers may be opened when waste is being added, but must be closed when:
1. the container is filled to it's intended level
2. for batch loading, when no additional material is to be added within 15 minutes
3. when the person performing the filling leaves the immediate vicinity
4. when the process generating the waste shuts down

Inspections

If Level 1 or 2 containers:
1. are received at a facility from off-site and not emptied within 24 hours, the containers must be visually inspected for visible cracks, holes, gaps, or other open spaces
2. if a level 1 or 2 container remains at a facility for more than 1 year, it must be visually inspected for cracks, holes, gaps, or other open spaces at least every 12 months

Repairs

1. If a defect is detected, repair must begin within 24 hours and be completed within 5 calendar days. If this is not feasible, the waste must be removed from the container.

Record Keeping

1. All leaks and measures taken to repair containers should be documented.
2. If a facility claiming that a waste stream is exempt based on VO concentration <500 ppmw, then the documentation must be kept on how this was determined.
3. A written report must be submitted within 15 days whenever a regulated waste is placed in a tank or container which was previously determined to be non regulated (e.g., based on VO concentration or vapor pressure).

Subpart BB

Subpart BB of RCRA regulates equipment such as pumps, valves, compressors, flanges, sampling ports, and pressure relief devices, which contact hazardous waste containing 10% or more organics. Equipment that contains or contacts hazardous waste for less than 300 hours per year is exempt.

To assure compliance with RCRA Subpart BB, the following are required for pumps and valves in light liquid service:

Work Practices:

1. Each piece of equipment subject to Subpart BB must be marked to be readily distinguished from other equipment (marking technique to be determined by plant personnel).

Inspections*

1. Monitor monthly for leaks using reference Method 21. Readings above 10,000 ppmv indicate a leak.
2. Visually inspect weekly for leaks.

Repairs

1. If a leak is detected, repair as soon as practicable, but must start within 5 days and be completed within 15 calendar days.

Record-Keeping (sample forms enclosed)

1. Equipment Inventory
2. Weekly Inspection sheets
3. Monthly Method 21 Inspection Sheets
4. Leak Detection and Repair Sheets

* To reduce frequency of inspections:

1. Certain pumps may qualify as operating with no detectable emissions, eliminating the monthly monitoring requirement. If instrument readings indicated less than 500 ppmv above background , the frequency of monitoring may be reduced. Contact ET &S for more information.
2. Certain valves may be designated as unsafe-to-monitor or difficult to monitor, allowing for reduced monitoring frequency. Contact ET & S for more information.
3. Valves for which no leak is detected for two consecutive months can convert to a quarterly monitoring schedule.

IF A LEAK IS DETECTED

Pumps, Valves, Compressors, Flanges, Sampling Ports, and Pressure Relief Devices

These steps should be taken:

Labeling Problem Equipment:

1. A waterproof and readily visible identification, marked with the equipment identification number, date evidence of the leak was found, and date leak was detected.
2. The identification of the equipment (except on a valve) may be removed after the leak is repaired.
3. The identification on a valve may be removed after it has been monitored for 2 consecutive months and no leak has been detected during those 2 months.

Record-keeping:

When a leak is detected record the following information (form attached):

1. Instrument and operator identification numbers and equipment identification number.
2. Date evidence of a potential leak was found.
3. Date leak was detected.
4. Dates of each attempt to repair leak.
5. Repair methods applied in each attempt to repair leak.
6. If Method 21 for leak detection continues to read ppm levels greater than 10,000, write "Above 10,000" in "Results" section.
7. If repair is delayed, write "Repair Delayed" in "Repair Method" section, give a reason for the delay, and expected date of successful repair in "Results" section.
8. Date of successful repair.

EQUIPMENT INVENTORY

To be filled out for each pump, compressor, flange, sampling port, and pressure relief-device which contacts a liquid or vapor containing greater than 10% organics.

Equip> I.D.	Hazardous Waste Manage-ment Unit I.D.	Approx. Location	Type of Equipment	% weight by organics	Hazardous Waste State	Mouthed of Compliance (e.g. monthly inspections)

WEEKLY VISUAL INSPECTION FORM

Pumps, Valves, Compressors, Flanges, Sampling Ports, and Pressure Relief Devices

DATE _____ INSPECTED BY: _____

Equipment I.D.	Type of Equipment	Description of Defect Detected	Additional Comments

METHOD 21 MONTHLY INSPECTION FORM

Pumps, Valves, Compressors, Flanges, Sampling Ports, and Pressure Relief Devices

DATE _____ INSPECTED BY: _____

Equipment I.D.	Type of Equipment	PPM Level Detected	Additional Comments

LEAK DETECTION FORM

Operator Name and 3M ID# _____

Method Used for Leak Detection (Method 21 or Visual) _____

Leak Detection Instrument I.D. _____

Date Evidence of Leak Discovered: _____

Date Leak Detected: _____

Date of Successful Repair: _____

Repair Log

Date of Repair Attempt	Repair Method	Results	

Subpart AA

Subpart AA regulates air emissions from process vents on distillation units, air stripping units, steam stripping units, solvent extraction units, etc., treating hazardous waste with grater than 10 ppmw organics. We probably do not have such units so this part of the rule will not be covered in depth here. If we do feel that the rule applies to some processes, then I will investigate the regulation further.

Instructions Guide For Subpart BB

This manual has been prepared to assist your plant with compliance with the Part BB rule. It will not automatically assure compliance with the Part BB rule. Some activities that do not require documentation have been excluded. For this reason, it is imperative that you read the rule summary and rule located in the back of the manual before using it as a compliance aid.

To use the manual, turn to the rule directory that reviews the various sections of the parts that were considered pertinent to St. Paul Tape Manufacturing Plant. Then go to the section that is indicated in the directory to access the appropriate form for reporting or proof of compliance purposes. A plan created by the plant must be readily available in this manual for inspection.

If you should have any questions concerning the rule or suggestions for the manual, you can call Adé Babatunde at (651) 778-7674.

3M Internal Correspondence

TO: ET&S Environmental Operations - 41-01-05

FROM: R. P. Siegel - Env. Tech. & Serv. - 41-01-05

SUBJECT: Subpart CC - Vapor Pressure Determination

DATE: March 13, 1997

This is a follow-up to my memo of November 25, 1996, summarizing the requirements of the RCRA Subpart CC rules, Organic Air Emission Standards for Tanks, Surface Impoundments, and Containers (40 CFR 264 and 265). These rules apply to tanks and containers used to manage hazardous wastes having at least 500 parts per million by weight (ppmw) of volatile organics (VO). Please refer to that memo for a detailed description of these requirements.

In the section of Subpart CC addressing tank requirements (§264.1084 and §265.1085), two levels of emissions control are given, designated as Level 1 and Level 2, based on tank size and vapor pressure. Level 1 requirements are relatively simple to meet, in most cases requiring only the addition of a conservation vent. Level 2 tanks are required to have an emissions control device achieving 95% control.

Tanks qualify for Level 1 if they meet the following size and vapor pressure criteria (all conversions are approximate):

Tank Size	Vapor Pressure
$\geq 151\ m^3$ (approx. 40,000 gal.)	≤ 5.2 kPa (approx. 0.75 psi)
$\geq 75\ m^3$ and $< 151 m^3$ (20,000-40,000 gal.)	≤ 27.6 kPa (4.0 psi)
$< 75\ m^3$ (20,000 gal.)	≤ 76.6 kPa (11.1 psi)

All tanks which do not meet the Level 1 criteria must comply with Level 2 requirements. The requirements for each level are detailed in my 11/25/96 memo.

Vapor pressure may be determined either by direct measurement, or by use of knowledge. One issue that was not addressed in the rule, and may not have been considered by EPA, is that vapor pressure is strongly temperature dependent. Guidance is not given on what temperature to use in the evaluation, and when questioned, EPA was not able to provide guidance. However, either of the following options can be justified for the reasons given:

1. Average annual ambient temperature - One option given in the rule for determining the vapor pressure is to use API 2517, "Evaporative Loss from External Floating Roof Tanks." This method uses the average annual ambient temperature in its calculations, and includes a table of average temperatures for major cities in each state. See me if you need this data. Since this API method is referenced in the rule, the use of annual average temperature is justified.

2. Maximum monthly average temperature - Several other federal regulations that deal with VO emissions from storage tanks (NSPS, MACT) specify the use of either API 2517, or the maximum monthly average temperature (usually July). This data is available from various sources. Use of the maximum monthly average temperature would be consistent with other federal regulations addressing similar issues.

Applicability

These requirements apply to TSD facilities and to large-quantity generators that manage hazardous wastes with VO concentrations of 500 ppmw or greater in tanks, surface impoundments, or containers. Units that are exempt from RCRA TSD and generator requirements (e.g., wastewater treatment, elementary neutralization, emergency spill containment, small quantity generators, satellite accumulation, empty containers) are also exempt from Subpart CC. Aditional exemptions include units used for on-site RCRA or CERCLA corrective action, containers $\leq 0.1 m^3$ (26.4 gal.), and units that do not receive hazardous waste after December 6, 1996.

The VO concentration in the waste may be determined using either direct measurement or process knowledge. If direct measurement is used, a documented sampling plan is required. It is expected that most 3M locations will take advantage of the process knowledge option, using Waste Stream Profile data.

Tanks

There are two levels of emission control requirements for tanks, designated as Level 1 and Level 2. Tanks qualify for Level 1 if they meet the following size and vapor pressure criteria (all conversions are approximate):

Tank Size	Vapor Pressure
$\geq 151\ m^3$ (approx. 40,000 gal.)	≤ 5.2 kPa (approx. 0.75 psi)
$\geq 75\ m^3$ and $< 151 m^3$ (20,000-40,000 gal.)	≤ 27.6 kPa (4.0 psi)
$< 75\ m^3$ (20,000 gal.)	≤ 76.6 kPa (11.1 psi)

All tanks which do not meet the Level 1 criteria must comply with Level 2 requirements.

Tanks that qualify for Level 1 controls must do the following:

- Determine the maximum operating vapor pressure (MOVP) for each waste stream in the tank. This can be done by either direct measurement or by process knowledge. MOVP should be determined at the maximum operating temperature of the tank.
- The tank must have a fixed roof with no visible cracks, holes, gaps, or other open spaces.
- All openings to the tank must be secured in the closed position except to provide access for sampling, inspection, maintenance, etc.
- A conservation vent is allowed for pressure-vacuum relief, which must operate with no detectable emissions in the closed position. Settings on the conservation vent shall be established based on the design of the tank. Other safety devices (e.g., a rupture disk) are also allowed.
- The roof and closure devices must be visually inspected at the start of the program, and annually thereafter, for visible cracks, holes or gaps. These inspections must be documented. If defects are detected, repairs must begin within 5 calendar days and be completed within 45 calendar days.

Tanks that qualify for Level 2 controls must meet the requirements for Level 1, and in addition emissions must be vented to a control device achieving 95% control. The conservation vent option is not addressed in Level 2, since this would also need to be vented to a control device.

Other options allowed for Level 2, other than the fixed roof/control device, include internal floating roof, external floating roof, pressure tank with no emissions, and a tank located inside an enclosure which is vented to a control device. Detailed requirements are given for each option, but since these are not commonly used for wastes at 3M locations, they are not described in this memo.

Surface Impoundments

It is believed that the surface impoundment requirements do not impact 3M operations. Please notify ET&S if you have a surface impoundment which may be subject to RCRA.

Containers

"Containers" includes drums, totes, roll-offs, rail cars, tank trucks, and similar portable units. Again, the Subpart CC rule applies only to those containers used to manage waste streams with a VO concentration of 500 ppmw or more. The following container or container operations are exempt from this rule: containers with capacity $\leq 0.1\ m^3$ (26.4 gal.), containers used in satellite accumulation, containers used by small quantity generators, and RCRA empty containers.

Containers are designated as Container Level 1, 2, or 3, based based on their design and use. Container Level 1 standards apply to containers $\leq 0.46\ m^3$ (approx. 122 gal.), or to any size container not in light material service. ("Light material service" is defined as having one or more organic constituents with a vapor pressure greater than 0.3 kPa [0.04 psi] at 20°C, and the concentration of such constituents is 20% by weight or greater.) Container Level 2 standards apply to containers great than $0.46\ m^3$ that are in light material service. Container Level 3 applies to containers used to treat a hazardous waste by waste stabilization. Container Level 3 requirements are not discussed in this memo.

For Container Level 1, one of the following must be used:

- A container meeting DOT regulations
- Use of a cover and closure device such that there are no visible holes, gaps, or other open spaces.
- An open-top container with a vapor suppressing barrier (e.g., foam).

In addition, for Level 1 containers with capacity $\geq 0.46\ m^3$ (122 gal.) which do not meet DOT regulations, documentation must be kept to show how it was determined that they are not in light material service.

For Container Level 2, one of the following must be used:

- A container meeting DOT regulations
- A container that operates with no detectable organic emissions, following a test method specified in the regulation.
- A container that has been demonstrated within the past 12 months to be vapor-tight, using a test method specified in the regulation. (This is applicable to tank trucks and rail cars.)

Level 1 and 2 containers may be opened when waste is being added, but must be closed when the container is filled to its intended level; for batch loading, when no additional material is to be added within 15 minutes; when the person performing the filling leaves the imeediate vicinity; or when the process generating the waste shuts down. Similar criteria are given for removal of waste from these container.

Other requirements for Container Levels 1 and 2:

- If Level 1 or 2 containers are received at a facility from off-site and not emptied within 24 hours, the containers must be visually inspected for visible cracks, holes, gaps or other open spaces.
- If a Level 1 or 2 container remains at a facility for more than 1 year, it must be visually inspected for cracks, holes, gaps or other open spaces at least every 12 months.
- If a defect is detected, repair must begin within 24 hours and be completed within 5 calendar days. If this is not feasible, the waste must be removed from the container.

An additional requirement for Level 2 containers is that waste must be transferred in or out of the container in a way to minimize exposure to the atmosphere. Examples of acceptable procedures include submerged fills and vapor balancing systems.

Closed-vent Systems and Control Devices

Very explicit and detailed requirements are given for these devices. Since these are expected to have limited application within 3M, these are not summarized in this memo. If you will be subject to the control device requirement, please notify your ET&S contact to develop a compliance plan.

Inspection and Monitoring

A written plan must be prepared to address the inspections and monitoring requried for tanks, containers, and control devices. This should be incorporated into existing inspection procedures, which in most cases already comply.

Recordkeeping

Records must be kept at the facility for the following, if applicable. All records must be retained for 3 years, unless otherwise indicated.

- Tanks - tank ID, inspection dates/results, determination of maximum organic vapor pressure (Level 1 only)

- Closed-vent system and control device - certification of design (retain for life of equipment), performance tests, maintenance, malfunctions

- Tanks and containers - if any facility is claiming that a waste stream is exempt based on a VO concentration <500 ppmw, then documentation must kept on how this was determined. The revised Waste Stream Profiles will provide this documentation.

Reporting Requirements

A written report must be submitted to EPA within 15 days whenever a regulated waste is placed in a tank or container which was previously determined to be non-regulated (e.g., based on VO concentration or vapor pressure). For tanks using control devices, a semi-annual report is required for any period in which the device did not operate as designed for 24 hours or longer.

Procedure Used in Determining VO Concentration Using Process Knowledge

3M has taken a conservative approach when applying process knowledge to determine VO concentrations of wastes. Rather than match wastes with the 500 ppmw limit, 3M has declared any waste to be covered by the Part CC rule if it contains an organic compound. This designation is indicated on the waste stream profiles by a Part CC flag. Any questions about this method of determining VO concentrations should be directed to Bob Cook at (612) 778-4353.

SECTION A - SUB PART BB EQUIPMENT LIST

Equipment Tag #	Locations in Plant	Type of Equipment	Number of Items	% By Wt. Total Org.	Hazardous Waste State In Equip.	Method of Compliance
1	Building 51 - Top of Haz. Waste Tank	Threaded	5			
2	Building 51 - Top of Haz. Waste Tank	Threaded	2			
		Ball Valve	1			
3	Building 51 - Top of Haz. Waste Tank	Threaded	2			
4	Building 51 - Top of Haz. Waste Tank	Ball Valve	1			
		Flange	1			
5	Building 51 - Top of Haz. Waste Tank	Flange	2			
6	Building 51 - Top Rear of Haz. Waste Tank	Flange	2			
7	Building 51 - Top Rear of Haz. Waste Tank	Flange	2			
8	Building 51 - Bottom Rear of Haz. Waste Tank	Threaded	3			
		Open-End	1			
9	Building 51 - Bottom Rear of Haz. Waste Tank	Flange	2			
		Ball Valve	1			
10	Building 51 - Bottom Rear of Haz. Waste Tank	Ball Valve	1			
		Threaded	3			
11	Building 51 - Bottom Rear of Haz. Waste Tank	Flange	3			
12	Building 51 - Bottom Rear of Haz. Waste Tank	Flange	2			
13	Building 51 - Bottom Rear of Haz. Waste Tank	Flange	3			
		Threaded	1			
		Checked Valve	1			
14	Building 51 - Bottom Rear of Haz. Waste Tank	Threaded	2			
15	Building 51 - Bottom Rear of Haz. Waste Tank	Flange	3			
16	Building 51 - Bottom Rear of Haz. Waste Tank	Threaded	2			

SECTION A - SUB PART BB EQUIPMENT LIST

Equipment Tag #	Locations in Plant	Type of Equipment	Number of Items	% By Wt. Total Org.	Hazardous Waste State In Equip.	Method of Compliance
17	Building 51 - Bottom Rear of Haz. Waste Tank	Threaded	2			
18	Building 51 - Bottom Rear of Haz. Waste Tank	Flange	3			
		Gate Valve	1			
19	Building 51 - Bottom Rear of Haz. Waste Tank	Flange	3			
20	Building 51 - Bottom Rear of Haz. Waste Tank	Flange	2			
		Open-End	1			
		Ball Valve	1			
21	Building 51 - Bottom Rear of Haz. Waste Tank	Flange	2			
		Threaded	2			
22	Building 51 - Bottom Rear of Haz. Waste Tank	Threaded	3			
		Flange	2			
23	Building 51 - Bottom Front of Haz. Waste Tank	Threaded	1			
		Open-End	1			
24	Building 51 - Bottom Front of Haz. Waste Tank	Threaded	2			
25	Building 51 - Bottom Front of Haz. Waste Tank	Manhole	1			
26	Building 51 - Bottom Front of Haz. Waste Tank	Flange	1			
		Threaded	7			
		Open-End	1			
27	Building 51 - Top Rear of Haz. Waste Tank	Flange	1			
28	Building 51 - Top Rear of Haz. Waste Tank	Threaded	1			
		Open-End	1			
		Flange	2			
		Gate Valve	1			

SECTION A - SUB PART BB EQUIPMENT LIST

Equipment Tag #	Locations in Plant	Type of Equipment	Number of Items	% By Wt. Total Org.	Hazardous Waste State In Equip.	Method of Compliance
1	Building 51 - Top of Haz. Waste Tank	Threaded	5			
2	Building 51 - Top of Haz. Waste Tank	Threaded	2			
		Ball Valve	1			
3	Building 51 - Top of Haz. Waste Tank	Threaded	2			
4	Building 51 - Top of Haz. Waste Tank	Ball Valve	1			
		Flange	1			
5	Building 51 - Top of Haz. Waste Tank	Flange	2			
6	Building 51 - Top Rear of Haz. Waste Tank	Flange	2			
7	Building 51 - Top Rear of Haz. Waste Tank	Flange	2			
8	Building 51 - Bottom Rear of Haz. Waste Tank	Threaded	3			
		Open-End	1			
9	Building 51 - Bottom Rear of Haz. Waste Tank	Flange	2			
		Ball Valve	1			
10	Building 51 - Bottom Rear of Haz. Waste Tank	Ball Valve	1			
		Threaded	3			
11	Building 51 - Bottom Rear of Haz. Waste Tank	Flange	3			
12	Building 51 - Bottom Rear of Haz. Waste Tank	Flange	2			
13	Building 51 - Bottom Rear of Haz. Waste Tank	Flange	3			
		Threaded	1			
		Checked Valve	1			
14	Building 51 - Bottom Rear of Haz. Waste Tank	Threaded	2			
15	Building 51 - Bottom Rear of Haz. Waste Tank	Flange	3			
16	Building 51 - Bottom Rear of Haz. Waste Tank	Threaded	2			

SECTION A - SUB PART BB EQUIPMENT LIST

Equipment Tag #	Locations in Plant	Type of Equipment	Number of Items	% By Wt. Total Org.	Hazardous Waste State In Equip.	Method of Compliance
17	Building 51 - Bottom Rear of Haz. Waste Tank	Threaded	2			
18	Building 51 - Bottom Rear of Haz. Waste Tank	Flange	3			
		Gate Valve	1			
19	Building 51 - Bottom Rear of Haz. Waste Tank	Flange	3			
20	Building 51 - Bottom Rear of Haz. Waste Tank	Flange	2			
		Open-End	1			
		Ball Valve	1			
21	Building 51 - Bottom Rear of Haz. Waste Tank	Flange	2			
		Threaded	2			
22	Building 51 - Bottom Rear of Haz. Waste Tank	Threaded	3			
		Flange	2			
23	Building 51 - Bottom Front of Haz. Waste Tank	Threaded	1			
		Open-End	1			
24	Building 51 - Bottom Front of Haz. Waste Tank	Threaded	2			
25	Building 51 - Bottom Front of Haz. Waste Tank	Manhole	1			
26	Building 51 - Bottom Front of Haz. Waste Tank	Flange	1			
		Threaded	7			
		Open-End	1			
27	Building 51 - Top Rear of Haz. Waste Tank	Flange	1			
28	Building 51 - Top Rear of Haz. Waste Tank	Threaded	1			
		Open-End	1			
		Flange	2			
		Gate Valve	1			

SECTION A - SUB PART BB EQUIPMENT LIST

Equipment Tag #	Locations in Plant	Type of Equipment	Number of Items	% By Wt. Total Org.	Hazardous Waste State In Equip.	Method of Compliance
29	Building 51 - Top Rear of Haz. Waste Tank	Flange	2			
30	Building 22 - Haz. Waste Transfer Room	Pump	1			
31	Building 22 - Haz. Waste Transfer Room	Threaded	6			
		Open-End	1			
32	Building 22 - Haz. Waste Transfer Room	Threaded	4			
		Ball Valve	1			
33	Building 22 - Haz. Waste Transfer Room	Threaded	2			
		Ball Valve	1			
34	Building 22 - Haz. Waste Transfer Room	Flange	2			
		Ball Valve	1			
35	Building 22 - Haz. Waste Transfer Room	AOV Valve	1			
		Flange	2			
		Threaded	2			
36	Building 22 - Haz. Waste Transfer Room	Flange	1			
37	Building 22 - Solvent Wash Room	Flange	1			
38	Building 22 - Solvent Wash Room	Flange	2			
		Open-End	1			
39	Building 22 - CO2 Room	Flange	2			
40	Building 22 - Solvent Wash Room	Threaded	2			
		Open-End	1			
41	Building 22 - Solvent Wash Room	Threaded	3			
42	Building 22 - Solvent Wash Room	Threaded	5			
		Open-End	1			

SECTION B - MONTHLY PUMP LEAK DETECTION

Equipment Tag #	Date of Test	Inst. I.D. #	Operator I.D. #	Background (ppm)	Test (ppm)	Date Begin Repairs	Date Finish Repairs	Method of Repair	Signature
30	6/23/99	PID		2	2				

SECTION C - WEEKLY PUMP INSPECTION FORM

Equipment Tag #	Date of Inspection	Liquids Observed (Y/N)	Date Evidence of Leak	Date Begin Repair	Date Finish Repair	Method of Repair	Signature
30	6/23/99	N					

SECTION D - PUMP EXEMPTION FORM

			Comply With One Of Three					Comply With Either						
Date	Dual Mechanical Seal (Y/N)	Barrier Fluid System (Y/N)	Barrier Fluid > Stuff Box (Y/N)	Degassing Reservoir & Control (Y/N)	Barrier Fluid Purge (Y/N)	Barrier Fluid <10 % Org (Y/N)	Barrier Fluid Sensor (Y/N)	Visual Weekly Inspect. (Y/N)	Daily Sensor Check (Y/N)	Auto Alarm Monthly Check (Y/N)	Leak (Y/N)	Date Begin Repair	Date Finish Repair	Signature

SECTION E - EXEMPT PUMPS BASED ON <500 PPM ABOVE BACKGROUND

Equipment I.D. #	Date Initial Test	Instrument I.D.	Operator I.D.	Back Ground (ppm)	Initial Test (ppm)	Date Annual Test	Annual Test (ppm)	External Shaft Penetrate (Y/N)	Operate With <500 ppm (Y/N)	Signature

SECTION F - Monthly VALVE INSPECTION FORM

Equipment I.D. #	Date Tested	Instrument I.D. #	Operator I.D. #	Back Ground (ppm)	Test (ppm)	Date Repair Begun	Date Repair Completed	Repair Method	Signature
2	6/23/99	PID		16	20				
4	6/23/99	PID		16	20				
9	6/23/99	PID		3	3				
10	6/23/99	PID		4	4				
13	6/23/99	PID		4	4				
18	6/23/99	PID		4	4				
20	6/23/99	PID		4	4				
28	6/23/99	PID		3	6				
32	6/23/99	PID		2	3				
33	6/23/99	PID		2	2				
34	6/23/99	PID		2	2				
35	6/23/99	PID		2	2				

SECTION G - QUARTERLY VALVE MONITORING FORM

(<500 ppm for 2 months)

Equipment I.D. #	Date Of Test	Instrument I.D. #	Operator I.D. #	Back Ground (ppm)	ppm Month 1	ppm Month 2	ppm Quarter 1	ppm Quarter 2	ppm Quarter 3	ppm Quarter 4	Signature

SECTION H - EXEMPT VALVE FORM (<500 PPM)

Equipment I.D. #	Date Of Test	Instrument I.D. #	Operator I.D. #	Background (ppm)	Test (ppm)	External Actuating Mechanism (Y/N)	Signature

SECTION I - UNSAFE-TO-MONITOR VALVES

Equipment I.D. #	Reason Valve Declared Unsafe	Date Monitored	Instrument I.D. #	Operator I.D. #	Background (ppm)	Test (ppm)	Signature

Section J: UNSAFE VALVES WRITTEN PLAN

SECTION K - DIFFICULT -TO-MONITOR VALVES

Equipment I.D. #	Reason Valve Declared Unsafe	Date Monitored	Instrument I.D. #	Operator I.D. #	Background (ppm)	Test (ppm)	Signature