



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

APR 29 2010

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Ms Jen Cowman
3M EHS Operations
3M Center
Building 224-5W-03
St. Paul, MN 55144

Dear Ms Cowman:

We have reviewed your testing protocol submitted on April 16, 2010, for an upcoming emissions test at the 3M facility in Elyria, Ohio. The operation manufactures cellulose sponges and is subject to the requirements of 40 CFR Part 63, Subpart UUUU, National Emission Standards for Hazardous Air Pollutants from Cellulose Products Manufacturing. The Environmental Protection Agency's Office of Air Quality Planning and Standards has the delegated authority to approve major alternatives to test methods and procedures submitted under 40 CFR 63.7(f), and this letter serves to render the decision.

Your facility is required to conduct a demonstration under Section 63.5535(g) to determine compliance with the emission limits (for the viscose process vents, reduction of total uncontrolled sulfide emissions) set forth in Table 1 of Subpart UUUU. In particular, your affected operation must reduce uncontrolled sulfide emissions by at least 75 percent based on a 6-month rolling average. Method 15 of 40 CFR Part 60, Appendix A is required in Table 4 of Subpart UUUU for measuring total sulfides.

You ask to use modifications to Method 15 that the Agency has approved for your facility in the past when under prior management. Specifically, instead of obtaining the samples by direct interface to the gas chromatograph, you desire to collect composite samples in Tedlar bags over a 1.5-hour period and analyze within 24 hours. Three composite samples would be collected. You would maintain the bags at a temperature 10 degrees warmer than the temperature of the stack between collection and analysis. You note that sampling times will not be selected to favor periods of high emissions which would translate into higher efficiency determinations.

We believe the modifications to Method 15 you ask to use are acceptable. We, therefore, grant approval for their use to satisfy the requirements of Subpart UUUU at your 3M facility. Since this alternative method is applicable to other similar facilities in this source category, we will be posting this letter on our website at <http://www.epa.gov/ttn/emc/approalt.html> for use by other interested parties.

If you have questions or would like to discuss the matter further, please call Foston Curtis at (919) 541-1063, or you may e-mail him at curtis.foston@epa.gov.

Sincerely,



Conniesue B. Oldham, Ph.D., Group Leader
Measurements Technology Group

cc: Foston Curtis (E143-02))
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