



July 16, 2008

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95812
Submitted electronically via <http://www.arb.ca.gov/lispub/comm/bclist.php>

Dear Board Members:

3M appreciates the opportunity to provide comments on the Modified Text for the Regulation to Limit Ozone Emissions from Indoor Air Cleaning Devices. Our comments are listed below.

- Section 94804 (a) – Sentence three indicates that the application must be completed and signed by both the manufacturer and the test facility. While this may be a viable option in some cases, it may also be time-consuming and inconvenient to exchange files with the test laboratory and further burden both parties. 3M requests that a stand-alone document containing the required information from the test facility may alternatively be attached to the manufacturer's section of the application (*i.e.*, an attachment to the application instead of an integral part of the application).
- Section 94804 (c)(4)(D) – A chain of custody form is required. The requirements for chain of custody do not appear to be identified in the regulation or in the application, so the status of whether any individual chain of custody is acceptable is unclear. 3M requests clarification on this point.
- Section 94808 – Manufacturers, distributors, retailers, sellers, and test laboratories are required to maintain production, quality control, sales, or testing records for products sold, supplied, offered for sale, introduced into commerce, or manufactured for sale within California for at least three years, and to make those records available to the Air Resources Board upon request. It is possible for 3M, a manufacturer of air cleaning devices, to maintain these records at a national level. However, there are many factors that make tracking sales and distribution specific to California very difficult. 3M requests that national data be acceptable for this recordkeeping requirement.

Thank you for your consideration of 3M's comments. Please contact me via phone (651-736-5932) or email (cfjacobson@mmm.com) if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Catherine Jacobson". The signature is written in a cursive style with a long, sweeping tail on the "n" of "Jacobson".

Catherine F. Jacobson, Ph.D., DABT
Advanced Toxicology Specialist