



September 28, 2000

Federal Express

Ms. Julie Spyers
U. S. EPA
The Performance Track Information Center
C/O Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

Dear Ms. Spyers:

Enclosed are applications from four (4) 3M facilities for participation in U. S. EPA's National Environmental Achievement Track Program. Those four facilities are:

- 1) 3M Dental Products Division Facility in Irvine, CA *A09-0016*
- 2) 3M Electrical Products Division Facility in New Ulm, MN *A05-0039*
- 3) 3M Traffic Control Materials Division Facility in Brownwood, TX *A06-008*
- 4) 3M Traffic Control Materials Division Facility in Guin, AL ~~*A04-0042*~~ *A04-0045*

These facilities have achieved and continue to achieve positive environmental results through a series of environmental management programs such as environmental management systems (EMS's), 3M's Pollution Prevention Pays (3P) Program and our Corporate research and development efforts. They represent only a few of 3M's facilities, all of which are good corporate citizens in the communities in which 3M employees live, work and play. As such, we believe them to be excellent candidates for participation in your National Environmental Achievement Track Program. As the program develops several more of our facilities may want to become involved.

I am the main contact person for coordination of 3M's participation in the Program however; you may also contact any of the individuals listed on the front of the application forms for information concerning each of the facilities for which they have responsibility. 3M looks forward to being a part of this important program and to bringing about even better environmental performance at all of our facilities.

Sincerely,
Jeffrey C. Muffat
Senior Environmental Regulatory Specialist

A09-0016



*National
Environmental
Achievement Track*

Application Form

3M Dental Products Division

Name of facility

3M (Minnesota Mining and Manufacturing) Company

Name of parent company (if any)

2111 Mc Gaw Ave

Street address

Street address (continued)

Irvine, CA 92614

City/State/Zip code

Give us information about your contact person for the National Environmental Achievement Track Program.

Name **Loan H. Dao**

Title **EHS Supervisor**

Phone **(949) 863-1360**

Fax **(949) 863-7023**

E-mail **lhdao@mmm.com**

**Dental Products Division
3M Health Care**

2111 McGaw Avenue
P.O. Box 19597
Irvine, CA 92713-9597
714/863-1360



October 27th, 2000

Ms. Emily Levin
NEAT

Subject: Addendum to NEAT Application

Dear Ms Levin:

This letter is an addendum to the National Environmental Achievement Track (NEAT) application we submitted. In the application to the NEAT program, we have selected the 4th aspect as "To continue to recover fuel from hazardous waste". While it is not cost effective as landfilling, 3M Dental sent about 1.8 lbs of waste/ 100 lbs of products for fuel and energy recovery in the last twelve months and we are committed to continue to fuel recover our hazardous wastes in the future. In this time of increasing production, 3M Dental is continuously making progress in reducing the amount of waste generated per total material used.

3M has a corporate pollution prevention program -Year 2000 Environmental Goal. This program requires all 3M facilities to reduce their waste by 50% relative to total output, by the end of year 2000, using 1990 as baseline year. Not only that 3M Dental has achieved this internal goal ahead of schedule, but consistently improving its waste-to-energy program.

If you have any questions, please do not hesitate to give Loan Dao a call at (949) 863-1360, ext. 338.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Ajay Myer'.

Ajay Myer
Plant Manager

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Identify your environmental requirements

Section A

Tell us about your facility.

1 What do you do or make at your facility?

3M Dental Products Division, a business unit of 3M, is a manufacturer with corporate offices in St. Paul, Minnesota. The division manufactures and markets more than 600 products for use by dentists and dental laboratories around the world including a broad line of restorative and crown and bridge materials (resin composite materials, dental adhesive products, pit-and-fissure sealants, finishing and polishing systems, temporary crowns, core build-up, and impressioning products) and infection control products.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
3843

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

Yes No

4 How many employees (full-time equivalents) currently work at your facility?

- Fewer than 50
- 50-99
- 100-499
- 500-1,000
- More than 1,000

Section A, continued

5 Does your facility have an EPA ID number(s)?

Yes

No

If yes, list in the right-hand column.

CAD 084160407

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right *or* enclose a completed Checklist with your application.

7 Check the appropriate box in the right-hand column.

I've listed the requirements above.

I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

3M Dental Products Division (DPD) was the first US-based company to receive ISO 14001 certification in 1996. In 1997, 3M DPD became a Star Cal/VPP company for excellence in health and safety programs. 3M DPD also received the prestigious Malcom Baldrige award in 1997.

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS

Section B

Tell us about your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

- a. Environmental policy Yes
- b. Planning Yes
- c. Implementation and operation Yes
- d. Checking and corrective action Yes
- e. Management review Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? Yes

3 Did this cycle include both an EMS and a compliance audit? Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? Yes

If yes, what method of EMS assessment did you use?

- Self-assessment
 - GEMI Other
 - CEMP
- Third-party assessment
 - ISO 14001 Certification
 - Other

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.



- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Waste - Total Solid Waste	7.8	lbs/100 lbs products	6.8	lbs/100 lbs products
<p>i. How is the current level an improvement over the previous level?</p> <p>Our production has increased in the last two years. To account for this, we reported the solid waste on lbs/100 lbs. of products. The solid waste decreased from 7.8 two years ago to 6.8 lbs/100 lbs. products recently.</p>				
<p>ii. How did you achieve this improvement?</p> <p>As most of our hazardous waste is sent off-site for fuel recovery, the total solid waste stream is composed mainly of non-hazardous waste. The improvement of total solid waste is due to plant recycling efforts and employee training to further increase recycling awareness. It is also due to our packaging redesign effort to streamline operations and eliminate waste.</p>				

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
Air Emissions - Emissions of VOCs	Quantity 3.73	Units tons	Quantity 3.73	Units tons
i. How is the current level an improvement over the previous level?				
While the current level of VOCs is the same as that of 2 years ago, our production has increased by 10% resulting in an improvement per unit of product basis.				
ii. How did you achieve this improvement?				
As part of our pollution prevention strategies, we emphasize source substitution ahead of recycling. Chemicals are always evaluated for emission potential to assure we only use the appropriate amount and types of required raw materials.				

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect?

Waste - Total Solid Waste

b. Is this aspect identified as significant in your EMS?

Yes No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

Option A:
Absolute value

(Quantity/Units)

Option B:
In terms of
units of production
or output

6.8 lbs/ 100 lbs products
(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

Option A:
Absolute value

(Quantity/Units)

Option B:
In terms of
units of production
or output

6.5 lbs/100 lbs products
(Quantity/Units)

e. How will you achieve this improvement?

Employee training, recycling efforts

Second aspect you've selected

a. What is the aspect?

Air emissions - Emissions of VOCs

b. Is this aspect identified as significant in your EMS?

Yes No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

Option A:
Absolute value

3.73 Tons*
(Quantity/Units)

Option B:
In terms of
units of production
or output

(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

Option A:
Absolute value

3.73 Tons*
(Quantity/Units)

Option B:
In terms of
units of production
or output

(Quantity/Units)

e. How will you achieve this improvement?

Source reduction, product reformulation

*** While the current level of VOCs is the same as that of 2 years ago, our production has increased by 10% resulting in an improvement per unit of product basis.**

Third aspect you've selected

- a. What is the aspect?
- b. Is this aspect identified as significant in your EMS?
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- e. How will you achieve this improvement?

Energy Use - Total Energy Use

- Yes No

- Option A:
Absolute value (Quantity/Units)
- Option B:
In terms of units of production or output **5,430 BTU/Lbs Product**
(Quantity/Units)

- Option A:
Absolute value (Quantity/Units)
- Option B:
In terms of units of production or output **5,260 BTU/Lbs Product**
(Quantity/Units)

Equipment modification, Energy conservation measures

Fourth aspect you've selected

- a. What is the aspect?
- b. Is this aspect identified as significant in your EMS?
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- e. How will you achieve this improvement?

Fuel Recovery

- Yes No

- Option A:
Absolute value (Quantity/Units)
- Option B:
In terms of units of production or output (Quantity/Units)

- Option A:
Absolute value (Quantity/Units)
- Option B:
In terms of units of production or output (Quantity/Units)

Continue to recover fuel from hazardous waste.

Section D

Talks about your public outreach and reporting.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

All community communications are responded to by the EHS department during business hours or the security guard records information during non-business hours for response by the EHS department. The plant manager and/or human resources manager or public relations department is responsible for all media communications.

2 How do you inform community members of important matters that affect them?

Plant management informs the community and business leaders about plant matters at local organization meetings such as Chamber of Commerce, United Way and Red Cross, to name a few.

3 How will you make the Achievement Track Annual Performance Report available to the public?

- Website www.
- Newspaper
- Open Houses
- Other

Plant also schedules facility tours for the community members.

4 Are there any ongoing citizen suits against your facility? Yes No

If yes, describe briefly in the right-hand column.

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/ Citizen Group</i>	Santa Ana Unified School District	Al Mijares, Ph.D. Superintendent	714-558-5501
	Junior Achievement of Orange County/Inland Empire	Geoff Wilson Executive Director	714-734-0387
<i>State/Local Regulator</i>	South Coast Air Quality Management District	Dr. Barry Wallerstein Executive Officer	909-396-2100
	California Air Resources Board	Michael Kenny Executive Officer	916-445-4383
<i>Other community/local reference</i>	American Red Cross, Orange County Chapter	George M. Chitty Chief Executive Officer	714-835-5381

Section E

Application and Participation Statement.

On behalf of **3M Dental Products Division**
Irvine, CA

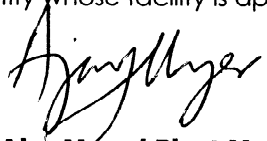
I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

 9/12/00

Printed Name/Title

Ajay Myer / Plant Manager

Facility Name

3M Dental Products Division

Facility Street Address

2111 McGaw Avenue, Irvine, CA 92614

Facility ID Numbers

CAD 084160407 CA 13563

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

**3M Dental Products, Irvine, CA
Applicable Environmental Regulations
National Environmental Achievement Track Application**

Applicable Federal Rules

Applicable Regulation	Regulation Title - Description (where necessary)
29 CFR 1926.62	OSHA Construction Standards for Lead - This facility is subject to construction work where an employee may be exposed to lead.
40 CFR 50	National Primary and Secondary Ambient Air Quality Standards (NAAQS)
40 CFR 51 40 CFR 52	PSD - This facility is located in an attainment area and construction/modification projects may trigger a PSD review
40 CFR 53	Ambient Air Monitoring Reference and Equivalent Methods
40 CFR 60	NSPS - Any new lines emitting VOC or new boilers will be subject to NSPS requirements.
40 CFR 61	NESHAP - This facility is subject to the general provisions and subpart M related to demolition and renovation of asbestos containing areas.
40 CFR 68	RMP - This facility is subject to the general duty clause this rule. This facility does not have any processes containing regulated substances above designated threshold quantities and is not required to submit a risk management plan to the EPA.
40 CFR 82.150	Refrigerant Management - This facility is subject to the service, maintenance, repair, and disposal requirements of this rule.
40 CFR 122.26	NPDES Stormwater Discharges - This facility has a stormwater permit.
40 CFR 261	Identification and Listing of Hazardous Waste
40 CFR 262	Generator of Hazardous Waste Standards - This facility is subject to the manifesting, pre-transport, and recordkeeping/reporting requirements of this regulation.
40 CFR 268	Land Disposal Restrictions
40 CFR 273	Standards for Universal Waste Management
40 CFR 355	EPCRA 302 - This facility stores materials on site that are listed by the EPA as an extremely hazardous substance (EHS) above the threshold planning quantities.
40 CFR 370	EPCRA 311/312 - This facility has reportable quantities of chemicals on-site subject to submission of 311 and 312 reports to the LEPC, SERC, and local fire departments.

**3M Dental Products Irvine, CA
Applicable Environmental Regulations
National Environmental Achievement Track Application**

Applicable State (California) Rules

Applicable Regulation	Regulation Title - Description (where necessary)
AB2185	Hazardous Material Business Plan
AB2588	California Air Toxics Hot Spots
AB2995	Safe Drinking Water Act
AB25781 AB3	Local air districts to establish expedited permit review.
SB1726	Hazardous Waste Reduction Plan
SB2034	New Release Reporting - This facility is subject to report to agency spills and releases which could reach state waters.
SB3713	Asbestos - This facility must notify employees of possible exposure to asbestos during construction.
Proposition 65	Prop. 65 - Warning Signs and quarterly newspaper ads are required for cancer causing chemicals.

Applicable Local (SCAQMD) Rules

Applicable Regulation	Regulation Title - Description (where necessary)
Regulation #1	General Provisions - This facility is located in the SCAQMD and is subject of the general provisions provided in this regulation.
Regulation #2	Permits - This facility requires air permits.
Regulation #3	Fees - This facility is subject to fees to cover the cost of evaluation, planning, inspection, and monitoring for the issuance of permits.
Regulation #4	Prohibitions - This facility is subject to Rule 401(Visible Emissions), 402 (Nuisance), 430 (Breakdown Provision) of this regulation.
Regulation #5	Procedure Before the Hearing Board - This facility would be subject to the is if there was a need to go before the hearing board.
Regulation #7	Emergencies - This regulation applies to all facilities located in the jurisdiction of the SCAQMD. It outlines the measures to be taken during an air pollution episode.
Regulation #9	Standards of Performance for New Stationary Sources - This regulation follows 40 CFR 60.
Regulation #11	Source Specific Standards - This facility is subject to the specific standards for coating (Rule 1122 and 1128) and solvent cleaning operations (Rule 1171).
Regulation #13	New Source Review - All new modified sources must have best available control technology.
Regulation #14	Toxics and Other Non-Criteria Pollutants: This facility is subject to NSR of Toxic Air Contaminants (Rule 1401), Emission Standards for Lead (Rule 1420).
Regulation #17	Prevention of Significant Deterioration (PSD) - This facility is located in an attainment area and construction/modification projects may trigger a PSD review.
Regulation #20	Regional Clean Air Incentives Market (RECLAIM) - This facility does have NOx and SOx emissions.

Applicable Local (City of Irvine) Rules

Applicable Regulation	Regulation Title - Description (where necessary)
-	City of Irvine bans use of CFC's.

National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Facility Name **3M Dental Products Division**
Facility Location: **Irvine, CA**
Facility ID Number(s): **CAD 084160407**
*(attach additional sheets
if necessary)*

Air Pollution Regulations

1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
2. Permits and Registration of Air Pollution Sources
3. General Emission Standards, Prohibitions and Restrictions
4. Control of Incinerators
5. Process Industry Emission Standards
6. Control of Fuel Burning Equipment
7. Control of VOCs
8. Sampling, Testing and Reporting
9. Visible Emissions Standards
10. Control of Fugitive Dust
11. Toxic Air Pollutants Control
12. Vehicle Emissions Inspections and Testing

Check All
That Apply

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**Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above
(identify)**

- 13.
- 14.

<input type="checkbox"/>
<input type="checkbox"/>

Hazardous Waste Management Regulations

1. Identification and Listing of Hazardous Waste (40 CFR 261)
 - Characteristic Waste
 - Listed Waste
2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
 - Manifesting

<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>

- Pre-transport requirements
- Record keeping/reporting
- 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - Transfer facility requirements
 - Manifest system and record-keeping
 - Hazardous waste discharges
- 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
 - General facility standards
 - Preparedness and prevention
 - Contingency plan and emergency procedures
 - Manifest system, Record keeping and reporting
 - Groundwater protection
 - Financial requirements
 - Use and management of containers
 - Tanks
 - Waste piles
 - Land treatment
 - Incinerators
- 5. Interim Status Standards for TSD Owners and Operators (40 CFR 265)
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)
- 7. Administered Permit Program (Part B) (40 CFR 270)

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

- 8.
- 9.

Hazardous Materials Management

- 1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153)
- 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)
- 3. Hazardous Materials Transportation Regulations (49 CFR 172-173)
- 4. Worker Right-to-Know Regulations (29 CFR 1910.1200)
- 5. Community Right-to-Know Regulations (40 CFR 350-372)

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)

- 6.
- 7.

Solid Waste Management

- 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)
- 2. Permit Requirements for Solid Waste Disposal Facilities
- 3. Installation of Systems of Refuse Disposal

- 4. Solid Waste Storage and Removal Requirements
- 5. Disposal Requirements for Special Wastes

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)

- 6.
- 7.

Water Pollution Control Requirements

- 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)
- 2. Designation of Hazardous Substances (40 CFR 116)
- 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)
- 4. NPDES Permit Requirements (40 CFR 122)
- 5. Toxic Pollutant Effluent Standards (40 CFR 129)
- 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)
- 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)
- 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)
- 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)
- 10. Water Quality Standards
- 11. Effluent Limitations for Direct Dischargers
- 12. Permit Monitoring/Reporting Requirements
- 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants
- 14. Collection, Handling, Processing of Sewage Sludge
- 15. Oil Discharge Containment, Control and Cleanup
- 16. Standards Applicable to Indirect Discharges (Pretreatment)

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

- 17.
- 18.

Drinking Water Regulations

- 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146)
- 2. National Primary Drinking Water Standards (40 CFR 141)
- 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)
- 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources
- 5. Underground Injection Control Requirements

- 6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)

- 7.
- 8.

Toxic Substances

- 1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704)
- 2. Import and Export of Chemicals (40 CFR 707)
- 3. Chemical Substances Inventory Reporting Requirements (40 CFR 710)
- 4. Chemical Information Rules (40 CFR 712)
- 5. Health and Safety Data Reporting (40 CFR 716)
- 6. Pre-Manufacture Notifications (40 CFR 720)
- 7. PCB Distribution Use, Storage and Disposal (40 CFR 761)
- 8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)
- 9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)

- 10.
- 11.

Pesticide Regulations

- 1. FIFRA Pesticide Use Classification (40 CFR 162)
- 2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165)
- 3. Certification of Pesticide Applications (40 CFR 171)
- 4. Pesticide Licensing Requirements
- 5. Labeling of Pesticides
- 6. Pesticide Sales, Permits, Records, Application and Disposal Requirements
- 7. Disposal of Pesticide Containers
- 8. Restricted Use and Prohibited Pesticides

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)

- 9.
- 10.

Environmental Clean-Up, Restoration, Corrective Action

- 1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify)
-

2. RCRA Corrective Action (identify)

Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, Corrective Action Regulations Not Listed Above (identify)

3.
4.



Winston H. Hickox
Agency Secretary

Air Resources Board

Alan C. Lloyd, Ph.D.
Chairman

2020 L Street • P.O. Box 2815 • Sacramento, California 95812 • www.arb.ca.gov



Gray Davis
Governor

September 19, 2000

Mr. Richard T. Farrell
National Environmental Performance Track (2129)
United States Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Mr. Farrell:

This letter is to encourage you to give the highest consideration to the United States Environmental Protection Agency's (U.S. EPA) National Environmental Achievement Track Program application that you will receive shortly from 3M. We understand that recognition under this program is reserved only for facilities with a solid environmental record and a firm commitment to do even more. We believe that 3M has satisfied these criteria in several different sectors of the air pollution effort here in California.

We were impressed in 1997, when the 3M Dental facility in Irvine, California was the recipient of the prestigious Baldrige National Quality Award for manufacturing. In addition, in the development of our regulations to reduce VOC emissions from consumer products, we were able to refer to 3M products as proof positive that product efficacy is compatible with low-VOC formulas.

As you may recall, 3M participated in U.S. EPA's Project XL that allowed government and business to test better or more cost-effective ways of achieving environmental and public health protection. As a result of their participation in Project XL, 3M voluntarily reduced VOC emissions by more than 100 tons per year at their Imation facility in Camarillo, California. 3M donated a large portion of these emission reduction credits to a local clean air organization.

If you would like additional information in support of the 3M application, please call me at (916) 445-4383 or Mr. Peter D. Venturini, Chief, Stationary Source Division at (916) 445-0650.

Sincerely,

for Michael P. Kenny
Executive Officer

California Environmental Protection Agency