



April 6, 2009

Re: 3M™ Window Films, LEED and Volatile Organic Compound (VOC) Regulations

To Whom It May Concern,

Thank you for inquiring about 3M™ Window Films and VOC Regulations. There are several different VOC regulations in effect in the United States today, some at the national level, some at the state level, and some at the local level. These regulations limit the amount of Volatile Organic Compounds that can be present in Consumer products, Industrial products, and Architectural and Industrial Maintenance coatings.

A Volatile Organic Compound (VOC) is defined as “a compound of carbon that combines with nitrogen oxides in the presence of sunlight to form ozone.” In order to attain National Ambient Air Quality Standards, as set forth by the EPA as part of the Clean Air Act of 1970, states and localities have adopted VOC regulations to reduce the amount of VOCs entering into the atmosphere that could react to form ozone. The most restrictive regulations are in California and are promulgated by the California Air Resources Board (CARB, a branch of Cal/EPA) and the South Coast Air Quality Management District (SCAQMD) in the Los Angeles area.

LEED for New Construction, Commercial Interiors, and Core and Shell (IEQ Credit 4.1: Low Emitting Materials- Adhesives and Sealants), Existing Buildings (Operations & Maintenance MR Credit 3: Sustainable Purchasing: Facility Alterations and Additions) and Homes (MR2 Environmentally Preferable Products) requires adhesives and sealants to have a VOC content that meets the current VOC content limits of SCAQMD Rule 1168.

The definition of an adhesive in SCAQMD Rule 1168 is “Any substance that is used to bond one surface to another surface by attachment.” Single-sided tapes and films that have adhesive incorporated onto one side of an inert substrate have historically been excluded from this definition, and are expressly excluded from CARB’s definition of “adhesive.” Thus, 3M™ Window Films are currently not affected by VOC regulations.

Please feel free to contact me if you have any further questions.

Best Regards,

A handwritten signature in cursive script that reads 'Anne Johnson'.

Anne Johnson
Product Responsibility
3M Renewable Energy Division
ajohnson@mmm.com