

DARLINGTON VENEER COMPANY, INC.

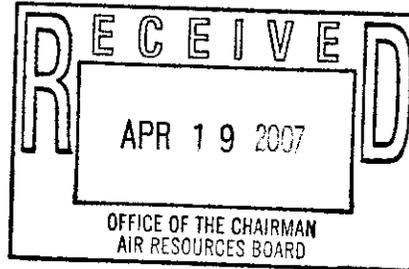
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DARLINGTON, SOUTH CAROLINA 29540

April 17, 2007



Dr. Robert Sawyer, Chairman
California Air Resources Board
1001 I Street
P. O. Box 2815
Sacramento, CA 95812

Orig: L Andreoni
Copy: R Sawyer
C Witherspoon

Dear Dr. Sawyer:

Our company appreciates the opportunity to comment on the proposed Air Toxic Control Measure to Reduce Formaldehyde from Composite Wood Products dated March 7, 2007.

Darlington Veneer is a third generation family owned company started in 1918 that produces stock panel hardwood plywood. The thicknesses produced range from 5/32" to 1-1/2" and include cores of particleboard, MDF, veneer core, and lumber core. Our sizes range from 48"x72" to 48"x144". The species literally range from A to Z (Ash to Zebrawood). The company owns a chain of ten distribution facilities in five southeastern states employing another 190 persons. The approximate production of our plant is 7000-8000 panels per day.

I believe the current version of the rule has significantly underestimated the additional costs to domestic hardwood plywood manufacturers like our company. These costs are already in place for particleboard and MDF manufacturers but hardwood plywood manufacturers like us will have to set up a quality control laboratory, purchase testing equipment and find or train additional personnel to conduct the testing that will be required. I estimate those costs to be more than \$100,000.00 in the first year and at least 70% of that amount each year thereafter. Additionally, the rule is vague on the amount of testing to be done, which might increase the above costs.

The sell through dates must be the same for importers and domestic manufacturers of hardwood plywood. Under the current proposed rule, importers have an additional 4 months in the marketplace before they must comply. This must be changed in the final rule.



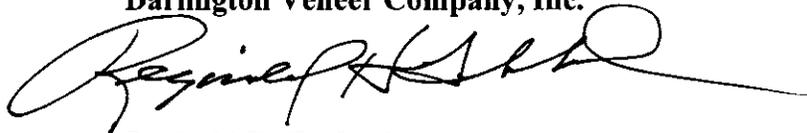
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The proposed phase 2 ceiling limits for formaldehyde emissions should be higher to allow for the fact that the industry's products must be manufactured significantly below the regulatory ceiling to allow for variability in the raw materials, processing equipment and test methods. At these extremely low levels it will be very difficult to consistently produce products meeting these limits. Even CARB's March fact sheet concludes that the average formaldehyde emissions will be 0.03 to 0.04 lower than the proposed caps. Additionally it appears that the costs to comply with phase 2 are extremely unreasonable.

I urge you to delay the final version until additional data can be studied involving questions of risk assessment, testing, and equal enforcement.

Sincerely,

Darlington Veneer Company, Inc.

A handwritten signature in black ink, appearing to read "Reginald H. Hubbard", with a long horizontal flourish extending to the right.

Reginald H. Hubbard
Vice-President

RHH/lmb