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**Composite Wood Products  
Airborne Toxic Control Measure (ATCM)**

Title 17, California Code of Regulations, Sections 93120-93120.12

Third Party Certification Guideline:  
***Defining Product Types***

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**Defining product types.** Some TPCs are trying to add efficiency to the certification program through proper grouping of “product types.”

Section 93120.1(a)36 reads:

“Product type” means a type of composite wood product that differs from another based on composition, thickness, number of plies (if hardwood plywood), and resin to distinguish one composite wood product from another made by the same manufacturer.

Section 93120.12, Appendix 2, subsection (f)(2) reads:

In order to qualify for certification, the manufacturer must establish a statistical correlation between values obtained from the primary or secondary test method and the values from the small scale tests for each product type and production line. For purposes of establishing this correlation, data for products from the manufacturer’s plant or data obtained by a third party certifier must be used. The correlation must be based on a minimum sample size of five data pairs.

Section 93120.12, Appendix 2, subsection (f)(3)(A) reads:

... For the purpose of a verifying primary or secondary method test, a manufacturer may group two or more product types together if they have similar emission characteristics...

**Program Issue:** The ATCM does not provide specific guidelines on how a product type must be defined. Based on the findings from the one-on-one calls, product types are largely being defined by TPCs based on the resin used to make a composite wood product. In some cases, all thicknesses of the product are included in a single product type, and in other instances, two or more thickness ranges of a product are used to define product types. Other TPCs allow as many products that fit the correlation to be included in a product type regardless of resin system, thickness, number of plies, etc. As such, a framework is provided to identify the fundamental elements that should be considered when defining product types in the future.

**Recommended CARB Guidance:** For future identification of product types, TPCs are advised to base these definitions *primarily* by the parameters which are most likely to

affect emissions, such as the type of resin system used to make the “product type.” For example, if a manufacturer makes particleboard with a specific name brand of MUF resin, all thicknesses of particleboard made by the manufacturer can be included in the product type they specify for their particleboard products, assuming that all applicable small-scale test results fit the correlation for the product. In cases such as this, the manufacturer and their TPC must decide whether to segregate their particleboard product type into two separate sub-product types (e.g., thick PB and thin PB). Further segregation of thick or thin PB would be suggested if there is an inadequate correlation based on the number of data pairs used to develop the correlation for the product type (see Composite Wood Product Airborne Toxic Control Measure Guideline No. CWP-10-001). This would not allow products made with different resin systems to be included in a single product type.

For hardwood plywood, common factors to consider with respect to defining product types can also include core type, adhesive used in the core, import vs. domestic core, and veneer wood species.

It may be likely that conventional UF resin systems will exhibit greater variability, therefore products should be evaluated to most effectively group products into “product types.” Other process parameters could be evaluated such as density, strength properties, furnish treatment, or production line.