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October 19, 2006

Via E-mail  
[jaguila@arb.co.gov](mailto:jaguila@arb.co.gov)

Mr. Jim Aguila  
Stationary Source Division  
Air Resources Board/CalEPA  
1001 I Street  
PO Box 2815  
Sacramento, CA 95812

SUBJECT: Proposed New Section 93120, Title 17, California Code of Regulations

Dear Mr. Aguila:

We are writing to convey our position with respect to the proposed Regulation of Formaldehyde Emissions from Composite Wood.

DASMA is North America's leading trade association of manufacturers of garage doors, rolling doors, high performance doors, garage door operators, vehicular gate operators, and access control products. Our membership, consisting of over 100 separate companies, represents more than 95 percent of the U.S. market for our industry.

While DASMA has continuously led efforts to produce safe products that provide enhanced protection against winds, fire, entrapment and injuries, we ask that garage doors be specifically excluded from the proposed regulation.

By its very nature, a garage door has virtually no impact on indoor air quality. First, the volume of airflow when a garage door is opened and closed allows an almost complete air-exchange in a garage. Second, garage doors are separated from the living space in a home by fire doors and fire rated walls.

Finally, because they are exposed to the elements, garage doors are typically made with a variety of materials intended to meet exterior element resistance needs. These materials, also utilized in siding, soffits, and fascia boards, are typically low emitters of formaldehyde.

Thank you again for your consideration of our request. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads 'Joseph R. Hetzel'. The signature is written in a cursive, flowing style.

JOSEPH R. HETZEL, P.E.  
Technical Director

JRH/lms  
dasma