Great Lakes MDF

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April 24, 2007

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

Dear Dr. Sawyer:

RE: Comments on the Proposed Air Toxic Control Measure for Formaldehyde in Composite Wood Products

Great Lakes MDF, LLC is a manufacturer of medium density fiberboard that is used throughout the industry and sent to all parts of the United States. The distribution of our products makes us a direct stakeholder in the regulatory issues taking place in the State of California. The proposed emission levels and the feasibility of alternative resin systems will create a negative economic impact on our business. Great Lakes is also very concerned about the ability of California to enforce the emission limits in a fair and balanced manner against international competition which if not balanced would essentially leave the playing field unleveled for North American plants in an already competitive marketplace.

We appreciate CARB working with industry to provide the citizens of California with a regulation that meets the agency's public health objective while at the same time calling for requirements that are both technologically possible and economically feasible. The proposal to be considered by the Board this week is close, but still falls short in the latter respect.

Specifically, we support the California Wood Industries Coalition (CWIC) recommendation to adjust the Phase II emission level limits as follows:

- Particleboard – a ceiling of 0.10 ppm rather than 0.09 recommended by agency staff
- MDF – a ceiling of 0.13 ppm rather than 0.11 as recommended by agency staff
- Thin MDF – a ceiling of 0.15 ppm rather than 0.13 as recommended by agency staff

A critical aspect of this regulation is the understanding that the use of ceiling values requires manufacturers to produce at substantially *lower* emission targets than required because of the inherent variability in raw materials, production processes and the repeatability of the compliance test itself. Modest changes in the range of 1/100th to 2/100^{ths} of a part per million (ppm) are essential in the Phase II ceiling levels if CARB expects the regulation to be met on an industry-wide basis, not just by a limited few or for a niche application.

The economic feasibility of alternative resin systems has been ignored by ARB. Alternative resin systems for the manufacturing of medium density fiberboard are considered cost prohibitive for the customer and this unproven resin technology is too unknown to stake our business livelihood upon. The cost to obtain the recommended levels will increase the cost of business to a dangerous level to the detriment of our business and worse the customer. In the end this dependence on alternative resin systems and unrealistic emission levels will harm the one group you are working very hard to protect and that is the consumer.

In summary, this regulation, with the emission levels proposed in Phase II, will be the most expensive ATCM in terms of cost per pound of reduced emission that ARB has ever promulgated. There is no measurable contribution to public health by adopting the emission levels currently in the rule as opposed to those recommended by industry. Therefore, we urge the Board to amend the Phase II limits as presented above to assure that the proposed regulation accomplishes its objective without placing unrealistic and unnecessary mandates on industry.

Sincerely,

Gregory P. Maher
President