April 25, 2007

To: California Air Resources Board

Re: Formaldehyde ATCM – Columbia Forest Products

I am writing to clarify various statements that have been made about new soy-based resin technology used at the Klamath Falls plant of Columbia Forest Products ("CFP").

I was employed by CFP for 34 years, 29 of which in operations. In October of 2006 I resigned from CFP. For several years I had been "Plant Superintendent" at the Klamath Falls plant in charge of all operations of plywood production including, production, manning, materials and budget responsibility. I also chaired a weekly meeting of CFP personnel regarding product claims held every Monday morning. As such, I was totally familiar with the plant's use of the Pure Bond adhesive in hardwood plywood production.

There is much to correct regarding the recent submission of Mr. Guay regarding the CWIC comments. The record should be set straight on various assertions regarding the CFP product and the plant:

1. Throughput. The actual press cycle for urea and soy resins is approximately the same, however, because of the short "Open time" of the soy resin the plant could not produce the same amount of product as it had before with urea. With urea resins one could lay up approximately four loads between the spreader and the press; with soy usually two. This led to a substantial decrease in plant production of more than 10%. Panel count was down by as much as 1,000 per day with the soy material.

2. Spreaders. The Number 3 spreader at Klamath Falls was replaced in November of 2006 with a ten foot spreader from Truman, Arkansas. It was modified by the Genesis Company of Salem, Oregon. Total costs for this modification was over $140,000. The spreader was replaced to address problems with applying the Pure Bond resins to the panels. This spreader had a larger applicator roll diameter which helped to control the spread differential due to the Pure Bond glue being so thick.

3. Tanks and Equipment. New polypropylene tanks and stainless steel mixing systems were installed in April of 2006, not as a redundant system but rather to accommodate the corrosive nature of the kymene resin used to make the Pure Bond adhesive.

4. Claims. As leader of the Monday meetings on production sales, I was privy to the problems that were asserted by customers and distributors regarding the Pure Bond product. Claims were significantly higher than when UF resins were being used, one settlement in the high 5 figures. Several customers changed to other suppliers. Also our internal reject rate increased from around 5% to almost 8% during 2006.

5. I also understand that various test results including Type I glue bond tests were submitted. This is totally inappropriate for a water resistant resin such as urea formaldehyde. Internal Bond test or IB tests should be performed on this adhesive system.

Although there are several other points from the Guay memo with which I disagree, these specifics should be of value in setting the record straight.

Very truly yours,