



*CalAg, LLC*

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December 22, 2004

Ms. Dorothy Shimer  
Research Division  
Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

Re: AB 1173 Revised

Dear Ms. Shimer:

CalAg, LLC applauds the work completed thus far but also welcomes the opportunity to provide comments in response to the revised Draft Report on Indoor Air Pollution Mandated by AB 1173 (Keeley, 2002). CalAg, LLC has developed a patented technology (U.S. Patent number 6,596,209) that allows for the production of premium quality Medium Density Fiberboard ("MDF") from California grown rice straw. The CalAg product uses a FORMALDEHYDE FREE polyurethane resin in the binding process, thus creating an end product from a rapidly renewable resource that has no "off-gassing" (0% formaldehyde emissions) and can be used as a direct replacement for any wood-based MDF end-use and used in any application where indoor air quality is a concern.

CalAg is currently in the final phases of meeting the financial requirements for plant construction and anticipates having its panelboard product on the market by early 2007. Extensive board making trials and pilot plant testing have been completed over the past several years and we would again like to point out that once available, CalAg's MDF will serve as a "direct replacement" for MDF which is traditionally made from wood and urea-formaldehyde resin.

Page 20 and 150 of the revised draft report under the sections entitled "Building materials and furnishings" denotes that "Low-emitting alternatives are available. Non-wood alternatives and composite wood products made with phenol-formaldehyde resin or methyl diisocyanate (MDI) have much lower formaldehyde emissions than composite wood products made with urea-formaldehyde resin, and could be substituted for some applications. In cabinets and furniture, all surfaces of these products can be coated or laminated to substantially reduce formaldehyde emissions."

CalAg would like to respectfully point out that MDF made with agricultural fibers and MDI resin will have no "off-gassing" (0% formaldehyde emissions), will be a substitute for any application wood based MDF is currently being used in and can be used in any stringent indoor air quality application. Additionally, surface coatings or laminates could be applied for decorative purposes but would not be required for the purpose of masking, slowing down or reducing the off-gassing of formaldehyde emissions because there are none.

CalAg would also like to respectfully point out that on page 60, section 2.3.1.2 “Sources of Formaldehyde” it is noted that “Coated products and phenol-formaldehyde resin products are preferred alternatives to urea-resin products.” CalAg suggests MDI resin be included as a preferred alternative resin when associated with pressed wood products and that it allows differentiation between products manufactured with reduced but still measurable amounts of formaldehyde and those with FORMALDEHYDE FREE binders.

Thank You for this opportunity to respond.

Sincerely,

Les Younie  
Vice President, Manufacturing & Engineering  
CalAg, LLC (Formerly California Agriboard, LLC)