

Composite Wood Product Airborne Toxics Control Measure

November 14, 2001



California Environmental Protection Agency

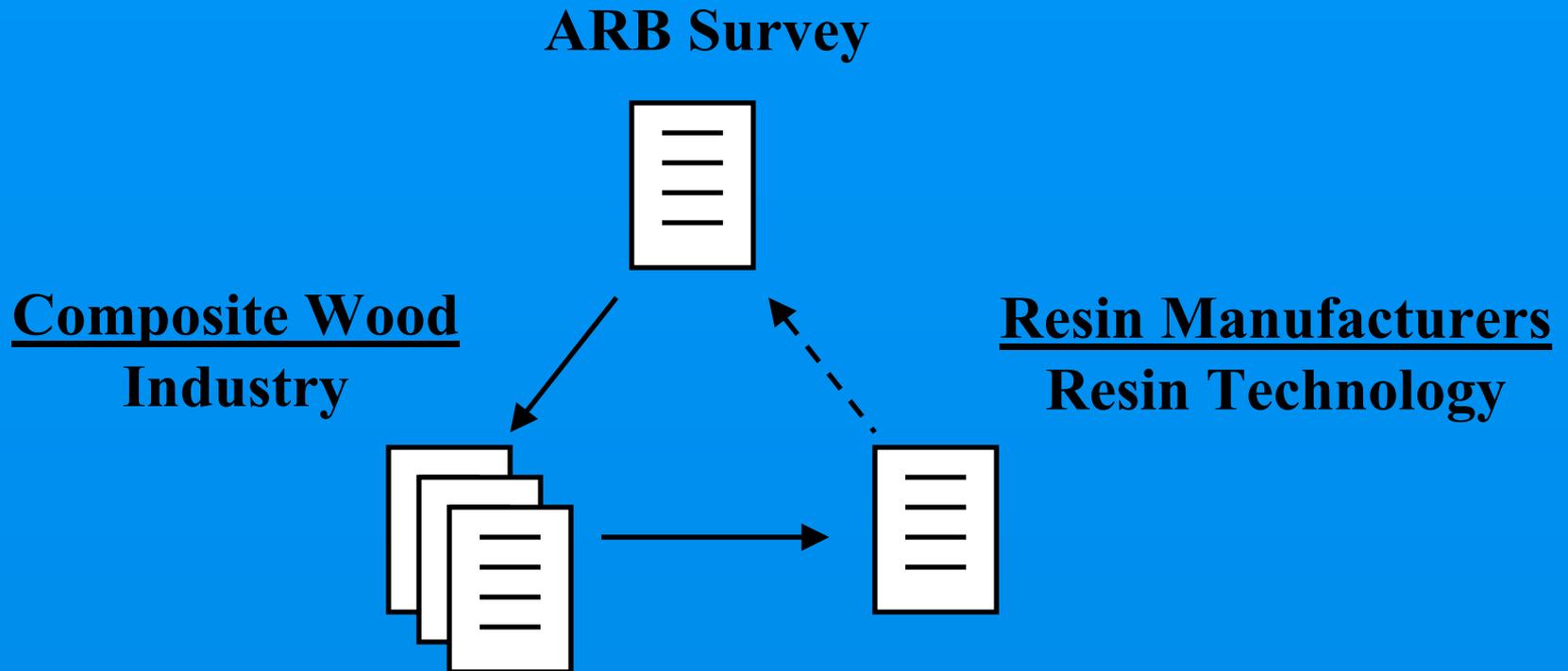
Air Resources Board

Product Survey Purpose

- **Gain understanding of composite wood industry on a national level**
- **Establish California emissions inventory**
- **Determine Best Available Control Technology**
- **Evaluate costs and potential impacts**

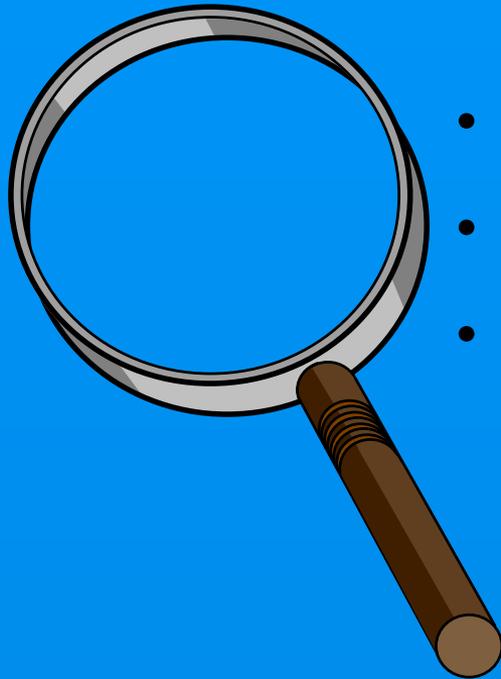


ARB Survey



Survey Comments

General



- **Need detailed instructions on all questions**
- **Clarify definitions**
- **Clarify procedure and applicability of various process forms**



Survey Comments

Need for Economic Data

- **Importance of sales data**
- **Importance of product cost data**
- **The relevance of the request for sales on a gross basis, in California and nationwide**



Survey Comments

Product Differentiation

- **Standard industry reporting should be used (i.e., 3/4” particleboard, MDF: 3/8” softwood plywood and OSB: 1/8” hardboard) for total annual production**
- **Are similar products that use different resins considered separate products ?**



Survey Comments

Resin Formulation Information

- **The percentage of components does not necessarily provide useful information regarding emission characteristics of the end product**
- **Resin density is not necessary, the percentage of solids is the common measure**
- **Provided by resin manufacturer**
- **Companies may also have more than one adhesive supplier**



Survey Comments

Confidentiality

- **Title 17, California Code of Regulations (CCR), sections 91000 to 91022**
- **California Public Records Act (Government Code Section 6250 et seq.)**



Survey Comments

Emission Rates

- **Emission rate data should consider the methods and protocols used in obtaining the information**
- **Differing atmospheric conditions will affect product emission rates**



Survey Comments

Suggested Additional Information

- Does this product meet industry or other standards for regulating formaldehyde?
- What is the end use of this product?
- Is the product finished with a coating, laminate, or film or other material which would retard emissions?
- Is it anticipated that this product will be finished in downstream facilities with such a coating?

