



Linda S. Adams
Secretary for
Environmental Protection

Air Resources Board

Mary D. Nichols, Chairman
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov



Arnold Schwarzenegger
Governor

November 2, 2007

Dear Sir/Madam:

We are sending you this letter because you have been identified to us as a potential fabricator of finished goods containing hardwood plywood (HWPW), medium density fiberboard (MDF), and/or particleboard (PB). As such, we want to make you aware that on April 26, 2007, the Air Resources Board (ARB) approved a new Airborne Toxics Control Measure (ATCM) to reduce formaldehyde emissions from HWPW, PB, and MDF, including thin MDF (< 8 mm in thickness). Beginning January 1, 2009, finished goods (e.g., furniture, cabinets, case-goods) that contain these products, must be made with HWPW, PB, and/or MDF that complies with lower formaldehyde emissions limits, to be legal for sale in California. This requirement applies to all finished goods containing HWPW, PB, and/or MDF, imported or domestic.

As a result of the ATCM, fabricators will need to keep detailed records to document their purchase and use of compliant HWPW, PB, and MDF. At a minimum, the required records must include:

- the names of your suppliers of HWPW, PB, MDF, or components containing those materials used to make your finished goods;
- the dates that you purchased your HWPW, PB, MDF, or components containing those materials; and
- a description of the prudent precautions you took to ensure that compliant HWPW, PB, MDF, or components containing those materials were sold to you. "Reasonable prudent precautions" include instructing each supplier that the goods they supply to a fabricator must comply with the applicable emission standards, and obtaining written documentation from each supplier that this is so.

Some modifications to your existing recordkeeping system may be needed to ensure that the required information is maintained, which may result in additional costs to you. In addition, you will need to label your finished goods as containing compliant HWPW, PB, and/or MDF, if you plan to sell those goods in California. As part of our ATCM enforcement program, fabricators will be subject to periodic inspection by ARB or local air district officials to ensure compliance with the requirements of the ATCM. Non-compliant fabricators will be subject to enforcement action, as warranted.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

Dear Sir/Madam
November 2, 2007
Page 2

For more information about the ATCM, please visit our composite wood products homepage: <http://www.arb.ca.gov/toxics/compwood/compwood.htm>. For information regarding Frequently Asked Questions, please visit: <http://www.arb.ca.gov/toxics/compwood/implementation/faq.htm>. A fact sheet on the ATCM has also been included for your information. If you have any questions about this letter or the regulatory development process, please contact Ms. Angela Csondes, Substance Evaluation Section, at (916) 445-4448, or by e-mail at acsondes@arb.ca.gov.

Sincerely,

/S/

Janette Brooks, Chief
Air Quality Measures Branch
Stationary Source Division

Attachment

cc: Angela Csondes
Substance Evaluation Section
Air Quality Measures Branch