

General Regulation Considerations

Public Workshop Comments Comparing the CARB ATCM with EPA's Proposed National Regulation for Formaldehyde Emissions from Composite Wood Products

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Basic Principles for Composite Wood Products Regulation

The federal regulation should mandate performance-based formaldehyde emissions requirements for composite wood panel products, without bias towards any resin or manufacturing technology employed to meet those requirements. Experience gained from CARB Phase 2 has shown that existing and developing technologies for both resins and panel manufacturing are capable of delivering composite wood products that emit at, or very near, the emission levels from natural wood. This position encourages advancement in all technologies and provides the widest array of options for panel manufacturers as well as the downstream chain of commerce.

Scope Expansion

- Adding laminators would greatly increase impact of regulation.
 - US: Up to several thousand who have not been required to CARB certify, and many are small businesses
 - Many may not be able to switch to NAF resins
 - Many not staffed to address reporting requirements, much less any testing that may be required
- Existing testing program not suited to address from either practicality or cost burden aspects.
 - Testing capacity of TPCs and contract labs would be strained or insufficient
 - TPCs may not be staffed to handle a potentially significant increase in inspection and auditing services.
 - Cost of QC and TPC certification under the proposed programs would be excessive and unjustified, especially for small businesses.

Thoughts

- If NAF laminators are assumed to not exceed the emissions levels of their respective platforms, this is not equal to the performance requirements on HWPW-CC producers. Not equitable.
- Opens the door on non-equitable treatment for PB, MDF and HWPW Veneer Core manufacturers.
- Public Law 111-199, and Committee Report 111-169 clearly establish that the formaldehyde regulation is focused on ASTM E1333-(96) – which establishes the environmental conditions under which emissions are measured.
 - Not appropriate to base discretionary implementation on data that was derived outside the mandated testing methodology environmental conditions.