

# **Update on California's Composite Wood Products Regulation**

**Association of Woodworking &  
Furnishings Suppliers Fair  
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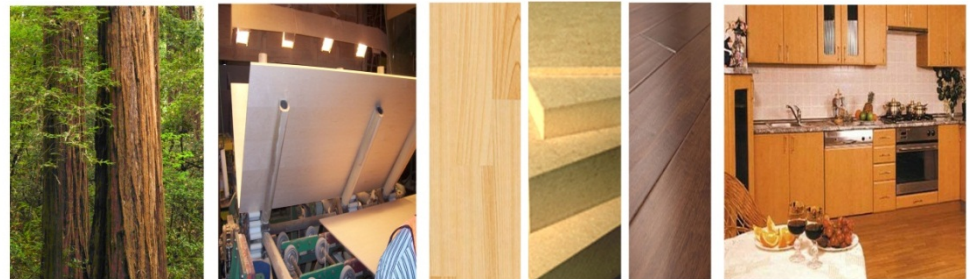


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**Air Resources Board**

# Overview

- Implementation
- Fabricator requirements
- Proposed regulatory amendments
- CARB enforcement
- Emissions testing
- Status of U.S. EPA's proposed regulation
- Questions



# Implementation Status

- CARB Composite Wood Products Airborne Toxic Control Measure (ATCM) began implementation in 2009
- Reduces formaldehyde emissions from hardwood plywood (HWPW), particleboard (PB), & medium density fiberboard (MDF)
- Phase 2 emission standards currently in effect
  - Range from 0.05 ppm for HWPW to 0.13 ppm for thin MDF
- Applies to products sold, supplied, used, imported for sale, or manufactured for sale in California

# Implementation Status

*continued*

- Requires finished goods to be made from compliant HWPW, PB, and MDF panels
  - i.e., flooring, furniture, cabinets, etc.
- Industry sectors affected by ATCM
  - Panel manufacturers
  - Finished goods fabricators
  - Distributors, importers, and retailers of panels & finished goods

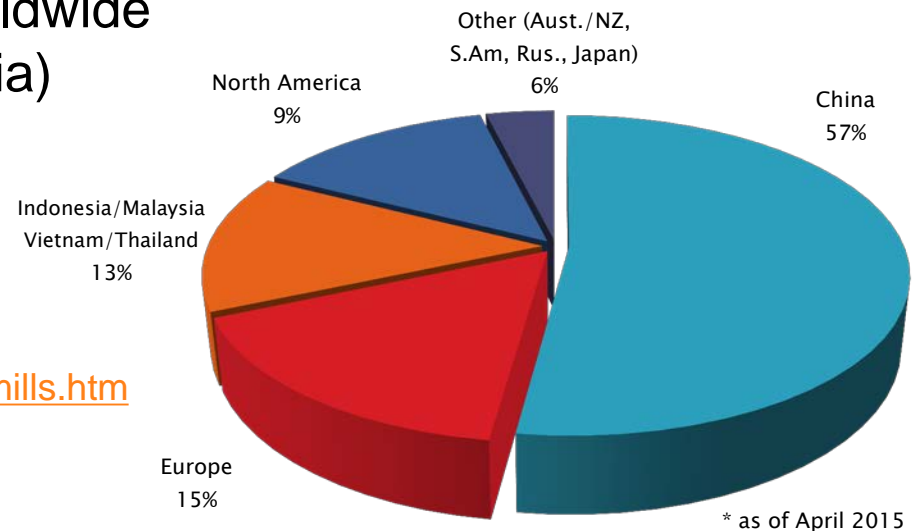
# Implementation Status

## *continued*

- Third Party Certification (TPC) Program
  - Panel manufacturers must be third party certified by CARB-approved certifiers
  - TPCs provide two main services:
    - Process verification & emissions testing
  - 40 CARB-approved TPCs worldwide (North America, Europe, & Asia)
  - About 900 certified mills
  - CARB website featuring certified mills:

<http://www.arb.ca.gov/toxics/compwood/tpc/listofmills.htm>

**Certified Mills Worldwide\***



# Implementation Status

*continued*

- NAF/ULEF Program
  - ATCM allows TPC exemption for manufacturers using no-added formaldehyde (NAF) or ultra-low-emitting formaldehyde (ULEF) resin systems
  - About 200 mills worldwide with CARB-approved NAF and ULEF products

# Fabricator Requirements

*Summarized in handout*

- Use certified composite wood material to make finished goods
- Obtain statement of compliance from suppliers
- Keep records
- Label finished goods or boxes
- CARB label vs. Prop. 65 label
- Provide statement of compliance on invoice or bill of lading to customers

# Fabricator Requirements

*continued*

- Suggested steps when importing components & composite wood material
  - Verify suppliers are providing certified composite wood material from panel manufacturers on ARB's list of certified mills
  - Verify that certified panel manufacturers are selling material to your suppliers



# Proposed Regulatory Amendments

## *Objectives*

- Clarify requirements and applicability
- Align ATCM with proposed U.S. EPA regulations to extent practicable
  - Numerous discussions with U.S. EPA staff
- Explore ways to better ensure compliance of imported products

# Proposed Amendments

*continued*

- Summary of proposed amendments
  - Panel manufacturers
    - Notify customers regarding non-complying panels
  - Distributors/retailers of panels
    - Labeling of partial bundles of panels
  - Fabricators
    - Additional requirements for laminated products

# Proposed Amendments

*continued*

- Laminated products – current ATCM approach
  - Applies to laminated products made by fabricators
    - Laminates consisting of wood veneer or synthetic material
  - Requires use of certified platform material
  - Testing revealed opportunities to reduce emissions

# Proposed Amendments

*continued*

- Proposal for laminated products
  - Establish new 0.13 ppm formaldehyde emission standard for unfinished laminated products
  - Standard would apply to laminated products consisting of unfinished wood veneer affixed to certified platform
  - No routine emissions testing or third party certification required
  - Synthetic laminated products still need certified platform
  - Benefit: achieves additional emission reductions beyond current ATCM by ensuring laminated products do not emit more than certified platform

# Proposed Amendments

## *Next steps*

- 5<sup>th</sup> public workshop on proposed amendments
  - 4<sup>th</sup> Quarter 2015 in Sacramento
  - Workshop will be webcast
  - Opportunity to provide comments
- Present to CARB's Board for consideration in 2016
  - Timing dependent on when U.S. EPA regulations are finalized

# CARB Enforcement

- Inspections conducted at panel retailers, distributors, & retailers of finished goods
- Products inspected for compliance with labeling requirements
- Documentation reviewed regarding statement of compliance
- Samples collected for emissions testing
- Several enforcement investigations underway

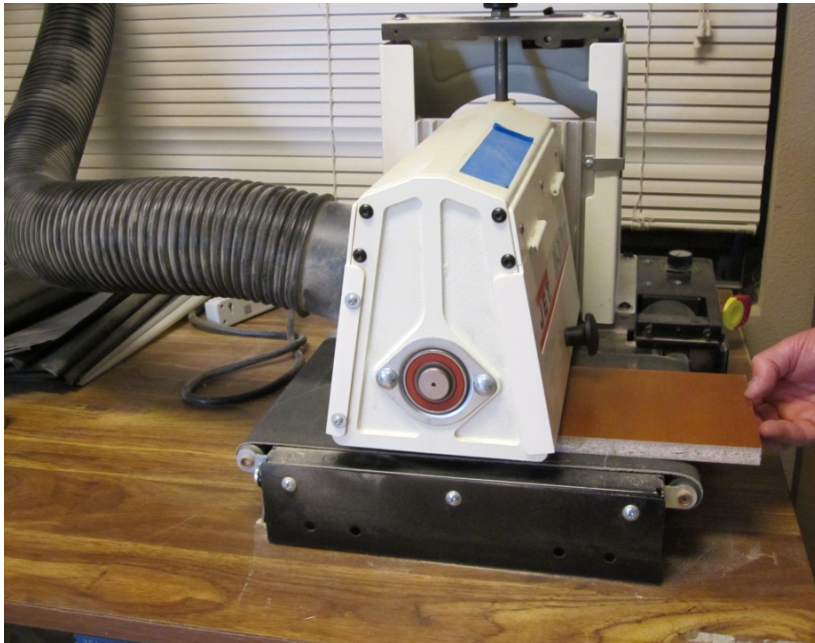
# Emissions Testing

- Purpose is to determine if composite wood panels and composite wood material in finished goods comply with emission standards
- Sample preparation procedures for panels and finished goods
- Emissions testing using CARB's small chamber test method (ASTM D6007)



# Emissions Testing

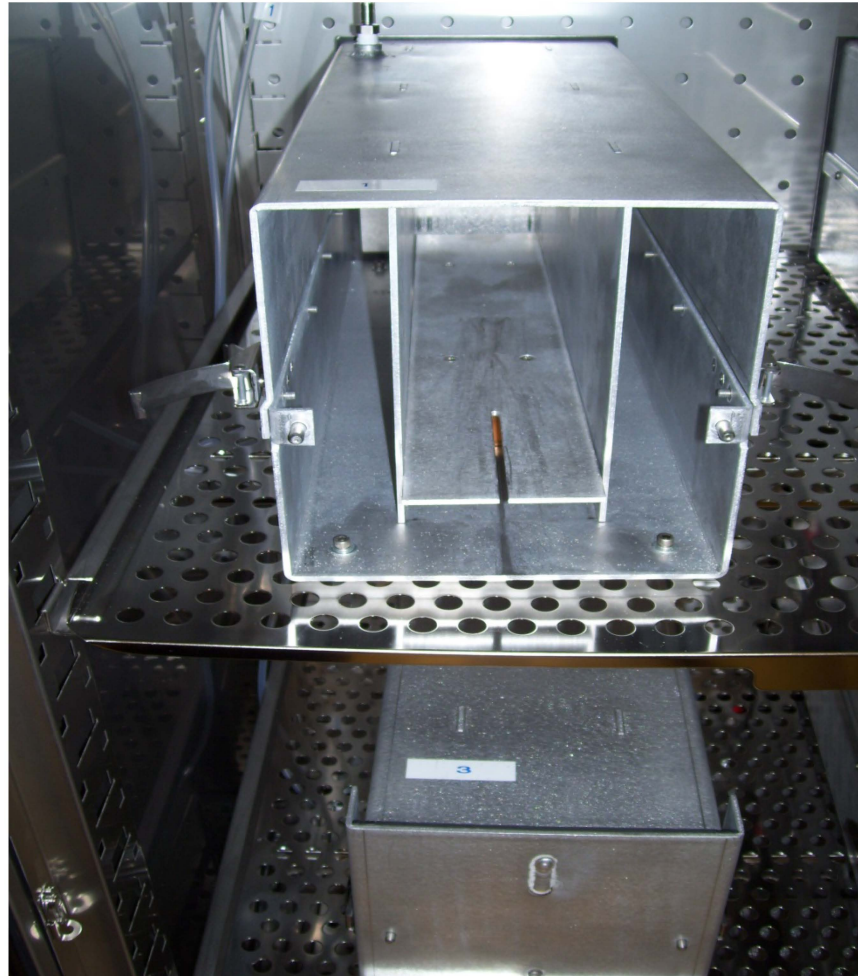
*Sample preparation – sanding off laminate*





# Emissions Testing

## *CARB's small testing chamber*



# Emissions Testing

*continued*

- Extensive testing conducted to develop sample preparation procedures
  - Posted to CARB's composite wood products webpage
- CARB accounts for uncertainty associated with sample preparation & emission testing when considering whether to take enforcement action

# Status of U.S. EPA's Proposed Regulation

- U.S. EPA proposed regulation based on CARB's emission standards
- U.S. EPA's goal is to finalize regulation by late 2015 or early 2016
- Regulation will become effective one year after finalized

# Questions



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