

# COMMENTS ON PROPOSED AMENDMENTS TO ATCM ON FORMALDEHYDE EMISSIONS FROM COMPOSITE WOOD PRODUCTS

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Composite Panel Association

## BACKGROUND

CPA is the trade association representing more than 90% of the North American production of Particleboard, MDF and Hardboard, as well as most manufacturers of wood-based decorative surfaces, most adhesive suppliers to the industry, and some of its biggest customers.

CPA operates TPC-1, the first approved by CARB in early 2008, and the largest certification program of its kind in North America.

CARB's TPC and quality assurance requirements are modeled in large part on CPA's longstanding certification practices and on our rigorous Quality Assurance Manual for client mills.

CPA also operates the International Testing and Certification Center (ITCC) in Leesburg, VA, and has more than 30 years of expertise in product emissions testing.

We sponsor the ANSI Standards for PB, MDF and HB, as well as our own EPP Certification – soon to be replaced by our Eco-Certified Composite (ECC) Sustainability Standard.

CPA has been working cooperatively with ARB on this regulation since the first stakeholder workshop in early 2002. In 2009, we joined with the Sierra Club to propose, draft and lobby for the federal legislation that is now directing the USEPA to implement a national standard similar to CARB's. Other industry stakeholders at today's workshop also partnered in this effort.

CPA is committed to regulation that is:

1. protective of public health (Phase 2)
2. technology-based and economically feasible
3. clear, fair and predictable
4. encourages industry to innovate
5. applicable and enforceable throughout the world for products sold in CA/USA

CPA supports rulemaking amendments by ARB that facilitate the quickest and most complete integration with the federal standard now being developed by USEPA.

That means finalizing these amendments before the end of 2012 and having federal and CA regulations go into effect at the same time.

ARB already has a robust rule, the main parts of which are just beginning to be felt in the market.

The proposed ARB amendments should be focused on cleanup, clarification, and compliance – not on expanding the current rule to new products or further complicating its administration and enforcement.



The key to the success of ARB's rule – and what distinguishes it the “toughest production standard in the world for industry products” as CARB has rightly termed it – is a robust TPC and mill quality assurance program. It is the starting point for compliance, and makes enforcement more viable.

This must be protected and strengthened.

# TPCS AND PANEL MILLS

TPC and mill quality assurance requirements should be amended to focus more on mitigating the possibility of non-complying lots entering the stream of commerce. This can be achieved by removing some TPC and mill discretion for mills with a history of non-complying events – i.e., two or more in a 12 month period.

# QUALITY ASSURANCE

CPA is the final stages of a year-long effort to develop mandatory enhancements to our mill quality assurance program, along with specific, voluntary best practices. When completed and announced this fall, CPA will adopt them unilaterally for client mills. We also urge ARB and USEPA to require them for all TPC's and client mills worldwide.

# TPCS, QUALITY CONTROL, TESTING

1. Need more rigor and transparency
2. Need better oversight by ARB/USEPA
3. Need more frequent inter-laboratory comparisons
4. Consider ISO Guide 65 compliance for all TPC's
5. Consider Mutual Recognition Agreement (MRA) for accrediting agencies

# TPCS, QUALITY CONTROL, TESTING

6. Use care in co-recognizing other test methods, especially if less verifiable
7. Equivalence with Large Chamber must remain the basis as any secondary method is considered
8. Focus on mitigating non-complying lots

# TPCS, QUALITY CONTROL, TESTING

9. Do not relax the 2 year ULEF and NAF application renewal period. The current practice is working.
10. Do not relax the quarterly on-site audits of mills. To reduce this to an annual audit is inconsistent with longstanding industry practice and would undermine the TPC system worldwide.

# HARDBOARD

Hardboard should remain outside the scope of covered products, as currently provided, not subject to new regulation. CPA is now completing work on four new/revised ANSI Standards that will clarify hardboard and related products and ensure they are treated properly for purposes of ARB and USEPA regulation.

# HARDBOARD DEFINITION

HARDBOARD IS A PANEL MANUFACTURED PRIMARILY FROM INTER-FELTED LIGNOCELLULOSIC FIBERS CONSOLIDATED UNDER HEAT AND PRESSURE IN A HOT PRESS TO A DENSITY OF 500 KG/M<sup>3</sup> (31 LBS/FT<sup>3</sup>) OR GREATER BY: (A) A WET PROCESS, OR (B) A DRY PROCESS THAT USES: (1) A PHENOLIC RESIN, OR (2) A RESIN SYSTEM IN WHICH THERE IS NO ADDED FORMALDEHYDE AS PART OF THE RESIN CROSS-LINKING STRUCTURE; or (C) A WET FORMED/DRY PRESSED PROCESS. OTHER MATERIALS MAY BE ADDED TO IMPROVE CERTAIN PROPERTIES, SUCH AS STIFFNESS, HARDNESS, FINISHING PROPERTIES, RESISTANCE TO ABRASION AND MOISTURE, AS WELL AS TO INCREASE STRENGTH, DURABILITY, AND UTILITY.

ANSI A135.4-2004, BASIC HARDBOARD, IS CURRENTLY UNDER ANSI REVISION AS BSR ANSI A135.4-20XX, BASIC HARDBOARD. THE TEXT ABOVE IS BEING BALLOTTED WITH STAKEHOLDERS THIS SUMMER.



CPA AND OUR MEMBERS ARE  
COMMITTED TO WORKING WITH ARB  
AND USEPA FOR REGULATORY  
SOLUTIONS THAT SERVE THE PUBLIC  
INTEREST, REFLECT SOUND SCIENCE,  
AND ARE TECHNOLOGY-BASED AND  
ECONOMICALLY FEASIBLE



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