

Update on California's Airborne Toxic Control Measure (ATCM) to Reduce Formaldehyde Emissions from Composite Wood Products

Conference Call with Annual Spring Meeting of
Composite Panel Association's
Environmental & Public Affairs Committee
Puerto Vallarta, Mexico

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Air Resources Board

Discussion Topics

- Implementation status
- Proposed amendments to ATCM
- Efforts to harmonize with U.S. EPA's proposed regulation
- Questions/comments

Implementation Status

- CARB airborne toxic control measure (ATCM) reduces formaldehyde emissions from three types of composite wood panels: particleboard (PB), hardwood plywood (HWPW), & medium density fiberboard (MDF)
- Lower Phase 2 emission standards all in effect (range from 0.05 ppm for HWPW to 0.13 ppm for thin MDF)
- Applies to products sold, supplied, used, or manufactured for sale in California
- Requires finished goods to be made from certified compliant HWPW, PB, and MDF panels
- CPA continues to be key industry stakeholder

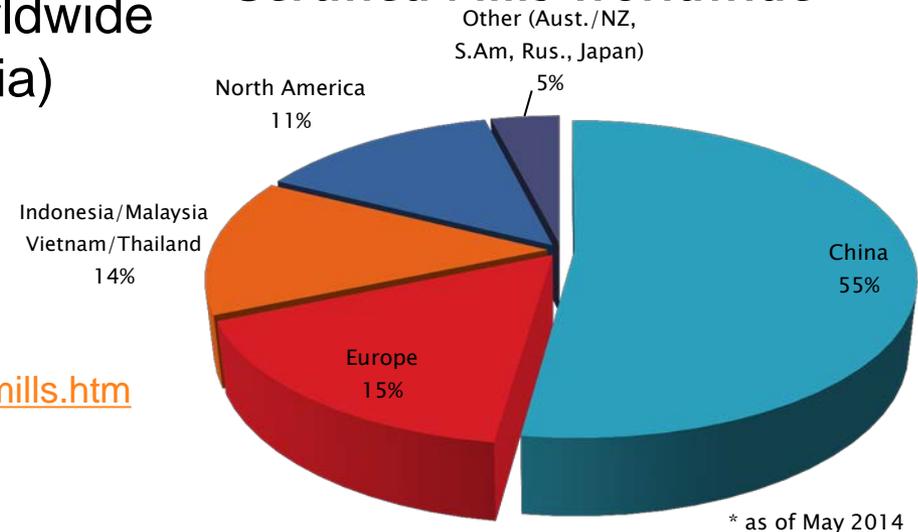
Implementation Status

continued

- Third party certification (TPC) program
 - Panel manufacturers must be third party certified by CARB-approved certifiers
 - TPCs provide two main services:
 - testing & product certification
 - 40 CARB-approved TPCs worldwide (North America, Europe, & Asia)
 - Over 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
 - Over 180 CARB-approved NAF and ULEF manufacturers

Implementation Status

continued

- Enforcement
 - Numerous inspections conducted at panel retailers and distributors, & retailers of finished goods throughout California
 - Several enforcement investigations in various stages of case development

Proposed Amendments - Objectives

- Clarify requirements and applicability
- Align ATCM with proposed U.S. EPA regulation to extent practicable
- Propose ATCM amendments for consideration by CARB's Board after U.S. EPA regulation finalized

Proposed Amendments

continued

- Proposed amendments to panel manufacturer requirements
 - Exemption continues for hardboard, but if found to emit more than 0.06 ppm, will be considered MDF
 - Additional quality control testing requirements
 - Customer notification re: non-complying panels
 - Amendments to NAF/ULEF requirements re: small mills, changes to approvals, & resin information

Proposed Amendments

continued

- Other proposed amendments
 - Third party certification program
 - clarify and tighten requirements
 - proficiency requirements for inter-laboratory comparisons
 - Labeling
 - partial bundles of panels
 - product labels from suppliers
 - 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 formaldehyde emission performance standard for unfinished laminated products of 0.13 ppm
 - Standard would apply to laminated products consisting of unfinished wood veneer affixed to certified platform
 - Synthetic laminated products still need certified platform
 - CARB is not proposing to require routine emissions testing or third party certification – up to fabricator to ensure compliance
 - Benefit: achieves additional emission reductions beyond current ATCM by ensuring laminated products do not emit more than certified platform

Proposed Amendments

continued

- Next steps regarding amendments
 - Possible additional public workshop on proposed amendments later this year
 - CARB's Board consideration in late 2014 or early 2015
 - Timing dependent on when U.S. EPA regulations are finalized
 - U.S. EPA regulations take effect one year after finalized

Efforts to Harmonize with U.S. EPA's Proposed Regulation

- Ongoing, productive discussions between U.S. EPA & CARB staff
 - U.S. EPA participation in CARB workshops and discussion sessions
 - U.S. EPA public comment period re: laminated products
- Elements still being considered
 - De minimus exemption for labeling
 - Reciprocity mechanism for U.S. EPA to acknowledge third party certifiers approved by CARB

Questions/Comments

- CARB staff appreciates the opportunity to participate in this meeting of CPA's Environmental & Public Affairs Committee
- Questions or comments?

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