



**Linda S. Adams**  
Secretary for  
Environmental Protection

# Air Resources Board

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**Mary D. Nichols, Chairman**  
1001 I Street • P.O. Box 2815  
Sacramento, California 95812 • [www.arb.ca.gov](http://www.arb.ca.gov)



**Arnold Schwarzenegger**  
Governor

December 11, 2007

Dear Sir/Madam:

We are sending you this letter because you have been identified to us as a potential retailer 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.

The ATCM requires that all products and finished goods sold by retailers must comply with the applicable emission standards. As a result of the ATCM, retailers will be required to keep records and document their purchase of compliant finished goods. At a minimum, the required records must include:

- the names of your suppliers of finished goods containing HWPW, PB, and/or MDF;
- the dates that you purchased your finished goods; and
- a description of the prudent precautions you took to ensure that the composite wood products and composite wood products contained in finished goods you purchase comply with applicable emission standards. "Reasonable prudent precautions" include communicating and instructing your suppliers that the goods they supply to you must comply with applicable emission standards, and that you obtain 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. As part of our ATCM enforcement program, retailers may be subject to periodic inspection by ARB or local air district personnel to ensure compliance with the requirements of the ATCM. Non-compliant retailers 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>.*

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California Environmental Protection Agency

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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](mailto:acsondes@arb.ca.gov).

Sincerely,

/S/

Janette M. Brooks, Chief  
Air Quality Measures Branch  
Stationary Source Division

Attachment

cc: Angela Csondes  
Substance Evaluation Section  
Air Quality Measures Branch