

California Air Resources Board
Staff Proposal
Alternate Regulatory Approach for Laminated Products Made with Wood Veneer*

Definition of Laminated Products

California's regulation to reduce formaldehyde emissions from composite wood products defines "laminated products" as "a finished good or component part of a finished good made by a fabricator in which a laminate or laminates are affixed to a platform." If the platform consists of a composite wood product, that product must comply with the applicable emission standards.

Proposal

Establish 0.13 ppm formaldehyde emission performance standard for laminated products made with wood veneer.

- The standard would apply to unfinished (i.e., no coating or topcoat) wood-veneered laminated products.
- Other requirements for all laminated products (i.e., labeling, use of certified platform material) would continue (i.e., for laminated products made with synthetic laminate and wood veneer).
- Routine quality control testing and third party certification of laminated products are not required. Fabricators would determine the best way to ensure laminated products meet the standard.
- Enforcement testing would consist of testing a specimen of a wood-veneered laminated product based on the flow-to-area ratio for medium density fiberboard (as specified in ASTM D 6007, the small chamber test method).

Basis

- Performance standard is based on the highest Phase 2 emission standard for products used as platforms for laminated products, that of thin medium density fiberboard.
- Approach treats laminated products as distinct from hardwood plywood. Unlike HWPW-CC, laminated products are not sold as hardwood plywood panels and are not labeled as complying with the ANSI/HPVA HP-1 standard for hardwood plywood.
- HWPC-CC panels are produced by several hundred mills worldwide; laminated products are produced by fabricators that number in the tens of thousands. There is not sufficient TPC/testing capacity to require fabricators to be subject to similar testing requirements as panel producers.

Benefits

- Establishes an emission ceiling and achieves additional emission reductions beyond the current regulation by ensuring that a laminated product does not result in emissions any greater than a certified platform.
- Performance based.
- Minimizes economic burden on small businesses.
- Simplifies enforcement - minimal deconstruction of laminated products will be needed to remove coating, if present; no need to determine the type of platform material, unless verifying that platform was made of compliant material. Laminated products sold as finished goods or incorporated as component parts of finished goods will be enforced to laminated product standard.

* Air Resources Board staff is developing proposed amendments to California's regulation of formaldehyde emissions from composite wood products. This one-page summary provides staff's current proposed changes to the requirements for laminated products that will be discussed at a public workshop on March 18, 2014. No changes are being proposed for laminated products made with synthetic laminate. More information on the workshop can be found at www.arb.ca.gov/toxics/compwood/compwood.htm.