

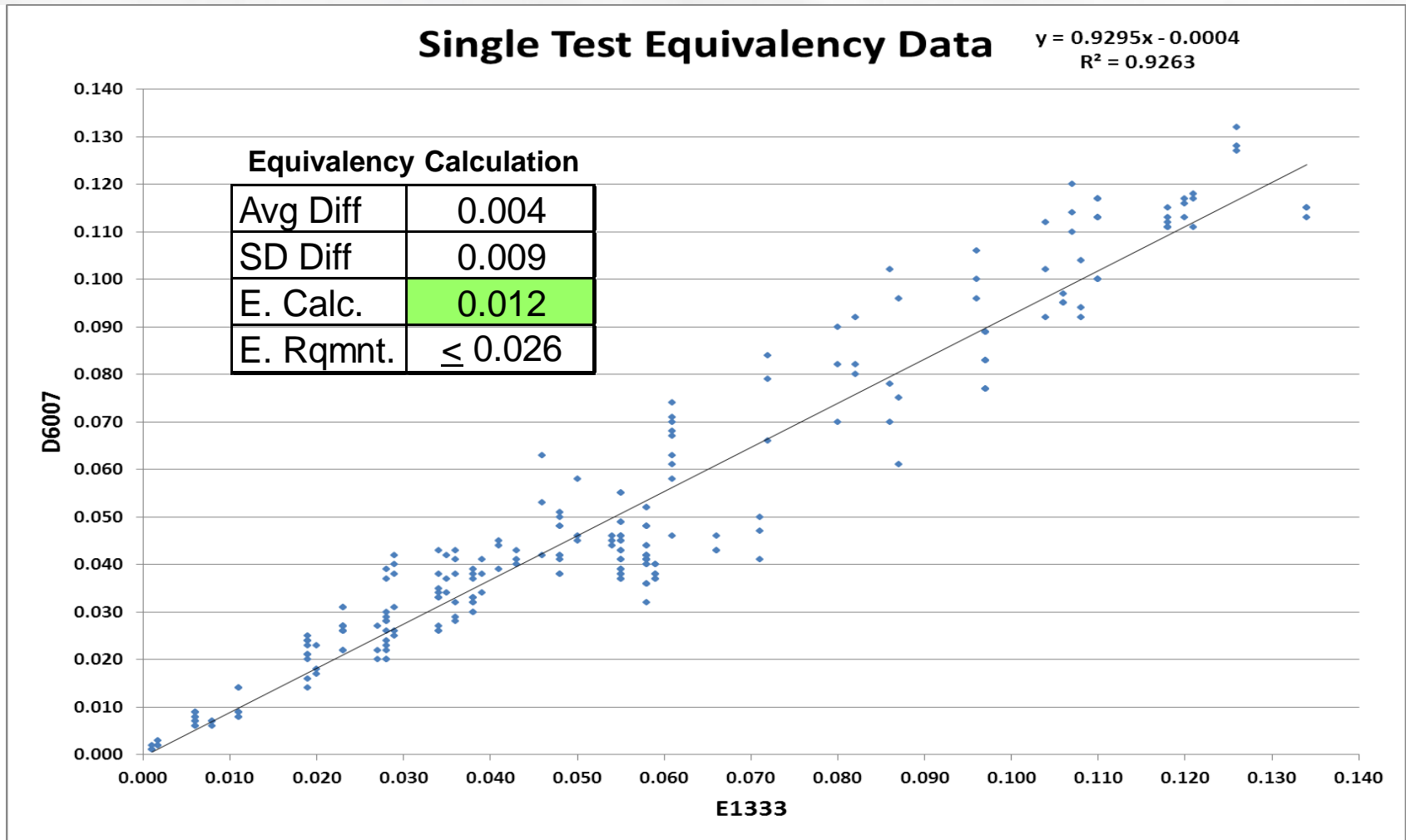
Third Party Certifier Considerations

Public Workshop Comments Comparing the CARB ATCM with EPA's Proposed National Regulation for Formaldehyde Emissions from Composite Wood Products

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Equivalency – E1333 vs Single Sample D6007

249 Data Pairs



TPC Testing Capacity – North America

TPC	CPA	BMH	PFS	TECO	HPVA	SCS	EPH	Forestwood	CCI
TPC Location	US	US	US	US	US	US	Germany	US	US
CARB TPC #	1	2	3	7	8	9	10	30	37
Total Listings	74	18	143	8	19	78	29	48	37
Testing Load/Yr	296	72	572	32	76	312	116	192	148
Canada	15				3				
Mexico	5						1		
USA	53	1	2		16				

1. The above does not include the 78 listings for NAF/ULEF Exemptions in North America. This would add another 39 tests per year on average for North America.
2. Testing load is based on 4 quarterly tests per mill listing.
3. Total listings are based globally for these TPCs.
4. It is not established whether there is sufficient reserve TPC testing capacity to adequately cover any significant increase in testing demand.

TPC Testing Capacity – Globally

- Globally, 852 mill/products listed as Phase 2 plus another 143 listed as NAF/ULEF exempt. Total annual TPC testing requirement = 3,480
 - Total number of **active** TPCs = 30
- Inclusion of potentially several thousands of laminators to those already covered under the CARB regulation would exceed the existing capacity of TPCs and their testing capabilities.