

ARB Evaluation of Composite Wood Products

**Stakeholder Meeting
October 5, 2004**

**Air Quality Measures Branch
Stationary Source Division**



California Environmental Protection Agency

Air Resources Board

Outline

- Introduction
 - Synopsis of August 4th meeting
- ATCM Needs Assessment
 - Description
 - Requirements
- Enforcement Program
 - Objective
 - Scope
 - Proposed enforcement approach
- Discussion
- Wrap-up

Summary of August 4th Meeting

- Background
 - Legal framework
 - Health and exposure information
- Technology evaluation
 - Survey results
 - Current emissions performance
 - Current levels
 - Best available control technology
- Potential regulatory concepts
 - Possible regulatory approach
- Data Needs
 - Costs, alternatives, imports (intrastate & foreign)

Needs Assessment Report

- A legally-required report on the need and appropriate degree of regulation for a substance the ARB has determined to be a toxic air contaminant (Health and Safety Code Section 39665)
- Establishes the basis for any proposed air toxics control measure
- Developed with the help from the local air pollution control districts, affected sources, and the public
- Made available for public review at least 45-days prior to ARB public hearing

Elements of a Needs Assessment

- Formaldehyde sources
 - Mobile, industrial, agricultural, natural
- Physical and chemical characteristics of formaldehyde
- Consideration of past and current formaldehyde regulations
- Emissions, exposure, and risk
- Available control technologies
- Costs and feasibility of reducing formaldehyde emissions
- Alternative methods or practices for reducing exposures
- Identify recommended control measures to reduce emissions and risk
- Potential adverse health, safety, or environmental impacts of implementing ATCM
- Impact of potential ATCM's on formaldehyde emissions and risk

Enforcement Program Overview

- Objective:
 - Develop a consistent, fair and appropriate method of enforcement
 - Achieve anticipated emissions reductions from composite wood products produced and used in California
- Scope:
 - Will apply to all commercial levels in California (panel manufacturers, distributors, finished product manufacturers and retailers)
 - May require segregation of California-only products

Enforcement Program Components

- Require compliance verification production to end-use
 - Raw boards, finished products
- Documentation records
 - Emissions testing - large chamber; QA/QC tests
- Sample retention
- Imports
 - Raw board testing
 - Finished product testing
- Allow for auditing/testing
- Labeling requirement

Enforcement at Production Level

- Manufacturers - Producers of panels and laminators
 - Product emissions testing
 - Similar to CPA certification
 - Production Documentation
 - Labeling
 - CPA Certification vs. ARB ATCM

Enforcement at Distribution Level

- Distribution facilities
 - Product testing
 - Similar to CPA certification for new boards/ modified product testing methods for finished products
 - Documentation
 - May include labeling component
 - Enforcement at distribution facilities
 - Includes imports

Enforcement at End-Use Level

- End-Use - retail stores, businesses who buy manufactured panels; includes finished products
 - Periodic product testing (test methods?)
 - Documentation
 - Enforcement at all retailers

Next Meeting

- Stakeholders meeting to discuss initial regulatory proposal
- Develop enforcement program
- Proposal cost analyses
- Develop regulatory language