

December 23, 2013

Lynn Baker  
Angela Csondes  
California Environmental Protection Agency  
Air Resources Board  
1001 I Street  
Sacramento, CA 95812-2815

Dear Lynn and Angela:

It was a pleasure to meet you at the CARB workshop on November 20, 2013 in Sacramento, California. We appreciate the California Air Resources Board seeking input from industry on the proposed formaldehyde regulations. Members of the Business and Institutional Furniture Manufacturer's Association understand the rationale for the change in direction and scope; however, we believe some elements of the 'Preliminary Draft – Airborne Toxic Control Measure to Reduce Formaldehyde Emissions from Composite Wood Products' and the 'Discussion Proposal - Alternate Regulatory Approach for Laminated Products' warrant additional consideration in order to ensure a smooth transition.

1. Issue – Distributing the emission limit in the 'Discussion Proposal – Alternate Regulatory Approach for Laminated Products' across the supply chain.

BIFMA laminated product finished goods manufacturers are concerned that the board manufacturers will view the proposed 0.11ppm as the board manufacturer limit; leaving furniture manufacturers little room for emissions associated with surface preparation, adhesives, and /or surface treatment materials.

BIFMA requests a one-year delay in the implementation of the laminated product section of the proposal. BIFMA also requests an additional three years at a maximum emissions limit of 0.13 ppm. We believe the extension is necessary to resolve issues with fabrics and porous veneers, and to reformulate some types of adhesives and coatings used in our industry.

2. Issue – Test method equivalence.

The ASTM methods referenced in the 'Discussion Proposal – Alternate Regulatory Approach for Laminated Products' are intended for testing emissions from flat panels.

The ANSI/BIFMA M7.1-2011 test method was specifically developed for components and is recognized as the global standard for quantifying emissions from 'finished' furniture. In addition to on-going quality assurance and economic benefits, BIFMA members believe that establishing equivalence of the ANSI/BIFMA M7.1-2011 will greatly assist with reducing unforeseen issues such as those described above as you consider tests for finished laminated products.

### 3. Issue – Labeling.

Replacement Parts – BIFMA members report that replacement parts are universally manufactured of the same materials and methods as parts for complete units where the entire unit is labeled for composite wood content. In order to avoid excessive cost and complexity, BIFMA requests an exemption from labeling replacement parts fabricated from a compliant platform when those parts are going into a finished product that is already labeled.

Labeling of individual panels - In order to avoid cost and quality issues associated with removing labels from individual panels prior to fabrication, BIFMA strongly supports an exemption from labeling of individual panels where the panel will be used to fabricate a finished product that will be labeled.

### 4. Issue - Label Content.

In order to avoid excessive cost and complexity, BIFMA requests that Section 93120.7-c-1 be modified to indicate that requirements may be met with ‘a label or combination of labels’, which provide all the required information. For example, if the date of manufacture were already labeled on the product, then it would be redundant to include again on the CARB label.

Thank you for your attention to our requests. Do not hesitate to contact us with any questions.

Sincerely,



David Panning  
Director of Technical Services