

September 27, 2024

Connie Klinkam
Composite Panel Association
19465 Deerfield Avenue, Suite 306
Leesburg, Virginia 20176

Dear Connie Klinkam:

Thank you for your letter dated July 18, 2024, requesting that CARB approve ISO 12460-2:2024, Wood Based Panels - Determination of Formaldehyde Release - Part 2: Small-Scale Chamber Method, as an alternative small-scale quality control test method for use by manufacturers of composite wood products.

CARB's Airborne Toxic Control Measure (ATCM) to Reduce Formaldehyde Emissions from Composite Wood Products gives us the authority to approve of alternative small-scale quality control test methods for use by manufacturers of composite wood products when conducting routine quality control testing of formaldehyde emissions. To be approved, such alternative quality control test methods must be shown to correlate to the ATCM's primary or secondary test methods.

We reviewed the test method, which specifies a procedure for a chamber test with different options of chamber sizes, from 0.004 m³ to 1 m³ in volume, to measure the formaldehyde concentrations in air from wood products under defined test conditions of temperature, relative humidity, loading and air exchange rate. According to the test method, the following analytical procedures can be used to quantify formaldehyde concentration in air: acetylacetone, chromotropic acid, DNPH, chemical sensor, and laser absorption spectroscopy (LAS). We understand that four of the analytical procedures have been in use for several years and are accepted as being well correlated to the ATCM's primary or secondary test methods. Because the LAS analytical procedure is new technology, CARB requested that you provide data demonstrating the correlation between the LAS analytical procedure and the primary or secondary test method. The data you provided demonstrates that the LAS measurements are highly correlated to the secondary test method measurements over a range of formaldehyde concentrations pertinent to our emission standards. Therefore, based on our analysis of the information provided, your request is approved.

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We will update our Composite Wood Products webpage listing of approved alternative quality control test methods to indicate that ISO 12460-2:2024 is approved for use by manufacturers of hardwood plywood, particleboard, and medium density fiberboard.

If you need further assistance, please contact Hilary Minor at hilary.minor@arb.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matthew O'Donnell". The signature is fluid and cursive, with the first name being more prominent.

Matthew O'Donnell, Chief, Risk Reduction Branch

cc: Hilary Minor, Air Pollution Specialist, Risk Reduction Branch