



AAMA Bulletin: California Formaldehyde Regulations

Originally Issued: September 24, 2008

Reminder Sent: December 8, 2008

Executive Summary

This bulletin will attempt to summarize activity to date and outline possible paths forward. The intent is not to debate whether the formaldehyde issue is harmful or the politics of the issue. The requirements have been signed into law; the industry must comply. The paper assumes that its intended audience is aware of much of the details of the issue and merely hits the highlights of a very complex issue as a refresher.

How We Got Here

In 2007 CARB, *California Air Resource Board*, adopted an ACTM, *Airborne Toxic Control Measure*, that restricts use of formaldehyde. On March 24, 2008, the EPA received a petition from 25 organizations with 5000 signatures. The petitioners are concerned about human health and environmental risks due to exposure to formaldehyde in composite wood products, including hardwood plywood, particleboard, and medium density fiberboard. The petition specifically asks the EPA to adopt and apply nationally the formaldehyde emissions regulation for composite wood products recently adopted by the California Air Resources Board.

AAMA, at the request of member Jeld-Wen, sent a bulletin to all AAMA members to make them aware of the situation and to ask them to submit comments directly to AAMA for a joint comment prior to the May 12th deadline. However, no comments were received.

At this time the formaldehyde restrictions are for products sold within California only.

Thresholds Manufacturers Have To Meet (PPM)

Effective Date	HWPW-VC	HWPW-CC	PB	MDF	THIN MDF
Jan 1, 2009	.08		.18	.21	.21
July 1, 2009		.08			
Jan 1, 2010	.05				
Jan 1, 2011			.09	.11	
Jan 1, 2012					.13
July 1, 2012		.05			



Fenestration Product Details

Exemptions: Windows containing less than 5% composites

Doors made with ULEF, *ultra low emitting formaldehyde*, or NAF, *no added formaldehyde*, containing less than 3% other composites

Inclusions: Window head and seat boards, jamb extensions, and any additions to factory window assemblies

Certification Requirements

Only manufacturers of hardwood plywood, particleboard and medium density fiberboard (MDF) are required to be third party certified. Certification is essentially a correlation between manufacturing process control and results yielded in standardized tests.

Fabricator Requirements (window and door manufacturers fall in this category)

- Label every product or box
- Must use only compliant composites
- Keep records for two years
- Subject to random inspections
- Sell through grace period of 18 months to deplete inventory

A very important if not critical message needs to be conveyed: Window manufacturers will be fabricators in the terms of this regulation and must comply by using only certified components and self labeling. They must maintain chain of custody records for two years. This commences January 1, 2009.

Please contact Chuck Anderson, AAMA Codes & Industry Affairs Manager, at canderson@aamanet.org if you require any additional assistance.

*AAMA is the source of performance standards, product certification,
and educational programs for the fenestration industry.SM*