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CARB
(California Air Resources Board)
PHASE I

Effective January 1, 2009 stricter regulations take effect in the state of California controlling the allowable formaldehyde levels in composite wood products. The regulations directly affect wood doors produced for installation within the state of California. This is due to composite materials used in the fabrication of wood doors such as particle board core and composite crossbands.

Oshkosh Door Company is pleased to announce that all of our door constructions are compliant with the new formaldehyde emission levels required under CARB phase I and commencing Jan 1, 2009 all shipments into California will be so labeled.

The following is an overview of the new language added to the current regulation as it affects wood doors:

California Code of Regulations 93120.12 title 17
AIRBORNE TOXIC CONTROL MEASURE TO REDUCE FORMALDEHYDE EMISSIONS
FROM COMPOSITE WOOD PRODUCTS

Purpose: Reduce formaldehyde emissions from composite wood products and finished goods containing composite wood products.

Definition of Composite wood products: Composite wood products are panel products made from pieces, chips, particles or fibers of wood bonded together by resin. The main focus of the regulation is on plywood, particle board and medium density fiberboard. Under the new regulation these products must meet specific emission levels set forth in 93120 based on test methods established in ASTM E 1333-96.

Effective dates: "Phase I" January 1, 2009 with more stringent requirements being implemented under Phase II beginning in January 2010 thru July 2012.

Application to wood doors: The new regulation applies to particle board core, composite crossbands and glues used in the fabrication of wood doors.

Control Process:

1. **Manufacturers:** Manufacture particleboard and MDF.

- All products they manufacture that are to be used in the state of California must be certified by a third party to be compliant with the regulations.
 - Manufacturers supply raw board to the fabricators who use the board in the door production process.
2. **Fabricators:** i.e. Door manufacturer: Assembles the finished door utilizing particleboard and MDF manufactured and certified as being compliant with regulations.
- Required to maintain records of manufacturer's certificates on file for doors supplied into the California market including dates of purchase and then to whom and when the finished doors were supplied. Records to be kept for a period of two years.
 - All doors supplied into the California market must be labeled in some fashion indicating they are compliant with 93120. The type and or configuration of the label is left to the fabricator.
3. **Sell through Distributors:** Door, frame and hardware distributors or millwork companies etc: who purchase doors for sale to the end user. In some cases a fabricator may fall under this category due to supplying doors fabricated by another door company.
- Responsible for informing the fabricator the finished goods will be used in California and need to be compliant with Regulation 93120.
 - Required to keep records showing date of purchase and documentation that the finished goods containing composite wood products are compliant with the regulations for a period of two years. Copies of fabricators invoices marked as being 93120 compliant will act as documentation.
 - If a distributor modifies the door in some matter that affects the formaldehyde emissions then they may fall under the requirements of a Fabricator.
 - **For More information regarding distributor responsibilities please refer to the following websites:**
 - a. www.arb.ca.gov/toxics/compwood/compwood.htm
 - i. From this website you may download the entire regulation along with the latest updates.
 - b. <http://www.arb.ca.gov/toxics/compwood/outreach/labelingadv.pdf>
 - i. This PDF explains the labeling process and provides contacts for further questions.