



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Jackson Morrill
Federal Wood Industries Coalition
c/o Composite Panel Association
19465 Deerfield Avenue, Suite 306
Leesburg, VA 20176

AUG 30 2017

Dear Mr. Morrill:

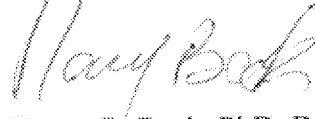
Thank you for your August 9, 2017, letter to the U.S. Environmental Protection Agency, regarding the Formaldehyde Emission Standards for Composite Wood Products final rule, which published on December 12, 2016 (81 FR 89674), pursuant to Toxic Substances Control Act Title VI (15 U.S.C. § 2697). In particular, you mentioned potential burdens associated with correlation testing using an ASTM E1333 large chamber method.

The EPA also acknowledges receipt of the referenced July 26, 2017, Composite Panel Association *Request for Interpretation* letter submitted via email by Mr. Jackson Morrill to the TSCA Title VI program office regarding the correlation testing issue. The EPA appreciates the detailed information and highlighted ramifications that would be endured by industry should the EPA not address this issue.

The EPA understands your concern and intends to pursue rulemaking, with an opportunity for public comment, to expressly allow tests conducted through the quality control methods listed in 40 CFR § 770.20(b) to be correlated to either ASTM E1333-14 or, upon a showing of equivalence, ASTM D6007-14 test chamber tests in 40 CFR § 770.20(d)(2)(i). This action aligns with the California Air Resources Board policy which allows mill quality control tests to be correlated to ASTM D6007-14 test chambers under their airborne toxic control measure to reduce formaldehyde emissions from composite wood products. As such, the EPA has been developing a direct final rule to update several voluntary consensus standards published in the December 12, 2016, final rule and intends to consider this technical amendment as part of that action. The EPA also intends to publish a companion Notice of Proposed Rulemaking for the action, in parallel with the direct final rule. If the EPA receives no adverse comment on the proposed rule, then the direct final rule would become effective by its own terms. If the EPA receives adverse comment, then the agency would withdraw the direct final rule and proceed to consider and respond to comments on the proposed rule. Both direct final and proposed rules are anticipated to be published in the Federal Register in September 2017.

Again, thank you for your letter. If you have any questions, please contact Erik Winchester of my staff at **Ex. 6** or winchester.erik@epa.gov.

Sincerely,



Nancy B. Beck, PhD, DABT
Deputy Assistant Administrator

Cc: American Chemistry Council
American Coatings Association
American Forest & Paper Association
American Home Furnishings Alliance
American Wood Council
APA – the Engineered Wood Association
Architectural Woodwork Institute
Association of Woodworking & Furnishing Suppliers
Business and Institutional Furniture Manufacturers Association
Hardwood Plywood and Veneer Association
HPVA Laboratories (CARB TPC-8)
International Wood Products Association
Kitchen Cabinet Manufacturers Association
Moulding & Millwork Producers Association
National Wood Flooring Association
Wood Machinery Manufacturers of America