

February 17, 2017

**RE: 40 CFR 770 FORMALDEHYDE EMISSION STANDARDS FOR COMPOSITE WOOD PRODUCTS**

Everyone who manufactures, imports, fabricates and sells composite wood product is gearing up for the implementation of the TSCA Title VI and 40 CFR 770 for formaldehyde emissions of composite wood products. We are in a period of many questions, such as how does this program affect my company, how does this affect other existing formaldehyde programs and what is going to happen with the transition in government to the new administration?

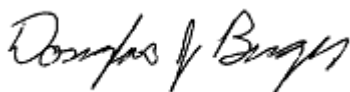
The EPA has announced a series of webinars which talk about the different rolls of companies under the regulation. These webinars are free to attend and provide a great opportunity to learn the program and ask questions. Following is a link to the webinars:

<https://www.eventbrite.com/e/us-epa-tsca-title-vi-formaldehyde-standards-webinar-general-audience-tickets-29580234277>

There are 2 main formaldehyde programs in the US which will be affected by the new EPA program. First, the California Air Resource Board (CARB) program is still in place. The EPA program was modeled after the CARB program and the intent was to allow some reciprocity between the programs. The EPA has allowed a 1 year reciprocity period. CARB had stated they intended to provide some type of reciprocity. The second formaldehyde emission requirement which is affected by the EPA program is 24 CFR 3280.308 for manufactured housing. Manufactured housing was exempted from the CARB program, but not from the EPA program. TSCA Title VI requires the Secretary of Housing and Urban Development to update 24 CFR 3280.308 to reflect the standard established by the TSCA. This is required to be done within 180 days of the promulgation of 40 CFR 770. That date is June 10, 2017. MHI has recommended a course which would remove the requirement for testing the finished goods and make most manufactured housing companies fabricators under 40 CFR 770. An EPA webinar for fabricators can be found at the link above.

As President Trump took office one of his first actions was issuing a memo on January 20, 2017 which delayed the implementation of new regulations in order to allow the new administration time to review them. The result was that the original date which TPCs and Accreditation bodies could start signing up for the EPA program was delayed from February 10 to March 21, 2017. Based on comments from the EPA there is no plan to delay the compliance date of December 12, 2017.

Respectfully,



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