



Regarding: Docket ID number EPA-HQ-OPPT-2012-0018
Issue: LUMBER CORE FLOORING

October 4, 2013

Ms. Lynn Vendinello
Chief, Fibers and Organics Branch
National Program Chemicals Division (NPCD)
Office of Pollution Prevention and Toxics (OPPT)
C/O Document Control Office (7407M)
Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460-0001

Regarding: Docket ID number EPA-HQ-OPPT-2012-0018

Dear Ms. Vendinello,

The following comments on the proposed formaldehyde regulations (docket EPA-HQ-OPPT-2012-0018) are provided by the National Wood Flooring Association (NWFA).

Please note this is the **THIRD of FOUR** documents provided by the NWFA regarding the proposed regulations. These documents are:

- 1) Docket ID number EPA-HQ-OPPT-2012-0018: Comments on the entire primary regulation
- 2) Docket ID number EPA-HQ-OPPT-2012-0018: Comments specific to the Inclusion of Bamboo Flooring
- 3) **Docket ID number EPA-HQ-OPPT-2012-0018: Comments specific to the Inclusion of Lumber Core Flooring**
- 4) Docket ID number EPA-HQ-OPPT-2011-0380-0001: Comments on the regulations specific to Third Party Certifiers

The National Wood Flooring Association (NWFA) is a not-for-profit trade association representing all segments of the hardwood flooring industry, including manufacturers, distributors, retailers, installers, inspectors, importers, exporters, service providers, and consultants. The NWFA represents more than 2600 small, medium and large businesses in the US and overseas, spanning the entire hardwood flooring supply chain. Members include manufacturers (both what the new regulation would define as a manufacturer as well



as fabricators and laminators), as well as importers, distributors, and retailers, all of whom will face increased costs as a result of these proposed regulations.

The NWFA is not a testing or certification organization and will not derive any revenue from the industry as a result of these regulations. The NWFA would be pleased to work with the EPA in industry outreach to help educate our membership regarding their final responsibilities under the new regulations.

Concerns in Brief Regarding the Inclusion of Lumber Core Flooring

We are very concerned that this proposed regulation means that engineered wood flooring could be labeled a “toxic product.” Wood is one of the most environmentally positive building products available to the American consumer and is prized for its healthy contributions to our homes and offices. It is naturally produced, lasts for centuries unlike other surface materials such as carpeting which is often chemically produced, not biodegradable and must be frequently replaced, clogging landfills. The idea that wood products should be in anyway considered toxic is distressing and painful for us to consider. The end impact of this regulation is likely to be a significant decrease in the marketability of both engineered wood flooring and laminate flooring with an HDF core and a further “commoditization” of the market.

The NWFA appreciates the EPA’s desire to protect the public health, but hopes regulations can be structured in such a way as to prevent unnecessary burdens on an industry still recovering economically.

The NWFA feels very strongly that any expansion over what CARB currently covers must be investigated further. We urge an adoption of regulations that as closely as possible mirror the current CARB program. **The inclusion of lumber core flooring, which is the topic of this specific commentary, is a significant expansion over CARB.**

Lumber core flooring producers have not been covered by the CARB program. They have no in-house QC laboratories and no experience with the testing protocols or record keeping responsibilities. Given that almost all lumber core flooring is produced with no glue usage in the core, it is inappropriate that they should be included in an expensive certification program. And certainly, as we argue elsewhere, at an absolute minimum, any factory finished flooring should be exempted as the finish would contain any possible emissions from such a product. If the EPA feels uncertain about making an absolute ruling now, we ask that the industry be given time to provide studies demonstrating the such a product does not require inclusion into the certification program.

To help the EPA understand the production conditions and why this produce should be specifically exempted, we have provided illustrations of the various forms of lumber core flooring construction.

As in all our commentary, we reference each concern/comment with the page number of the regulations as listed in the Federal Register / Vol. 78, No. 111 / Monday, June 10, 2013 with black font being the original reference text and NWFA Comments being provided in blue font.



We appreciate the EPA seeking industry commentary and stand ready to provide further information as required.

Thank you,

Submitted on behalf of the NWFA Government Relations Committee and its Taskforce on the EPA's Formaldehyde Standards for Composite Wood Products by:

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p. 34829

ORIGINAL REFERENCE: EPA notes that the statutory definition of hardwood plywood includes a number of different types of cores that may not appear to expressly fit under the statutory emission standards for veneer core and composite core. Yet, EPA does not believe that Congress intended to exempt hardwood plywood made with a lumber core, for example, from the emission standards of TSCA Title VI in part because the statute says that “the emission standards . . . shall apply to hardwood plywood.” EPA requests comment on whether and how this revision would affect entities making laminated products with lumber cores or any other special core material.

NWFA COMMENT: The NWFA requests clarification on the issue of lumber core flooring (and any other products that might fit this production style.) This would suggest the inclusion into the independent certification requirement a product known as “lumber core” flooring, which is also sometimes called “sandwich” or “3 layer” flooring.

CARB does not require this type of flooring to be certified at this time and **the NWFA requests that the EPA does not expand TSCA VI beyond what CARB currently covers. Therefore, lumber/special core flooring should be specifically exempted from from the program.**

(Engineered flooring utilizing plywood/HDF/particleboard platforms should utilize properly certified cores as they are required to do under CARB.)

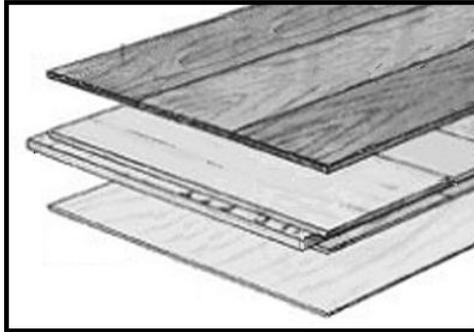
However, if such a production style is included, then we believe that all factory finished lumber core flooring should be specifically exempt. Further, if it is determined to be necessary to expand the certification system, it should be done as a separate regulation that can be appropriately customized for the downstream industries.

If the EPA believes that there is doubt regarding the need to specifically add in lumber core flooring, we ask for a delay in the stated inclusion so the lumber core flooring industry can provide studies and data showing that such production styles naturally meet the required emission standards without requiring independent TPC oversight.

Finally, if the EPA believe that such a product must be included in this immediate regulation, it is requested that such a product be specifically included only in the third period of the phased-in timeline as a product new to the certification program. Producers of lumber core have no experience with CARB regulations/procedures and will need time to develop systems, build/contract QC laboratories, etc.

Further, we believe that producers of lumber core who convert to a completely NAUF or NAF production condition should be permitted a general exemption from the program.

The exact pattern and construction of lumber core will vary from mill to mill however the consistent features are: 1) three layers, 2) cross structure with the core running perpendicular to the two veneer faces.



While there are many core patterns possible in lumber core flooring, **the vast majority of constructions, by far, use no glue at all between core lumber strips.** The top and bottom layers to hold the entire product together, much like bread holds the meat in a sandwich.

To help the EPA better understand unique product and why it should be specifically exempted, we have outlined some of the production conditions below.

LUMBER CORE PRODUCTION SAMPLES

The exact pattern and construction of “lumber core” flooring, which is also sometimes called “sandwich” or “3 layer” flooring will vary from mill to mill. The consistent features are: 1) three layers, 2) cross structure with the core running perpendicular to the two veneer faces.

The majority of constructions use no glue at all between core lumber strips. The top and bottom layers to hold the entire product together, much like bread holds the meat in a sandwich. For example:

1) Pictured below, the strips have been placed in a staggered pattern with no glue between the strips.



2) Here, the core strips' length equals the width of the final plank. Again there is no glue between the strips. The glue is on the surface of the strips only.



3) In other cases, the small strips are fed into a stringer line where circle saws cut 2 grooves roughly 3mm (1/8”) deep into the surface. String is then pushed into these grooves so the mill can move the core fingers as

one piece. The strings temporarily hold the fingers together until the top and bottom layers are applied. Again, no glue is placed between the strips.



4) Some mills may use a tape (similar to a masking tape) to hold their core strips together prior to veneer gluing, but again, place no glue between the strips.



5) Lastly a very few mills will glue the strips together or use an FJL (finger-jointed laminated) core. Here, random width strips are edge-glued together to form the core:



We note that finger-jointed lumber has been specifically exempted from both CARB and the EPA oversight regulation—this is not a construction method that requires certification. We feel that the logical extension is that 3 layer flooring with an FJL core is also exempt.

VENEER PROCESSING/FINAL PRODUCTION

After the core has been made, veneer is glued to the top and bottom. The backing veneer is usually thin rotary sawn plies. For higher end flooring, the backer might be a low grade veneer of the same species as the top (face) veneer.



The top veneer might be a thin rotary peeled veneer, or multiple sawn or sliced strips, or a thicker sawn plank between 3mm to 6mm (1/8" to 1/4"). Depending on the factory, they may place face veneers on cut to size cores, one by one. Another option is to place multiple face veneers on a wide core board then cut apart into single planks as shown below:



Many final floors will show significant gapping in the core.



The final floor blank is tongue and grooved. The individual core strips are clearly visible on the tongue.



Given the minimal or zero amounts of glue used in the core, and the fact that CARB does not currently cover this type of flooring, the NWFA requests that the EPA not expand TSCA VI beyond what CARB currently covers. Therefore, a product known as “lumber core” flooring, which is also sometimes called “sandwich” or “3 layer” flooring should be specifically exempted from from the program. Once again, engineered flooring utilizing plywood/HDF/particleboard platforms should utilize properly certified cores as they are required to do under CARB.



**Conclusion regarding Docket ID number EPA-HQ-OPPT-2012-0018
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We thank the reviewers for providing us the opportunity to comment on these regulations. Again, we emphasize our three key points:

- The protection of confidential business information and a simplified label.
- The use of a phased-in timeline, allowing a minimum of one year for TPC's to become accredited, followed by a year for primary panel manufacturers, followed by a year for those industries or producers new to the CARB certification program.
- The specific exemption of secondary manufacturers/fabricators/laminators, and barring that, the exemption of factory finished material, and barring that, including them only through the development of a second regulation that would be tailored for these downstream industries.

Specifically for lumber core flooring, we request that the new TSCA regulations are not expanded over CARB to include lumber-core flooring. If they are, we request a general exclusion of all factory finished flooring. However

- **If the EPA believes it necessary to cover any/all of these products, we ask that they be added in at the end of a phased-in timeline to allow these manufacturers time to prepare since none were covered under CARB and these regulations/procedures will be new to them.**

Finally, we remind readers that this is the THIRD of FOUR documents provided by the NWFA.

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