



Composite Window Components

Not Exempt from CARB Requirements

BY CHUCK ANDERSON

California, the perennial bellwether of trends in lifestyle and legislation, has fired regulatory shots across the window industry's bow several times in the last decade. The Golden State is back in the industry's news again with an Airborne Toxic Control Measure (ACTM) to govern the content of formaldehyde in composite wood products.

CARB—Why You Should Care

Developed by the California Air Resources Board (CARB), the new requirements that took effect January 1, 2009, require that composite wood products sold in California—hardwood plywood (HWPW) panels, particle board (PB) and medium-density fiberboard (MDF)—must meet the required low levels of the chemical. Similar requirements for HWPW with a composite core will take effect July 1, 2009. The regulations “represent a historic step forward in reducing alleged carcinogenic formaldehyde emissions that can collect over time indoors,” says CARB chair Mary Nichols.

The reason why this measure is of particular interest to our industry is that it applies not just to stand-alone materials (such as 4-by 8-foot panels), but also to components used in other products, including doors and windows.

There are exceptions, specifically windows for HUD-approved manufactured homes, windows containing less than five percent by volume of composites and exterior doors containing less than three percent by volume of composites. Also exempt are those meeting the

Ultra Low Emission Formaldehyde (ULEF) or No Added Formaldehyde (NAF) requirements. However, what the exceptions give, the regulation's somewhat unique definition of a “window” takes away.

CARB specifies that a window frame includes jambs, stiles, sashes and rails, yet excludes sills, headers and window seats, which means these components do not qualify for the exemptions. The same logic applies to decorative wood pieces, such as corbels, moldings, rosettes and transition blocks. If these pieces are made out of products that contain HWPW, PB or MDF in their products, then these goods are subject to the regulation as a finished good.

So if a window manufacturer's California-bound products have parts, head and seat boards, jamb extensions or additions to factory window assemblies made of composite wood, they are specifically covered by the new CARB rule.

Extensive Criteria Must Be Met

The certification, labeling and chain of custody compliance provisions are extensive:

- Composite parts used must comply with the emission and certification requirements of the rule;
- Records showing the date of purchase of the composites must be kept for two years. This applies to each participant in the supply chain—fabricators, distributors and dealers;
- A label (stamp, tag, sticker or bar code) must be applied to every product or product package, bearing the fabricator's name,

production date and the compliance standard of the product being used. If sills, window headers and window seats contain composite wood, the composite wood must comply with the ACTM and the finished window product must be labeled appropriately; and

- It is further recommended that the manufacturer obtain written documentation of product compliance from suppliers and provide this documentation to customers.

Keep in mind that what happens in California rarely stays in California. In fact, a petition was filed with the U.S. Environmental Protection Agency (EPA) last March to adopt the California regulation nationwide. While the EPA denied the petition in June (due in part to AAMA commentary), it agreed to initiate an investigative proceeding that will include an industry survey and stakeholder meetings.

AAMA has concurred with the EPA's objective of reducing human exposure to formaldehyde, regardless of the source, which can include carpet, paints, stains and many other products besides doors and windows. We will be monitoring further developments to ensure that reasonable goals for fenestration products are achieved within the context of industry performance-based standards. ■

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