



Air Resources Board



Matthew Rodriquez
Secretary for
Environmental Protection

Mary D. Nichols, Chairman
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov

Edmund G. Brown Jr.
Governor

January 31, 2014

Ms. Olga Prokopyeva
Syktyvkar Plywood Mill Ltd.
66 Uchtinskoe ave,
Syktyvkar, 167026
Republic of Komi,
Russia

Dear Ms. Prokopyeva:

This letter is in response to a written request from Syktyvkar Plywood that we received on January 13, 2014 for Air Resources Board (ARB) approval to renew your Executive Order as an ultra-low-emitting formaldehyde (ULEF) manufacturer of composite wood products destined for sale, supply, or use in California. Your application includes a request to manufacture hardwood plywood-veneer core (HWPW-VC) with an ULEF resin system. Staff reviewed your request and deemed your renewal application complete, pursuant to section 93120.3(d) of the Airborne Toxic Control Measure to Reduce Formaldehyde Emissions from Composite Wood Products, (ATCM), title 17, California Code of Regulations, sections 93120-93120.12. We are pleased to inform you that your application to renew your Executive Order as an ULEF manufacturer has been approved.

The enclosed Executive Order N-14-108 specifies ongoing conditions that must be met by manufacturers of ULEF products for sale, supply, or use in California. In addition, please note that all relevant provisions and requirements of section 93120.3(d), and other sections in the ATCM remain in effect. Section 93120.3(d)(5) specifies that the Executive Order issued to ULEF manufacturers has a duration of two years, and the manufacturer may apply for re-approval as provided in the section. At the appropriate time you may address your application for re-approval to me at the address noted in the letterhead. Furthermore, section 93120.3(d)(7) requires ULEF manufacturers to notify ARB in advance if they decide to change to urea formaldehyde based resins, and must comply with the requirements of section 93120.3(b) for that product type.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

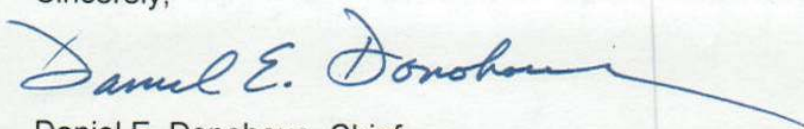
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Ms. Prokopyeva
January 31, 2014
Page 2

Please note that approval of your Executive Order is contingent upon the use of the resins specified, and ARB must be notified in advance of any changes in resin supply that Syktyvkar Plywood decides to make for its ULEF products.

If you have any questions regarding this matter, please contact Angela Csondes at (916) 445-4448 or via email at acsondes@arb.ca.gov or Layla Gonzalez at (916) 324-0354 or via email at lgonzale@arb.ca.gov.

Sincerely,



Daniel E. Donohue, Chief
Emissions Assessment Branch
Stationary Source Division

Enclosure

cc: Angela Csondes
Air Pollution Specialist
Technical Analysis Section
Stationary Source Division

Layla Gonzalez
Air Pollution Specialist
Technical Analysis Section
Stationary Source Division

Fraunhofer Institute for Wood Research
Wilhelm-Klauditz-Institut WKI

Director
Prof. Dr. Ing. Bohumil Kasal

Head of the Testing, Supervision and
Certifying Body
Dipl.-Ing. Harald Schwab

Bienroder Weg 54 E
38108 Braunschweig

Dipl.-Ing. Harald Schwab
Head of the Testing, Supervision and
Certifying Body
Quality Assessment QA
Phone + 49 531 2155-370 | Fax -907
harald.schwab@wki.fraunhofer.de
www.wki.fraunhofer.de

Braunschweig, 03.02.2012

Fraunhofer WKI | Bienroder Weg 54 E | 38108 Braunschweig

Syktyvkar Plywood Mill Ltd.
Uchtinskoe ave. 66
167026 Syktyvkar
Republic of Komi
Russia

Your reference

Your message dated

Our reference
Mes/Nu

Withdrawal of CARB Certification


Dear Sir or Madam,

upon the Executive Order N-11-108 relating to the ARB Approval for an exemption from Third Party Certification for composite wood product manufacturers that use ultra-low-emitting formaldehyde resins we like to inform you that the CARB certificate number 561-2008-11-TPC-4 issued by WKI as approved Third Party Certifier is not applicable any longer. This certificate is replaced by the Executive Order!

The exemption from Third Party Certification is valid for two years from the date your Executive Order is signed. After two years a re-approval is requested and must include all information and data as mentioned in section 93120.3 (d)(5) of the ATCM or attachment C of the ULEF / NAF application form respectively.

Please contact us at least three month in advance that we can assist you to provide all necessary data for your re-approval.

With kind regards



Dipl.-Ing. Harald Schwab



DAC-15-0009-08



Niedersächsisches Ministerium
für Soziales, Frauen, Familie,
Gesundheit und Integration

Anerkannte Prüf-, Überwachungs- und Zertifizierungsstelle NDS08



EC notified 0765



CARB notified TPC 4

Fraunhofer-Gesellschaft zur Förderung der angewandten Forschung e.V., München
Executive Board
Univ.-Prof. Dr.-Ing. habil. Prof. e.h. mult. Dr. h.c. mult. Hans-Jörg Bullinger, Präsident
Prof. Dr. rer. nat. Ulrich Buller
Prof. (Univ. Stellenbosch) Dr. rer. pol. Alfred Gossner
Dr. Alexander Kurz

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State of California
AIR RESOURCES BOARD

EXECUTIVE ORDER N-14-108

Relating to ARB Approval for an Exemption from Third Party Certification for
Composite Wood Product Manufacturers that use
Ultra-low-emitting Formaldehyde Resins under
section 93120.3, title 17, California Code of Regulations

Syktyvkar Plywood Mill, Ltd. (Syktyvkar Plywood)

WHEREAS, the Air Resources Board (ARB) has adopted the "Airborne Toxic Control Measure to Reduce Formaldehyde Emissions from Composite Wood Products" (the "ATCM"; title 17, California Code of Regulations, sections 93120-93120.12), which establishes formaldehyde emission standards for composite wood products;

WHEREAS, section 93120.1(a)(42) of the ATCM defines "ultra-low-emitting formaldehyde (ULEF) resins" to mean "resins formulated such that average formaldehyde emissions are consistently below the Phase 2 emission standards in section 93120.2," for making hardwood plywood, particleboard, or medium density fiberboard;

WHEREAS, section 93120.3(d) of the ATCM allows manufacturers of hardwood plywood, particleboard, and medium density fiberboard who use ULEF resins to apply for written approval from the Executive Officer for an exemption from the requirements of section 93120.3(b) of the ATCM;

WHEREAS, section 93120.3(d) of the ATCM allows manufacturers of hardwood plywood, particleboard, and medium density fiberboard who use ULEF resins to submit an application for an exemption from the requirements of section 93120.3(b) of the ATCM to the Executive Officer, which includes: (A) a statement indicating which product types will be manufactured using ULEF resins for sale in California; (B) the chemical formulation of the candidate ULEF resin(s), including base resins, scavenger resins, scavenger additives, catalysts, and other additives as used in manufacturing; (C) the name of their ARB approved third party certifier; and (D) data on the emissions performance of the candidate ULEF resin(s);

WHEREAS, the data on emissions performance of the candidate ULEF resin required in section 93120.3(d) of the ATCM must be obtained by working with an ARB approved third party certifier, and must include six months of routine quality control testing data, the correlation of the routine quality control testing data to primary or secondary testing data, and the results of two primary or secondary method tests, as required in Appendix 2 of section 93120.12 of the ATCM;

WHEREAS, section 93120.3(d)(2) of the ATCM requires that ninety percent of the six months of routine quality control testing data and the results of two primary or secondary method tests must be shown to be no higher than 0.04 ppm, and that all data must be shown to be no higher than 0.05 ppm for hardwood plywood and 0.06 ppm for particleboard, medium density fiberboard, and thin medium density fiberboard;

WHEREAS, section 93120.3(d)(5) of the ATCM provides that the Executive Officer shall approve the application and issue an Executive Order if the evidence submitted by the applicant is sufficient to demonstrate that the applicant has met the requirements specified in sections 93120.3(d)(1) and 93120.3(d)(2) of the ATCM;

WHEREAS, Syktyvkar Plywood Mill, Ltd. (Syktyvkar Plywood or the "applicant") submitted an application that we received on December 12, 2011;

WHEREAS, the original application from Syktyvkar Plywood specified the range in product manufacturing parameters, applicable post-press product treatments, base resin trade name(s) and base resin manufacturer(s)/supplier(s), and other ingredients added to the base resin by the applicant to manufacture ULEF products;

WHEREAS, ARB was provided base resin/adhesive information specifying the base resin polymer type and minimum and maximum values of all major and any minor ingredients in the base resin on a percent by weight of solids basis;

WHEREAS, the original application from Syktyvkar Plywood was deemed complete on December 16, 2011, and Syktyvkar Plywood was issued Executive Order N-11-108, signed on December 20, 2011, listing the base resin in Confidential Attachment A;

WHEREAS, section 93120.3(d) of the ATCM allows ULEF product manufacturers to apply for re-approval to ARB by submitting an updated application;

WHEREAS, Syktyvkar Plywood submitted an updated application for re-approval to ARB on January 13, 2014;

WHEREAS, the updated application for re-approval from Syktyvkar Plywood was deemed complete on January 28, 2014;

WHEREAS, the Executive Officer finds that the completed, updated application demonstrated the ULEF manufacturer's ability to continue to comply with section 93120.3(d); and

WHEREAS, the Executive Officer approved Syktyvkar Plywood's request for re-approval, and it is appropriate that Executive Order N-11-108 be superseded by this Executive Order N-14-108.

NOW, THEREFORE, IT IS ORDERED that Syktyvkar Plywood is hereby approved as an ULEF manufacturer of hardwood plywood-veneer core that is exempt from the requirements of section 93120.3(b) and Appendix 2 of section 93120.12 of the ATCM, provided that the following terms and conditions are met for products sold, supplied, offered for sale, or manufactured for sale in California;

1. Syktyvkar Plywood must use the commercial resins listed and suppliers listed in section A of Confidential Attachment A of this Executive Order for the manufacture of ULEF hardwood plywood-veneer core products.
2. The chemical formulation of the base resins used for the manufacture of ULEF composite wood products by Syktyvkar Plywood must be within the ranges specified in section B of Confidential Attachment A of this Executive Order.
3. As specified in section B of Confidential Attachment A, Syktyvkar Plywood is legally responsible for insuring that the base resin is within the ranges specified in section B.
4. The application rate of the base resins used for the manufacture of ULEF composite wood products by Syktyvkar Plywood must be within the ranges specified in section C of Confidential Attachment A of this Executive Order.
5. Other chemical components of the base resins (such as sizing wax and release wax) used for the manufacture of ULEF composite wood products by Syktyvkar Plywood must be within the ranges specified in section D of Confidential Attachment A of this Executive Order.
6. The allowable operating parameters for press temperature and press time for the base resins used to manufacture the ULEF composite wood products by Syktyvkar Plywood must be within the ranges specified in section E of Confidential Attachment A of this Executive Order.
7. Only the composite wood products with the product names listed in section F of Confidential Attachment A of this Executive Order are authorized under this Executive Order.

BE IT FURTHER ORDERED that this Executive Order N-14-108 supersedes Executive Order N-11-108, which was issued on December 20, 2011;

BE IT FURTHER ORDERED that Syktyvkar Plywood may change the resin system supplier listed in section A of Confidential Attachment A of this Executive Order if the new resin supplier supplies the same resin type listed in Confidential Attachment A of this Executive Order, at least two primary or secondary method tests are performed on random samples selected by their ARB-approved

third party certifier, and the Chief of the Emissions Assessment Branch of the Stationary Source Division is notified before Syktyvkar Plywood uses the resin for production;

BE IT FURTHER ORDERED that Syktyvkar Plywood must conduct confirmatory testing for a new resin supplier by demonstrating that the results of two primary or secondary method tests for the new resin system supplier are no higher than 0.04 ppm for the ULEF products authorized under this Executive Order;

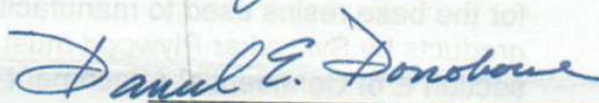
BE IT FURTHER ORDERED that this Executive Order shall have a duration of two years from the date that it was signed, and the applicant may apply for re-approval as provided in section 93120.3(d)(5) of the ATCM.

BE IT FURTHER ORDERED that the applicant must maintain records in electronic or hard copy form for two years, for review by ARB upon request, as specified in section 93120.3(g) of the ATCM.

BE IT FURTHER ORDERED that the Executive Officer may review and for good cause, modify or revoke this Executive Order as provided in section 93120.3(d) of the ATCM. The Executive Officer shall not modify or revoke this Executive Order without affording the applicant the opportunity for a hearing in accordance with the procedures specified in title 17, California Code of Regulations, section 69955.1 et seq.

BE IT FURTHER ORDERED that the applicant must notify the Executive Officer in writing within 30 days if there is any change in their product manufacturing parameters or base resin manufacturer(s) or supplier(s) that does not comply with any of the requirements, terms or conditions specified in the ATCM or this Executive Order.

Executed at Sacramento, California this 31ST day of January, 2014.



Daniel E. Donohoue, Chief
Emissions Assessment Branch
Stationary Source Division

Attachment A
Formulation Data and Operating Parameters
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State of California
 AIR RESOURCES BOARD
 Executive Order N-14-108

Syktyvkar Plywood Mill, Ltd. (Syktyvkar Plywood)

Section A.

Resin Supplier: Syktyvkar Plywood Mill, Ltd.

- **Address:** 66 Uchtinskoe Ave., Syktyvkar, 167026, Republic of Komi, RUSSIA

Commercial Resin: PFP – 3013

- **Resin Binder Type:** Phenol formaldehyde (PF)

Section B.

Base Resin Chemical Formulation (Percent by Weight):

Resin trade name: PFP – 3013			
Chemical type:	Phenol Formaldehyde (PF)		
Mole ratio:	P:F ratio = 1 to 2.3		
List of Ingredients			
Ingredient	CAS No.	Percent by Weight	
		Minimum	Maximum
Phenol	108-95-2	21	24
Formaldehyde	50-00-0	16.3	16.3
Sodium hydroxide	1310-73-2	12	13.8
Lignosulphonate	8062-15-5	3.5	3.5
Water	7732-18-5	45.4	47.7

Attachment A
Formulation Data and Operating Parameters
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State of California
AIR RESOURCES BOARD
Executive Order N-14-108

Syktyvkar Plywood Mill, Ltd. (Syktyvkar Plywood)

Section C.

Base Resin Application Rate (Pounds per 1,000 square feet):

- Hardwood plywood – veneer core (min/max): 26 to 32

Section D.

**Other Ingredients Added by the Composite Wood Product Manufacturer
(Amount Added per Pound of Base Resin on a 100 Percent Solids Basis):**

- Chalk (CAS No. 72608-12-9): 3 to 3.2 percent by weight
- Flour (No CAS No.): 1 to 2.8 percent by weight

Section E.

Allowable Operating Parameters:

- Press Temperature (°C)
 - Hardwood plywood – veneer core (min/max): 125 (no range given)
- Press Time (Minutes):
 - Hardwood plywood – veneer core (min/max): 3 to 28

Section F.

Product Names & Types Authorized in Executive Order N-14-108:

- Unfaced birch plywood (SyPly™); thickness range = 4 to 40 mm