



OWENS FLOORING

2/9/18

To our Valued Customers,

RE: Compliance to CARB Regulation 93120 to reduce formaldehyde emissions from composite wood products.

Owens Flooring has always elected to actively participate in responsible environmental initiatives for the benefit of *all our customers*. As such, Owens Flooring products comply with CARB Phase 2 requirements *by design*.

The California Air Resource Board's Airborne Toxic Control Measure (Regulation 93120) established ceiling levels for off-gassing of formaldehyde used in the manufacture of composite wood products. Compliance requirements are applicable by categories: Manufacturers, Distributors, Importers, Fabricators, Retailers, and Third Party Certifiers. Under the current CARB Phase 2 regulation as a "Fabricator", Owens Flooring must exercise "reasonable prudent precautions" to ensure composite wood products utilized in finished goods are compliant.

The following defines Owens Flooring's prudent precautions:

- Source hardwood plywood only from Third Party Certified CARB Phase 2, and/or TPC-Exempt Ultra-Low Emitting Formaldehyde (ULEF) manufacturers.
- Specify compliance requirement "CARB Phase 2" on all hardwood plywood purchase orders.
- Specify hardwood plywood manufacture resin/adhesive in purchased product description.
- Verify/record CARB compliance level as labeled by hardwood plywood manufacturer at receiving.
- Request manufacturers' Third Party Certification and/or Executive Order for TPC-Exemption-ULEF.
- At Owens Flooring's discretion – sample and submit unprocessed hardwood plywood for validation testing per ASTM E1333 (Large Chamber) and/or ASTM D6007 (Small Chamber).

Additional information is available at California Air Resource website <http://www.arb.ca.gov/toxics/compwood/compwood.htm>.