



3/22/19

To our Valued Customers,

RE: Compliance to TSCA TITLE VI 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 TSCA TITLE VI requirements *by design*.

On December 12, 2016, EPA published in the Federal Register a final rule to reduce exposure to formaldehyde emissions from certain wood products produced domestically or imported into the United States. THE EPA worked with the California Air Resources Board (CARB) to help ensure the final national rule was consistent with California's requirements for similar composite wood products. Compliance requirements are applicable by categories: Manufacturers, Distributors, Importers, Fabricators, Retailers, and Third Party Certifiers. Under the current TSCA TITLE VI 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 TSCA TITLE VI compliant, and/or TPC-Exempt Ultra-Low Emitting Formaldehyde (ULEF) manufacturers.
- Specify compliance requirement "TSCA TITLE VI" on all hardwood plywood purchase orders.
- Specify hardwood plywood manufacture resin/adhesive in purchased product description.
- Verify/record TSCA TITLE VI compliance 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 the EPA website <https://www.epa.gov/formaldehyde/formaldehyde-emission-standards-composite-wood-products>.