



## SIP No. 2013

**Subject:** Formaldehyde Levels

**Date:** November 2007 (Revised January 2015)

The Oriented Strand Board (OSB) used as the facings for R-Control SIPs include very low levels of formaldehyde. The formaldehyde is present in very small amounts due to phenol formaldehyde adhesives which form the structural bond between the wood strands.

Note: Formaldehyde related concerns in wood products are associated with some *urea* formaldehyde adhesives but not with *phenol* formaldehyde adhesives. OSB contains no added *urea* formaldehyde resin.

APA, the Engineered Wood Association, has researched the formaldehyde emissions from APA trademarked products thoroughly and has conducted tests using a large-scale test chamber method for measuring formaldehyde emissions. In this test, OSB is placed within a heated chamber and monitored for formaldehyde emission on both newly produced OSB and OSB several months after production. The OSB concentration within the test chamber was significantly greater than that utilized in a typical structure.

The results of testing by the APA and other laboratories are that less than 0.1 parts per million (ppm) are emitted within the large scale chamber. This is for both new and aged OSB. Formaldehyde that is emitted by OSB is below HUD standards for emissions.

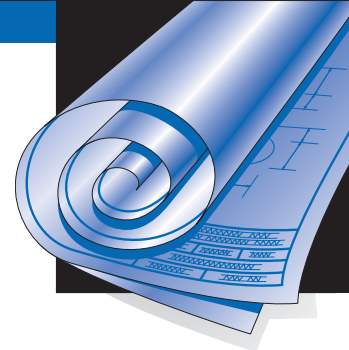
Attached, please find a bulletin authored by the APA concerning formaldehyde and engineered wood products.



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# Formaldehyde and Engineered Wood Products

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Formaldehyde is a naturally occurring organic airborne chemical that can be synthesized for use in certain industrial uses such as adhesives used for wood products and in the manufacture of many other household goods such as medical products, carpets and cosmetics. Because elevated levels of formaldehyde may lead to health concerns, regulations exist to limit exposure. These include limits on formaldehyde emissions from some types of wood products. In addition, some green building specifications create preference for low emitting products. This Technical Note provides facts on formaldehyde and regulations applicable to engineered wood products.

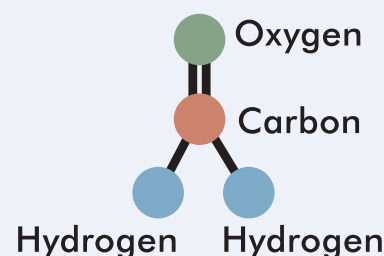
## FORMALDEHYDE

At room temperature, formaldehyde is a colorless gas which has a pungent smell at higher concentrations. Small amounts of formaldehyde are naturally produced by humans, animals and plants and may be emitted by fruits, vegetables, trees and raw wood. Formaldehyde is naturally present in outdoor air. Compared to rural air, urban outdoor air concentrations of formaldehyde are typically higher due to human activities such as traffic and other combustion sources. Indoor air may contain formaldehyde from products that emit formaldehyde as well as from combustion sources such as cigarette smoking, cooking or heating fuels. Table 1 shows levels of formaldehyde exposure measured from some typical household activities.

When formaldehyde is emitted into air, it is broken down into carbon dioxide, usually within hours. Formaldehyde is naturally attracted to water, where it is readily absorbed and breaks down. Formaldehyde does not build up in humans or plants. Further information on formaldehyde is cited in the reference section of this publication.

### WHAT IS FORMALDEHYDE?

Formaldehyde is a simple chemical made of hydrogen, oxygen, and carbon. It occurs naturally, and is the product of many natural processes. It is made by human bodies and is in the air. Plants and animals also produce formaldehyde. It is in many fruits and vegetables, and is a byproduct of cooking certain vegetables, such as brussel sprouts and cabbage. This chemical breaks down quickly and is metabolized to simple carbon dioxide. Our bodies readily break down the low levels to which people are exposed everyday.



Formaldehyde is also a product from combustion associated with the burning of kerosene and natural gas; automobile emissions; and cigarettes. It is an important industrial chemical used in the manufacture of numerous consumer products, including permanent press fabrics and even toothpaste.

TABLE 1

**VARIOUS FORMALDEHYDE EXPOSURE LEVELS**

Source/Description	Expected Exposure, parts per billion (ppb)	Footnote (see below)
Painting a 12 ft x 12 ft x 9 ft room	968	(a)
Wallpapering a 12 ft x 12 ft x 9 ft room	2051	(a)
Walk-in closet with 20 permanent press shirts (washed)	231	(b)
Broil fish using a gas or electric range	105	(c)
Gas range in self-clean mode	337	(c)
Electric range in self-clean mode	183	(c)
One cigarette in small room	49	(d)
Human breath	Around 2	(e)
Typical indoor air	10-30	(f)
Urban air	5-100	—
Rural air	0.8-5	—
Raw wood (emission chamber)	20	—

(a) Calculated from data taken from the Battelle report for the California Air Resources Board, *Determination of Formaldehyde & Diisocyanate Emission from Residential Indoor Sources*, Contract No. 93-9315, Final Report 1996.

(b) This example is calculated from data for washed permanent press shirts from the Battelle report for the California Air Resources Board, *Determination of Formaldehyde & Diisocyanate Emission from Residential Indoor Sources*, Contract No. 93-9315, Final Report 1996.

(c) *Indoor Air Quality Residential Cooking Exposures Final Report*, prepared for the California Air Resources Board, CARB Contract Number 97-330, prepared by Ray Fortmann, Peter Kariher, and Russ Clayton, ARCADIS, Geraghty & Miller, Inc, November 30, 2001.

(d) Reference taken from the *International Programme on Chemical Safety, Environmental Health Criteria 89* published under the joint sponsorship of The United Nations Environment Programme, The International Labour Organization, The World Health Organization, Geneva, 1989.

(e) *Mass Spectrometric Profile of Exhaled Breath* – field study by PTR-MS, Berthold Moser, Florian Bodrogi, Guenther Eibl, Matthias Lechner, Josef Rieder, Philipp Lirk, 2004.

(f) *Interim Findings on Formaldehyde Levels in FEMA-Supplied Travel Trailers, Park Models and Mobile Homes* from the Centers for Disease Control and Prevention, February 29, 2008.

## **FORMALDEHYDE STANDARDS AND REGULATIONS OF WOOD PRODUCTS**

Because some adhesives used to produce composite wood products contain formaldehyde, limits on emissions from pressed wood products have been developed in product standards and state and national regulations. In the U.S., formaldehyde regulations of composite wood products began in the early 1980s for particleboard and decorative plywood panels used in mobile homes (HUD CFR 3280.308). Data indicated that emission levels from moisture resistant phenol formaldehyde adhesives used for structural plywood were very low; therefore the HUD regulations explicitly excluded plywood made with phenol formaldehyde adhesives.

This Technical Note provides information on formaldehyde regulations that apply to U.S. structural engineered wood products. For purposes of this Technical Note, engineered wood products are defined as wood products recognized in U.S. model code for structural applications. Because the vast majority of U.S. construction involves site-built conditions where exposure to weather is expected, the standards for engineered wood products require moisture resistant adhesive systems. The inherent structural and moisture durability of these adhesives systems naturally results in very low formaldehyde emissions. Table 2 provides definitions of the standards, adhesives systems and applications for engineered wood products.

TABLE 2

**DESCRIPTION OF U.S. ENGINEERED WOOD PRODUCTS****U.S. Engineered Wood Products**

<b>Product</b>	<b>Applicable Standard(s)<sup>(a)</sup></b>	<b>Adhesives</b>	<b>Uses</b>
Structural Plywood	<i>U.S. Voluntary Product Standard PS 1-09 Structural Plywood, U.S. Voluntary Product Standard PS 2-10 Performance Standard for Wood-Based Structural-Use Panels, CSA O121 Canadian Douglas-fir Plywood and CSA O151 Canadian Softwood Plywood</i>	Phenol formaldehyde	Sheathing for walls, floors, roof and other industrial and construction uses
Oriented Strand Board (OSB)	<i>U.S. Voluntary Product Standard PS 2-10 Performance Standard for Wood-Based Structural-Use Panels, and CSA O325, Construction Sheathing</i>	Phenol formaldehyde, pMDI <sup>(b)</sup>	Sheathing for walls, floors, roof and industrial uses
Structural Glued Laminated Timbers	<i>ANSI A190.1 Structural Glued Laminated Timber and CSA O177 Qualification Code for Manufacturers of Structural Glued Laminated Timber</i>	Phenol resorcinol formaldehyde (PRF), melamine, polymer isocyanate <sup>(c)</sup>	Beams, headers, columns, trusses
Prefabricated Wood I-joists	<i>ASTM D5055 Standard Specification for Establishing and Monitoring Structural Capacities of Prefabricated Wood I-Joists</i>	Phenol formaldehyde, melamine, polymer isocyanate <sup>(d)</sup>	Floor joists, roof rafters
Structural Composite Lumber (SCL) <sup>(e)</sup>	<i>ASTM D5456 Standard Specification for Evaluation of Structural Composite Lumber Products</i>	Phenol formaldehyde, pMDI <sup>(f)</sup>	Beams, headers, studs, flanges of I-joists
Specialty Products – Cross Laminated Timber (CLT), Rim Board, Engineered Wood Siding	<i>ANSI/APA PRG 320-2011 Standard for Performance-Rated Cross-Laminated Timber, ANSI/APA PRR-410 Standard for Performance-Rated Engineered Wood Rim Boards, ANSI/APA PRP 201 Standard for Performance-Rated Engineered Wood Siding, and ICC ES AC 321</i>	Phenol formaldehyde, pMDI	Specialty construction uses

(a) Complete citation of standards is provided in the reference section at the end of this publication

(b) pMDI = Polymeric Methylene Diphenylene Diisocyanate

(c) ANSI A190 adhesives must also meet ANSI 405 and ASTM D2559

(d) Adhesives used to adhere components must meet ASTM D2559

(e) SCL includes laminated veneer lumber (LVL), parallel strand lumber (PSL), oriented strand lumber (OSL) and laminated strand lumber (LSL)

(f) Adhesives must meet ASTM D2559 and D5456

## **U.S. FORMALDEHYDE REGULATIONS APPLICABLE TO OTHER WOOD PRODUCTS**

### **1. U.S. HUD Manufactured Home Construction and Safety Standard (CFR 3280.308)**

This standard specifies a 0.20 ppm emission limit for plywood and a 0.30 ppm limit for particleboard when tested with the ASTM E1333 Large Chamber Method. The intent was to regulate the specific nonstructural panel types. Testing during development of the regulation confirmed PS 1 structural plywood readily meets the plywood emission limit; therefore the regulation explicitly exempts phenolic bonded plywood from ongoing testing and certification. Therefore, **the engineered wood products in Table 2 are either not covered by, or are explicitly exempt from, the HUD regulation.**

### **2. California Air Resources Board (CARB) Air Toxic Control Measure (ATCM) for Composite Wood Products**

This regulation was developed by a division of the California EPA and took effect in 2009. The scope of the standard covers particleboard, MDF and hardwood plywood. The demonstrated low emission levels of the engineered wood products listed in Table 2, led the CARB regulation to explicitly exempt structural plywood specified to PS 1, structural panels specified to PS 2, OSB specified to PS 2, structural composite lumber specified to ASTM D5456, structural glued-laminated timber specified to ANSI A190.1 and prefabricated wood I-joists specified to ASTM D5055.

### **3. U.S. Formaldehyde Standards for Composite Wood Products Act**

This Federal Act was signed into law July, 2010 and instructs the EPA to publish implementation rules by January 2013. The act mirrors the standard previously established by the California Air Resources Board and it explicitly exempts structural plywood specified to PS 1, structural panels specified to PS 2, OSB specified to PS 2, structural composite lumber specified to ASTM D5456, structural glued-laminated timber specified to ANSI A190.1 and prefabricated wood I-joists specified to ASTM D5055.

## **INTERNATIONAL REGULATIONS FOR ENGINEERED WOOD PRODUCTS**

Wood product standards in other countries often group structural and nonstructural panel types into a common standard, whereby the moisture resistance and formaldehyde emission characteristics are evaluated to specific criteria. Some U.S. Engineered Wood Products have been evaluated to these international formaldehyde emission standards. Following are summary conclusions.

- 1.** Japanese Agricultural Standards (JAS). The JAS standards use the JIS A1460 test method that measures the emissions for wood products when enclosed in a desiccator. The most stringent formaldehyde limit is the F\*\*\*\* designation whereby the product must have average emission level below 0.30 mg/l. U.S. structural plywood (PS 1 or PS 2), OSB (PS 2), structural glued-laminated timber (ANSI A190.1) and Laminated Veneer Lumber (LVL) easily and consistently meet the F\*\*\*\* requirements when evaluated to the respective JAS standard. This formaldehyde regulation is considered one of the most stringent limits in the world.
- 2.** OSB and plywood panels sold into Europe for construction uses must meet the specific product standard for the panel type (such as EN 300 for OSB and EN 636 for plywood) and the general panel standard EN 13986 used for construction applications throughout the European Union. The European standard for formaldehyde emissions is EN 717-1 which uses a one cubic meter chamber to measure emission levels. U.S. structural plywood (PS 1 or PS 2) and OSB (PS 2) easily meet the 0.124 mg/m<sup>3</sup> limit of the E1 class, the most stringent formaldehyde class based on EN 717-1.

3. Laminated Veneer Lumber (LVL), is regulated in Australia by evaluation of formaldehyde emissions using the AS/NZS 4357.4 test method. This method is very similar to the JIS A1460 test method used in the JAS standards. U.S. LVL made to ASTM D5456 has easily and consistently met the 0.5 mg/l limit which qualifies it for the E<sub>0</sub> rating, the most stringent rating in AS/NZS LVL standards.

**In summary, when tested to international formaldehyde emission limits, U.S. Engineered Wood Products have consistently met the most stringent emission regulations.**

## **GREEN BUILDING SPECIFICATIONS**

Green building rating systems often include criteria to address indoor air quality goals, including mitigation of formaldehyde concentrations or formaldehyde-emitting products. Some of these specifications are relevant to Engineered Wood Products as follows:

### **1. LEED 2009**

This popular rating system uses a point rating system for green buildings. Indoor Environmental Quality Credit 4.4 covers “Low-Emitting Materials – Composite Wood and Agrifiber Products.” The section criteria specifies products that “contains no added urea formaldehyde resin”. All of the products within Table 2 meet the criteria for this section and thereby are eligible for the point. As with other green building rating systems, final approval is subject to verification by the designer or approved professional that assesses LEED compliance.

### **2. 2012 National Green Building Standard ICC 700-2012**

This national green rating program was developed as a consensus standard and adopted by the International Code Council as a reference standard for adoption by member code groups for residential construction. The criteria for formaldehyde emissions from composite wood products are similar to the LEED 2009 and CARB. **The Engineered Wood Products listed in Table 2 are eligible for the points in Section 901.4(5) which require that a minimum of 85 percent of material within the product group is manufactured from composite wood products that contain no added urea-formaldehyde or are in accordance with the CARB regulations.**

### **3. CALGreen**

This standard has been adopted into California State building law as a method to verify structures meeting state environmental goals for buildings. The third edition of CALGreen (effective July 1, 2012) requires all new buildings (residential and nonresidential) as well as all remodels and additions to existing nonresidential buildings exceeding 2,000 square feet or \$500,000 must meet the mandatory requirements of CALGreen. CALGreen specifies that composite wood products used in the interior or the exterior of a building meet the CARB regulations. Similar to the CARB regulation, all structural engineered wood products are explicitly exempt from the requirement. **The engineered wood products in Table 2 are not within the scope of the CALGreen formaldehyde limits and are therefore permitted – (see also the above section on CARB).**

## REFERENCES

### Engineered Wood Product Standards

*U.S. Voluntary Product Standard PS 1-09 Structural Plywood, Form L870*

*U.S. Voluntary Product Standard PS 2-10 Performance Standard for Wood-Based Structural-Use Panels, Form S350*

*ANSI A190.1 Structural Glued Laminated Timber*

*ANSI 405 Standard for Adhesives for Use in Structural Glued Laminated Timbers*

*ANSI/APA PRG 320-2011: Standard for Performance-Rated Cross-Laminated Timber, Form PRG-320*

*ANSI/APA PRR-410: Standard for Performance-Rated Engineered Wood Rim Boards, Form PRR-410*

*ASTM D2559 Specification for Adhesives for Structural Laminated Wood Products for Use Under Exterior (Wet Use) Exposure Conditions*

*ASTM D5456 Standard Specification for Evaluation of Structural Composite Lumber Products*

*CSA O121 Canadian Douglas-fir Plywood*

*CSA O151 Canadian Softwood Plywood*

*CSA O177 Qualification Code for Manufacturers of Structural Glued Laminated Timber*

*CSA O325 Construction Sheathing*

\*ASTM publications are available at [www.astm.org](http://www.astm.org)

### Formaldehyde Regulations

HUD: standard is available at [www.gpo.gov/fdsys/pkg/CFR-2010-title24-vol1/content-detail.html](http://www.gpo.gov/fdsys/pkg/CFR-2010-title24-vol1/content-detail.html) (search for cfr 3280, Manufactured Housing Construction Safety Standard)

CARB: [www.arb.ca.gov/toxics/compwood/compwood.htm](http://www.arb.ca.gov/toxics/compwood/compwood.htm)

EPA Federal Act: [www.epa.gov/oppt/chemtest/formaldehyde/](http://www.epa.gov/oppt/chemtest/formaldehyde/)

CALGreen: [www.documents.dgs.ca.gov/bsc/CALGreen/2010\\_CA\\_Green\\_Bldg.pdf](http://www.documents.dgs.ca.gov/bsc/CALGreen/2010_CA_Green_Bldg.pdf)

### Formaldehyde Guidance

EPA Integrated Risk Information System: [www.epa.gov/iris/subst/0419.htm](http://www.epa.gov/iris/subst/0419.htm)

U.S. EPA: [www.epa.gov/iaq/formaldehyde.html](http://www.epa.gov/iaq/formaldehyde.html)

U.S. Consumer Product Safety Commission: [www.cpsc.gov/CPSCPUB/PUBS/725.html](http://www.cpsc.gov/CPSCPUB/PUBS/725.html)

ACC website: [www.formaldehydefacts.org](http://www.formaldehydefacts.org)

## Formaldehyde and Engineered Wood Products

We have field representatives in many major U.S. cities and in Canada who can help answer questions involving APA trademarked products. For additional assistance in specifying engineered wood products, contact us:

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### PRODUCT SUPPORT HELP DESK

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