

Kährs

From: Baker, Lynn@ARB <lbaker@arb.ca.gov>
Sent: Wednesday, November 18, 2009 8:53 PM
To: Uhler, Bruce <Bruce.Uhler@kahrs.com>
Cc: Takemoto, Brent@ARB <btakemot@arb.ca.gov>
Subject: RE: question on lumber core

Bruce,

Your "fingers core" appears to be solid lumber core. And as Brent had indicated, hardwood plywood with a lumber core is exempt from our regulation.

Lynn
Lynton Baker
Staff Air Pollution Specialist
Substance Evaluation Section
Stationary Source Division
California Air Resources Board
(916) 324-6997
lbaker@arb.ca.gov

From: Uhler, Bruce [mailto:Bruce.Uhler@kahrs.com]
Sent: Monday, November 16, 2009 4:27 PM
To: Baker, Lynn@ARB
Cc: Takemoto, Brent@ARB
Subject: FW: question on lumber core

Hello Lynn

Could you make a comment on our construction, I see that Brent is out of the office.

Thank you,

Bruce

Bruce Uhler

From: Uhler, Bruce
Sent: Monday, November 16, 2009 7:24 PM
To: Takemoto, Brent@ARB
Cc: Williams, Jeffery@ARB; Baker, Lynn@ARB; Uhler, Bruce
Subject: RE: question on lumber core





Brent

Would it be possible for you to make a comment on this product construction. This product (15mm) uses our pine fingers core which we believe meets the "lumber core" construction description.

I would appreciate your opinion.

Thank you again,

Bruce

Bruce Uhler

Vice President Commercial/Global

KÄHRS INTERNATIONAL

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From: Takemoto, Brent@ARB [mailto:btakemot@arb.ca.gov]

Sent: Wednesday, November 04, 2009 2:00 PM

To: Uhler, Bruce

Cc: Williams, Jeffery@ARB; Baker, Lynn@ARB

Subject: RE: question on lumber core

Bruce: Thank you for your email. I refer you to our FAQ webpage at:

<http://www.arb.ca.gov/toxics/compwood/implementation/faq.htm>

Item #20 concerns lumber core:

20. Is lumber core product subject to the regulation? Hardwood plywood (HWPW) with lumber core is exempt from the regulation. The ATCM has two HWPW standards, neither of which includes lumber core: one for HWPW with veneer core and one for HWPW with composite core. Veneer core is clearly not a lumber core, and composite core is defined in the regulation as particleboard or medium density fiberboard (MDF) or one of these in combination with veneer (combination core).

If your product meets the definition for lumber core, then they would not be subject to the regulation.

I will be out of the office this afternoon, but feel free to call me tomorrow (11/5) if you want to discuss this further.

Regards, Brent Takemoto

From: Uhler, Bruce [mailto:Bruce.Uhler@kahrs.com]

Sent: Wednesday, November 04, 2009 8:49 AM

To: Takemoto, Brent@ARB

Subject: question on lumber core

Dr. Brent Takemoto

Hello Brent:

We have spoken before from Sweden and you were most helpful to us.



I have one more question that I need to talk with you in regards to lumber core.

We are considered the fabricator under the CARB/ATCM regulation as we acquire our core material from third party vendors. We have testing completed on those products using HWPW and MDF/HDF from our suppliers and they are well under emission levels.

We also make products using a core of solid Pine or Spruce fingers, these products do use an MUF glue to adhere the layers together but these products do not use HWPW –VC or CC, MDF/HDF, or PB.

Do these products using a solid Pine or Spruce finger core construction have to be tested or are they exempt under the “lumber core” statement? (these products meet E1/E0 & F****)

Should I call you at your convenience? I think it would be answered in 10 minutes or less.

Thanks again Brent,
Bruce
Bruce Uhler
Vice President

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