



Roseburg Particleboard Panels' Compliance With HUD Formaldehyde Emission Requirements

To Our Valued Client,

This letter addresses questions related to Roseburg's compliance with the US Housing and Urban Development's formaldehyde emission requirements, as contained in HUD 24 CFR 3280 (the "HUD Standard").

All Roseburg composite panels, including particleboard shelving and countertops, are third-party certified to the more stringent US Environmental Protection Agency's formaldehyde emission requirements, as established by the Toxic Substances Control Act ("TSCA"), Title VI, and published in the Federal Register under 40 CFR Part 770 (the "EPA Standard").

The EPA Standard requires particleboard to comply with a maximum formaldehyde emission limit of **0.09 ppm**, using either the ASTM E1333 (Large Chamber), or the ASTM D 6007 (Small Scale Chamber) test with demonstrated equivalency to E1333.

The HUD Standard requires that "particleboard materials shall not emit formaldehyde in excess of **0.3 ppm**." This is more than three times higher than the 0.09 limit of the EPA Standard to which Roseburg is certified. The (outdated) HUD Standard also requires testing to be conducted in accordance with ASTM E1333. It does not currently recognize ASTM D 6007, which is widely used today for mill certification testing.

Until the HUD Standard is updated, we are unable to include the HUD reference on our unit tags at our mills that utilize ASTM D 6007 for third-party certification testing. We expect this will be corrected when the HUD Standard is updated to align with the EPA Standard.

Note: The Federal Formaldehyde Act of 2010 requires HUD to adopt EPA's formaldehyde emission standards for all three regulated products in manufactured homes within 180 days of the release of EPA's final regulation.

If you have questions related to this issue or any other questions about our products, please contact a Roseburg sales or customer service representative:

Western Sales

Springfield, Oregon
Toll Free: 800-245-1115

South/East Sales

Johns Creek, Georgia
Toll Free: 866-387-2646

Ver. February 5, 2019