



# Air Resources Board



**Matthew Rodriguez**  
Secretary for  
Environmental Protection

**Mary D. Nichols, Chairman**  
1001 I Street • P.O. Box 2815  
Sacramento, California 95812 • [www.arb.ca.gov](http://www.arb.ca.gov)

**Edmund G. Brown Jr.**  
Governor

January 10, 2014

Mr. Mike Hughes  
Mullican Flooring  
655 Woodlyn Road  
Johnson City, TN 37601

Dear Mr. Hughes:

This letter is in response Mullican Flooring's written request that we received on December 10, 2013, for Air Resources Board (ARB) approval to be an ultra-low-emitting formaldehyde resin (ULEF) manufacturer of composite wood products destined for sale, supply, or use in California. Your application includes a request for approval to manufacture hardwood plywood – veneer core (HWPW-VC) using an ULEF resin. We reviewed your request and supporting documentation, and found that the application is complete pursuant to section 93120.3(d) of the Airborne Toxic Control Measure (ATCM) to Reduce Formaldehyde Emissions from Composite Wood Products, title 17, California Code of Regulations, sections 93120-93120.12. We are pleased to inform you that your application to be an ULEF manufacturer of HWPW-VC products, exempt from the third party certification requirements in section 93120.3(b) and the quality assurance requirements in section 93120.12, Appendix 2, has been approved.

The enclosed Executive Order N-14-174 specifies on-going conditions that must be met by manufacturers of ULEF products for sale, supply, or use in California. In addition, please note that all relevant provisions and requirements of section 93120.3(d), and other sections in the ATCM remain in effect. Section 93120.3(d)(5) specifies that the Executive Order issued to ULEF manufacturers has a duration of two years, and the manufacturer may apply for re-approval as provided in the section. At the appropriate time, you may address your application for re-approval to me at the address noted in the letterhead. Furthermore, section 93120.3(d)(7) requires ULEF manufacturers to notify ARB in advance if they decide to change resin systems, and must then comply with the requirements of section 93120.3(b) for that product type.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.*

California Environmental Protection Agency

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For your information, at the request of Mullican Flooring's resin manufacturer, we have held the resin formulation data that was sent to ARB on behalf of Mullican Flooring confidential. Please note that approval of your Executive Order is contingent upon the use of the resin specified by your resin manufacturer, and ARB must be notified in advance of any changes in resin supply that Mullican Flooring decides to make for its ULEF products.

If you have any questions regarding this matter, please contact Angela Csondes at (916) 445-4448 or via email at [acsondes@arb.ca.gov](mailto:acsondes@arb.ca.gov) or Ryan Huft at (916) 327-5784 via email at [rhuft@arb.ca.gov](mailto:rhuft@arb.ca.gov).

Sincerely,



Daniel E. Donohue, Chief  
Emissions Assessment Branch  
Stationary Source Division

Enclosure

cc: Angela Csondes  
Air Pollution Specialist  
Technical Analysis Section  
Stationary Source Division

Ryan Huft, P.E.  
Air Resources Engineer  
Technical Analysis Section  
Stationary Source Division