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.
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.

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(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

   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/m³ 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 E₀ 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 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


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

Formaldehyde Regulations

HUD: standard is available at 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

EPA Federal Act: www.epa.gov/oppt/chemtest/formaldehyde/


Formaldehyde Guidance

EPA Integrated Risk Information System: www.epa.gov/iris/subst/0419.htm

U.S. EPA: www.epa.gov/iaq/formaldehyde.html


ACC website: www.formaldehydefacts.org
Formaldehyde and Engineered Wood Products

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