



ROBERT WEED PLYWOOD CORP.

705 MAPLE STREET • P.O. BOX 487 • BRISTOL, IN 46507-0487

(574) 848-4408 • (574) 848-7631 • FAX (574) 848-5679

Formaldehyde Emission Standards Information Packet

Introductory Letter	1
Certificate of Compliance	2
RVIA Standard News Bulletin 16/09	3
Robert Weed Plywood Product Availability	5
Robert Weed Plywood Product Labeling	6
Robert Weed Plywood Chain of Custody	10
CARB Reference Information	11



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October 28, 2009

In light of Robert Weed Plywood's ongoing commitment to our mission statement, "Service with integrity and value earns trust and respect leading to innovation and growth," we are providing our customer base with the following informational package.

This package describes Robert Weed Plywood's compliance to the following regulatory standards surrounding formaldehyde emissions:

- CARB Phase 1
- CARB Phase 2
- HUD
- RVIA

This package is not intended to be an all-inclusive introduction and explanation of the standards above, but instead an explanation of how Robert Weed Plywood is approaching meeting the applicable standards for all composite wood products.

Robert Weed Plywood is also monitoring Senate Bill S1660, which is the proposed basis for a national formaldehyde standard. We will work to fully understand and communicate how this new regulation will affect our industry and be diligent about assuring compliant material for our customers.

Please contact your Robert Weed Plywood Sales Representative with any questions regarding the enclosed information.

Sincerely,

David Weed
President



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CERTIFICATE OF COMPLIANCE

October 18, 2009

Revision B

Non-expiring and valid until changing regulations warrant publication of Revision C.

Robert Weed Plywood certifies that all raw and fabricated parts meet the applicable formaldehyde regulatory standards outlined by:

- CARB §93120.2
- HUD CFR 24 3280.30
- RVIA Standard News Bulletin SNB-16/09

SPECIFICATION	PLYWOOD	PARTICLEBOARD	MDF
CARB § 93120.2			
-Phase 1 (2009)	<0.08 ppm	<0.18 ppm	<0.21 ppm
-Phase 2 (2010, 2011)*	<0.05 ppm	<0.09 ppm	<0.11 ppm
HUD CFR 24 3280.308	<0.2 ppm	<0.3 ppm	Not Applicable
RVIA SNB-16/09 **			
-January 1, 2010	Phase 2 Emissions	Phase 2 Emissions	Phase 2 Emissions
-January 1, 2011			
-July 1, 2011	Phase 2 CARB Certified	Phase 2 CARB Certified	Phase 2 CARB Certified
-July 1, 2012			

* Plywood 2010, PB and MDF 2011

** RVIA Effective dates are based on date of manufacture

.Proof of continued compliance is stated on every RWP Invoice.

CARB Compliance Certification is provided by plywood manufacturers and their CARB Approved Third Party Agencies. Emission levels are specified on product labels and invoices. All certifications from suppliers will be kept on file for 2 years, as specified by CARB Regulations.

HUD Compliance Certification is provided by Robert Weed Plywood's Third Party Agency and ASTM E1333 Large Chamber Testing. Emission levels are specified on product labels and invoices.

RVIA Compliance Certification is provided by compliance to HUD and CARB. Emission levels are specified on product labels and invoices.

David Weed
President

Matthew Bunner
Vice President of Operations

STANDARDS



NEWS

June 22, 2009

Standards News Bulletin SNB-16/09

TO: RVIA Manufacturers, Supplier and Other Interested Parties

FROM: Kent Perkins, Director, RV Standards

SUBJECT: **Recreation Vehicle Industry Association (RVIA) Board of Directors Adopts California Air Resource Board's (CARB) Phase 2 Formaldehyde Timeline**

On June 11, 2009, the RVIA Board of Directors unanimously approved a recommendation submitted by its Standards Steering Committee to adopt the CARB Phase 2 formaldehyde regulation implementation timeline as a membership requirement, with one modification: while the CARB timeline for RVs sold in California is based on a product's "date of sale," RVIA's program requirement for RVs sold in all other states will instead be based on the product's "date of manufacture." These regulations address the maximum permissible levels of formaldehyde emissions from various wood products.

CARB has developed a phased schedule of implementation and certification dates to help manufacturers, including RV manufacturers, prepare for the actual date the requirements go into effect for the state of California. CARB has based the effective date of these requirements on the date a product, such as an RV unit, is sold at retail. Thus, when CARB indicates that certain wood products need to be "all certified" by a particular date, it means the date of sale for any unit containing those wood products. If a RV with uncertified wood products is sold in California after the stated date, this sale would violate the CARB requirements.

RVIA has voluntarily adopted these CARB regulations as a membership requirement for all RVs. However, for RVs shipped to the remaining 49 states, the dates in the CARB timeline will apply to the date a unit is manufactured. The reasoning behind this modification is that the date of



RECREATION VEHICLE INDUSTRY ASSOCIATION STANDARDS DEPARTMENT
1896 Preston White Dr. P.O. Box 2999 Reston, VA 20195-0999 Tel: 703/620-6003 Fax: 703/620-5071 www.rvia.org



manufacture is the only date that is controllable by our manufacturing members. A summary of the Implementation Timeline for Phase 1 & Phase 2 is attached for your reference.

PLEASE NOTE: There is different Phase 2 implementation/all certified dates for different products as noted on the attached timeline and summarized as follows:

Hardwood Plywood – Veneer Core (HWPW-VC) – Phase 2 "0.05" Emission Level Implementation date is January 1, 2010 with All Certified beginning July 1, 2011.

Particleboard (PB) – Phase 2 "0.09" Emission Levels Implementation date is January 1, 2011 with All Certified beginning July 1, 2012.

Medium Density Fiberboard (MDF) – Phase 2 "0.11" Emission Level Implementation date is January 1, 2011 with All Certified beginning July 1, 2012.

Thin MDF – Phase 2 "0.13" Emission Level Implementation date is January 1, 2012 with All Certified beginning July 1, 2013.

Hardwood Plywood – Composite Core (HWPW-CC) – Phase 2 "0.05" Emission Level Implementation date is July 1, 2012 with All Certified beginning January 1, 2014.

Should you have any question regarding this new RVIA policy please contact Kent Perkins at 1-800-336-0154, ext 336 or by e mail at kperkins@rvia.org.

SE09075/gg

ROBERT WEED PLYWOOD PRODUCT AVAILABILITY

Robert Weed Plywood buys only CARB Phase 2 meranti plywood produced by certified mills. Copies of mill certificates are available upon request. We are fully confident that our purchasing practices will ensure availability of CARB Phase 2 Certified meranti plywood to our client base.

CARB Phase 2 Certified particleboard and MDF is available upon request from customers up until the sell through date of June 30, 2012. Following the sell through date, all MDF and particleboard will be CARB Phase 2 Certified. Please note that sell through dates are only applicable to composite panels that are manufactured by mills prior to January 1, 2009.

Page 11 of this packet contains an overview of sell through dates that apply to distributors, fabricators and retailers of finished goods.

See your Robert Weed Plywood Sales Representative regarding updated information on availability of CARB certified material.

ROBERT WEED PLYWOOD PRODUCT LABELING

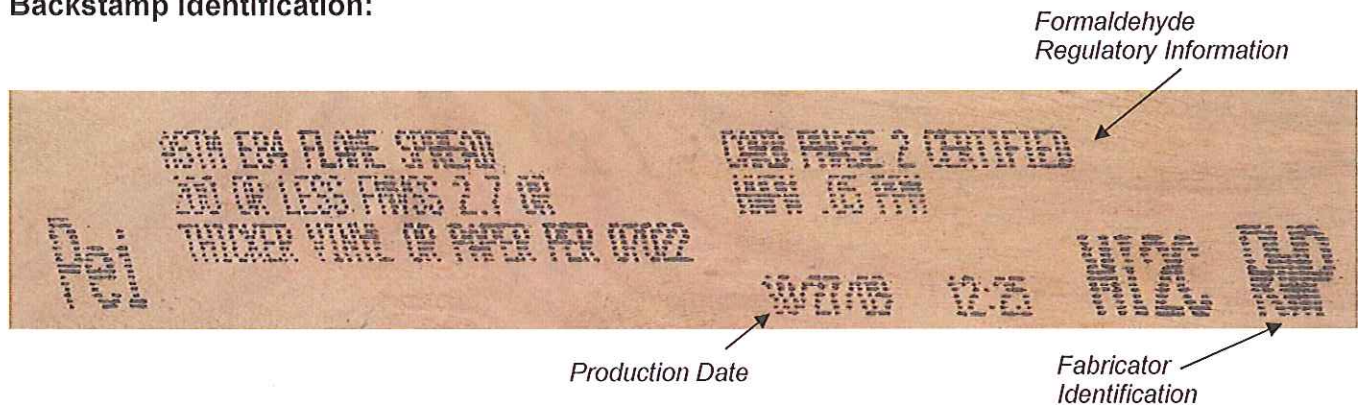
CARB requires that the following information be present on bundle tags or individual parts:

- Fabricator name
- Date of production
- Marking that denotes the product was made with hardwood plywood, particleboard, or MDF that complies with applicable Phase 1 or Phase 2 emission standards.

Tag Identification:



Backstamp Identification:



In addition to these requirements, CARB requires that goods are designated as complying with the applicable emission standards on the bill of lading OR the invoice. Robert Weed Plywood designates this information both on every invoice and all delivery tickets.

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 REPRINT

INVOICE# 631988

Invoice Date 10/22/09

Page 1

Batch#

BILL
TO:

SHIP
TO:

Terms 1% 10 ADI N30
 Ship Via SIV Transportation, LLC
 Special Instructions

SalesPerson
 Order Date 10/20/09

Cust PO # 1681255
 Date Shipped 10/21/09
 Pick Tick. # 745542-000

Item Number	Customer Part Number	Description	Qty Ord.	Sq. Ft.	Unit Price U/M	Extension
2780VKC2C		2.7 48X96 OVERLAY MERANTI 3RD PARTY CERT. CARB PHASE 2 CONFORMS TO RWP STD Q	440	440		14080

P order chg frm 2780VBC2C
 item # 02929600

Std Q : SEE MSDS FOR PHYSICAL AND HEALTH HAZARD INFO MADE WITH HWPW, PB, OR MDF THAT IS CERTIFIED AS
 CARB PHASE 2. PLYWOOD .05 PPM, PARTICLEBOARD .09 PPM, MDF .11 PPM

SAMPLE INVOICE

Sub Total.....
 Shipping & Handling....
 Tax.....
 Sub Total.....
 Deposit.....
 Balance Due.....

Unpaid invoice over 30 days are subject to
 finance charges of 1 1/2% per month (18% per year)



631988



1681255

ROBERT WEED PLYWOOD PRODUCT LABELING

As the industry moves through the increasing levels of CARB compliance, Robert Weed Plywood bundle tags will be identified with colored stickers as follows:

- CARB Phase 1 Emissions Compliant (Green)
- CARB Phase 1 Certified (Red)
- CARB Phase 2 Certified (Orange)

“Emissions compliant” material meets the applicable phase requirements for formaldehyde emissions, while “Certified” material means that the product fully meets all of the requirements of the CARB standard as certified by a CARB approved Third Party Agency.

The colors on the bundle tags are intended to assist our customers in rotating through their inventory in a manner that mirrors the progression of CARB standards.

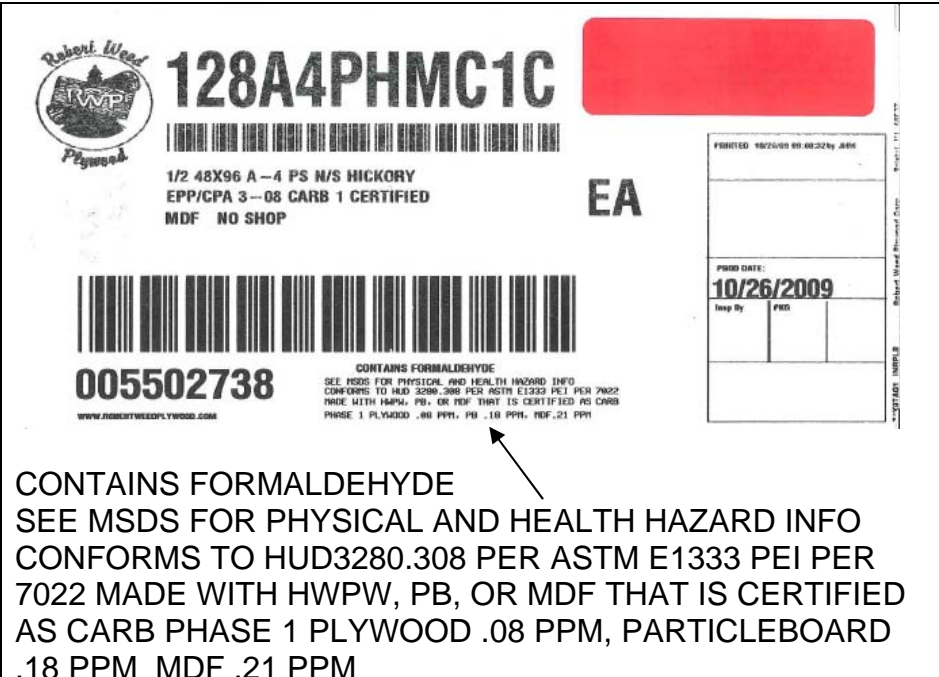
Tag samples showing color coding and product labeling are shown below and on the following pages. Also included is a copy of a sample invoice that shows how compliance information is displayed on invoices. This serves as a current up to date statement of our compliance to applicable standards and is included on every invoice.

BUNDLE TAG EXAMPLES

 <p>2780VKF4</p> <p>2.7 48X96 OVERLAY MERANTI JAPANESE STAR F-4 @ 0.05 PPM</p> <p>EA</p> <p>PROD DATE: 10/26/2009</p> <p>Inspected By: PKG</p> <p>MKF4</p> <p>CONTAINS FORMALDEHYDE SEE MSDS FOR PHYSICAL AND HEALTH HAZARD INFO. F4* PLYWOOD. COMPLIES TO CARB PHASE 2 EMISSION LIMITS FOR PLYWOOD 0.05 PPM, CARB PHASE 1 EMISSION LIMITS FOR PARTICLEBOARD 0.18 PPM, MDF 0.21 PPM</p>	<p>Bundle tag for all F4* meranti and meets CARB Phase 1 emission levels.</p> <p>Green</p>
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ROBERT WEED PLYWOOD PRODUCT LABELING

BUNDLE TAG EXAMPLES



128A4PHMC1C

1/2 48X96 A-4 PS N/S HICKORY
EPP/CPA 3-08 CARB 1 CERTIFIED
MDF NO SHOP

EA

PRINTED: 10/26/09 09:40:22 by JRM

PROD DATE:
10/26/2009

Ship By: PMS

005502738

CONTAINS FORMALDEHYDE
SEE MSDS FOR PHYSICAL AND HEALTH HAZARD INFO
CONFORMS TO HUD 3280.308 PER ASTM E1333 PEI PER 7022
MADE WITH HWPW, PB, OR MDF THAT IS CERTIFIED AS CARB
PHASE 1 PLYWOOD .08 PPM, PARTICLEBOARD .18 PPM, MDF .21 PPM

Bundle tag example for RV and manufactured housings products certified as CARB Phase 1.

Red



271020VKC2C

2.7 48X102 OVERLAY MERANTI
3RD PARTY CERT. CARB PHASE 2
0.05 PPM OR LESS

EA

PRINTED: 11/05/08 11:00:40 by JRM

PROD DATE:
11/05/2008

Ship By: PMS

005241734

CONTAINS FORMALDEHYDE
SEE MSDS FOR PHYSICAL AND HEALTH HAZARD INFO
MADE WITH HWPW, PB, OR MDF THAT IS CERTIFIED AS
CARB PHASE 2. PLYWOOD .05 PPM, PARTICLEBOARD .09
PPM, MDF .11 PPM

Bundle Tag for RV Products certified as CARB Phase 2.

Orange

ROBERT WEED PLYWOOD CHAIN OF CUSTODY

Robert Weed Plywood fulfills the fabricator requirement that we request verification from our suppliers that we receive CARB certified material. Purchase orders or certifications from vendors that guarantee CARB compliance are stored for a period of two years as required for CARB. We have full mill traceability as long as a customer can provide a copy of the backstamp or bundle tag.

Receiving and distribution use coded tags to communicate the correct classification on bundles of wood products. The tags also identify the mill where the material is manufactured. When bundles are brought to the lines, the operators use the part number and the mill code to choose the appropriate backstamp for our panels.

CARB REFERENCE INFORMATION

CARB defines:

- **Distributors** as “any person to whom a composite wood product or finished good is sold or supplied for the purposes of resale or distribution in commerce.” Robert Weed Plywood is a Distributor of raw material.
- **Fabricators** as “any person that uses composite wood products to make finished goods. ‘Fabricator’ includes producers of laminated products.” Robert Weed Plywood and our RV customers are Fabricators.
- **Retailers** as “any person or entity that sells, offers for sale, or supplies directly to consumers composite wood products of finished goods that contain composite wood products.” RV dealerships are Retailers.

The following chart offers information regarding sell through dates for distributors, fabricators and retailers.

		CARB Sell Through Provision Dates																
R - Raw Goods F - Finished Goods		2010					2011				2012						2013	
		3/31	4/30	5/31	6/30	12/31	3/31	5/31	6/30	12/31	3/31	5/31	6/30	9/30	11/30	12/31	6/30	12/31
DISTRIBUTORS																		
Phase 1																		
	HWPW - VC **					FR												
	HWPW - CC					FR												
	PB/MDF **					FR												
	Thin MDF **					FR												
Phase 2																		
	HWPW - VC					R			F									
	HWPW - CC														R			F
	PB/MDF							R					F					
	Thin MDF											R					F	
FABRICATORS																		
Phase 1																		
	HWPW - VC					F												
	HWPW - CC					F												
	PB/MDF					F												
	Thin MDF					F												
Phase 2																		
	HWPW - VC								F									
	HWPW - CC																	F
	PB/MDF												F					
	Thin MDF																F	
RETAILERS																		
Phase 1																		
	HWPW - VC **					R			F									
	HWPW - CC					R			F									
	PB/MDF **					R			F									
	Thin MDF **					R			F									
Phase 2																		
	HWPW - VC					R			F									
	HWPW - CC																R	F
	PB/MDF								R				F					
	Thin MDF															R	F	

Further information from CARB can be found on the California Air Resources Board web pages as follows:

- **Frequently Asked Questions**
<http://www.arb.ca.gov/toxics/compwood/implementation/faq.htm>
- **Listings of CARB approved Third Party Certifiers of Raw Materials**
<http://www.arb.ca.gov/toxics/compwood/listoftpcs.htm>
- **Update Information**
<http://www.arb.ca.gov/toxics/compwood/compwood.htm>