



# COMPOSITE PANEL ASSOCIATION

19465 Deerfield Avenue, Suite 306, Leesburg, Virginia 20176  
Tel 703.724.1128 • Fax 703.724.1588  
[www.CompositePanel.org](http://www.CompositePanel.org)

December 17, 2020

Mike Rudy  
Timber Products Company  
1090 SE M Street  
Grants Pass, OR 97526  
Mill 519

Dear Mr. Rudy,

This letter is in response to Timber Products Company Grants Pass' application that we received on December 14, 2020 for approval to be a panel manufacturer of EPA TSCA Title VI certified composite wood products destined for sale, supply, or use in the United States. Your application includes a request for approval to manufacture hardwood plywood-veneer core (HWPW-VC) using UF resin system. We reviewed your application and found that your application is complete pursuant to 40 CFR 770 *Formaldehyde standards for composite wood products*. CPA is informing you that your application to be an EPA TSCA Title VI panel manufacturer as of December 17, 2020 has been approved.

Please note that all relevant requirements of 40 CFR 770 remain in effect. 40 CFR 770.20(d) *Equivalence or correlation* specifies that each plant reestablish new quality control limit (QCL) correlations (both hot and shipping QCLs, if applicable), with at least 5 new matching data sets and required r-value, on an annual basis (anniversary date of qualification into the CPA Formaldehyde Emissions Grademark Certification Program/HCHO Program) for each product type for the first three years of operation under EPA TSCA Title VI. Be aware that until this issue is addressed through EPA guidance or an amendment, your plant will be responsible for reestablishing its correlations within one year after joining the EPA TSCA Title VI-compliant HCHO Program.

For more information about HCHO Program, you can check [www.compositepanel.org](http://www.compositepanel.org)

If you have any question regarding this matter, please contact me via email or phone.

Sincerely,

A handwritten signature in blue ink that reads "Connie Klinkam". The signature is written in a cursive style with a large initial 'C'.

Connie Klinkam  
Senior Director of Technical Services  
[cklinkam@cpamail.org](mailto:cklinkam@cpamail.org) [certification@cpamail.org](mailto:certification@cpamail.org)  
703.724.1128 ext 296