DECORATIVE HARDWOODS Association

Decorative Hardwoods Association®

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Office of Pollution Prevention and Toxics (OPPT)
Office of Chemical Safety and Pollution Prevention (OCSPP)
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

**Subject: Support for EPA's Updated Draft Risk Calculation Memorandum for Formaldehyde EPA-HQ-OPPT-2018-0438**

Dear EPA Officials,

On behalf of the Decorative Hardwoods Association (DHA), I am writing to express our strong support for the U.S. Environmental Protection Agency's (EPA) Updated Draft Risk Calculation Memorandum for Formaldehyde. DHA represents North American manufacturers of hardwood plywood, engineered wood floors and hardwood veneer. Our products have long been regulated for formaldehyde under TSCA Title VI. DHA supports TSCA Title VI and was an advocate for the law. DHA is committed to advancing worker health, environmental stewardship, and the development of science-based regulatory frameworks. It is important to recognize that Formaldehyde is naturally produced by wood products and formaldehyde is used in some adhesives. Because formaldehyde is naturally occurring it is particularly important that US EPA uses the best available science in risk calculations for formaldehyde. The outcome of EPA's risk evaluation holds significant implications for our industry and the broader U.S. economy and DHA supports EPA's Updated Draft Risk Calculation Memorandum for Formaldehyde.

**DHA Supports EPA's Science-Based Course Correction for Formaldehyde**
We commend EPA for its rigorous and transparent reassessment of formaldehyde risks. We support EPA's revision of its formaldehyde inhalation risk assessment to reflect the best available science, directly address recommendations from scientific peer reviewers, and align with TSCA's statutory mandates as well as Executive Order 14303, Restoring Gold Standard Science. The revised approach, grounded in the latest scientific evidence and stakeholder input, reflects a welcome course correction toward a threshold-based risk assessment framework. We particularly support EPA's reliance on controlled human exposure studies, which provide robust, directly relevant data for evaluating health effects. This evidence-based methodology ensures that regulatory decisions are anchored in real-world exposures and outcomes, fostering both health protection and regulatory credibility.

**Sensory Irritation as the Health-Protective Endpoint**
EPA's selection of sensory irritation as the health-protective endpoint is fully justified by the scientific literature. The weight of the scientific evidence demonstrates that sensory irritation is the most sensitive and biologically relevant endpoint for inhalation exposure to formaldehyde. Thus, protecting against sensory irritation is protective of downstream effects, including chronic non-cancer and cancer outcomes, under a threshold mode of action. EPA's revised framework appropriately reflects these conclusions and aligns with recommendations from EPA's own scientific advisory bodies.

**DHA Supports Reliance on Controlled Human Exposure Studies**
DHA supports EPA's reliance on controlled human chamber studies rather than observational epidemiology for identifying points of departure. These studies provide well-characterized exposure concentrations and durations, direct evidence of cause-and-effect relationships, and greater scientific rigor for regulatory decision-making. Where such studies are available, they represent the gold standard for inhalation hazard assessment.

**Consistency with Peer Review and International Authorities**
We are encouraged by EPA's commitment to harmonizing its risk assessment with peer review recommendations and international guidelines. The updated memorandum is consistent with Recommendations from the Science Advisory Committee on Chemicals (SACC) and the Human Studies Review Board (HSRB); Evaluations by authoritative international bodies, including those in the European Union (EU) Scientific Committee on Occupational Exposure Limits (SCOEL) and the World Health Organization (WHO) Indoor Air Quality Guidelines; and
A well-established scientific consensus supporting a threshold, non-linear mode of action for formaldehyde. This alignment enhances the credibility, durability, and defensibility of EPA's TSCA risk determinations.

**Occupational Exposure Values and Practical Implementation**
EPA's proposed occupational exposure values are both health-protective and practically implementable. The benchmarks are consistent with existing Occupational Safety and Health Administration (OSHA) standards and reflect the realities of industrial operations. We recommend that EPA continue to consider feasibility, technological capabilities, and economic impacts when finalizing these values. Practical implementation will require clear guidance on exposure monitoring, worker training, and compliance verification to ensure that protective measures translate into real-world risk reduction.

**Additional Information to Inform Risk Management**
In response to EPA's solicitation for input on risk management, we offer the following recommendations:

- Personal Protective Equipment (PPE): We support the recognition of PPE as a critical layer of protection for workers in formaldehyde-handling environments. EPA should provide flexibility in PPE selection to accommodate industry-specific needs and technological advancements.

- Workplace Controls: Engineering controls, such as local exhaust ventilation and closed-system processes, are effective means of minimizing exposure. We encourage EPA to promote performance-based standards that incentivize continuous improvement.
- Emission Factors: Accurate emission factors are essential for reliable exposure assessment. We recommend that EPA collaborate with industry stakeholders to ensure that emission estimates reflect current practices and available data.

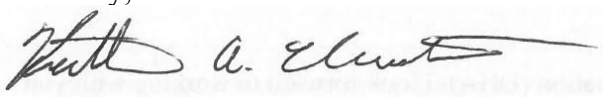
**TSCA Requires a Risk-Based Approach**

The Toxic Substances Control Act (TSCA) mandates that EPA's risk evaluations and management actions be based on the weight of scientific evidence and proportional to the risks identified. We support EPA's adoption of a risk-based framework that integrates hazard, exposure, and risk management considerations. This approach ensures that regulatory actions are justified, effective, and tailored to actual risks, in alignment with statutory requirements.

**Conclusion**

In closing, the Decorative Hardwoods Association reaffirms its strong support for EPA's Updated Draft Risk Calculation Memorandum for Formaldehyde and the agency's commitment to scientific integrity, stakeholder engagement, and health protection. We urge EPA to finalize and implement this science-based framework in its forthcoming risk evaluations and management actions.

Sincerely,



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