

July 8, 2009

Linda Kincaid
Industrial Hygiene Service
20255 Glasgow Drive
Saratoga, CA 95070
Via Email (nanosafety@gmail.com)

Dear Ms. Kincaid:

As the Executive Director of the Formaldehyde Council, Inc. (FCI), the trade association that represents the leading producers and users of formaldehyde, I have been following your reports on indoor air, formaldehyde and composite wood products with great interest. FCI is dedicated to promoting the responsible use and benefits of formaldehyde and ensuring its accurate scientific evaluation. Therefore, I would like to discuss some of the issues you raise in your articles in more depth.

You report that in the course of your work, you've measured levels of formaldehyde inside drawers, kitchen cabinets and boxes and that these readings should be cause for concern. While your testing parameters are not clear, we are not aware of any industrial hygiene sampling protocol that would suggest the approach you describe.

It seems that it is particularly inappropriate to cite health concerns when the testing method is ambiguous and there is a limited sampling pool. There are rigorous standard protocols for testing product emissions under the California Air Resources Board's (CARB) Air Toxic Control Measure (ATCM) for composite wood products. Furthermore, as I'm sure you are aware, some of the spot samples you have measured (e.g., inside of a drawer) are hardly representative of what people might breathe.

Given your spot testing methods and the types of cabinets tested, the readings you reported are not typical of products produced by responsible U.S. manufacturers. If sourced from U.S. manufacturers, the composite wood products that make up the majority of components used in the assembly of a cabinet are subject to a third-party product emission certification process. One of FCI's members, the Kitchen Cabinet Manufacturers Association (KCMA), sponsors a nationally recognized voluntary testing and certification program for cabinets, ANSI/KCMA A161.1, Performance & Construction Standard for Kitchen and Vanity Cabinets. U.S. government agencies, architects, builders, remodelers, and other specifiers reference this program.

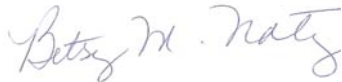
Cabinets that comply and bear the KCMA certification seal are recognized in the marketplace as a quality product after a rigorous battery of tests simulating years of typical household use. Approved third-party independent laboratories perform the tests,

which includes random sample selections from unannounced visits to manufacturing plants. Given these standards, we can only conclude that the products you tested may have been sourced overseas from Asia where manufacturing controls (if any) aren't nearly as rigorous as those in the United States.

In short, FCI supports finished products that are made with compliant third party certified composite wood components. We therefore would like to better understand the scope and nature of your testing program, which suggests the use of noncertified composite wood components. We are quite concerned that you are aimed at identifying worst-case sources of formaldehyde emissions; yet you are casting a wide net that suggests irresponsible practices among U.S. composite wood manufacturers. We ask that you engage in further discussions with us.

Please give me a call at 703-741-5752.

Sincerely,

A handwritten signature in cursive script that reads "Betsy M. Natz".

Betsy Natz
Executive Director
The Formaldehyde Council, Inc.

CC: Josh Futterman (jfutterman@examiner.com), Examiner.com