

Information and Process flow for EPA & CARB Certification

1. Introduction

Thank you for your interest in CARB & EPA TSCA Title VI certification program that certifies composite wood including Medium Density Fiberboard, Particle Board and Hardwood Plywood in accordance with the California Air Resources Board (CARB) Airborne Toxic Control Measure and 40 CFR Part 770 to Reduce Formaldehyde Emissions from Composite Wood Products.

These EPA & CARB regulation requires that manufacturers of composite wood to meet formaldehyde limits and undergo quarterly inspection and laboratory testing by an approved Third-Party Certifier. We are pleased that you are considering Sustainable Stewardship Private Limited (SSPL) as your inspection agency.

First step in pursuing certification is to arrange the filled CARB Application Form and after receipt of Application, we will review the application and sent you a Proposal.

2. References and Resources

There are several resources available to guide for achieving CARB & EPA certifications. Sustainable Stewardship Private Limited recommend that you familiarize your team with these documents and resources available on the CARB website at <http://www.arb.ca.gov/toxics/compwood/compwood.htm> and <https://www.ecfr.gov> and <https://www.regulations.gov/document?D=EPA-HQ-OPPT-2016-0461-0001>

- EPA CFR 40, Part 770
- CARB ATCM 93120-93120.12 Regulation
- CARB Advisories resource section
- Frequently Asked Questions (FAQs) resource section

3. Applicability of EPA & CARB Certification

- Hardwood plywood (HWPW) (Veneer and Composite Core)
- Particleboard (PB)
- Medium Density Fiberboard (MDF) and thin Medium Density Fiberboard (tMDF)

These composite wood products are used to make items such as furniture, work stations, shelving, countertops, flooring and toys.

As per CARB & EPA regulation, composite wood manufacturers, importers, fabricators, distributors, and retailers can sale, supply or manufacture composite wood products to or in the state of California and all over the U.S, respectively.

4. Certification Process

The CARB & EPA certifications are an yearly certification cycle programme. Within this, the CARB & EPA regulations require quarterly onsite inspections & laboratory testing to verify continued compliance. The typical inspection schedule for customers may be as below:

Certification	Upon application approval, Onsite Initial Inspection and Laboratory Testing.
Quarter 1	At site Inspection & Laboratory Testing (approx. 1 month from issues of certification)
Quarter 2	At site Inspection & Laboratory Testing (approx. 4 months from issue of certification)
Quarter 3	At site Inspection & Laboratory Testing (approx. 7 months from issue of certification)
Re-Certification	At site Inspection & Laboratory Testing (approx. 10 months from issue of certification).

The inspection schedules will be different for customers who have been approved by CARB to offer No Added Formaldehyde (NAF) or Ultra-low-emitting formaldehyde (ULEF) products.

Additional inspections, may be necessary, unannounced or otherwise, in situations where there is a high frequency of non-complying lots, validated complaints of non-compliance by key stakeholders, or other extenuating circumstances that could lead to non-compliance.

Process Flow

Activities	Processes
Application	<ul style="list-style-type: none"> •Upon receipt of Application form, SSPL prepare the proposal & send. •Acceptance of Proposal by the client and SSPL issues invoice.
Inspection	<ul style="list-style-type: none"> •Approved Inspector coordinates with customer to receive the QC Manual and conducts on-site inspection, reviews documents and draws samples for testing.
Testing and reporting	<ul style="list-style-type: none"> •Samples drawn by Inspector are tested by CARB approved TPC Lab. •The Inspector submit on-site inspection report.
Certification	<ul style="list-style-type: none"> •Technical review of the report; identifying non-conformance. •Closure of non-conformances. •Issuance of certification.
Quarterly Inspections	<ul style="list-style-type: none"> •Quarterly inspections and Lab testing are required for clients using formaldehyde; clients using Ultra Low-Emitting (ULEF) or No-Added (NAF) Formaldehyde resins receive exemption from CARB after the specified number of Inspections are conducted and time period of consistent test results below the threshold limits.

5. Information for Customer

Composite wood products manufactured in compliance with EPA & CARB Phase 2 formaldehyde limits may be labelled and sold as such.

The TPC certificate, EPA & CARB label is not directly transferrable to your company's full inventory of manufactured composite wood products.

The EPA & CARB product certification has a defined scope, limited to the products and sites listed on the Certification Report.

6. CARB Phase 2 Formaldehyde Limits

Emission Standards in parts per million (ppm) per ASTM E1333				
Hardwood Plywood (Veneer Core):	Hardwood Plywood (Composite Core)	Particle Board	Medium Density Fiberboard	Thin Medium Density Fiberboard
0.05	0.05	0.09	0.11	0.13
Ultra-Low Emitting Formaldehyde: ULEF means resins formulated such that average formaldehyde emissions are consistently below the Phase 2 emission standards in section 93120.2, as provided in section 93120.3(d).				
No Added Formaldehyde: NAF includes, but is not limited to, resins made from soy, polyvinyl acetate or methylene diisocyanate.				

7. CARB & EPA Certification Mark Guidelines

The CARB & EPA TSCA Title VI regulation requires on product and invoice or bill of lading compliance labeling.

On product labeling requires: "Each panel or bundle of composite wood products must be clearly labeled to indicate compliance with the emission standards specified in section 93120.2(a). The label shall include, at a minimum, all of the following information:

- a. Manufacturer name;
- b. Product lot number or batch produced;
- c. A marking to denote that the composite wood product complies with the applicable Phase 1 or 2 emission standards specified in section 93120.2(a) or was made using ULEF resins or no-added formaldehyde based resins; and
- d. The ARB assigned number of the approved third party certifier
- e. This requirement does not apply to manufacturers using no-added formaldehyde based resins that have obtained ARB approval as provided in section 93120.3(c) or products manufactured using ULEF resins as provided in section 93120.3(d)(2).

Invoice or Bill of Lading Compliance labeling requires the following:

- a. The ARB assigned number of the approved third party certifier, if applicable; and
- b. A statement that the composite wood products comply with the applicable Phase 1 or Phase 2 emission standard specified in section 93120.2(a) and, if applicable, were made using ULEF resins or no added formaldehyde based resins

The misuse and mislabeling of any final product is NON-COMPLIANCE and will result in the termination of your contract and certificate, as well as possible legal action.

8. Certification Tenure & Infringement of Requirement

CARB & EPA certificates are valid for 1 year subject to quarterly surveillance inspections for clients using formaldehyde. Clients using NAF or ULEF resins are subject to terms outlined by CARB. TPC shall confine requirements, evaluation and decision on certification to matters specifically related to the scope of the relevant certification scheme.

Forestwood Industries, Inc, USA representative for India

According to the CARB ATCM Regulation and TPC requirements, Customer shall:

- a. No certification claim can be made for any product by the manufacturer prior to issuance of a CARB certificate;
- b. Consistent compliance with the relevant provisions of the CARB & EPA Certification rules and regulations;
- c. Make necessary arrangements for the conduct of the inspection, including provision for document verification and access to all areas, records (including internal inspection reports), and personnel for the purposes of evaluation (e.g. testing, inspection, assessment, surveillance, reassessment) and resolution of complaints;
- d. No claims to be made outside the scope of the certification. TPC should be notified immediately of any scope changes;
- e. Not use its product certification in such a manner as to bring the TPC into disrepute, nor make any statement regarding its product certification that the TPC may consider misleading or unauthorized;
- f. Upon suspension or cancellation of certification, discontinue its use of all advertising that contains any reference to the certification
- g. Return the certification documents related to certification issued by the TPC; if asked to do so.
- h. Use certification to indicate that products are certified as being in conformity with the specified rules and regulation;
- i. To ensure that no certificate or report nor any part thereof is used in a misleading manner;
- j. In making reference to its product certification in communication media such as documents, brochures or advertising, comply with the requirements of the TPC.

TPC reserves the right to suspend, withdraw or terminate the issued certificates. Reasons for suspension, withdrawal and termination include, but are not limited to: unwillingness or inability to correct nonconformities, unwillingness or inability to meet financial or contractual arrangements; misusing or damaging the integrity of the TPC or relevant governing body trademarks; intentional violation of requirements etc.

For more information about the EPA & CARB certification process please contact info@sustainablestewardship.net