



# WHAT THE NEW CARB RULE MEANS FOR YOU

A Quick Reference Guide to the California Air Resources Board's Air Toxic Control Measure (ATCM) for Formaldehyde Emissions from Composite Wood Products

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## 1. PRODUCTS AND BUSINESSES COVERED BY ATCM

### Composite Wood Products Covered

- Particleboard.
- Medium Density Fiberboard (MDF).
- Thin MDF ( $\leq 8$  mm in thickness) [has different emission requirements and compliance deadlines than regular MDF].
- Hardwood Plywood made with a veneer core.
- Hardwood Plywood made with a composite core (particleboard or MDF) [has different compliance deadlines than veneer core hardwood plywood].

### Business Activities Covered

- Manufacturers of composite wood products for sale or use in California.
- Importers of composite wood products for sale or use in California.
- Distributors of composite wood products for sale or use in California.
- Fabricators of products containing composite wood products for sale or use in California.
- Distributors of fabricated products containing composite wood products for sale or use in California.
- Retailers of composite wood products and fabricated products containing composite wood products for sale or use in California.
- Third party certifiers of products to the requirements of the Composite Wood Air Toxic Control Measure.

### Business Definitions

**Manufacturer**—A company that manufactures regulated composite wood panels (hardwood plywood, particleboard or MDF).

**Importer**—A company that imports regulated composite wood panels.

**Fabricator**—A company that manufactures domestic or imported finished goods made with regulated composite wood panels.

**Distributor**—A company that distributes regulated composite panels or finished goods made with regulated composite panels (different rules for each), but not to consumers. Does not alter products.

**Retailer**—A company that sells regulated composite panels or finished goods made with regulated composite panels (different rules for each) to consumers.

## WHAT THE NEW CARB RULE MEANS FOR YOU: A QUICK REFERENCE GUIDE {continued}

### Phase 1 and Phase 2 Formaldehyde Emission Standards for Hardwood Plywood (HWPW), Particleboard (PB), and Medium Density Fiberboard (MDF)<sup>1</sup>

Effective Date	Phase 1 (P1) and Phase 2 (P2) Emission Standards (ppm)				
	HWPW-VC	HWPW-CC	PB	MDF	Thin MDF
January 1, 2009	P1: 0.08		P1: 0.18	P1: 0.21	P1: 0.21
July 1, 2009		P1: 0.08			
January 1, 2010	P2: 0.05				
January 1, 2011			P2: 0.09	P2: 0.11	
January 1, 2012					P2: 0.13
July 1, 2012		P2: 0.05			

<sup>(1)</sup> Based on the primary test method, ASTM E 1333-96(2002), in parts per million (ppm). HWPW-VC = veneer core; HWPW-CC = composite core.

## 2. EXEMPTIONS

### General Exemptions from ATCM

- Composite wood products and fabricated products containing composites offered for sale or use **outside** of California.
- Composite wood products used in manufactured homes subject to US HUD regulations.
- Goods owned by consumers that are brought into California as part of a household move, etc.
- Goods owned by consumers that are subsequently resold on a secondary market.
- Local governments are exempt from recordkeeping and labeling requirements unless they are offering fabricated products or composite wood products for sale.

### Specific Product Exemptions from ATCM

- Finger jointed lumber.
- Hardboard meeting ANSI A135.4, ANSI A135.5 or ANSI 135.6.
- Prefabricated wood I-Joists meeting ASTM D5055.
- Structural plywood meeting PS-1.
- Structural panels meeting PS-2.
- Structural composite lumber meeting ASTM D 5456.
- Structural glued laminated lumber meeting ANSI A190.
- Windows containing less than 5% composites.
- Exterior doors made with composites meeting the Ultra Low Emission Formaldehyde (ULEF) or No Added Formaldehyde (NAF) requirements, or containing less than 3% other composites.
- New vehicles meeting Section 430 of the California Code, except for recreational vehicles.
- Curved plywood

## 3. MANUFACTURER EMISSION LIMITS AND DEADLINES

Products meeting the emission limits above (see chart) must also be certified by a CARB approved third party certification program unless they are approved Ultra Low Emission Formaldehyde (ULEF) or No Added Formaldehyde (NAF) products (see certification exemptions).

## 4. SELL THROUGH PROVISIONS FOR MOVING INVENTORY BEYOND THE MANUFACTURING DEADLINES\*

- Manufacturers and Importers of composite wood products: 3 months beyond the Phase 1 and Phase 2 ATCM manufacturing deadlines.
- Distributors of composite wood products: 5 months beyond the Phase 1 and Phase 2 ATCM manufacturing deadlines.
- Retailers of composite wood products: 12 months beyond the Phase 1 and Phase 2 ATCM manufacturing deadlines.
- Fabricators and Distributors of finished products containing composite wood products: 18 months beyond the Phase 1 and Phase 2 ATCM manufacturing deadlines.
- Retailers of fabricated products containing composite wood products: 18 months beyond the Phase 1 and Phase 2 ATCM manufacturing deadlines.

\*see above table

### 5. COMPLIANCE TESTING REQUIREMENTS

- Certification testing by approved third party certification testing agencies shall be conducted using either the primary or secondary test, or an alternate secondary test approved by CARB.
  - The primary ATCM test is ASTM E1333, the Large Chamber test.
  - The secondary ATCM test is ASTM D6007, the Small Scale Chamber test. Certifiers must show equivalent results to the primary test in order to use the secondary test.
- Alternate secondary tests must be approved by CARB. Certifiers must show equivalent results to the primary test in order to use an alternate secondary test.



### 6. CERTIFICATION REQUIREMENTS AND EXEMPTIONS

#### Manufacturer Requirements

- For each product, initial compliance with emissions standards must be verified by an approved third party certification agency.
- Following initial qualification, quarterly third party verification of emissions is required.
- Manufacturer is responsible for the emissions performance of all certified products.
- Each certified mill's quality program must include a quality control manual describing quality systems and procedures as well as specified facilities and personnel.
- Mill must do regular quality tests during each production shift (for particleboard and MDF) or by production level (for hardwood plywood). A mill's approved third party certification agency may perform the quality control tests.
- Mills must set quality limits by correlating their tests to the third party's primary and/or secondary compliance test.
- Mill must follow specific procedures for products found to be out of compliance with the standard.
- Quality records must be retained for two years.

#### Third Party Certification Agency Requirements

- Obtain approval from CARB.
- Obtain accreditation from a signatory of the International Laboratory Accreditation Cooperation Agreement (ILAC).
- Demonstrate actual field experience with certification and management of inspectors.
- Demonstrate experience with laboratory procedures or obtain contractual arrangements with a CARB approved testing laboratory.
- Verify that manufacturers using certification services are complying with the quality requirements of the rule and provide them with independent audits and a CARB approved certifier number for product labels and notifications.

- Maintain records of certification activity for two years and provide an annual report to CARB of certification activities, including test results.

#### Exemptions to Third Party Certification Requirements

Finished products must be fabricated with certified composites but do not require separate third party certification.

Approved Ultra Low Emission Formaldehyde (ULEF) and No Added Formaldehyde (NAF) composite wood products are exempt from daily third party certification quality control requirements, but must make a regular demonstration of ongoing compliance.

- NAF and ULEF producers must apply to CARB to obtain an approved exemption and provide an initial demonstration of compliance with special emission limits.
- NAF and ULEF producers must provide basic adhesive chemical formulation information to CARB.
- NAF producers must provide 3 months of initial quality data to show compliance with special emission limits and at least one primary or secondary compliance test.
- ULEF producers must provide 6 months of initial quality data showing compliance with special emission limits and at least two primary or secondary compliance tests.
- 90% of the NAF and ULEF tests in the initial quality data set must be 0.04 PPM or lower. Additionally, all hardwood plywood quality data and compliance tests must be 0.05 PPM or lower, and all particleboard and MDF quality data and compliance tests must be 0.06 PPM or lower.
- NAF and ULEF producers must provide CARB with a primary or secondary compliance test showing compliance with the special NAF/ULEF limits every two years.
- Primary and/or secondary compliance tests must be performed by an approved third party certification agency.

### 7. LABELING, NOTIFICATION AND RECORDKEEPING REQUIREMENTS

#### Composite Manufacturer/Importer Labels

- Manufacturer name.
- Production lot number or batch.
- Compliance standard being met—i.e., Phase 1, Phase 2, ULEF or NAF.
- CARB-assigned number of third party compliance agency (except for ULEF/NAF products).

#### Composite Manufacturer/Importer Notifications

- A statement of compliance must be included with either the invoice or the bill of lading.
- Compliance statement must include the manufacturer's name, the certification number of the third party compliance agency and the compliance standard met by the product.

#### Composite Manufacturer/Importer Records

- Quality test data or compliance data and records indicating ongoing ULEF/NAF approval must be kept for 2 years.
- Maintain tracking records to allow products to be traced to their specific production lots.
- Maintain product purchaser information and invoice numbers.
- Maintain product transporter information.
- Maintain records regarding disposition of products not complying with the standard.
- Receiving written documentation of product compliance from suppliers and providing it to customers is recommended.

#### Distributor Requirements (incl. importers of finished goods)

- No additional labeling is required if products are not modified.
- Keep records showing date of purchase of ATCM regulated products for 2 years.
- Statement of compliance notification on bill of lading or invoice indicating the compliance standard being met.
- Receiving written documentation of product compliance from suppliers and providing it to customers is recommended.

#### Fabricator Requirements

- Must use composites that comply with the emission and certification requirements of the rule.
- Records showing date of purchase for composites must be kept for 2 years.
- Label required for every product or product box applied as a stamp, tag, sticker or bar code.
- Label must include the fabricator's name, the production date and the compliance standard of the product being used.
- Receiving written documentation of product compliance from suppliers and providing it to customers is recommended.

#### Retailer Requirements

- Must stock composites and/or fabricated products containing composites that comply with the labeling, emission and certification requirements of the rule.
- Maintain purchasing records for composites and/or fabricated products containing composites for 2 years.
- Receiving written documentation of product compliance from suppliers and providing it to customers is recommended.

### 8. RESOURCES

#### Composite Panel Association (CPA)

703.724.1128 or [jbradfield@cpamail.org](mailto:jbradfield@cpamail.org)  
[www.pbmdf.com](http://www.pbmdf.com)

#### Hardwood Plywood Veneer Association (HPVA)

703.435.2900 or [gramp@hpva.org](mailto:gramp@hpva.org)  
[www.hpva.org](http://www.hpva.org)

#### American Home Furnishing Association (AHFA)

336.884.5000 or [bperdue@ahfa.us](mailto:bperdue@ahfa.us)  
[www.ahfa.us](http://www.ahfa.us)

#### Kitchen Cabinet Manufacturers Association (KCMA)

703.264.1690 or [dtitus@kcma.org](mailto:dtitus@kcma.org)  
[www.kcma.org](http://www.kcma.org)

#### California Air Resources Board (CARB)

916.327.5615 or [btakemot@arb.ca.gov](mailto:btakemot@arb.ca.gov)  
[www.arb.ca.gov/toxics/compwood/compwood.htm](http://www.arb.ca.gov/toxics/compwood/compwood.htm)

### 9. CERTIFICATION AND TESTING SERVICES

To ensure products are CARB compliant, your best resource is the CPA's International Testing and Certification Center (ITCC), in Leesburg, Virginia. The ITCC is a state-of-the-art facility equipped with the latest quality control technology to meet the testing and certification needs for low and ultra-low emitting products. The new Center expands upon decades of independent, reliable testing services and encompasses the CPA Grademark Program, the largest and most stringent certification program for North American composite panel products.

The ITCC adheres to the toughest guidelines and, like the CPA center it replaces, will be accredited by the National Voluntary Laboratory Accreditation Program (NVLAP). ITCC certification programs also carry American National Standards Institute (ANSI) and International Accreditation Services (IAS) accreditations.

#### ITCC

73 Lawson Road  
Leesburg, VA 20176  
703.724.1128 Fax 703.724.1588

**Certification Services:** Chris Surak at [csurak@cpamail.org](mailto:csurak@cpamail.org)

**Testing Services:** Bill Harrington at [bharrington@cpamail.org](mailto:bharrington@cpamail.org)



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