

State of California
California Environmental Protection Agency
Air Resources Board

Summary of Comments and Responses
Regarding the Draft Third Party Certifier Guidelines
June 8, 2010

TPC Guideline CWP-10-001: Acceptable “r” Value

Comment #1: Collecting additional data points: European Task Group 1 agrees with the method in general but asks CARB to provide clear guidelines on how and from what products additional data-points can be obtained. A definition or explanation of the requirement “similar emission character” given in the ATCM is very much required. In the opinion of European Task Group 1 for initial certification (qualifying test and/or establishment of correlation) products are to be selected from the whole thickness range to be certified in order to cover a wide emission range.

Response: We suggest that the data for an initial certification and correlation should be derived from measurements made on the range of product thicknesses at a mill. For the purpose of establishing a correlation and linear regression, we understand that some mills have produced slightly higher or lower emitting panels (by adjusting the resin percentage) strictly for the purpose of producing the spread in emissions.

Appendix 2 of the ATCM allows manufacturers to work with TPCs to group product types if they have “similar emission characteristics.” By this, we meant that if a TPC agrees with a manufacturer that two product types are so similar (e.g., only relatively minor differences in thicknesses, so likely little difference in emissions), that product types could be grouped to reduce the amount of qualification and correlation testing. However, some initial testing data may be needed to verify that two or more product types in fact have “similar emission characteristics,” especially if a manufacturer wants to group product types that the TPC suspects may not have similar emission characteristics.

Comment #2: The ATCM requires the establishment of correlations and initial type testing for each individual production line (section 93120.12(f)(2)). The wording in the ATCM regarding quarterly verifying tests is not as specific (section 93120.12(f)(3)(A)). What exactly is the intention of the ATCM and/or CARB? Do samples from each production line have to be tested in quarterly inspections or can product types be grouped together from various production lines or do different production lines always have to be treated separately?

Response: The intent of the ATCM is to require verification testing (quarterly primary or secondary method testing) by a TPC on a representative amount of product to affirm that the certified products made by a manufacturer comply with applicable standards. At the discretion of the TPC, verification tests should be conducted on as much product as needed to provide assurance to the manufacturer that the full range of CARB-certified products that they make, comply with applicable standards. Samples from each production line should be tested if observed product variability indicates that testing is needed to affirm compliance. If the same correlation is used to monitor products made

on different production lines and emission variability between production lines is comparable, products from both production lines do not need to be tested.

Comment #3: Does CARB endorse the use and method of establishing an excursion limit which is given in the Composite Panel Association's Grademark Program Manual? Can you please issue a guidance paper on how the excursion limit is to be determined and observed?

Response: Under 93120, Appendix 2(g)(3), the ATCM requires manufacturers to develop a quality control limit (QCL) and to establish excursion limits. For more information, refer to the Composite Panel Association's (CPA's) Grademark Program Manual (Appendix I), which can be used to establish an excursion limit.

Comment #4: Does CARB have any specific procedures, statistical methods or criteria which should be applied by the TPC in evaluating the validity of an existing correlation (e.g., as additional data pairs become available through quarterly testing)?

Response: The use of proper correlations must be derived through consensus between a manufacturer and TPC. TPCs need to advise manufacturers on how much testing they believe is warranted and manufacturers need to understand the risks involved with testing less than what is recommended by a TPC.

Comment #5: Establishing a correlation with an acceptable "r" value: Various documents refer to "r" or "R²" values, which could lead to confusion.

Response: We will maintain consistency with the CPA's program and base our recommendations in consideration of "r" values vs. "R²" values.

Comment #6: We did not have a chance to review the BS EN 326-2 document that your suggested "r" values are based on, but since they are from 2000, one can expect that they are largely based on higher emitters. We believe the listed values are sufficient but may be a bit restrictive. Perhaps the "r" values for each degree of freedom should be shifted up one level. For example, 5 data pairs having 3 degrees of freedom must achieve an "r" value of 0.811.

Response: As written, the regulation does not specify minimum "r" values that must be achieved. Our suggested "r" values are provided for general guidance. However, your point concerning "r" values based on higher emitting products is well made and should be noted by all TPCs when establishing mill correlations.

Comment #7: The "r" value in the guideline is different with our current one (reference to CPA), shall all TPCs have to follow the value in guideline or (can we) keep our own value(s) (that we established)?

Response: They are calculated using the same equation and should match when rounded to two decimal places. However, in the case of a disagreement, we encourage all TPCs to use their best technical judgment to ensure the most effective certification program.

Comment #8: In our program, for those cluster data pair, we will try to establish the correlation relationship by adding one more point (0, 0) among the pair, it is quite similar with the second alternative method suggested in guideline P.2 Paragraph 3. Could we continue to keep our method?

Response: Your approach appears to be consistent with the second alternative method, although we prefer the use of data collected using blank QC and verification test chambers. If you are comfortable with that approach insofar as assuring compliance for your clients, it is acceptable to continue using it.

Comment #9: In Page 3, the reference file for MBTH here is the publication in “The Analyst”, while in Guideline No.2, only ASTM D5014 mentioned, we think it should be the same in reference file, could CARB help to unify it?

Response: We are unsure about the copyright issues regarding the citation of an ASTM document. We will unify the citations in the final guideline.

Comment #10: Just collecting more data will not be helpful when low value clustering is the problem. We need to expand the range by testing non-CARB products produced by the mill. This can be done by having them make some higher emitting board for testing. Since most of the PB/MDF plants make their own resin, this could be easily accomplished...

Response: Our recommendation would be use products made with the same resin system as the certified product. Expanding the range of the correlation by adding a point at or near the origin, based on measurements of empty test chambers, is preferred over the use of a high-emitting product to establish a linear relationship for the product.

Comment #11: This makes no sense to me – calling the cluster average the QCL in no way makes the QC test a predictor of the reference test value, and has little if any basis in statistical QC procedure.

Response: We are offering options for TPCs to consider. This option was suggested as a way to establish a margin of safety for mills vs. using the highest value in the cluster. If an approach of this kind is used, our recommendation is that a value other than the maximum value in a cluster be used – the average value is typically on the order of 0.01 ppm lower than the maximum for products around the Phase 2 limits.

Comment #12: Limiting the emission range between 0.03 and 0.08 also makes little sense. That is the basic problem with clustering. To eliminate the cluster problem, you have to expand the range. I see no problem with having a range 2 or 3 times as large. I seriously doubt that many (if any) mills will be able to achieve an “r” of 0.878 using the restricted range. One reason is that variability introduced by sampling inconsistency and testing accuracy looms too large at that low value.

Response: We are not proposing to limit the range over which a correlation is developed. The example range was offered as a minimum range, and we agree that stronger correlations can be developed using ranges two or three times larger.

Comment #13: Well this would certainly enable anyone to have an “r” of 1.0 (having only two data sets always gives a straight line and “r” of 1.0). I don’t disagree with this approach but I would like to see some kind of a limit on the cluster value – how tight does a cluster have to be before this approach is taken. If data reflects a random scatter instead of a tight cluster, this isn’t an appropriate approach. I would also recommend that if a cluster average is used, that a third, higher point, be added by the means described above.

Response: As guidance, a cluster would be a set of data with x-axis and y-axis value ranges of 0.03 ppm or less. When dealing with data of this kind, the reality is that the linear relationship for most data sets is best estimated by a two-point correlation. Any guidance we provide is aimed at helping TPCs select which two points to use – ideally ones that will provide cost-appropriate assurance to the manufacturer that their products comply with applicable standards.

Comment #14: Again, this (average small-scale test value) approach does not assure that production meets the reference test limit. All you are saying is that average test values define conformance. I don’t think that is the intent of the CARB rule.

Response: It provides a larger compliance margin of safety than using the maximum value in the cluster. Average test values indicate compliance – they do not define conformance.

Comment #15: In summary, the best solution may be a combination of several approaches: (1) Accept the zero-zero data point; (2) use the cluster average as a second data point; and (3) add a third, higher, non-CARB data point. As values approach the zero ppm level in phase 2, sampling and conditioning variability can make a greater impact than when values are higher. Greater attention to these details are as important as the analytical methodology. Another source of variability in Chinese plants is their tendency to produce their own resins at the plant level, as opposed to the US and European models of resin being purchased from large, commodity based resin manufacturers. Large resin plants tend to have greater control over product consistency.

Response: We will consider your suggestion and ask that more detail be provided on how to create the third, higher data point. Our intent is to encourage greater attention to detail with respect to analytical methodologies.

Comment #16: There is a lot of work that needs to be done in order to establish the acceptable correlation value “r”. Technically it is not a big problem, but practically it is problem for plywood mills in China. Use the cluster average I believe is the idea.

Response: To the extent we can, our intent is to provide guidance to TPCs as to what CARB’s preferences are when a given approach is used for establishing a correlation. Each mill needs to be handled on a case-by-case basis, and where appropriate, the cluster average approach may be the best option for a given mill.

Comment #17: As our experience, the low end of the working range for the photometric acetyl acetone method in JIS A 1460 and EN 120 is 0.004 ppm. It could be concluded that JIS A 1460 for HWPW and EN 120 for MDF and PB can be used as Phase 2 quality control test methods. (Based on the part 9.1 of ISO12460-1:2007, the acetyl acetone method should be able to provide a determination limit (accuracy) of 0.005 mg/m³. In part 3.6 of ISO 12460-1:2007, at 23 C and 1,013 kPa, the following relationships exist for the formaldehyde: 1 mg/m³ = 0.81 ppm (parts per million). So, since the acetyl acetone method has a suitable determination limit, could it be used in replace of the chromotropic acid method for ASTM D 5582?

Response: Yes. ASTM D 5582 allows for the use of other analytical methods that provide comparable levels of accuracy, such as the acetyl acetone method.

Comment #18: Is the guidance a step to be followed or a choice?

Response: You have a choice – what we provide through our guidance is our recommendation on how to implement standard approaches so that there is greater consistency in how correlations are developed by the TPCs.

Comment #19: If step #3 is used, how do you correlate the small scale test value to the primary test value – how do you determine what the equivalent primary method value is for a small scale test result?

Response: You would not need to – you are setting a threshold value that would not be exceeded, and as long as your results are below that value, the data do not need to be assigned an equivalent primary method test value.

Comment #20: Program Manual is currently used widely as a reference; however, ultimately the authority remains with CARB to interpret and implement the CARB regulation, thus clear guidance from CARB is sought):

- (A) CARB is asked to provide clear CARB-approved guidelines for establishing Excursion Limits

Response #20A: In Appendix B of the Formaldehyde Grademark Quality Assurance Manual (January 1, 2007), an “excursion limit” is defined as “... a quality control level that shall not be exceeded by a certified lot (Section 8.6). This “not to exceed” level is established at 1.35 times the standard deviation above the quality control limit (i.e., QCL + 1.35 SD).”

A “QCL” is also defined In Appendix B as “...the value for any approved small scale quality control test which is the correlative equivalent to the maximum value in the Large Chamber test permitted by the applicable standard for the product type (Section 8.3, Appendix H-informative).”

In section 93120.12, Appendix 2, subsection (g)(3), it is written: “...The QCL is the value for any approved small scale quality control test which is based on the correlative equivalent to the value in a primary or secondary method test permitted by the

applicable standard. In addition to the QCL, an excursion limit shall be established to account for process and testing variation to keep the product's emissions from exceeding the applicable standard. In the event that a manufacturer produces product lots that consistently exceed the applicable QCL, based on exceedance criteria established by the third party certifier, the certifier shall be notified promptly."

In our view, the excursion limit serves as an indicator of diminished process control, errors in small-scale testing, inter alia, to manufacturers to take corrective action sooner rather than later. As compliance with applicable emission standards is the ultimate criterion for issuing a notice of violation, TPCs are advised to work with manufacturers on the risks associated with setting overly stringent or overly permissive excursion limits. Absent other written guidance, TPCs are advised to follow the process in Section 8.6 in the Formaldehyde Grademark Quality Assurance Manual noted above.

- (B) Criteria are to be determined together with CARB how and when it is possible to transition from one aforementioned option to another?

Response #20B: As additional data are collected, the linear relationship of mill correlations should be periodically reexamined by TPCs. In setting the QCL for a product type, the goal is to choose a numerical value that accurately reflects the product's verification test method emission level, with a margin of safety, which encompasses the effects of factors known to raise product emission levels. In providing the three options in TPC Guideline CWP-10-001, we are relying on TPCs to work with their clients to decide what correlation estimation option is best based on the available data. As the manufacturer is responsible for ensuring product compliance, TPCs need to apprise them of the risks they may face if the QCL is set too low so they can weigh any potential cost-savings they may be considering.

- (C) Criteria have to be laid down how the quality of the correlation affects the QCL (e.g. a large spread in data resulting in more conservative QCL)

Response #20C: Based on the data and information that has been shared with us regarding data clusters, and the absence of a prescribed minimum "r" or "R²" value that correlations must have, we provided guidance based on EN 326-2. A number of TPCs have noted that the guidance was germane to products with higher emission levels and may not have direct applicability to products that comply with CARB's Phase 2 standards. In providing the guidance in TPC Guideline CWP-10-001 on minimum "r" values, we highlight the uncertainty inherent to data clusters and the need to exercise caution when establishing the numerical value of a QCL. Using the three correlation estimation options described in the Guideline provides a sound basis for making an accurate choice that reflects the product's verification test method emission level, with a margin of safety.

- (D) A procedure for evaluation of validity of the correlation during quarterly testing/inspection has to be established. Do values have to be considered on a quarterly or a yearly basis? A (common) statistical method has to be developed for evaluation of the correlation. Criteria defining when a correlation curve has to be reworked have to be established. A proper statistical approach has to be laid down. Proper tools have to be provided by CARB or established within the CETPC and/or the global TPC community.

Response #20D: We agree that this would be beneficial and are open to any suggestions at this time. To a large extent, the results of our own enforcement testing

will be a major consideration insofar as the efficacy of the existing correlation requirement. We have relied on the experience and expertise of TPCs to help us define how a correlation needs to be established and if guidance is needed on when a correlation needs to be reworked, we will look into this in the coming year.

- (E) Method for how to distinguish between two lines has to be laid down? When are two products different and need different correlations?

Response #20E: Presently, we do not know how much product emissions differ, on average, between production lines in mills that make the three regulated products. Moreover, we do not know what decisions TPCs have made insofar as when separate correlations are needed for a product made on different production lines. We welcome the opportunity to review the data that has been collected and evaluate the bases for decisions to use one versus more than one correlation for a product made on different lines within a single mill.

Comment #21: When different resin systems are used, we believe different correlations should be used. For products spanning a large thickness range, it is our understanding that sufficient differences may exist between “thick” and “thin” products, and the only case that we have made a distinction is for “thin MDF.” If TPCs feel strongly about CARB providing more guidance on this matter, we ask for interested parties to submit data to us from different lines within a mill and the rationale for using one versus more than one correlation for quality control purposes. We believe that TPCs want guidance based on actual data, which we do not have access to.

- Method for how to determine when a product constitutes a “new product” which needs a new correlation. Can any data from the original product be used of the new correlation?

Response: The basis should be when the TPC and manufacturer agree that the QCL estimated using the existing correlation product no longer is “the correlative equivalent to the maximum value in the primary/secondary method test permitted by the applicable standard for the product type.” If a TPC is uncertain about the accuracy of the QCL derived using an existing correlation, the matter should be discussed with the manufacturer and risks of using the correlation explained.

If the data from the original product bear no similarity to the “new product,” it may have utility only insofar as broadening the range over which the correlation for the product is developed. It would help to see an example so the magnitude of difference in product emissions can be evaluated.

Comment #22: How is the quality of the correlation to affect the QCL? Are special safety margins to be considered? If yes how?

Response: In our view, the “r” or “R²” value serves as an indicator of how reliable the correlation is and as appropriate, should be considered in how large a margin of safety is needed. We do not believe all manufacturers want the same margin of safety and if they choose to accept the risk of having a small margin, it is their choice. TPCs should provide a recommendation on how large a margin of safety is warranted in consideration of observed variation in product QC and verification test results.

Comment #23: When, how often, and according to what method/criteria does a TPC evaluate the validity of a correlation? Ideally a clear statistical method should be established.

Response: We did not envision a need for regular reanalysis of a correlation unless production processes and/or resin systems are changed. Unless there is reason to believe that a new correlation is needed (e.g., poor quarterly test result or QC data outside the excursion limit), there may be no need to require that a new correlation be established. The addition of data from quarterly testing was envisioned as sufficient insofar as affirming the utility of an existing correlation.

Comment #24: When does a TPC have to consider a product as a “new product,” which needs a new correlation?

Response: At a minimum, when a different resin system is used to make the product. We rely on the expertise and experience of TPCs to determine if an existing correlation is unsuitable for purposes of assuring product compliance with applicable standards.

Comment #25: Correlations: In order to obtain data-pairs spread over a wider emission range: Does CARB endorse the strategy of producing special boards in order to spread the range? What are your recommendations on how these boards with slightly higher or lower emission are to be produced?

Response: For slightly higher emission products, we would endorse efforts to produce special boards in the range of 0.10 ppm for HWPW, 0.15 ppm for PB and MDF, and 0.20 ppm for thin MDF. Products with concentrations above these values may skew the correlation, leading to an inaccurate QCL, and put manufacturers at risk. For lower emission products, we encourage measuring the concentrations from raw wood.

TPC Guideline CWP-10-002: Small-scale Testing with Chromotropic Acid

Comment #26: There is some good guidance in this guideline, but much of it is simply common lab procedures. Any mill personnel using these methods should be rigorously following procedures as published in the standard and periodically demonstrate competence to the TPC in the mill and through blind sample analysis as written in the final regulation order.

Response: Our intent is to offer guidance on what can be done for TPCs with less experience in a given method. We want to promote the use of procedures that add assurance and accuracy to the results being collected.

Comment #27: Per our understanding, if results of small-scale results are repeatedly lower than the method detection limit (MDL), the mill should transfer to another more sensitive method for analysis. We couldn't understand the periodic operation of "Positive control" in this case. Does that mean the mill could still use their original method even if the sample results are lower than the MDL? What's the purpose of the Positive control?

Response: Our preference is to have the mill transfer to a more sensitive method for analysis, but some mills may not want to change for cost or other reasons. If a mill prefers to use a specific QC test method, the guidance was provided as a means to demonstrate that the procedure is being done correctly and that if measurable amounts of formaldehyde were emitted from a product, then it would be measured by the test method being used by the mill. A certain amount of "positive results" are needed to assure that the results reported as below the MDL are actually below the MDL. Therefore, it may be necessary for the TPC to conduct experiments with the mill to assure what level of "Positive control" results can actually be detected by the mill in their small scale test method.

Comment #28: CARB is suggesting that we, as TPCs, do more oversight of mill QC procedures. This is entirely appropriate and may require that TPC representatives in China acquire greater fluency in testing methodology and dedicate more time in the mills.

Response: To the extent that more oversight is needed – in our discussions with selected TPCs, they have shared their experiences with Chinese mills where reducing cost is a primary driver. As such, until Chinese mill operators understand the ramifications of a violation, it may require additional oversight to ensure that they operate according to the requirements of the ATCM.

Comment #29: If CARB allows a manufacturer to use "ASTM D 5582 with modification" to speed up the certification process, we suggest that the approval is done by the TPC. In this case, if needed, CARB may provide a standard – how many days of conditioning can be decreased and how long sampling time can be increased.

Response: We will consider suggestions from TPCs on this matter. We believe that TPCs will have valuable insight on what could be done to improve the utility of the method for Phase 2 products.

TPC Guideline CWP-10-003: Grouping of Product Types

Comment #30: This makes sense. If the TPC sees a particular iteration of a product type that is off the normal curve, they can request further correlation. Perhaps to provide further guidance CARB could list some of the specific common factors that influence emissions characteristics such as those for HWPW like face/back adhesive, core type, adhesive used in core type, import vs. domestic cores, certified vs. non certified cores press time, etc.

Response: We will provide more specificity in the revision regarding HWPW.

Comment #31: Due to our limited experience in plywood certification (up to now we have not certified any plywood mills), we are not sure if the recommendation of product type (Guideline CWP-10-003) can be extended to plywood. In the case of plywood, it seems that one of the parameters that is likely to affect emissions is the different wood species and probably the grouping for plywood may consider the type of resin and also the species of wood (it will depend on the emission values).

Response: We will include additional factors for HWPW – see response #25.

Comment #32: The ATCM requires the establishment of correlations and initial type testing for each individual production line (section 93120.12, Appendix 2, subsection (f)(2)). The wording in the ATCM regarding quarterly verifying tests is not as specific (section 93120.12, Appendix 2, subsection (f)(3)).

- (A) What exactly is the intention of the ATCM and/or CARB?

Response #32A: The intention of CARB is to ensure that there is a sound technical basis between the small-scale testing done at mills and quarterly verification testing done by TPCs. Mill certification is predicated on primary/secondary method testing combined with regular small-scale testing as a demonstration that product quality is being consistently maintained. CARB's requirement for "initial type testing for each individual production line" provides a margin of safety to manufacturers that are aware of systematic differences in the emission levels of products made on their production lines. As appropriate, where differences between product emissions from different production are substantive, it may be in the best interest of the manufacturer to establish separate correlations for each production line. Where differences are negligible, the same correlation can be used for products made on one or more production lines.

- (B) Do samples from each production line have to be tested in quarterly inspections or can product types be grouped together from various production lines?

Response #32B: Product types from various production lines can be grouped in cases where a single correlation can be used for purposes of establishing a QCL. As such, samples from each production line do not have to undergo quarterly verification testing unless products from each production have distinct correlations – that is, the products are not in the same product group.

Comment #33: Grouping of products: Is the similarity in emission characteristics to be judged by whether or not products follow the same correlation; i.e. products which fit the same correlation curve are considered to exhibit “similar emission characteristics”? The requirement “similar emission characteristics” in the context of TPC work is at present understood to mean the ability to predict chamber emission values from the QC method test results.

Response: Yes, however, we do not recommended grouping products made with different resin systems even if they exhibit similar emission characteristics.

Comment #34: Is it possible to put together product types from different product lines at the same site into one group of product types?

Response: Yes, product types from different production lines in a mill may be grouped, as long as the QCLs for all of the product types are determined using the same correlation.

Comment #35: According to the definition of CARB, we differentiate between product types and groups of product types. Is it correct that a product type has just one thickness? Is it correct that we have to define a correlation for each individual product type or can product types be grouped together into groups for the purpose of establishing correlations?

Response: A product type may span a thickness range, so long as the same correlation is used for the all the products in the thickness range. As for #13, product types can be grouped as long the QCLs for all of the product types in the group are determined using the same correlation.

TPC Guideline CWP-10-004: Certified Mill List

Comment 36: Last section “4”: Due to matters of confidentiality TPCs are not in a position to “respond to inquiries from users of composite wood products.” Please note that TPCs are only allowed to provide information to the respective manufacturer, CARB, and under certain circumstances, to courts and public authorities. Please consider removing the entire section “4.”

Response: Our guideline was to suggest that TPCs voluntarily be in a position to respond to such inquiries if a manufacturer gave them the approval to release such information. This suggestion by CARB is an effort to make the composite wood product certification more transparent to the public. We understand that you would not want to release the information if the mill had not granted their approval.

Comment #37: As a side issue there appears to be an ever increasing demand for documentation required by manufacturers and the like to support/verify that a product is CARB compliant. It may well get to the stage that some rules and guidelines are needed to ensure consistency of the documentation.

Response: Timeliness and confidentiality are the factors we endeavor to balance – on the one hand, it is important to be responsive to stakeholders that want to affirm that the products being offered to them are CARB certified before making a purchase. On the other hand, TPCs are sometimes bound by confidentiality agreements precluding disclosure of information about their customers. While we (CARB) can respond to inquiries based on the information in the Certified Mill List, it may not be accurate if the List is not up-to-date. If stakeholders cannot ask a TPC directly for information concerning a mill’s certification status, then we need to be able to contact a TPC to verify a mill’s status when asked. We will consider the need for documentation guidelines as we continue to work with TPCs.

Comment #38: It is stated in Guideline as: “TPCs should notify CARB of changes in a mill’s certification status within 48 hours of when a mill terminates its TPC agreement, initiates a new TPC agreement, or has its certification revoked by a TPC;”

We are not sure what it means “to initiate a new TPC agreement”, as it does take a certain period of time to have a mill’s product certified from the time to initiate a new TPC agreement, and should we have to notify ARB (within 48 hours) at time to initiate a new TPC agreement (before a mill’s product certified)?

Response: When a mill decides to change its TPC, we assume that they will enlist services of another TPC on the approved list. This statement asks all TPCs to give us notice when a mill chooses to terminate services with them, or if the TPC revokes the mill’s certification, and when TPCs add a new mill to their list of certified mills. This is essentially being done as a matter of maintaining the certified mill list on CARB’s website, and including it in the Guideline serves to emphasize their importance to the TPC program.

Comment #39: How do you handle a single large chamber test failure? Is the manufacturer immediately decertified, along with notification to CARB, or is the product in question decertified and another sample taken and tested?

Response: For guidance on this question, please refer to the ATCM, section 93120.12, Appendix 2, (f)(3)(B).

Comment #40: It seems that this is an issue that has not been addressed thoroughly – what constitutes a manufacturer decertification versus a product decertification.

Response: Product decertification refers to a product type, or group of product types, that fails to comply with applicable emission standards based on testing performed by a CARB approved TPC. The decertification of a manufacturer can occur when all product types are decertified by a TPC.

TPC Guideline CWP-10-005: Communication

No substantive comments received.

Other TPC-related Questions

Comment #41: When does a Third Party Certifier stop certification?

Response: When a TPC has determined that the manufacturer is not producing products that meet the emission standards, or other egregious actions by a manufacturer that result in inconsistent product quality. For example, if a mill fails a quarterly verification test, their QC test records are not up to date, internal quality assurance manual are not being followed properly or TPC recommended corrective actions are not implemented in the time frame specified.

Comment #42: How is a manufacturer to proceed if he wants to use a new resin for the production of a certified composite wood product?

Response: If the use of a new resin constitutes the creation of a new product type, then mill trials need to be conducted to develop a new correlation and QCL for products made with the new resin. At which point a TPC has assurance that the product is being made consistently and that the product's emissions are below the level of the applicable standard, the product can be stamped as CARB-certified.

Comment #43: Does CARB endorse/agree with methods and criteria given in the CPA Grademark Program Manual for reduction of testing frequency in the plant?

Response: Some reduction in frequency in QC testing is allowed in Appendix 2 of the ATCM, and we would agree that the criteria given in the Grademark Program can also be used.