

Staff Working Draft
ENFORCEMENT PLAN

For Discussion Purposes Only

I. Composite Wood Product Manufacturers

Manufacturing Plants

A. Particleboard and Medium Density Fiberboard Manufacturers

1. Must meet product performance standards
 - a. Compliance to the product performance standards can be achieved by:
 - Large chamber test method (ASTM E1333-96)
 - An alternative test method provision may be used upon approval by the ARB (to be determined)

B. Reporting Requirements

1. Documentation is required on all composite wood products produced for sale and use in California by the facility operator
 - a. Composite wood products must be labeled in a way that shows compliance to ARB product performance standards. This label shall be documented either by a stamp on the product or batch produced or shown on the sales form. The label or form shall include the following information:
 - Manufacturer name
 - Product lot number or batch produced
 - Statement indicating product complies with ARB standards
 - b. All manufacturers subject to this regulation shall submit quarterly test data simultaneously with the CPA certification program (?). The reporting form must include:
 - Manufacturer name, address, and contact information
 - List of products or product line tested (batch number/date)
 - Results from large chamber tests for each product line tested
2. Recordkeeping for test data is required over a 2 year period

C. Each Manufacturing plant is subject to periodic inspection by ARB or District officials

1. The ARB and District officials may conduct random inspections at the facilities and pull a sample for product testing at anytime during the year
 - a. Testing will be conducted at an ARB-approved lab (to be determined)

Hardwood Plywood Plants

A. Hardwood Plywood Manufacturers

1. Must meet product standards for hardwood plywood
 - a. Compliance to the product performance standards can be achieved by:
 - Large chamber test method (ASTM E1333-96)
 - An alternative test method provision may be used upon approval by the ARB
2. The ARB and District officials may conduct random inspections at the facilities and pull a sample for product testing at anytime during the year

B. Reporting Requirements

1. Documentation is required on all hardwood plywood products produced for sale and use in California by the facility operator
 - a. Required label program or Bill of Laden
2. All manufacturers subject to this regulation shall annually submit a product testing form for each of the composite wood products manufactured. The form must include:
 - Manufacturer name, address, and contact information
 - List of products or product line tested
 - Results from large chamber tests for each product line tested

C. Subject to periodic inspection by ARB or District officials

II. Distribution Level

Distribution Facilities

- A. Compliance can be demonstrated by certification (under penalty of perjury) of composite wood product manufacturer
- B. Subject to product testing under a similar large chamber test methods stated in section I (a,b,c)
- C. Facilities may be required to provide raw composite wood board for sale or use within their facility to verify emissions compliant composite wood products
 - 1. Products must be tested according to large chamber test methods stated in section I (a-d)
- D. Subject to periodic inspection by ARB or District officials

Reporting Requirements

- A. Documentation is required on all hardwood plywood products distributed at the facility by the facility operator
- B. All sales documentation forms shall include:
 - Address of the composite wood product manufacturer
 - Product performance standard documentation for compliance with the ARB required emission standard
 - Contact phone number

III. End-Use Level

Retail Stores and Businesses who Buy Composite Wood Products

- A. Must have proof that end product was made with complying materials
- B. Subject to periodic inspection by ARB officials
- C. May include individual product testing to comply with comparable composite wood product emission limits (TBD)

Reporting Requirements

- A. The end-user is responsible for providing documentation to the ARB or District officials that each of their products made with composite wood products complies with ARB product performance standards
- B. All end-user product forms shall include:
 - Address of the composite wood product manufacturer or distributor
 - Product performance standard documentation for compliance with the ARB required emission standard
 - Contact phone number

Definitions

“Manufacturer” means a business defined in Government Code Section 14837©.

“Distributor” means any person to whom a composite wood product is sold or supplied for the purposes of resale or distribution in commerce, except that manufacturers, retailers, and consumers are not distributors.

“Consumer” means any person who seeks, purchases, or acquires any composite wood product for personal use. Persons acquiring a composite wood product for the purposes of resale are not “consumers” of that product.

“Retailer” means any person who sells, supplies, or offers for sale composite wood products, either finished or in raw board form, directly to consumers.

“Person” means “person” as defined in Health and Safety Code section 39047.

“Composite Wood Product” means any engineered wood product such as particleboard, medium density fiberboard, hardwood plywood.

“End-user” means any business that offers for sale or distribution any product made with composite wood products or unfinished composite wood products in California.

“Hardwood Plywood” means a panel composed of an assembly of layers or plies of veneer or veneers in combination with lumber core, particleboard core, MDF core, hardboard core, or of a special core material joined with an adhesive. Except for special constructions, the grain of alternate plies is at right angles and the face veneer is a hardwood or certain softwood species.

“Medium Density Fiberboard” means a composite panel composed of cellulosic fibers (usually wood) made by dry forming and pressing of a resinated fiber mat (ANSI A208.2-202, medium density fiberboard)

“Particleboard” means a composite panel composed of cellulosic (usually wood) in the form of discrete pieces or particles, as distinguished from fibers, which are pressed together with resin.