

## FACT SHEET for FABRICATORS of FINISHED GOODS

REDUCING FORMALDEHYDE EMISSIONS FROM

### Composite Wood Products

*Airborne Toxic Control Regulation Requirements*



#### What are composite wood products?

“Composite wood products” are panels made from pieces, chips, particles, or fibers of wood bonded together with a resin. The California Air Resources Board (CARB) Composite Wood Products Regulation specifically focuses on three products: hardwood plywood with a veneer core or composite core (HWPW), particleboard (PB), and medium density fiberboard (MDF). The regulation requires finished goods to be made with HWPW, PB, and MDF that comply with the regulatory requirements and to be labeled as such. Composite wood is found in many different types of finished goods such as cabinets, doors, furniture, flooring, moldings, toys, mirror and photo frames, audio speakers, base boards, shelving, and countertops.

#### Who is subject to the Composite Wood Products Regulation?

The regulation applies to panel manufacturers, distributors, importers, fabricators, retailers, and third party certifiers of HWPW, PB, MDF. It also applies to retailers and fabricators of finished goods containing those products that are sold or supplied to businesses and consumers in California. This fact sheet discusses the requirements for fabricators.

#### Who is a fabricator?

A “fabricator” is anyone that uses composite wood products to make finished goods. Examples of fabricators include individuals and/or companies that use composite wood panels to produce furniture, flooring, cabinets, and doors.

#### What are the emission standards?

The regulation established two phases of formaldehyde emission standards for HWPW with a veneer core (HWPW-VC) and with a composite core (HWPW-CC), PB, MDF, and thin MDF ( $\leq 8$  mm thick). The initial Phase 1 standards are no longer legal. The more stringent Phase 2 standards are shown below. Finished goods must be made with composite wood products that meet these Phase 2 standards. The standards apply to both domestic and imported products.

#### PHASE 2 FORMALDEHYDE EMISSION STANDARDS (parts per million)\*

EFFECTIVE DATE	HWPW-VC	HWPW-CC	PB	MDF	tMDF
JANUARY 2010	0.05	----	----	----	----
JANUARY 2011	----	----	0.09	0.11	----
JANUARY 2012	----	----	----	----	0.13
JULY 2012	----	0.05	----	----	----

\*based on ASTM E 1333-96 (2002)

#### What does the Composite Wood Products Regulation require?

The regulation establishes emission limits and labeling requirements for composite wood products. It also requires fabricators to take reasonable prudent precautions to ensure the products they make comply with the emission limits and to keep records.

#### What are the labeling requirements for fabricators?

Fabricators must label all finished goods produced for the California market to indicate they are made with complying products. The label shall be applied as a stamp, tag, sticker, or bar code on every finished good produced, or on every box containing finished goods. The minimum label requirements are: the fabricator’s name, production date, and markings that the product was made with HWPW, PB, and MDF that complies with the Phase 2 emission standards.

Finished goods should be labeled as having been made with no-added formaldehyde based resins (NAF) or ultra-low emitting formaldehyde based resins (ULEF) if this is true for all of the HWPW, PB, and MDF used in fabricating the finished good. Fabricators also must include a statement of compliance on bills of lading or invoices, which serves as a record of the sale of compliant products for downstream customers.

### **What is meant by “reasonable prudent precaution”?**

Reasonable prudent precaution means that a fabricator takes steps to ensure that the composite wood products used in finished goods that they make are in compliance with the applicable emission standards, such as using only compliant products, requesting written verification of compliance from suppliers, and requiring copies of formaldehyde test results from third party certifiers.

### **What are the recordkeeping requirements for fabricators?**

Fabricators producing goods for the California market must keep records showing the dates of purchase and suppliers of composite wood products that they used, and to whom they sold their finished goods. These records must be kept in either electronic or hard copy form for a minimum of two years.

### **Are fabricators subject to facility inspections?**

Yes. All fabricators are subject to inspection by CARB inspectors or local air district personnel. During inspections, ARB or local air district personnel may audit records and secure samples for compliance testing.

### **What exemptions apply under the Composite Wood Products Regulation?**

The regulation does not apply to finished goods sold outside of California or to products subject to federal requirements governing the construction of manufactured homes. The regulation also provides exemptions for certain types of window and door assemblies.

### **Are fabricators required to emission test their finished goods?**

No. Fabricators are not required to emission test the finished goods they produce or to have those goods third party certified.

### **What are fabricator requirements for laminated products?**

A laminated product is a finished good or component part of a finished good made by a fabricator in which a laminate or laminates (synthetic or wood veneer) are affixed to a platform or core material. If the platform consists of a composite wood product, then that platform material must be third party certified and comply with the applicable emission standards.

## **FOR MORE INFORMATION**

For more information, please see our frequently asked questions (FAQs) at:

<http://www.arb.ca.gov/toxics/compwood/implementation/faq.htm> or visit our website at:

<http://www.arb.ca.gov/toxics/compwood/compwood.htm>. For questions, please call or email any of the following:

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