

# Third Party Certification Webinar

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## *Composite Wood Products Airborne Toxic Control Measure (ATCM)*



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California Environmental Protection Agency  
 Air Resources Board

# Overview

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- Composite Wood Product ATCM
- Overview of the Third Party Certification (TPC) Program
- TPC Application Form
- TPC Review Process
- TPC Website
- TPC Issues
- ULEF/NAF Update

# Background



# Composite Wood Products ATCM

## *Key Elements*

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- Establishes new formaldehyde emission limits for HWPW, PB, and MDF panels, **and** requires their use in finished goods
- Panel manufacturers must demonstrate compliance through third party certification; i.e., CARB certification
  - label panels as compliant
- Fabricators must use compliant HWPW, PB, and MDF in finished goods for California
  - use panels that are labeled as compliant
- Retailers must obtain compliant composite wood products and finished goods for sale to the California public

# Composite Wood Products ATCM

## *Applicability*

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- Panel Manufacturers
- **Third Party Certifiers**
- Importers
- Distributors
- Fabricators
- Retailers

# Composite Wood Products ATCM

## *Rulemaking Status*

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- On April 18, 2008 the Office of Administrative Law (OAL) approved the regulation and codified it into title 17, California Code of Regulations
- The regulation is now effective
- Implementation of first emission standards on January 1, 2009

# Overview of Third Party Certification (TPC) Program



# Third Party Certification is Key!

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- TPC program is key element for enforceability of the ATCM
- Integrity of TPC program is essential to realize full anticipated health benefits
  - Verification that all HWPW, PB, MDF meets emission standards
- ATCM is having a global impact

# What is the Role of TPC?

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**Third Party Certifier** – *an organization or entity approved by the Executive Officer that: (A) verifies the accuracy of the emission test procedures and facilities used by manufacturers to conduct formaldehyde emission tests, (B) monitors manufacturer quality assurance programs, and (C) provides independent audits and inspections*

- TPCs do not certify products
- TPCs verify quality assurance (QA) and quality control (QC) procedures
- TPCs help manufacturers set process limits to ensure they meet the emission standards

# Third Party Certification Responsibilities

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- Manufacturer quality assurance verification
- Help develop Quality Control (QC) limit
- Independent inspections and audits
- Use primary or secondary test methods certification testing
- Maintain records
  - Manufacturers they represent; mfrs with reduced testing
  - Results of inspections and audits
  - List of contract laboratories
  - Correlations between small scale and primary or secondary test method
  - ARB executive order
- Annual report to CARB

# TPC Application Form



# Key ATCM Requirements

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- Evidence of field experience in verification of labs and wood products
- Evidence of ability to train and supervise inspectors
- “Product certification agency” accreditation
- List of composite wood products applicant is applying to verify and evidence that applicant is qualified for this task

# TPC Application Form

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- CARB drafted comprehensive application late-March, 2008
- CARB circulated draft application form for review by TPC's
- CARB conference call on April 4, 2008
  - received comments and ideas and revised the application form
- Final form is available on CARB website

# TPC Application Form

## *Major Elements*

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- Seeks information to determine basic competency
- Demonstration relies on documentation
- Designed to account for international TPC
- Assesses TPC experience in evaluating composite wood products production
- Sets the basis to establish competency to perform TPC functions
- Allows for integration of all internationally accredited laboratories

# TPC Application Form

*What are we asking for?*

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- Company information (Section A)
- Background information (Section B)
  - product types to be certified
  - actual field experience
  - experience in formaldehyde emission testing
- Initial plant qualification (Section C)
- Primary and secondary test method (Section D)
- Facility inspection procedures (Section E)

# TPC Application Form

The screenshot shows a Mozilla Firefox browser window with the following details:

- Title Bar:** tpcapplication.pdf (application/pdf Object) - Mozilla Firefox
- Address Bar:** http://www.arb.ca.gov/toxics/compwood/tpc/tpcapplication.pdf
- Page Content:**
  - Header:** California Environmental Protection Agency Air Resources Board (with logo)
  - Section Title:** Application to be a Third Party Certifier (TPC) of Composite Wood Products
  - Form Fields:**
    - Please mail completed application to:** California Air Resources Board, Stationary Source Division, ATTN: Jose Saldana-TPC Application Review Coordinator, 1001 I Street, Sacramento, CA 95814, Phone (916) 327-5630, jsaldana@arb.ca.gov
    - Pre-application meeting:**  I request a pre-application meeting. In this case, please complete section A below and return this form to the address shown above.
- Browser Interface:** Includes a menu bar (File, Edit, View, Go, Bookmarks, Tools, Help), a toolbar with navigation and zoom controls (89%), and a sidebar with Bookmarks, Pages, Attach, and Comments.
- Taskbar:** Shows the Windows Start button, several application icons, and the system tray with the time 1:13 PM.

# TPC Application Form

## *How Do You Apply?*

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- Access and download the application form from CARB website
- Fill out application form including as much detail as possible
- Provide all necessary documentation (e.g., ISO or other relevant accreditation)
- Submit application to CARB, either electronically or by mail
- No fee required to apply for the program

# TPC Application Review Process



# Air Resources Board Third Party Certification Application Process

Application to become an ARB-approved third party certifier received by ARB

ARB informs applicant of receipt

Within 45-days, a determination is made whether the application is complete or incomplete

incomplete

complete

If incomplete, ARB will inform the applicant that the application was incomplete and shall identify specific information required to make the application complete

Once complete, a letter is sent to applicant informing them the application is complete and ARB has 90-days to reach a decision to approve or disapprove

Applicant submits supplemental information to ARB

incomplete

Within 30-days of receiving supplemental information a decision is made whether the application is complete or incomplete

complete

Determination within 90-days to approve or disapprove the application

disapprove

approve

Disapproval letter mailed

Approval letter and Executive Order mailed to applicant

# How Will CARB Evaluate TPC Applications?

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- Initial review for completeness
- Best evidence of “general” competence is ISO/IEC accreditation
- Accreditation to ISO/IEC standards alone is not sufficient for approval
- Objective and standardized criteria

# How Will CARB Evaluate TPC's Applications? (*continued*)

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## ■ Objective Criteria

Assess applicants accreditation and certification

Modeled after accreditation to ISO/IEC

- Product certification agency
- Laboratories
- Inspection bodies

## ■ Standardized Criteria

Assess applicants ability to fulfill the requirements of Appendix 3.

- Experience in the inspection and/or testing of wood products

# TPC Approval

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- Upon approval, CARB will issue an Executive Order (EO) designating the applicants as an approved TPC
- EOs will assign a unique identifying number to each approved TPC
- List of approved TPCs will be posted on the CARB website
- ATCM specifies that CARB has authority to modify or revoke an EO

# TPC Website



# TPC Website

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## Third Party Certification Program

Website: <http://www.arb.ca.gov/toxics/compwood/certifiers.htm>

Information contained in the TPC website include:

- Approval process flowchart
- Third party certification application form
- List of candidate third party certifiers
- List of approved third party certifiers

# TPC Issues

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- Comparison of international accreditations
- Applicants with lack of composite wood products testing experience
- Applicants with no accreditation but with experience with composite wood products testing
- Use of primary vs. secondary test method
- Attachments received in languages other than English

# ULEF/NAF Application Status

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- Application under development
- Application available on website by end of May, 2008

# Where to Find Help

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- Visit our website:

<http://www.arb.ca.gov/toxics/compwood/compwood.htm>

- Sign up for our list server at:

<http://listserv.arb.ca.gov/major/lists/subunsubb.php>

- Contact our technical staff:

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