

Update on California's Formaldehyde Regulation

**World of Wood Convention
International Wood Products Association
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California Air Resources Board

Overview

- Comparison of CARB and U.S. EPA regulations
- Labeling requirements
- Status of CARB enforcement
- Amendments to CARB regulation
- Questions



Comparison of CARB & U.S. EPA Regulations

- CARB's Composite Wood Products Airborne Toxic Control Measure (ATCM) to reduce public exposure to airborne formaldehyde became effective January 2009
- EPA Toxic Substances Control Act (TSCA) Title VI regulation finalized December 12, 2016
- EPA TSCA Title VI compliance date delayed
- CARB will retain and enforce California regulation

Comparison

(continued)

- Comparison of regulations
 - Identical formaldehyde emission standards
 - Some differences in specific requirements
 - Wood-veneered laminated products made by fabricators
 - Duration of recordkeeping
 - Testing
 - Labeling
 - Where the regulations differ, the most stringent requirement applies in California
 - CARB will release table comparing key requirements

Labeling Requirements

- CARB and EPA regulations require labeling of panels and finished goods
- CARB will accept EPA TSCA Title VI labeled panels and finished goods
 - Third-party certifiers (TPCs) must first be recognized by EPA and panel producers must sell TSCA compliant products to fabricators for use in finished goods
- EPA exempts finished goods containing less than 144 square inches of composite wood material from labeling
 - Not exempt from CARB labeling requirement



Labeling Requirements

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- CARB will accept TSCA Title VI statement of compliance on bill-of-lading or invoice
- Reminder: labels for finished goods should not include TPC number
 - Misleads customers that TPC verified emissions of finished good
 - Only panels are required to be verified by TPC



Status of CARB Enforcement

- CARB is continuing to inspect distributors and retailers of panels and finished goods
- Products are inspected for compliance with labeling requirements
- Documentation is reviewed regarding statement of compliance
- Samples are collected for emissions testing
- CARB has settled cases against four flooring companies for selling noncompliant flooring (labeled Phase 2 compliant)

Amendments to CARB Regulation

- CARB plans to amend regulation to:
 - Clarify requirements
 - Consider additional emission reductions from other products
 - Improve enforceability and better ensure compliance of imported products
 - Align with EPA regulation, where appropriate
- CARB public workshop on proposed amendments
 - Timeframe: early 2019

Questions

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

