

CARB & EPA TSCA Title VI Certification Manual

In accordance with the California Air Resources Board (CARB) Airborne Toxic Control Measure (ATCM) 93120-93120.12, Title 17, California Code of Regulations and EPA TSCA Title VI, 40 CFR Part 770

V 1.1



GICIA India Pvt Ltd
B-081, 8th Floor, Tower B, ATS Bouquet, Noida,
Sector-132, (U.P) -201304, India
Email: anamika.ghosh@gicia.org

1. Introduction

Thank you for your interest in GIPL CARB & EPA TSCA Title VI certification program that certifies composite wood including Medium Density Fiberboard, Particle Board, and Hardwood Plywood in

accordance with the California Air Resources Board (CARB) Airborne Toxic Control Measure and 40 CFR Part 770 to Reduce Formaldehyde Emissions from Composite Wood Products.

The regulation requires manufacturers of composite wood to meet formaldehyde limits and undergo quarterly inspection and laboratory testing by an approved Third-Party Certifier. GIPL in association with ICC-ES (CARB approved Third Party Certifier) is the first and leading Certification agency in India providing these certifications.

We are pleased that you are considering us as your inspection agency. GIPL offers an opportunity to turn this mandatory regulation into a competitive advantage, and have a dedicated team of professionals and a network of skilled inspectors ready to assist you.

The first step in pursuing certification is to complete a CARB & EPA TSCA Title VI Application Form, which can be found on the GIPL website at https://gicia.org/wp-content/uploads/2021/04/Application-Form_CARB-TSCA-1.pdf Once we receive your Application, we will scope your assessment and provide you with a detailed Proposal.

2. References and Resources

There are several resources available to guide you in your path to CARB & EPA certifications. We recommend that you thoroughly familiarize yourself with these documents and resources available on the CARB website at <http://www.arb.ca.gov/toxics/compwood/compwood.htm> and <https://www.ecfr.gov>:

- CARB ATCM 93120-93120.12 Regulation
- CARB Advisories resource section
- Frequently Asked Questions (FAQs) resource section
- EPA CFR 40, Part 770

3. Certification Process

The CARB & EPA certification process is based on a one-year certification cycle. Within this, the CARB & EPA Regulation requires quarterly onsite inspections and laboratory testing to verify continued compliance. As such the typical inspection schedule for clients is as follows. A more detailed outline is provided in *Certification Process Flowchart*.

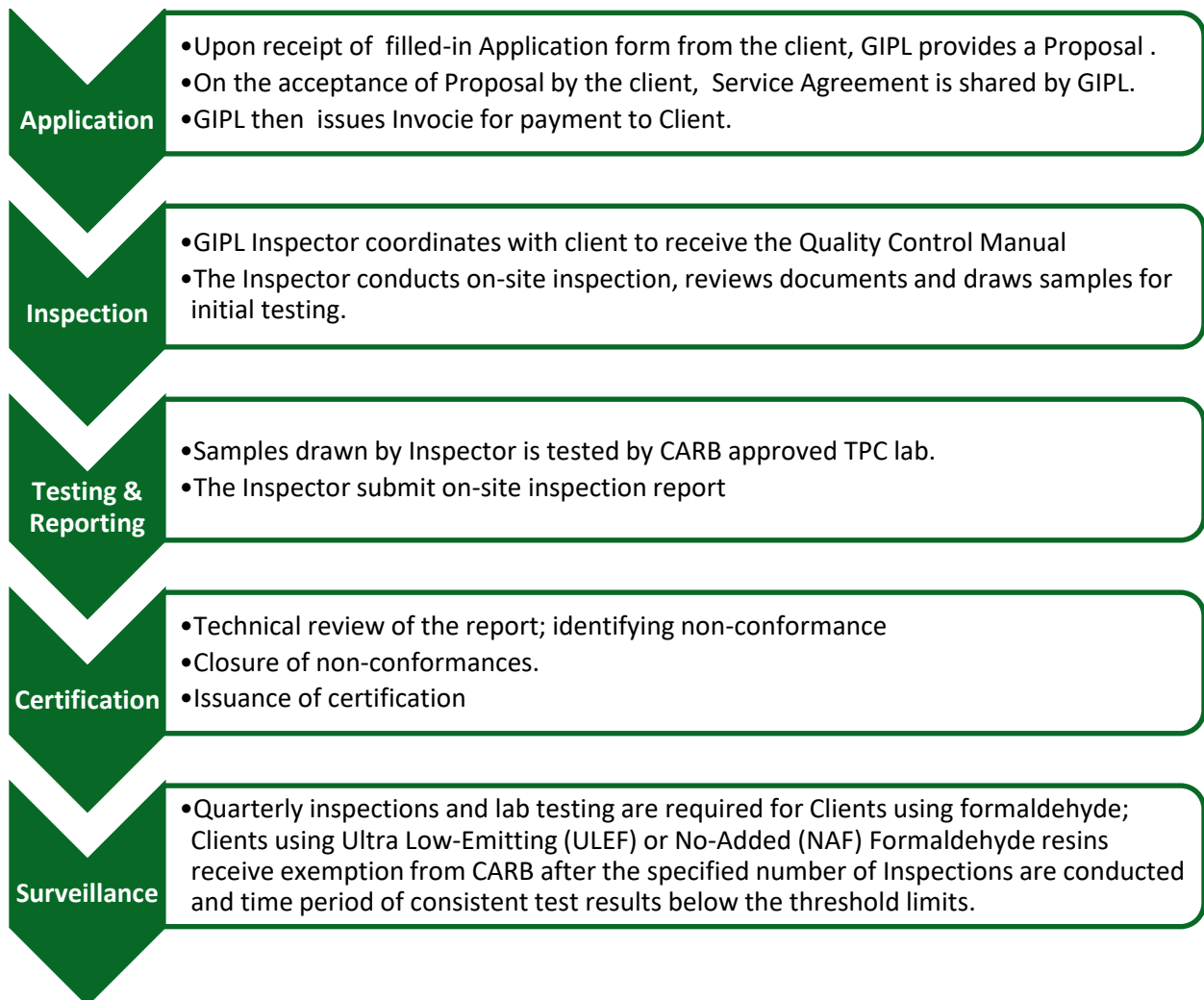
Initial	Upon application approval, Onsite Initial Inspection and Laboratory Testing
Quarter 1	Onsite Surveillance Inspection and Laboratory Testing (approximately 1month from award of certification).
Quarter 2	Onsite Surveillance Inspection and Laboratory Testing (approximately 4 months from award of certification).

Quarter 3	Onsite Surveillance Inspection and Laboratory Testing (approximately 7 months from award of certification).
Renewal	Renewal Onsite Inspection and Laboratory Testing (approximately 10 months from award of certification).

The inspection schedules will vary for clients who have been approved by CARB to offer No Added Formaldehyde (NAF) or Ultra-low-emitting formaldehyde (ULEF) products.

Additional inspections, may be necessary, unannounced or otherwise, in situations where there is a high frequency of non-complying lots, validated complaints of non-compliance by key stakeholders, or other extenuating circumstances that could lead to non-compliance.

Certification Process Flowchart



4. Information For Customer

- a. Only composite wood products manufactured in compliance with CARB Phase 2 formaldehyde limits may be labelled and sold as such.
- b. The ICC-ES certificate and CARB & EPA label is not directly transferrable to your company's full inventory of manufactured composite wood products.
- c. The CARB & EPA product certification has a defined scope, limited to ONLY the products and sites listed on the Certification Report.

5. CARB Phase 2 Formaldehyde Limits

- a. Hardwood Plywood (Veneer Core): 0.05 parts per million (ppm)
- b. Hardwood Plywood (Composite Core): 0.05 ppm
- c. Particle Board: 0.09 ppm
- d. Medium Density Fiberboard: 0.11 ppm
- e. Thin Medium Density Fiberboard: 0.13 ppm

6. CARB & EPA Certification Mark Guidelines

The CARB & EPA TSCA Title VI regulation requires on product and invoice or bill of lading compliance labeling.

On product labeling requires: "Each panel or bundle of composite wood products must be clearly labeled to indicate compliance with the emission standards specified in section 93120.2(a). The label shall include, at a minimum, all of the following information:

- a. Manufacturer name;
- b. Product lot number or batch produced;
- c. A marking to denote that the composite wood product complies with the applicable Phase 1 or 2 emission standards specified in section 93120.2(a) or was made using ULEF resins or no-added formaldehyde based resins; and
- d. The ARB assigned number of the approved third party certifier
- e. This requirement does not apply to manufacturers using no-added formaldehyde based resins that have obtained ARB approval as provided in section 93120.3(c) or products manufactured using ULEF resins as provided in section 93120.3(d)(2).

Invoice or Bill of Lading Compliance labeling requires the following:

- a. The ARB assigned number of the approved third party certifier, if applicable; and
- b. A statement that the composite wood products comply with the applicable Phase 1 or Phase 2 emission standard specified in section 93120.2(a) and, if applicable, were made using ULEF resins or no added formaldehyde based resins

The misuse and mislabeling of any final product is NON-COMPLIANCE and will result in the termination of your contract and certificate, as well as possible legal action.

7. Certification Tenure & Infringement of Requirement

CARB & EPA certificates are valid for 1 year subject to quarterly surveillance inspections for clients using formaldehyde. Clients using NAF or ULEF resins are subject to terms outlined by CARB. GIPL shall confine requirements, evaluation and decision on certification to matters specifically related to the scope of the relevant certification scheme.

According to the CARB ATCM Regulation and GIPL policy, Clients shall:

- a. No certification claim can be made for any product by the manufacturer prior to issuance of a CARB & EPA certificate;
- b. Consistent compliance with the relevant provisions of the GIPL Certification Program;
- c. Make all necessary arrangements for the conduct of the inspection, including provision for document verification and access to all areas, records (including internal inspection reports), and personnel for the purposes of evaluation (e.g. testing, inspection, assessment, surveillance, reassessment) and resolution of complaints;
- d. No claims to be made outside the scope of the granted certification. GIPL should be notified immediately of any scope changes;
- e. Not use its product certification in such a manner as to bring the Certification Body into disrepute, nor make any statement regarding its product certification that the Certification Body may consider misleading or unauthorized;
- f. Upon suspension or cancellation of certification, discontinue its use of all advertising that contains any reference to the certification
- g. Return any certification documents related to certification issued by the Certification Body;
- h. Use certification only to indicate that products are certified as being in conformity with the specified Regulation;
- i. Endeavor to ensure that no certificate or report nor any part thereof is used in a misleading manner;
- j. In making reference to its product certification in communication media such as documents, brochures or advertising, comply with the requirements of the Certification Body.

GIPL (after consulting the ICC-ES) reserves the right to suspend, withdraw or terminate client certificates. Reasons for suspension, withdrawal and termination include, but are not limited to: unwillingness or inability to correct nonconformities, unwillingness or inability to meet financial or

contractual arrangements; misusing or damaging the integrity of the GIPL or relevant governing body trademarks; intentional violation of requirements *etc.*

For more information about the certification process please contact hrishikesh@gicia.org.