



M A N A G E M E N T B U L L E T I N

Date: April 26, 2018 **A-753**
To: APA Member Mills
cc: APA Board of Trustees
From: Steve Zylkowski – Director, Quality Services Division
Subject: Formaldehyde Emission Standards for Composite Wood Products in EPA Toxic Substance Control Act (TSCA) Title VI

As a result of the case of Sierra Club et al. vs. Scott Pruitt (EPA), the EPA recently published a Federal Register announcement of the revised compliance dates for the formaldehyde standards for composite wood products under the EPA TSCA VI regulations. Following that court order and joint stipulation document, the relevant compliance dates are now:

- By **June 1, 2018**, regulated composite wood panels and finished products containing such composite wood panels that are manufactured (in the United States) or imported (into the United States) must be certified as compliant with either the TSCA Title VI or the California Air Resources Board (CARB) Airborne Toxic Control Measures (ATCM) Phase II emission standards, which are set at identical levels, by a third-party certifier (TPC) approved by CARB and recognized by EPA. Previously, these products were required to be TSCA Title VI compliant by December 12, 2018.
- Until **March 22, 2019**, regulated products certified as compliant with the CARB ATCM Phase II emission standards must be labeled as compliant with either the TSCA Title VI or the CARB ATCM Phase II emission standards. Regulated products manufactured in or imported into the United States after March 22, 2019 may not rely on the CARB reciprocity of 40 CFR 770.15(e) and must be certified and labeled as TSCA Title VI compliant by an EPA TSCA Title VI TPC with all of the required accreditations.
- After **March 22, 2019**, CARB-approved TPCs must comply with additional accreditation requirements in order to remain recognized as an EPA TSCA Title VI TPC and to continue certifying products as TSCA Title VI compliant.

For more information visit: <http://www.epa.gov/formaldehyde>

Some APA member mills may be receiving questions from their customers regarding the implementation of the EPA TSCA VI regulations. These regulations apply to composite wood products and finished goods made with composite wood products. **Composite wood products are defined as particleboard, MDF and hardwood plywood. With respect to engineered wood products certified by APA, the EPA TSCA VI regulations are technically equivalent to the California Air Resources Board (CARB) regulations in that engineered wood products are not covered by the regulations.**

For more information on the EPA rules, see the attached links:

- EPA information on the formaldehyde rules:
<https://www.epa.gov/formaldehyde/formaldehyde-emission-standards-composite-wood-products-0>

- FAQs from the EPA regarding the formaldehyde rules:
<https://www.epa.gov/formaldehyde/regulated-stakeholder-questions-and-answers-epas-rule-implement-formaldehyde-standards>

We are updating APA literature dealing with formaldehyde to reflect the EPA TSCA VI regulations. If you or your staff have any questions on formaldehyde regulations or their application to APA member products, please feel free to contact Steve Zylkowski (email: steve.zylkowski@apawood.org).

A handwritten signature in black ink, appearing to read "Steve Zylkowski". The signature is fluid and cursive, with the first name "Steve" written in a larger, more prominent script than the last name "Zylkowski".