SUPPLEMENTAL ACCREDITATION REQUIREMENTS:

EPA TOXIC SUBSTANCES CONTROL ACT (TSCA) TITLE VI FORMALDEHYDE ACCREDITATION PROGRAM

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INTRODUCTION

The Formaldehyde Emission Standards for Composite Wood Products Act of 2010 [Title VI of the Toxic Substances Control Act (TSCA)] established emission standards for formaldehyde from composite wood products and directed EPA to finalize a rule on implementing and enforcing a number of provisions covering composite wood products.

Beginning June 1, 2018, composite wood products sold, supplied, offered for sale, manufactured, or imported in the United States are required to be labeled as CARB ATCM Phase II or TSCA Title VI compliant. Beginning on March 22, 2019, composite wood products must be labeled as TSCA Title VI compliant. These products include: hardwood plywood, medium-density fiberboard, and particleboard, as well as household and other finished goods containing these products.

PURPOSE

This document describes the accreditation requirements applicable to third-party certifier (TPC) testing laboratories wishing to test for levels of formaldehyde in wood products in accordance with 40 CFR Part 770 for the United States Environmental Protection Agency (U.S. EPA) Third Party Certification program. This accreditation program applies to independent or TPC-controlled laboratories.

A number of requirements cited in the CFR apply only to the panel producer’s in-house laboratory for performance of quality control tests during production of panels; these requirements are outside the scope of this accreditation program.

REFERENCES

The EPA regulation can be found at www.ecfr.gov (see ECFR: 40 CFR Part 770).
EPA Formaldehyde Resource webpage: https://www.epa.gov/formaldehyde

1. ACCREDITATION REQUIREMENTS

1.1. ISO/IEC 17025, General Requirements for the Competence of Testing and Calibration Laboratories
1.2. AR 2250, ANAB Accreditation Requirements for ISO/IEC 17025 Testing Laboratories
1.3. 40 CFR Part 770

2. GENERAL INFORMATION

2.1. Third-Party Certifier (TPC) Laboratories

2.1.1. TPCs participating in this program are required to operate or have a contract with an ISO/IEC 17025 accredited testing laboratory to perform initial and ongoing quarterly testing of products to be
certified. The requirements for the accreditation program apply to all TPC testing laboratories participating in the program.

2.1.2. If the laboratory being assessed is not part of the same legal entity that is an accredited TPC, the laboratory is expected to have a contract with the TPC (the client) that outlines the work to be performed.

2.1.3. TPC laboratories that have demonstrated experience with test method ASTM D6007-14 only must be contracting testing with a laboratory that has a large chamber and can demonstrate its experience with ASTM E1333-14.

2.2. Scope of Accreditation

2.2.1. The scope of accreditation shall include the CFR part “40 CFR Part 770 – Formaldehyde Standards for Composite Wood Products” and the formaldehyde test methods ASTM E1333-14 and ASTM D6007-14, if used.

## 3. SPECIFIC PROGRAM REQUIREMENTS

3.1. Quarterly testing of certified products is required under CFR Part 770.7 (c)(4)(i)(B). The results of these tests shall be released to the client. The allowable emissions limits are defined in 40 CFR Part 770.10.

3.2. Products that do not meet these defined limits are required to have their failing test results reported by the TPC to the panel producers and the EPA within 72 hours of the test being completed.

3.3. CFR Specific Requirements

**40 CFR Part 770.20 - Testing Requirements**

(a)(1) - All panels must be tested in an unfinished condition, prior to the application of a finishing or topcoat, as soon as possible after their production but no later than 30 calendar days after production.

(a)(2) - Facilities that conduct the formaldehyde testing required by this section must follow the procedures and specifications, such as testing conditions and loading ratios, of the test method being used.

(a)(3) - All equipment used in the formaldehyde testing required by this section must be calibrated and otherwise maintained and used in accordance with the equipment manufacturer’s instructions.

(c) - Quarterly testing must be supervised by EPA TSCA Title VI TPCs and performed by TPC laboratories.

(c)(1) - Quarterly testing must be performed using ASTM E1333–14 or, with a showing of equivalence pursuant to paragraph (D) of this section, ASTM D6007–14.

(c)(2) - Sample Handling - Samples must be randomly chosen by an EPA TSCA Title VI TPC. Samples must be selected from each certified product type for quarterly testing purposes. For hardwood plywood samples, the samples must be randomly selected from products that represent the range of formaldehyde emissions of products produced by the panel producer. Samples must not include the top or the bottom composite wood product of a bundle.
(c)(3) - Samples must be closely stacked or air-tight wrapped between the time of sample selection and the start of test conditioning. Samples must be labeled as such, signed by the EPA TSCA Title VI TPC, bundled air-tight, wrapped in polyethylene, protected by cover sheets, and promptly shipped to the TPC laboratory. Conditioning must begin as soon as possible, but no later than 30 calendar days after the samples were produced.

(c)(4) - Results - Any sample that exceeds the applicable formaldehyde emission standard stated in CFR part 770.10 must be reported by the TPC laboratory to the panel producer in writing and to the EPA within 72 hours.

(d) - Equivalence or correlation between ASTM E1333–14 and any other test method used for quarterly or quality control testing must be demonstrated by EPA TSCA Title VI TPCs or panel producers, respectively, at least once each year for each testing apparatus or whenever there is a significant change in equipment, procedure, or the qualifications of testing personnel. Once equivalence or correlation have been established for three consecutive years, equivalence or correlation must be demonstrated every two years or whenever there is a significant change in equipment, procedure, or the qualifications of testing personnel.

(d)(1) - Equivalence between ASTM E1333–14 and ASTM D6007–14 when used by the TPC for quarterly testing. Equivalence must be demonstrated for at least five comparison sample sets, which compare the results of the two methods. Equivalence must be demonstrated for each small chamber used and for the ranges of emissions of composite wood products tested by the TPC.

For the ASTM E1333–14 method, each comparison sample must consist of the result of testing panels, using the applicable loading ratios specified in the ASTM E1333–14 method, from similar panels of the same product type tested by the ASTM D6007–14 method.

For the ASTM D6007–14 method, each comparison sample shall consist of testing specimens representing portions of panels similar to the panels tested in the ASTM E1333–14 method and matched to their respective ASTM E1333–14 method comparison sample result. The ratio of air flow to sample surface area specified in ASTM D6007–14 must be used.

The five comparison samples must consist of testing a minimum of five sample sets as measured by the ASTM E1333–14 method.

4. PROFICIENCY TESTING REQUIREMENTS

4.1. Each EPA TSCA Title VI Laboratory shall participate in the CARB interlaboratory comparison (ILC) for formaldehyde emissions when offered.

4.2. In lieu of participation in the CARB interlaboratory comparison, the TPC laboratory may participate in an EPA-recognized proficiency testing program, if available.

4.3. If neither the CARB ILC program or any EPA-recognized proficiency testing programs are available in each year, the TPC laboratory shall perform quality assurance activities in accordance with the requirements of ISO/IEC 17025.
5. CONFIDENTIALITY AND DISCLOSURE OF INFORMATION

5.1. All information gathered for this accreditation program is open for review by authorized EPA personnel. The outcome of the accreditation, assessment report, nonconformities, and laboratory corrective action(s) may be submitted to EPA representatives upon request as required by 40 CFR Part 770.

5.2. The laboratory must immediately disclose in writing to ANAB any instances of inappropriate and prohibited laboratory practices per 40 CFR Part 770 discovered during any internal or external assessment or investigation, along with the applicable corrective action.

5.3. ANAB will notify the EPA in writing of action that adversely affects the accreditation status of a TPC laboratory accredited as part of this program.

5.4. Upon request by ANAB, the TPC laboratory shall allow EPA representatives to observe any assessment activity performed by ANAB.

REVISION HISTORY

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