

## **Approval WKI-17-561**

Approval for an Exemption from the testing and certification requirements for Composite Wood Product Manufacturers that use Ultra-low-emitting Formaldehyde Resins under 40 CFR Part 770, Subpart C, § 770.18

### **General Provisions**

The Environmental Protection Agency (EPA) has adopted the "Formaldehyde Standards for Composite Wood Products" and published them in 40 CFR Part 770 (the „EPA TSCA Titel VI"). This final rule establishes formaldehyde emission standards, testing and certification provisions, and other requirements for the manufacture, distribution, and sale of composite wood products, component parts and finished goods that contain composite wood products.

EPA TSCA Title VI, § 770.18 defines provisions for producers using ultra-low-emitting formaldehyde (ULEF) resins in composite wood product panels.

EPA TSCA Title VI, § 770.18 (a) allows producers of composite wood product panels who use ULEF resins to apply to an EPA TSCA Title VI Third Party Certifier (TPC) or CARB for written approval either to conduct less frequent testing than specified in § 770.20 or for a two-year exemption from testing requirements in § 770.20 and certification requirements in §§ 770.15 and 770.40 (b).

EPA TSCA Title VI, § 770.18 (a) specifies the content of an application to be submitted by the producer of composite wood product panels to an EPA TSCA Title VI Third Party Certifier or CARB to receive ULEF approval. The application shall include: (1) the panel producers name, address and telephone number; (2) an identification of the specific product type, including resin system; (3) at least two tests conducted under the supervision of an EPA TSCA Title VI TPC pursuant to test method ASTM E1333-10 or ATSM D6002-02; (4) six month of routine quality control tests under §770.20, including a showing of correlation in accordance with §770.20 (d) (2), totaling not less than ten quality control tests.

EPA TSCA Title VI, § 770.18 (d) requires for an exemption from testing and certification requirements of §770.20 for composite wood products made with ULEF resins the following: (1) no test result higher than 0.05 ppm of formaldehyde for hardwood plywood or 0.06 ppm for particleboard, medium density fiberboard, and thin medium-density fiberboard; (2) for 90% of the six month of routine quality control testing data no higher than 0.04 ppm of formaldehyde.

EPA TSCA Title VI, § 770.18 (b) defines that the EPA TSCA Title VI TPC will approve a panel producer's application within 90 calendar days of receipt if the application is complete and demonstrates that the candidate product achieves the emission standards required for reduced testing or for a two-year exemption.

EPA TSCA Title VI, § 770.18 (e) specifies that products with valid exemption from CARB will also be exempt from the requirements in §§ 770.15, 770.20 and 770.40 (b) if they meet the requirements under § 770.18 (d) and the requirements of the CARB remain as stringent as EPA's requirements.

## Application data

**Syktyvkar Plywood Mill Ltd.**  
**Uchtinskoe ave. 66**  
**167026 Syktyvkar**  
**Republic of Komi**  
**Russia**

submitted an original application dated August 24, 2017; Purpose of the application was to receive a document that proves ULEF exemption under EPA TSCA Title VI for the product specified as:

### **birch plywood for building purposes**

product type: plywood, birch, phenolic-formaldehyde (PF), unfaced  
thickness range: 4 mm ≤ 35 mm

The application includes a valid CARB Executive Order with number N-16-108 for an Exemption from the testing and certification requirements.

The application for approval was deemed complete on August 30, 2017 by the Fraunhofer Institute for Wood Research (TPC 4). Furthermore it was found, that the evidence submitted by the applicant meets the criteria for an ULEF manufacturer to be exempt from testing and certification requirements of §770.20

## Further stipulations

**Syktyvkar Plywood Mill Ltd.** must use the commercial resins listed and suppliers listed in confidential attachment A of CARB Executive Order with number N-16-108 for the manufacture of above specified ULEF products. **Syktyvkar Plywood Mill Ltd.** is responsible for insuring that the base resin is within the ranges specified.

The chemical formulation of the base resins used for the manufacture of ULEF products must be within the ranges specified in confidential attachment A of CARB Executive Order with number N-16-108.

The application rate of the base resins used for the manufacture of ULEF products must be within the ranges specified in confidential attachment A of CARB Executive Order with number N-16-108.

Other chemical components of the base resins (such as sizing wax and release wax) used for the manufacture of ULEF products must be within the ranges specified in confidential Attachment A of CARB Executive Order with number N-16-108.

The allowable operating parameters for press temperature and press time for the base resins used to manufacture the ULEF products must be within the ranges specified in confidential attachment A of CARB Executive Order with number N-16-108.

Only the composite wood products with the product names listed in confidential attachment A of CARB Executive Order with number N-16-108 are authorized under this approval.

Products that are represented by a test result according to method ASTM E1333-10 or ATSM D6002-02 that exceeds the applicable ULEF emission standard or a quality control test that

indicates that the product exceeds the applicable ULEF emission standard lose their reduced testing approval and **Syktyvkar Plywood Mill Ltd.** must reapply as specified under § 770.18(a).

**Syktyvkar Plywood Mill Ltd.** must notify the TPC in writing within 72 hours if there is any change in their product manufacturing parameters or base resin manufacturer(s) or supplier(s) that does not comply with any of the requirements, terms or conditions specified in the TSCA Title VI or this approval.

Any time there is an operational or process change such as a change in resin formulation, press cycle duration, temperature, or amount of resin used per panel, **Syktyvkar Plywood Mill Ltd.** shall conduct at least five quality control tests under § 770.20 and at least one test result in accordance with method ASTM E1333-10 or ATSM D6002-02 that indicate compliance with the applicable ULEF emission standard.

A change in the resin system invalidates the exemption or reduced testing approval for any product type produced after such a change.

**Syktyvkar Plywood Mill Ltd.** must maintain records in electronic or hard copy form for as long as the panel producer is producing composite wood products with reduced testing or under a thirdparty certification exemption. Records must also be made available to the TPC.

This approval shall have a duration of two years from the date this approval is signed. **Syktyvkar Plywood Mill Ltd.** may apply for re-approval as provided under § 770.18 (g).

Braunschweig, 23.11.2017



Dipl.-Ing. Harald Schwab  
Head of the Testing, Supervision and  
Certifying Body

Attachements:

EPA TSCA Title VI-Attestation WKI-651 dated 19<sup>th</sup> April 2016