CARB Compliance

On April 26, 2008, the California Air Resource Board (CARB) approved the world’s most sweeping restrictions on emissions of formaldehyde, a cancer-causing chemical found in many wood-based furniture products. The restrictions cut, by nearly 60%, the allowable formaldehyde emissions that seep into the air from the resin or glue most commonly used to bond plywood, particleboard and medium density fiberboard.

The first phase of the regulation, known as CARB Phase 1, took effect on January 1, 2009. The next phase of the regulation known as CARB Phase 2 (CARB 2) went into effect on January 1, 2011. As with CARB Phase 1, CARB Phase 2 has defined guidelines for the manufacturer, distributor, and fabricator of composite wood products as to when they must comply with CARB Phase 2.

The purpose of this letter is to confirm that all products manufactured by Closet Works comply with the CARB regulation requirements.

The additional attached pages will provide additional information on the CARB rule and the certificates on the various materials we utilize within our products.

The Closet Works Team

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WHAT THE NEW CARB RULE MEANS FOR YOU

A Quick Reference Guide to the California Air Resources Board’s Airborne Toxic Control Measure (ATCM) for Formaldehyde Emissions from Composite Wood Products

July 2009

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1. PRODUCTS AND BUSINESSES COVERED BY ATCM

Composite Wood Products Covered
- Particleboard.
- Medium Density Fiberboard (MDF).
- Thin MDF (≤ 8 mm in thickness) [has different emission requirements and compliance deadlines than regular MDF].
- Hardwood Plywood made with a veneer core.
- Hardwood Plywood made with a composite core (particleboard or MDF) [has different compliance deadlines than veneer core hardwood plywood].

Business Activities Covered
- Finished products for sale or use in California may only contain CARB compliant composite wood products certified by a CARB approved Third Party Certification (TPC) agency. Fabricators must specify and only use compliant composites.
- Manufacturers of composite wood products for sale or use in California must obtain certification by a CARB approved TPC.
- Manufacturers, importers and distributors of composite wood products for sale or use in California, have recordkeeping, labeling and notification obligations.
- Fabricators of finished products containing composite wood products and distributors have recordkeeping, labeling and notification obligations.
- California retailers of composite wood products and fabricated products containing composite wood products have labeling and recordkeeping requirements.
- Third Party certifiers of composite wood products have recordkeeping, monitoring and reporting requirements.

Business Definitions
Manufacturer—A company that manufactures regulated composite wood panels (hardwood plywood, particleboard or MDF).

Importer—A company that imports regulated composite wood panels.

Fabricator—A company that manufactures domestic or imported finished goods made with regulated composite wood panels.

Distributor—A company that distributes regulated composite panels or finished goods made with regulated composite panels (different rules for each), but not to consumers. Does not alter products.

Retailer—A company that sells regulated composite panels or finished goods made with regulated composite panels (different rules for each) to consumers.

www.CARBrule.org
3. MANUFACTURER EMISSION LIMITS AND DEADLINES

Products meeting the emission limits above (see chart) must also be certified by a CARB approved third party certification program unless they are approved Ultra Low Emission Formaldehyde (ULEF) or No Added Formaldehyde (NAF) products (see certification exemptions).

4. SELL THROUGH PROVISIONS FOR MOVING INVENTORY BEYOND THE MANUFACTURING DEADLINES*

- Manufacturers and Importers of composite wood products: 3 months beyond the Phase 1 and Phase 2 ATCM manufacturing deadlines.
- Distributors of composite wood products: 9 months beyond the Phase 1 and 5 months beyond the Phase 2 ATCM manufacturing deadlines.
- Retailers of composite wood products: 9 months beyond the Phase 1 and 5 months beyond the Phase 2 ATCM manufacturing deadlines.
- Fabricators and Distributors of finished products containing composite wood products: 18 months beyond the Phase 1 and Phase 2 ATCM manufacturing deadlines.
- Retailers of fabricated products containing composite wood products: 18 months beyond the Phase 1 and Phase 2 ATCM manufacturing deadlines.

*see above table
5. CERTIFICATION REQUIREMENTS AND EXEMPTIONS

Manufacturer Requirements
- For particleboard, MDF and hardwood plywood products, compliance with emissions standards must be verified by an approved third party certification agency (see exemptions below).
- Manufacturers are responsible for the emissions performance of all products certified.
- Each certified mill’s quality program must include a quality control manual describing quality systems, specified facilities and trained personnel.
- Mills must undergo initial qualification, do regular quality tests and quarterly third party audits/ emission verifications by the TPC.
- Mill must follow specific procedures for products found to be out of compliance with the standard.
- Quality records must be retained for two years.

Third Party Certification Agency Requirements
Obtain approval from CARB based on the following conditions:
- Obtain accreditation from a signatory of the International Laboratory Accreditation Cooperation Agreement (ILAC).
- Demonstrate actual field experience with certification and management of inspectors.
- Demonstrate experience with laboratory procedures or obtain contractual arrangements with a CARB approved testing laboratory.
- Verify that manufacturers using certification services are complying with the quality requirements of the rule and provide them with independent audits and a CARB approved certifier number for product labels and notifications.
- Maintain records of certification activity for two years and provide an annual report to CARB of certification activities, including test results.

Exemptions to Third Party Certification Requirements
- Finished products must be fabricated with certified composites but do not require separate third party certification. Approved Ultra Low Emission Formaldehyde (ULEF) and No Added Formaldehyde (NAF) composite wood products are exempt from daily third party certification quality control requirements, but must make a regular demonstration of ongoing compliance.
- NAF and ULEF producers must apply to CARB to obtain an approved exemption and provide an initial demonstration of compliance with special emission limits.
- NAF and ULEF products must demonstrate a 90% or better compliance with a 0.04 PPM ASTM E1333 limit.
- Primary and/or secondary compliance tests for ULEF/NAF approval must be performed initially, and annually thereafter, by an approved Third Party Certification Agency.

6. COMPLIANCE TESTING REQUIREMENTS
- Certification testing by approved third party certification testing agencies shall be conducted using either the primary or secondary test, or an alternate secondary test approved by CARB.
  - The primary ATCM test is ASTM E1333, the Large Chamber test.
  - The secondary ATCM test is ASTM D6007, the Small Scale Chamber test. Certifiers must show equivalent results to the primary test in order to use the secondary test.
7. LABELING, NOTIFICATION AND RECORDKEEPING REQUIREMENTS

Composite Manufacturer/Importer Labels
- Manufacturer name.
- Production lot number or batch.
- Compliance standard being met—i.e., Phase 1, Phase 2, ULEF or NAF.
- CARB-assigned number of third party compliance agency (except for ULEF/NAF products).

Composite Manufacturer/Importer Notifications
- A statement of compliance must be included with either the invoice or the bill of lading.
- Compliance statement must include the manufacturer’s name, the certification number of the third party compliance agency and the compliance standard met by the product.

Composite Manufacturer/Importer Records
- Quality test data or compliance data and records indicating ongoing ULEF/NAF approval must be kept for 2 years.
- Maintain tracking records to allow products to be traced to their specific production lots.
- Maintain product purchaser information and invoice numbers.
- Maintain product transporter information.
- Maintain records regarding disposition of products not complying with the standard.
- Receiving written documentation of product compliance from suppliers and providing it to customers is recommended.

Distributor Requirements (incl. importers of finished goods)
- No additional labeling is required if products are not modified.
- Keep records showing date of purchase of ATCM regulated products for 2 years.
- Statement of compliance notification on bill of lading or invoice indicating the compliance standard being met.
- Receiving written documentation of product compliance from suppliers and providing it to customers is recommended.

Fabricator Requirements
- Must use composites that comply with the emission and certification requirements of the rule.
- Records showing date of purchase for composites must be kept for 2 years.
- Label required for every product or product box applied as a stamp, tag, sticker or bar code.
- Label must include the fabricator’s name, the production date and the compliance standard of the product being used (i.e. Phase 1, Phase 2, ULEF, NAF).
- Receiving written documentation of product compliance from suppliers and providing it to customers is recommended.

Retailer Requirements
- Must stock composites and/or fabricated products containing composites that comply with the labeling, emission and certification requirements of the rule.
- Maintain purchasing records for composites and/or fabricated products containing composites for 2 years.
- Receiving written documentation of product compliance from suppliers and providing it to customers is recommended.

8. RESOURCES

Composite Panel Association (CPA)
703.724.1128 or jbradfield@cpamail.org
www.pbmdf.com
www.CARBrule.org—the reliable resource for compliance

Hardwood Plywood Veneer Association (HPVA)
703.435.2900 or KHowlett@hpva.org
www.hpva.org

American Home Furnishing Association (AHFA)
336.884.5000 or bperdue@ahfa.us
www.ahfa.us

Kitchen Cabinet Manufacturers Association (KCMA)
703.264.1690 or dbitus@kcma.org
www.kcma.org

California Air Resources Board (CARB)
916.327.5615 or btakemot@arb.ca.gov
www.arb.ca.gov/toxics/compwood/compwood.htm

9. CERTIFICATION AND TESTING SERVICES

Your best assurance of using CARB compliant products is to specify those certified by CPA—the first Third Party Certifier approved by CARB. A list of certified facilities is available at www.pbmdf.com and www.CARBrule.org.

All CPA certified products are tested at CPA’s new state-of-the-art International Testing and Certification Center (ITCC) in Leesburg, Virginia. The ITCC is accredited by the US Commerce Department’s National Voluntary Lab Accreditation Program (NVLAP). CPA’s certification programs also carry ISO Guide 65, ISO Guide 17120 ISO Guide 17025 and International Accreditation Services (IAS) accreditations.

ITCC
73 Lawson Road
Leesburg, VA 20175
703.724.1128 Fax 703.724.1588

Certification Services: Chris Surak at csurak@cpamail.org
Testing Services: Bill Harrington at bharrington@cpamail.org

= CARB + 100% Recycled/Recovered

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www.pbmdf.com

www.CARBrule.org
ECO-CERTIFIED COMPOSITE GRAMDEMARK PROGRAM

CERTIFICATE OF COMPLIANCE

Composite Panel Association
Hereby Affirms That

TAFISA CANADA INC.
LAC-MEGANTIC, QUEBEC

Has Completed and Fulfilled the Requirements of:
CPA ECC 4-11 Standard for Eco-Certified Composites

SCOPE OF CERTIFICATION
Laminated panels

Mill ID #606
Effective Date: February 28, 2013
To verify continued certification, visit ECCproduct.org

Thomas A. Julia
President
Hereby Affirms That

ARAUCO NORTH AMERICA
BENNETTSVILE, SOUTH CAROLINA

Has Completed and Fulfilled the Requirements of:
CPA 4-11 Eco-Certified Composites (ECC) Sustainability Standard and
California Air Resources Board (CARB) Airborne Toxic Control Measure (ATCM) 93120

SCOPE OF CERTIFICATION
Particleboard

ECO-ATTRIBUTES
(To comply with the standard, at least 3 of the following are required)

☑ Carbon Footprint
☑ Locally Sourced Fiber
☑ Recycled, Recovered or Post-Consumer Fiber Content
☐ Sustainable Use of Wood Fiber
☑ Responsible Wood Sourcing

Mill ID #116
Reissue Date: December 30, 2014
To verify continued certification, visit ECCproduct.org

Edgar Deomano, Director of Technical and Certification Services
FORMALDEHYDE EMISSIONS GRADEMARK CERTIFICATION PROGRAM

CERTIFICATE OF COMPLIANCE

Composite Panel Association
19465 Deerfield Ave, Suite 306, Leesburg, VA 20176

California Approved Third Party Certifier TPC-1

Hereby Affirms That

UNIBOARD
SAYABEC, QUEBEC, CANADA

Has Fulfilled The Requirements of:
California Air Resources Board (CARB) Airborne Toxic Control Measure (ATCM) 93120

SCOPE OF CERTIFICATION
Particleboard (Phase 2)

Mill ID 211
Re-issue Date: January 15, 2015
To verify continued certification, visit www.compositepanel.org

[Signature]
Edgar Deomano
Director of Technical and Certification Services