



## HPVA LABORATORIES TESTING AND CERTIFICATION SERVICES

42777 Trade West Drive Sterling, Virginia 20166 TEL: 703-435-2900 FAX: 703-435-2537

### **What is CARB Phase 2?**

In 2008, the California Air Resources Board (CARB) instituted a [rulemaking](#) proposing limits of formaldehyde emissions from unfinished composite wood panels including hardwood plywood, particleboard, and medium density fiberboard. The rulemaking, known as CARB 93120 ATCM (or “CARB” for short), was introduced in phases to allow panel manufacturers to gradually reduce their products’ formaldehyde emissions levels. The last and most recent phase, Phase 2, took effect in 2012. It set the following product emissions limits: Hardwood Plywood (HWPW) = 0.05 parts per million (ppm), Particleboard = 0.09 ppm, MDF = 0.11 ppm, and thin MDF (MDF less than 8mm-thick) = 0.13 ppm. Since 2012, any unfinished composite panels made in or sold into California must be certified to meet these emissions limits. Companies using these types of panels to produce a finished good (e.g. flooring, furniture, or cabinet manufacturers) are also obligated to confirm “CARB Phase 2 certified” panels are used.

### **What about EPA TSCA Title VI?**

On December 12, 2016, the U.S. EPA announced it would be adopting the CARB Phase 2 emissions limits in their own federal regulation under Title VI of the Toxic Substances Control Act (TSCA). After various delays, The Standards for Composite Wood Products Act (known as “TSCA Title VI”) went into full effect on March 22<sup>nd</sup>, 2019. Effective this date, all unfinished composite panels made in, used in, or sold into the United States must be certified. The CARB and TSCA Title VI regulations are very similar and enforce the same formaldehyde emissions limits, but [they are not equivalent](#). In fact, the CARB ATCM is still in effect and California [continues to enforce it](#). Companies up and down the composite wood panel supply chain must therefore be vigilant in understanding and complying with both the CARB and TSCA Title VI regulatory requirements. This of course includes panel manufacturers and the finished good producers that use them, but it also encompasses the importers, distributors, and retailers who sell these products as well.

For more information on TSCA Title VI, visit the [EPA website](#). For a simplified understanding of your company’s requirements, review these relevant compliance guides for [Mills \(panel producers\)](#), [Fabricators and laminated product producers](#), and [Importers, distributors and retailers](#). If you are still confused, don’t worry: the experts at HPVA Laboratories (soon to be Capital Testing and Certification Services) are here to help! Contact them at [labexperts@hpva.org](mailto:labexperts@hpva.org) for one-on-one support with any certification or compliance questions you may have.

### **References**

- 1.) CARB 93120 ATCM - <https://ww3.arb.ca.gov/regact/2007/compwood07/fro-final.pdf? ga=2.183502630.1068625437.1579276958-378083576.1549299794>
- 2.) CARB ATCM Enforcement Summary (11/27/2019) - <https://ww3.arb.ca.gov/toxics/compwood/cwenfnews.pdf? ga=2.69809554.321185187.1579530084-378083576.1549299794>
- 3.) CARB/U.S. EPA Comparisons - <https://ww2.arb.ca.gov/resources/documents/carbus-epa-comparisons>
- 4.) EPA Formaldehyde Emission Standards for Composite Wood Products page - <https://www.epa.gov/formaldehyde/formaldehyde-emission-standards-composite-wood-products>
- 5.) EPA Resources and Guidance Materials - <https://www.epa.gov/formaldehyde/resources-and-guidance-materials-translations-formaldehyde-emission-standards-composite>

**Josh Hosen, M.S.**

Director of Certification Programs

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