



EPA TOXIC SUBSTANCES CONTROL ACT (TSCA) TITLE VI

It is our ongoing commitment to keep our clients informed of industry regulation requirements and the impact on supply chain labeling and tracking of products. We offer the following information regarding Roseburg's compliance with Title VI of the Toxic Substances Control Act (also known as the "EPA formaldehyde emission regulation") for your information.

What is it?

Title VI of the Toxic Substances Control Act (TSCA) is a federal formaldehyde emissions standard for composite wood products. A composite wood product is defined as Particleboard, MDF, and Hardwood Plywood. Therefore, this requirement does not apply to EWP, Lumber, or Softwood Plywood (just like CARB ATCM 93120). All composite wood products manufactured in, imported into, or sold in the United States must comply with TSCA Title VI.

What are the specific emissions requirements?

- Hardwood Plywood - 0.05 ppm
- Particleboard - 0.09 ppm
- Medium Density Fiberboard (MDF) - 0.11 ppm
- Thin MDF (≤ 8 mm) - 0.13 ppm

Information Resources:

The Composite Panel Association provides up to date information about the regulation on their [website](#) in addition to the following two helpful documents.

- [Resource Guide: What the EPA Formaldehyde Rule Means to You](#)
- [EPA Rule At-a-Glance](#)

The U.S. Environmental Protection Agency provides links to the final regulation, reference information and FAQs.

- [Resources and Guidance Materials](#)
- Frequently Asked Questions - [FAQs for regulated stakeholders](#)
- Formaldehyde Emission Standards for Composite Wood Products - [Rule Summary](#)

Roseburg FAQs:

What needs to be on the label?

Producer's name, third party certifier (TPC) number, lot number, and "TSCA Title VI certified".

Who is Roseburg's TPC?

Our third party certifier is the Composite Panel Association (CPA), TPC-1.

When will Roseburg start labeling?

Roseburg is on track to begin labeling certified product no later than April 30, 2018.

Do products that use an NAF or ULEF resin system need to be TSCA certified?

Yes, all composite products manufactured in, imported into, or sold in the U.S. need to be TSCA Title VI certified as of June 1, 2018. A product may be in compliance with TSCA Title VI if certified by a CARB approved TPC that is also recognized by EPA until March 22, 2019. Producers of an NAF or ULEF product may apply for an exemption or reduced testing. Further, the standard says NAF or ULEF resin systems may be voluntarily reported on the label. None of this, however, excludes an NAF or ULEF composite product from the broader TSCA certification and labeling requirements.

What's important for a Roseburg distributor to know?

First, a distributor must take "reasonable precautions" to ensure that the composite wood product they sell complies with the emissions standards. Second, if a composite product is not individually labeled (i.e., a single panel/piece), a distributor must have sufficient means of identifying the product producer and label information. The label information must be made available to a consumer within 30 days of the request. Lastly, distributors should maintain traceability records for a period of three years.

Contact your Roseburg Representative if you have additional questions.

Western Sales Office - (800) 245-1115

Eastern Sales Office - (866) 387-2646