



Attn: Cinmar Vendors,

The California Air Resources Board (CARB or ARB) has released a regulation to reduce formaldehyde emissions from composite wood products sold in California and as a Cinmar vendor your composite wood products will be required to meet this regulation.

****93120. Airborne Toxic Control Measure to Reduce Formaldehyde Emissions from Composite Wood Products****

Emissions standards are broken into Phase 1 and Phase 2 with varying dates for compliance.

This new regulation affects ALL parties in the supply chain and there are differing requirements for each party involved.

Please read and review the information below. If any questions arise please contact Cinmar Vendor Compliance for assistance.

cinmarvc@cinmar.com

Thanks in advance for your continued partnership,

Sincerely,

Cinmar Vendor Compliance

CARB Regulation

Materials Covered:

- Hardwood Plywood (HWPW) (separated into veneer core and composite core)
- Particleboard (PB)
- Medium Density Fiberboard (MDF) (Standard or Thin) –includes Low-and High-Density
- All products made from above materials regardless of finish (ex. paint, laminate, coatings, etc.)
- Finished and Unfinished Products

Materials Not Covered:

- Any material that does not contain a formaldehyde resin such as:
 - Hardboard
 - Natural Wood Panels
 - Bamboo or other solid wood products
 - Softwood Plywood (Cone bearing)
 - Oriented Strand Board and Chip Board

Special Provisions

Materials

- * HWPW, PB and MDF made from **Ultra Low** Emission Formaldehyde (ULEF) resin*
- * HWPW, PB and MDF made from **No Add** Formaldehyde (NAF) resin*

Although special provisions have been put in place for these materials the manufacturer must still test to document compliance

Examples of Products

Storage & Work Bench

Couches, Sofas, Love Seats

Organizing Racks and Shelves

Dry Erase Board, Dartboard

Recliners & Rockers

Beds, Cribs, Cradles, Futons

Wall Units

Serving & Bed Trays

Children's & Teen's Furniture

Jewelry & Storage Boxes

Wood & Laminate Flooring

Lamp, Computer & Plant Stands

Hutches, Gun Cabinets

Mirrors & Picture Frames

Changing Tables

File Cabinets & Desks

TV, Book, & Wall Shelves

Picnic, Game & Folding Tables

Chairs-Folding, Office, Other

Computer Tables

Bookcase, Book Ends

High Chairs, Step Stools

Storage & Wine Racks

Coat, Blanket & Book Racks

Chests and Dressers

Wooden Wall Decorations

Pallets with Composite Wood

Raw Material Emission Limits

Phase 1 Emission Standards (in parts per million (ppm))

Manufacturer Effective Date	Hardwood Plywood: Veneer Core (HWPW-VC)	Hardwood Plywood: Composite Core (HWPW-CC)	Particle Board (PB)	Medium Density Fiberboard (MDF)	Thin Medium Density Fiberboard (MDF-Thin)
Jan-09	0.08	---	0.18	0.21	0.21
Jul-09	---	0.08	---	---	---

Phase 2 Emission Standards (in parts per million (ppm))

Jan-10	0.05	---	---	---	---
Jan-11	---	---	0.09	0.11	---
Jan-12	---	---	---	---	0.13
Jul-12	---	0.05	---	---	---

Manufacturer Requirements

Phase 1 Compliance Dates:

- HWPW (Veneer Core), PB and MDF **January 1, 2009**
- HWPW (Composite Core) **July 1, 2009**

Requirements for certification of raw material panels:

- **Hire CARB approved Third Party Certifier (TPC)**
 - TPC will coordinate all testing and certification of compliance including record keeping, record retention and labeling.
- **Product Labeling**
 - Must label all compliant product
 - Denote compliance to Phase 1 or 2 of section code 93120.2a
- **Documentation**
 - Must provide compliance documentation for all product
- **Phase 1 Sell-Through Dates for raw material panels:**
 - HWPW (Veneer Core), PB and MDF : **April 1, 2009**
 - HWPW (Composite Core) **October 1, 2009**

Fabricator Requirements

- Fabricators are not required to test
- Fabricators are required to:
 - **Notify Vendors**
 - Take “reasonable prudent precautions” (RPP) to instruct each supplier to comply
 - **Product Labeling**
 - Label every finished product or box with a minimum of:
 - Fabricator name
 - Date of production of finished good
 - Markings to denote compliance to Phase 1 or 2 of section code 93120.2a
 - **Documentation**
 - Designate compliance to specific phase on the bill of lading or invoice
 - **Record Retention**
 - Obtain documentation from each supplier that compliant materials are being used and the requirements of the regulation are being met
 - Include dates of purchase and suppliers of the composite wood products and finished goods
 - Retain records in electronic or hardcopy for a minimum of two years
- **Phase 1 sell through dates for finished products:**
 - HWPW (Veneer Core), PB and MDF July 1, 2010
 - HWPW (Composite Core), January 1, 2011

Distributor and Importer Requirements

- **Distributors and Importers are not required to test**
- **Distributors and Importers are required to:**
 - **Notify Vendors**
 - Take “reasonable prudent precautions” (RPP) to instruct each supplier to comply
 - **Product Labeling**
 - No additional labeling is required beyond Fabricator labeling unless modification of the product has occurred
 - **Documentation**
 - Designate compliance to a specific phase on the BOL or invoice
 - **Record Retention**
 - Obtain documentation from each supplier that compliant materials are being used and the requirements of the regulation are being met
 - Include dates of purchase and suppliers of the composite wood products and finished goods
 - Retain records in electronic or hardcopy for a minimum of two years
- **Distributor sell through dates:**

	Unfinished Product	Finished Product
● HWPW (Veneer Core), PB and MDF	June 1, 2009	July 1, 2010
● HWPW (Composite Core),	December 1, 2009	January 1, 2011
- **Importer sell through dates:**

	Unfinished Product	Finished Product
● HWPW (Veneer Core), PB and MDF	April 1, 2009	July 1, 2010
● HWPW (Composite Core),	October 1, 2009	January 1, 2011

Retailer Requirements

- Retailers are not required to test
- Retailers are required to:
 - **Vendor Notification**
 - Maintain records documenting precautions (RPP) taken to ensure compliant material is being used in all finished goods using composite wood.
 - Require a written response from vendor of their understanding of the regulation and commitment to comply
 - **Record retention**
 - Obtain documentation from each supplier that compliant materials are being used and the requirements of the regulation are being met
 - Records should include dates of purchase and suppliers of the composite wood products and finished goods
 - All records must be kept in electronic or hardcopy for a minimum of two years
 - **Product Labeling**
 - No product labeling is required at the retailer level when the product is sold directly from the retailer to the consumer
- **Sell through dates:**

	Unfinished Product	Finished Product
● HWPW (Veneer Core), PB and MDF	January 1, 2010	July 1, 2010
● HWPW (Composite Core),	July 1, 2010	January 1, 2011

Resources

California Air Resources Board website:

[California Air Resource Board](#)

List of Mills currently producing compliant wood products:

[Mill List link](#)

List of approved Third Party Certifiers:

[TPC List](#)